

## 6 OTHER CEQA SECTIONS

### 6.1 GROWTH INDUCEMENT

California Environmental Quality Act (CEQA) Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an environmental impact report (EIR). Section 15126.2(d) of the State CEQA Guidelines provides the following guidance for assessing growth-inducing impacts of a project:

Discuss the ways in which the 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 (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can induce growth directly, indirectly, or both. Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- ▶ substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- ▶ substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; and/or
- ▶ removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open-space land to urban uses, and other effects. These indirect or secondary effects of growth may result in significant environmental impacts. CEQA does not require that the EIR speculate unduly about the precise location and site-specific characteristics of significant, indirect effects caused by induced growth, but a good-faith effort is required to disclose what is feasible to assess. Potential secondary effects of growth could include consequences – such as conversion of open space to developed uses, increased demand on community and public services and infrastructure, increased traffic and noise, degradation of air and water quality, or degradation or loss of plant and wildlife habitat – that are the result of growth fostered by the project.

The decision to allow those projects that result from induced growth is the subject of separate discretionary processes by the lead agency responsible for considering such projects. Because the decision to allow growth is subject to separate discretionary decision making, and such decision making is itself subject to CEQA, the analysis of growth-inducing effects is not intended to determine site-specific environmental impacts and specific mitigation for the potentially induced growth. Rather, the discussion is intended to disclose the potential for environmental effects to occur more generally, such that decision makers are aware that additional environmental effects are a possibility if growth-inducing projects are approved. The decision of whether impacts do occur, their extent, and the ability to mitigate them is appropriately left to consideration by the agency responsible for approving such projects at such times as complete applications for development are submitted.

## 6.1.1 Summary of Growth-Inducing Impacts

As stated above, a project is considered growth-inducing if it would directly or indirectly foster substantial economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding element. Examples of projects likely to have significant growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or industrial parks in areas that are only sparsely developed or are underdeveloped. Typically, development projects on sites that are designated for development and surrounded by existing suburban uses are not considered adversely growth-inducing because growth in areas that already have development and infrastructure available to serve new development are generally considered environmentally beneficial.

## 6.1.2 Growth-Inducing Impacts of the Project

Implementation of the proposed project would result in an increase in population within the unincorporated County. As previously mentioned in Chapter 2, "Project Description," of this Draft EIR, the proposed project consists of General Plan land use designation amendments, rezoning, and approval of a tentative subdivision map to create 379 residential lots, clubhouse lot, park site lot, six landscape lots, and nine open space lots. The project site is surrounded by suburban development (or planned suburban development). Additionally, this development would occur within the General Plan El Dorado Hills Community Region Boundary; therefore, the General Plan anticipates development at the project site.

Implementation of the proposed project would include connections and installation of utilities and infrastructure (water, sewer, and roadways) to serve the new units. While these infrastructure improvements would connect to adjacent development, the improvements would not encourage growth in these adjacent areas, as they are already developed with suburban uses. Therefore, the growth that would occur as a result of the proposed project would not be considered substantial or adverse.

As previously described in Section 3.12, "Population and Housing," the proposed project would result in a range between 854 to 1,077 residents. As the project would not provide any commercial uses, the project would not generate any potential employment opportunities. The County expects a 0.9 percent annual growth rate per year between 2020 and 2030, estimating approximately 1,724 new residents per year. While the population of El Dorado County has been on a slow decline since 2020 and may not meet future projected population estimates, the anticipated population increase as a result of the project would fall within the County' projected and planned population growth. Although not a substantial increase, the proposed 379 residential lots and population of 854 to 1,077 new residents associated with the proposed project would directly contribute to population growth within El Dorado County, but it would not in and of itself cause the growth projections to be exceeded and would represent a small percentage of anticipated future growth. Additionally, the project site is included in Sacramento Area Council of Governments' (SACOG's) 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) as part of an Established Community and is considered to be accounted for in SACOG's growth pattern estimation for the region. The 2020 MTP/SCS forecasts about 2,330 new housing units in El Dorado Hills and 4,070 new housing units in the Established Community Type in El Dorado County (SACOG 2019). The project would account for approximately 16 percent of total new housing units in El Dorado Hills by 2040. Therefore, the proposed project would not result in substantial direct growth-inducement.

## 6.1.3 Elimination of Obstacles to Growth

The elimination of either physical or regulatory obstacles to growth is considered a growth-inducing impact. A physical obstacle to growth typically involves the lack of public infrastructure. The extension of public infrastructure, including roadways, water mains, and sewer lines, into areas not currently provided with roads and utilities would be expected to support new development. Similarly, the elimination of or a change to a regulatory obstacle, including growth and development policies, could result in new growth.

