6.0 OTHER CEQA CONSIDERATIONS

This section discusses additional topics statutorily required by CEQA, including growth-inducing impacts, significant irreversible environmental effects, energy consumption and conservation, significant and unavoidable environmental effects, and a summary of cumulative effects.

6.1 GROWTH-INDUCING IMPACTS

INTRODUCTION

CEQA Guidelines Section 15126.2(d) requires that an EIR evaluate the growth-inducing impacts of a proposed action. A growth-inducing impact is defined by CEQA Guidelines as:

> ...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. Included in this are projects which would remove obstacles to population growth...It must not be assumed that growth in an 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, for example, a project involved construction of new housing. A project would have indirect growth inducement potential if, for example, it established substantial new permanent employment opportunities (e.g., commercial, industrial or governmental enterprises) or if it would involve a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand. Similarly, a project would indirectly induce growth if, for example, it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. A project providing an increased water supply in an area where water service historically limited growth could be considered growth inducing.

CEQA Guidelines further explain that the environmental effects of induced growth are considered indirect impacts of the proposed action. These indirect impacts or secondary effects of growth may result in significant, adverse environmental impacts. Potential secondary effects of growth include increased demand on community and public services and infrastructure, increased traffic and noise, and adverse environmental impacts such as degradation of air and water quality, degradation or loss of plant and animal habitat, and conversion of agricultural and open space land to developed uses.

Growth inducement may constitute an adverse impact if the growth is not consistent with or accommodated by 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.

COMPONENTS OF GROWTH

The timing, magnitude, and location of land development and population growth in a community or region are based on various interrelated land use and economic variables. Key variables include regional economic trends, market demand for residential and nonresidential uses, land availability and cost, the availability and quality of transportation facilities and public services, proximity to employment centers, the supply and cost of housing, and regulatory policies or conditions. Since the general plan of a community defines the location, type and intensity of growth, it is the primary means of regulating development and growth in California.

GROWTH EFFECTS OF THE PROPOSED PROJECT

The proposed General Plan Update would guide future development throughout the Planning Area and would both directly and indirectly induce growth. Section 3.0, Demographics, of this Draft EIR provides a discussion of the City's existing population, housing, and employment conditions and trends as well as an analysis of the Project's growth potential. Changes in population and employment are not in and of themselves environmental impacts. However, they may result in the need for the construction of new housing, businesses, infrastructure, and services that provide for increases in population and employment. The Project's potential impacts on the physical environment are evaluated in Sections 5.1 through 5.13 of this Draft EIR.

Population and Employment Growth

The proposed Project would allow for the future construction of up to 47,836 new homes within the Planning Area at a wide range of types and densities. Construction of these homes would increase the City's population by approximately 157,319 residents to a total of 328,378 at build out. This would represent an approximately 92 percent increase over the City's 2017 population of 171,059 (DOF 2016).

In addition, the proposed Project would allow for substantial non-residential development throughout the Planning Area allowing for the creation of approximately 77,339 new jobs for a total of 122,802. This represents an increase of 63 percent over the City's existing job pool. The Project would therefore induce growth through the creation of permanent employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand. However, as discussed in Section 3.0, the City currently has a jobs-to-housing ratio of 0.84, indicating a shortage of jobs compared to available housing stock in the City. Consequently, some of the City's existing residents could find employment in the Planning Area. Furthermore, as described above, the Project includes residential development that could accommodate future workers relocating to the Planning Area.

The Project would induce substantial growth in the Planning Area but would result in a more balanced jobs-to-housing ratio of 1.21 at build out. A more balanced jobs-to-housing ratio can reduce environmental impacts by limiting commute vehicle miles traveled during peak periods in areas where congestion is growing.

Indirect Growth Effects

The proposed Project could also indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service.

Annexation of Study Areas

As described throughout this Draft EIR, the proposed Project includes preliminary planning efforts for four Study Areas located outside the City's current limits and sphere of influence (SOI) indicating the City's intent for future annexation and development of these areas. Annexation would allow for the extension of infrastructure into the Study Areas and make them available for future development including additional residential units and non-residential space. Each of the Study Areas is currently developed with rural residential and agricultural uses and could accommodate significant new growth.

