4 Other CEQA Considerations

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, this environmental impact report (EIR) also identifies (1) significant environmental effects of the Creekside Village Specific Plan (CVSP or 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).

This chapter summarizes the significant environmental effects that cannot be avoided if the proposed project is implemented (i.e., significant and unavoidable impacts). It also addresses the significant irreversible environmental changes and growth-inducing impacts of the project. An evaluation of the significant environmental effects of the proposed project, applicable mitigation measures, the level of impact significance before and after mitigation, and evaluation of cumulative impacts, is provided in Chapter 3, Environmental Analysis. As discussed in Chapter 5, Alternatives, the Reduced Impact Alternative (RIA) is analyzed at the project-level and could be recommended for approval by staff and the Planning Commission and approved by the Board of Supervisors. This Chapter notes any differences in the other CEQA considerations discussed herein for the RIA as compared to the proposed project.

4.1 Significant Environmental Effects

As discussed throughout Chapter 3, Environmental Analysis, Sections 3.1 through 3.15 of this Draft EIR provide a comprehensive overview of the proposed project's significant environmental effects, including the level of significance both before and after mitigation.

4.2 Significant and Unavoidable Environmental Impacts

Pursuant to CEQA Guidelines Section 15126.2(c), an EIR must address any significant environmental impacts, including those that can be mitigated but not reduced to less than significant as a result of implementation of a project. 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 project level and cumulative environmental effects of the proposed project are discussed in detail in Chapter 3 of this Draft EIR. The project would result in significant and unavoidable impacts related to Aesthetics, Air Quality, and Tribal Cultural Resources. For all other environmental issue areas, the project would result in either less-than-significant impacts, in some instances with mitigation or no impact. The significant and unavoidable impacts are as follows:

Aesthetics

Impact 3.1-1. The proposed project would cause a substantial adverse effect on a scenic vista.

Impact 3.1-2. The proposed project would substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Impact 3.1-4. The proposed project would contribute to a significant cumulative impact related to scenic vistas.

Impact 3.1-5. The proposed project would contribute to a significant cumulative impact related to visual character and quality of public views.

Air Quality

Impact 3.2-1. The proposed project would conflict with or obstruct implementation of the applicable air quality plan.

Impact 3.2-2. The proposed project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Impact 3.2-3. The proposed project would expose sensitive receptors to substantial pollutant concentrations.

Impact 3.2-5. The proposed project could result in a cumulatively considerable net increase of any criteria pollutant for which the project area is in non-attainment under an applicable federal or state ambient air quality standard (including the release of emissions that exceed quantitative thresholds for ozone precursors).

Tribal Cultural Resources

Impact 3.13-1. The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or is a resource determined by the County to be significant.

Impact 3.13-2. The proposed project, in combination with past, present and reasonably foreseeable development, could make a cumulatively considerable contribution to a significant cumulative impact related to tribal cultural resources, including Native American human remains.

4.3 Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines requires a discussion of any significant irreversible environmental change that would be caused by the proposed project. However, Section 15127 limits the discussion of irreversible changes to EIRs prepared in connection with any of the following activities:

a. The adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency;
b. The adoption by a Local Agency Formation Commission of a resolution making determinations; or
c. A project which will be subject to the requirement for preparing an environmental impact statement pursuant to the requirements of the National Environmental Policy Act of 1969.

The proposed project is an adoption of a Specific Plan; therefore, a discussion of significant irreversible environmental changes is provided.

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 approximately 208 acres of undeveloped land 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. These impacts would be the same under the RIA.

Resources that would be permanently and continually consumed by project implementation, including the proposed project and RIA, 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, general plan 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 Sections 15127 and 15126.2(d) require a discussion of the potential for irreversible environmental damage caused by environmental accidents associated with a 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 in the Executive Summary, all such activities would comply with applicable local, state and federal laws related to the use, storage and transport of 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. Compliance with applicable local, state and federal laws would serve to protect against significant and irreversible change resulting from the accidental release of hazardous materials. Although irreversible environmental changes would result from the project, such changes are

determined to be less than significant, and the limited use of nonrenewable resources that would be required by project construction and operation is justified. This would be the same for the RIA.

To ensure that energy consumption is considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (Public Resources Code [PRC] Section 21100[b][3]). Energy conservation implies that a project's cost-effectiveness be reviewed not only in dollars, but also in terms of energy requirements. For many projects, cost-effectiveness may be determined more by energy efficiency than by initial dollar costs. A lead agency may consider the extent to which an energy source serving a project has already undergone environmental review that adequately analyzed and mitigated the effects of energy production.

Consistent with PRC Section 211009(b)(3), CEQA Guidelines Appendix G, and a ruling set forth by the court in *California Clean Energy Committee v. City of Woodland*, potentially significant energy implications of a project must be considered in an EIR to the extent relevant and applicable to that project. Accordingly, based on the energy consumption thresholds set forth in both Appendix F and Appendix G of the CEQA Guidelines, the project's estimated energy demands (both short-term construction and long-term operational demands) were evaluated (see Section 3.5, Energy, of this EIR). The overall purpose of the analysis is to evaluate whether the project would result in the wasteful, inefficient, or unnecessary consumption of energy.