As mentioned in Chapter 2, "Project Description," the proposed project includes several utility infrastructure improvements such as circulation, drainage, off-site roadway facility, off-site water distribution, off-site wastewater conveyance, and off-site electrical service improvements that would serve the project site. Implementing the proposed project therefore would result in the elimination of these growth obstacles because it would involve constructing and installing the infrastructure necessary to serve development of the project site. Connections to services and facilities constructed to connect to the proposed project to existing facilities or accommodate the addition of the proposed project would generally be proportionate to the level necessary to accommodate the project and would not, in themselves, increase the development potential of properties outside of the project site that were not planned for development in the project description or the El Dorado County General Plan. Therefore, these improvements to several utility infrastructures would be growth accommodating but it would not be growth inducing.

## 6.2 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

The State CEQA Guidelines Section 15126.2(b) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed project is implemented. As documented throughout Chapter 3 (project level impacts) and Chapter 4, "Cumulative Impacts," of this Draft EIR, after implementation of the recommended mitigation measures, most of the impacts associated with the proposed Generations at Green Valley Project would be reduced to a less-than-significant level. The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available to reduce the project's impacts to a less-than-significant level.

- ▶ Impact 3.7-1 and 4-11: The project would result in GHG emissions during both construction and operational phases. While mitigation (Mitigation Measures 3.7-1a, 3.7-1b, and 3.14-2) has been identified to address this impact, the project would result in a significant and unavoidable impact under project and cumulative conditions.
- ▶ Impact 3.11-1: Short-term construction-generated noise levels associated with the project would expose nearby noise-sensitive receptors to noise levels that could exceed the FTA's recommended daytime construction noise criteria of 90 dB  $L_{eq}$  within off-site improvement areas. While mitigation (Mitigation Measure 3.11-1) has been identified to address this impact, the project would result in a significant and unavoidable impact under project conditions.
- ▶ Impact 3.14-2 and 4-24: Implementation of the project would exceed the significance threshold of 19.1 VMT per capita for residential uses (i.e., 15 percent below the existing county VMT per capita) as identified in County Resolution 141-2020. While mitigation (Mitigation Measure 3.14-2) has been identified to address this impact, the project would result in a significant and unavoidable impact under project and cumulative conditions.
- ▶ Impact 3.15-1: The project would include the construction of on-site and off-site infrastructure improvements that would result in significant environmental impacts related to construction noise. While mitigation (Mitigation Measure 3.11-1), has been identified to address this impact, the project would result in a significant and unavoidable impact under project conditions.
- ▶ Impact 4-8: The project would contribute to the cumulative loss of oak woodland habitat due to the anticipated removal of approximately 56 acres of oak woodland habitat. Thus, the project's contribution to cumulative oak woodland loss identified in the Biological Resources Policy Update and ORMP Final EIR would be cumulatively considerable and significant and unavoidable.

## 6.3 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the project. Specifically, the State CEQA Guidelines 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 generation 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.

The State CEQA Guidelines describe three distinct categories of significant irreversible changes, including changes in land use that would commit future generations to specific uses; irreversible changes from environmental actions; and consumption of nonrenewable resources.

The proposed project would result in the future development of undeveloped land, which is a long-term commitment. Though the project proposes 57.58 acres of open space lots, 176.39 acres of undeveloped land would be rezoned for future residential units, 4 acres would be proposed as an area for a park site, and 3.3 acres would be proposed as an area for a clubhouse. Therefore, a total of approximately 183.69 acres would be rezoned for future development. However, while the proposed project would result in the future development of land, the land could eventually be redeveloped with other land uses or remove the homes if the presently proposed residential uses were to become obsolete.

Irreversible environmental changes would result from the actions associated with the conversion of a largely undeveloped site to future residential uses. Implementation of the proposed project would include the construction of off-site and on-site improvements as well as the rezoning of the project site that would result in the construction of structures, roads, and other infrastructure, which would be composed of a variety of nonrenewable (metal, gravel, concrete) or slowly renewable resources (wood), and would be fueled by using primarily non-renewable fossil fuel sources. While the project would require several additional utility improvements, the scale of such consumption for the proposed project would be typical for a residential development.

The proposed project would convert existing seasonal grazing land to a residential development. This would result in the consumption of a non-renewable resource, as grazing land would be permanently removed. However, the removal would not constitute a significant impact as the project site is not defined as important farmland under CEQA as described in Section 3.11, "Land Use, Planning, and Agriculture and Forestry Resources."