Infrastructure

The proposed Project could also potentially indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. The City's infrastructure and public services are largely provided by other public and private service providers (e.g., Sacramento County Water Agency and Elk Grove Water District for water supply; Sacramento Regional County Sanitation District and Sacramento Area Sewer District for wastewater service; Sacramento Municipal Utility District for electrical service; Cosumnes Community Services District for parks, recreation, and fire protection; Pacific Gas and Electric Company for natural gas service) that utilize master plans for guiding planned facility and service expansions that are subject to environmental review under CEQA.

The Study Areas are in an area that is, for the most part, rural and undeveloped. Infrastructure facilities such as water and sewer lines would need to be extended throughout the Planning Area to serve future development. The Project would require connection to transmission water mains and sewer interceptors that are existing or planned in the area and which have been planned on a cumulative basis through a series of studies for the various development projects in the area.

The Project also describes roadway improvements that are required to serve anticipated development, but these improvements would add capacity and could accommodate increased traffic volumes in the area. However, the proposed roadway improvements would involve widening and improving roadways to accommodate planned growth from the proposed Project and would not be designed to accommodate additional growth outside the Planning Area. Therefore, the Project's proposed roadway improvements would not indirectly result in any growth beyond that already considered in this Draft EIR.

ENVIRONMENTAL EFFECTS OF GROWTH

As described above, the proposed Project would induce substantial population growth in the Planning Area, both directly and indirectly. Future infrastructure and roadway improvements would support such growth within the Planning Area. As a result of the Project's potential to increase the City's housing supply and employment opportunities, the Project is considered to be growth-inducing. The environmental effects of this growth would result in substantial changes to demands for public services and utilities as discussed in Section 5.11, Public Services and Recreation and Section 5.12, Public Utilities. The effects of this growth are addressed in Sections 5.1 through 5.13 of this Draft EIR.

6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

CEQA Sections 21100(b)(2) and 21100.1(a) require that EIRs prepared for the adoption of a plan, policy, or ordinance of a public agency must include a discussion of significant irreversible environmental changes of project implementation. In addition, CEQA Guidelines Section 15126.2(c) describes irreversible environmental changes as:

> 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.

Because the proposed Project is a long-range plan and not a development project, the proposed Project does not itself propose any new development or other physical changes which could result in significant irreversible environmental effects. However, the Project would allow for future build out of the proposed Land Use Diagram, which constitutes a long-term commitment to residential, non-residential, and public land uses. It is unlikely that circumstances would arise that would justify the return of the land to its original condition.

Build out of the Planning Area would irretrievably commit building materials and energy to the construction and maintenance of buildings and infrastructure proposed. Renewable, nonrenewable, and limited resources would likely be consumed as part of future development projects under the proposed General Plan Update and would include, but would not be limited to, oil, gasoline, lumber, sand and gravel, asphalt, water, steel, and similar materials. In addition, build out of the Planning Area would result in increased demand on public services and utilities (see Section 5.9, Hydrology and Water Quality, Section 5.11, Public Services and Recreation, and Section 5.12, Public Utilities, of this Draft EIR).

6.3 SIGNIFICANT AND UNAVOIDABLE PROJECT-SPECIFIC ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. In addition, Section 15093(a) of the CEQA Guidelines allows the decision-making agency to determine whether the benefits of a proposed project outweigh the unavoidable adverse environmental impacts of implementing the project. The City can approve a project with unavoidable adverse impacts if it prepares a "Statement of Overriding Considerations" setting forth the specific reasons for making such a judgment.

The following project-specific significant and unavoidable impacts associated with the proposed Project are specifically identified in Sections 5.1 through Section 5.13 of this Draft EIR. The reader is referred to the various environmental issue areas of these sections for further details and analysis of the significant and unavoidable impacts identified below.