As documented in Section 3.5, Energy, new development, such as that proposed by the project, is required to comply with California Title 24 energy efficiency requirements which is considered demonstrable evidence of efficient use of energy. The project would provide for and promote energy efficiencies beyond those required under other applicable federal and state standards and regulations, and in doing so would meet or exceed all Title 24 standards. On this basis, the proposed project and RIA would not result in the inefficient, wasteful, or unnecessary consumption of energy.

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 3 and Chapter 5 for the RIA).

4.4 Growth-Inducing Impacts

As required by Section 15126.2(e) 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.

The project would require a temporary construction workforce and would provide new residences consistent with growth projected to occur in this area of the county. The temporary construction workforce would be needed to build the project and associated improvements. The number of construction workers needed during any given period would largely depend on the specific stage of construction but would likely range from a dozen to several dozen workers on a daily basis. It is assumed these construction workers would either live in the county or in nearby areas.

These circumstances are further described below.

- **Elimination of Obstacles to Growth:** This refers to the extent to which a project removes infrastructure limitations or provides infrastructure capacity or removes regulatory constraints that could result in growth unforeseen at the time of project approval (e.g., a major expansion of a wastewater treatment facility that allows for more construction in the service area).
- **Economic Effects:** This refers to the extent to which a 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.

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.

Projects that physically remove obstacles to growth, or projects that indirectly induce growth, are those that may provide a catalyst for future unrelated development in the area. The project would involve installation of new water and sanitary sewer lines, as well as storm drainage infrastructure and roadways, within the project site that would connect to existing utilities and roadways. The project site is located in a developing area of the county where existing utility infrastructure is available and the new residences would tie into the existing infrastructure. The purpose of the installation of new utilities and internal roads is solely to serve the needs of the project, and not to provide capacity for future projects or growth. In addition, since the surrounding project area is already served by existing roads as well as wet and dry utilities, the project would not expand water lines, sanitary sewer or stormwater drainage infrastructure into areas not previously served by such utilities.

Further, given that the surrounding project area is already served by existing roads and utilities, it is unlikely that the project would create demand for existing community service facilities that would require construction or expansion of regional-scale facilities. Thus, the project would not result in indirect population growth by providing vehicular access to an area presently lacking such access or extending utilities into an area not currently served by such utilities. This conclusion would be the same for the RIA.

Economic Effects

The proposed project would affect the local economy by the construction of up to 918 new homes. Construction of the project would also require temporary construction workers that would contribute to the local economy. A portion of these temporary construction workers may already be living in the area and contributing to the local economy. Other temporary construction workers may come from outside the area on a temporary basis, and these workers would represent net new contributions to the local economy.

Additional local employment can be generated through the multiplier effect, as discussed above. 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 a 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 a resident of the project goes out to lunch, the person who serves the resident 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 residents of the project.

Increased future employment generated by resident 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 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 county and the larger region. However, growth within the western portion of the county is primarily focused on development of single-family homes. The Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) provides housing unit projections for El Dorado County (not including the Tahoe Basin area, as this area is not included within the SACOG boundary). According to the 2020 MTP/SCS projections, the number of housing units within the county is expected to grow from 63,780 in 2016 to 72,280 in 2040, a growth of 13.3% (SACOG 2019a).

In conclusion, the project could cause population growth through providing new homes. However, this growth falls well within regional growth projections for population and housing in the county. The Project would not remove obstacles to population growth and would not cause an increase in population such that new community facilities or infrastructure would be required outside of the project site. Lastly, the project is not expected to encourage or facilitate other activities that could significantly affect the environment, as explained above. For these reasons, the project is not considered to be significantly growth inducing. These conclusions would be the same for the RIA.

4.5 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 (Section 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).

Each technical section included in Chapter 3 provides an evaluation of the project's contribution to any significant cumulative impact.

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)). This EIR uses a "hybrid" approach in which potential cumulative impacts of the project are assessed in combination with buildout projections included in the County's 2004 General Plan, as modified by a list of projects that have been approved for development since the adoption of the General Plan, as described in detail in Chapter 3, Environmental Analysis.

The cumulative analysis in each of the technical sections evaluates the proposed project's contribution to the cumulative scenario. The technical sections in Chapter 3 evaluate the project's cumulative impacts at the end of the impacts analysis including a description of the cumulative context for each issue area evaluated. Cumulative analysis is included in Chapter 5 for the RIA.

4.6 Other Considerations

CEQA provides that economic or social effects are not considered significant effects on the environment unless the social and/or economic changes are connected to physical environmental effects. A social or economic change related to a physical change may be considered in determining whether the physical change is significant (CEQA Guidelines Section 15382). The guidance for assessing economic and social effects is set forth in Section 15131(a) of the CEQA Guidelines:

> Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on physical changes.

The project's direct and indirect physical environmental effects associated with construction and operation of the project, such as associated increases in air pollutant emissions and discovery of unanticipated cultural resources are all addressed in Chapter 3 of this Draft EIR and Chapter 5 for the RIA. The County has not identified any chain of cause and effect by which any economic or social changes resulting from the project would foreseeably result in additional physical consequences beyond those addressed in Chapter 3 and Chapter 5.