
5.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

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The following is an introduction to the Project-specific and cumulative environmental analysis and general assumptions used in the analysis. The reader is referred to the individual technical sections (Sections 5.1 through 5.13) of this Draft Environmental Impact Report (Draft EIR) regarding specific assumptions, methodology, and significance criteria used in the analysis for each topic.

ANALYSIS ASSUMPTIONS GENERALLY USED TO EVALUATE THE IMPACTS OF THE PROJECT

BASELINE ENVIRONMENTAL CONDITIONS ASSUMED IN THE DRAFT EIR

Section 15125(a) of the California Environmental Quality Act (CEQA) Guidelines requires that an EIR include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation (NOP) is published. The CEQA Guidelines also specify that this description of the physical environmental conditions is to serve as the baseline physical conditions by which a lead agency determines whether impacts of a project are considered significant. For the proposed Project, the physical environment as it existed at the time the NOP was published generally serves as the baseline.

The environmental setting conditions of the Project area and the surrounding area are described in the technical sections of this Draft EIR (see Sections 5.1 through 5.13). In general, these setting discussions describe the setting conditions as they existed when the NOP for the Project was released in June 2017. It is appropriate to evaluate impacts against the conditions that exist when the NOP was published for most issue areas. For issue areas either directly or indirectly related to infrastructure, impacts are more conservatively analyzed against future baseline conditions that consider General Plan and approved growth, because improvements (e.g., roadway widenings, intersection improvements, wastewater distribution and conveyance, solid waste disposal, water supply, electricity and natural gas supplies) must consider and accommodate ultimate demand. The assumptions inherent in the Air Quality and Noise analysis are derived from the Transportation and Circulation analysis (prepared by Fehr and Peers Associates); therefore, the baseline is the same as the other issue areas related to infrastructure.

PROJECT BUILDOUT ASSUMPTIONS

The Draft EIR impact analysis is based on the buildout conditions allowed by the land use designations proposed within the Planning Area. **Table 2.0-2** (see Section 2.0, Project Description) identifies the potential population and employment that would result from development of the Planning Area. Operational impacts of the Project are based on those buildout conditions. The City anticipates that planned buildout conditions would occur gradually over a timeframe between the baseline year and beyond 2050.

APPROACH TO THE PROJECT ANALYSIS

Sections 5.1 through 5.13 of this Draft EIR contain a description of current setting conditions (including applicable regulatory setting), an evaluation of the direct and indirect environmental effects resulting from implementation of the proposed Project with implementation of applicable regulations and General Plan policies and implementation measures, identification of measures that mitigate the identified significant environmental effects, and, if applicable, identification of whether significant environmental effects of the proposed Project would remain after application of proposed mitigation measures. The individual technical sections of the Draft EIR follow the following format.

5.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

Existing Setting

This subsection includes a description of the physical conditions associated with each technical area, consistent with CEQA Guidelines Section 15125. As identified above, the existing setting is the baseline against which environmental impacts of the Project are evaluated.

Regulatory Framework

This subsection describes applicable federal, state, regional, and local plans, policies, laws, and regulations that apply to each technical area. The analysis of impacts assumes that all applicable regulations will be applied to future projects.

Impacts and Mitigation Measures

The Impacts and Mitigation Measures subsection of each technical section identifies direct and indirect environmental effects associated with implementation of the proposed Project and identifies proposed measures to mitigate environmental effects, where applicable. Environmental effects are determined by comparing the existing environmental setting with build out of the proposed Project. A statement is included in each impact discussion identifying the level of significance the impact will have both before and after mitigation. The analysis considers application of all applicable regulations and implementation of the proposed General Plan policies and implementation measures.

Standards of significance are identified and utilized to determine whether identified environmental effects are considered “significant” and require the application of mitigation measures. Each environmental impact analysis is supported by substantial evidence included in the discussion.

Feasible mitigation measures that could minimize significant adverse impacts are discussed, after which the impact discussion notes whether the impact has been mitigated to a less than significant level or if it remains significant and unavoidable. CEQA requires that mitigation to lessen the environmental impact must be feasible. CEQA Guidelines Section 15126.4(a)(1) states, “An EIR shall describe feasible measures which could minimize significant adverse impacts....” Feasible is defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors” (California Public Resource Code Section 21061.1).

Effect of the Environment on the Project

In *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377, the California Supreme Court held that “agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents.” The court did not hold that CEQA never requires consideration of the effects of existing environmental conditions on the future occupants or users of a proposed project. But the circumstances in which such conditions may be considered are narrow: “when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project’s impact on the environment—and not the environment’s impact on the project—that compels an evaluation of how future residents or users could be affected by exacerbated conditions.” There are noted exceptions to this ruling: development projects involving or near schools; development projects near airports; and analysis in determining CEQA exemptions for certain housing projects. In addition, the court explained in a

footnote that CEQA does not prohibit an agency from considering as part of an environmental review how existing conditions might impact a project's future users or residents. However, the court stopped short of suggesting that the agency should determine the significance of such impacts and require mitigation.

Consequently, the City is not required by CEQA to address the extent to which existing risks or conditions could affect future occupants or users of lands that might be developed in the future, with the exceptions of specific risks involving schools and airports. Any such discussion in this Draft EIR has been provided to the public on a voluntary basis in the interests of full disclosure.

APPROACH TO THE CUMULATIVE IMPACT ANALYSIS

Definition of Cumulative Setting

CEQA Guidelines Section 15130(a) requires that an EIR "discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." CEQA Guidelines Section 15130(b) states, "The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact."

Because the proposed General Plan is essentially a set of guidelines for projects that could occur within the timeframe of the General Plan, the Plan itself represents the cumulative development scenario for the reasonably foreseeable future in the City. Therefore, the analysis presented in this Draft EIR generally represents a cumulative analysis of Elk Grove as a whole over the General Plan planning horizon described above. In instances where other cumulative development in neighboring jurisdictions or within the region as a whole could contribute to impacts generated by the proposed General Plan, those impacts, as well as the context, are discussed in the cumulative impact discussion that follows the project-specific impacts in each section.

Consideration of Cumulative Impacts

Each technical section in the Draft EIR considers whether the Project's effect on anticipated cumulative setting conditions is cumulatively considerable (i.e., a significant effect). The determination of whether the Project's impact on cumulative conditions is considerable is based on applicable public agency standards, consultation with public agencies, and/or expert opinion. Section 6.0, Other CEQA Considerations, summarizes the cumulative impacts associated with the development of the Project.

EFFECTS FOUND NOT TO BE SIGNIFICANT

As discussed in the Notice of Preparation prepared for the proposed Project (see **Appendix A**) and Section 1.0, Introduction, the proposed Project was determined to have no impacts related to the following issue area. This issue will not be further evaluated in the EIR.

- Seiche, tsunami, and mudflow

5.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

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