AESTHETICS, LIGHT, AND GLARE

5.1.2 Implementation of the General Plan will encourage new development and redevelopment activities that could degrade the existing visual character or quality of the Planning Area.

5.1.3 Implementation of the General Plan would create new sources of daytime glare, and would change nighttime lighting and illumination levels associated with new and redevelopment activities in the Planning Area, which would contribute to skyglow.

AGRICULTURAL RESOURCES

5.2.1 Implementation of the proposed Project would allow for new development in areas of the Planning Area that are designated Important Farmland and/or under Williamson Act contract.

AIR QUALITY

5.3.1 Buildout of the proposed Project could result in short-term construction emissions that could violate or substantially contribute to a violation of federal and state standards for ozone, PM_{10}, and $PM_{2.5}$.

5.3.2 The Project could result in long-term operational emissions that could violate or substantially contribute to a violation of federal and State standards for ozone and coarse and fine particulate matter.

5.3.4 The proposed Project could result in increased exposure of existing or planned sensitive land uses to stationary or mobile-source TACs that would exceed applicable health risk standards.

5.3.5 Implementation of the Project would not result in increased exposure of sensitive receptors to odorous emissions as compared to baseline conditions.

5.3.6 The Project would be substantially consistent with all applicable control measures in the Sacramento Regional NAAQS 8-Hour Ozone Attainment and Further Progress Plan (Attainment Plan), but because the Project would exceed the SMAQMD's air quality thresholds of significance, the Project would not be considered to be fully consistent with the Plan's goals.

BIOLOGICAL RESOURCES

5.4.1 Implementation of the proposed Project could result in adverse effects, either directly or indirectly, on species listed as endangered, threatened, rare, proposed, and candidate plants and wildlife.

5.4.2 Implementation of the proposed Project could result in adverse effects, either directly or indirectly, on non-listed special status species (Species of Special Concern, fully protected, and locally important).

CULTURAL RESOURCES

None identified.

GEOLOGY, SOILS, MINERAL RESOURCES, AND PALEONTOLOGY

None identified.

GREENHOUSE GAS EMISSIONS AND ENERGY

None identified.

HAZARDS AND HAZARDOUS MATERIALS

None identified.

HYDROLOGY AND WATER QUALITY

5.9.4 The proposed Project would increase the demand on water supplies, some of which would be groundwater.

NOISE

5.10.2 Implementation of the proposed Project would result in a significant increase in transportation noise, including traffic noise levels along many existing roadways in the City. Even with implementation of proposed policies to limit traffic noise impacts, predicted traffic noise levels would still result in potential increases above applicable standards.

PUBLIC SERVICES AND RECREATION

5.11.3.1 Implementation of the proposed Project would allow for future development in the Planning Area, which would result in an increase of school-aged children and require the construction of new public school facilities, the construction of which could have impacts on the physical environment.

PUBLIC UTILITIES

5.12.1.1 Implementation of the proposed Project would increase demand for domestic water supply, which may result in the need for additional water supplies.

5.12.1.2 Implementation of the proposed Project would require the construction of new and expanded water supply infrastructure, which could result in impacts to the physical environment.

TRANSPORTATION

The traffic analysis was based upon a scenario in which development under the proposed Project was added to the existing condition with background levels of traffic included. See cumulative impacts.

6.4 SIGNIFICANT AND UNAVOIDABLE CUMULATIVE IMPACTS

This section summarizes the cumulative impacts associated with the proposed Project that are identified in the environmental issue areas in Chapter 5.0. Cumulative impacts are the result of combining the potential effects of the proposed Project with other recently approved, planned, and reasonably foreseeable development projects in the region. The reader is referred to Sections 5.1 through 5.13 for a full discussion of the proposed Project's cumulative impacts.

CEQA requires that an EIR contain an assessment of the cumulative impacts that could be associated with the proposed project. According to CEQA Guidelines Section 15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (as defined by Section 15130). As defined in CEQA Guidelines Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. A cumulative impact occurs from:

> ...the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

In addition, Section 15130(b) identifies that the following three elements are necessary for an adequate cumulative analysis:

1) Either:

   a. 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,

   b. 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. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

2) 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; and

3) 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.

Where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, a lead agency is not required to consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

A general description of the cumulative setting is provided in Section 5.0, Introduction to the Environmental Analysis and Assumptions Used, as well as in **Table 5.0-1.** In addition, the cumulative setting for environmental issue areas evaluated in the Draft EIR is described in the section specific to the issue area (see Sections 5.1 through 5.13).

Identified below is a compilation of the cumulative impacts that would result from implementation of the proposed Project and other approved and proposed development in the region. As described above, cumulative impacts are two or more effects that, when combined, are considerable or compound other environmental effects. Each cumulative impact is determined to have one of the following levels of significance: less than cumulatively considerable, potentially cumulatively considerable, or cumulatively considerable.

AESTHETICS, LIGHT, AND GLARE

5.1.4 Implementation of the proposed Project, in addition to other reasonably foreseeable projects in the region, would introduce new development into undeveloped agricultural and rural areas that would have a cumulatively considerable contribution to impacts on visual character.

5.1.5 Implementation of the proposed Project, in addition to other reasonably foreseeable projects in the region, would introduce new development into undeveloped agricultural and rural areas, increasing nighttime lighting and daytime glare and contributing to regional skyglow.

AGRICULTURAL RESOURCES

5.2.3 Implementation of the proposed Project would ultimately result in the conversion of Important Farmland and the cancellation of Williamson Act contracts. This loss would contribute to the cumulative loss of farmland in the region.

AIR QUALITY

5.3.7 The proposed Project in combination with growth throughout the air basin will exacerbate existing regional problems with criteria air pollutants and ozone precursors.

BIOLOGICAL RESOURCES

5.4.7 Future development in the Planning Area, when considered together with other past, existing, and planned future projects, could result in a significant cumulative impact on biological resources in the region.

CULTURAL RESOURCES

None identified.

GEOLOGY, SOILS, MINERAL RESOURCES, AND PALEONTOLOGY

None identified.

GREENHOUSE GAS EMISSIONS AND ENERGY

5.7.2 Adoption of the proposed General Plan and CAP Update would result in emission reductions that are consistent with statewide reduction targets for 2020 and 2030. However, based on current emission estimates for the City projected for 2050, and considering the proposed policies and programs included in the General Plan and CAP Update, the proposed General Plan and CAP Update would likely not result in sufficient GHG reductions for the City to meet the longer-term goal for 2050 as stated in EO S-3-05.

HAZARDS AND HAZARDOUS MATERIALS

None identified.

HYDROLOGY AND WATER QUALITY

5.9.7 Development of the Planning Area, in combination with other development in the Central Basin, would increase demand for groundwater and could potentially interfere with recharge of the aquifer.

NOISE

5.10.5 Implementation of the proposed Project would contribute to cumulative noise levels along many roadway segments in the Planning Area due to increased cumulative traffic volumes.

PUBLIC SERVICES AND RECREATION

5.11.3.2 Implementation of the proposed Project, in combination with other development in the EGUSD service area, would result in the increase of school-aged children, which would require the construction of new public school facilities, which could have impacts on the environment.

PUBLIC UTILITIES

5.12.1.3 Implementation of the proposed Project, in combination with other development, would contribute to cumulative demand for domestic water supply.

5.12.2.3 Implementation of the proposed Project, in addition to other development in the Regional San service area, would generate new wastewater flows requiring conveyance and treatment.

TRANSPORTATION

5.13.1 Implementation of the proposed Project could cause unacceptable level of service conditions at some intersections and on some roadway segments.

5.13.2 Implementation of the proposed Project would exacerbate unacceptable (LOS F) conditions on SR 99 and I-5.

5.13.3 Implementation of the proposed Project would result in increased VMT.

REFERENCES

DOF (California Department of Finance). 2017. *E-5 Population and Housing Estimates for Cities, Counties and the State, January 1, 2011–2017, with 2010 Benchmark.*