

6 OTHER CEQA CONSIDERATIONS

This chapter provides a summary of significant environmental impacts; significant and unavoidable impacts; significant irreversible environmental changes; and growth-inducing effects.

Comments received on the Notice of Preparation (NOP) were reviewed during preparation of this SEIR. A comment letter was submitted by the Sacramento Local Agency Formation Commission (LAFCo) expressing concern regarding project effects on growth inducement. The City reviewed and considered this information during preparation of this chapter.

6.1 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

Section 15226.2(b) of the CEQA Guidelines requires EIRs to include a discussion of any significant environmental impacts that cannot be avoided if the proposed project is implemented.

Chapter 3 of this SEIR provides a detailed analysis of significant and potentially significant environmental impacts related to approval of the proposed project; identifies feasible mitigation measures, where available, that could avoid or reduce these significant and potentially significant impacts; and presents a determination whether these mitigation measures would reduce these impacts to less-than-significant levels.

Following is a listing of significant and unavoidable impacts associated with implementation of the proposed project. Cumulative impacts associated with the proposed project, including significant impacts, are summarized in Chapter 4 of this SEIR.

SECTION 3.2, AESTHETICS

- ▶ **Impact 3.2-1:** Substantial degradation of existing visual character.

SECTION 3.3, AGRICULTURAL RESOURCES

- ▶ **Impact 3.3-1:** Direct and indirect loss of agricultural land, including Farmland of Statewide Importance.
- ▶ **Impact 3.3-2:** Potential conflict with existing on-site and off-site Williamson Act contracts.

SECTION 3.4, AIR QUALITY

- ▶ **Impact 3.4-2:** Generation of long-term operational emissions of criteria pollutants and precursors.

SECTION 3.5, BIOLOGICAL RESOURCES

- ▶ **Impact 3.5-3:** Loss of nesting and foraging habitat for special-status and other protected raptors. (Swainson's Hawk).

SECTION 3.6, CULTURAL AND TRIBAL CULTURAL RESOURCES

- ▶ **Impact 3.6-2:** Substantial adverse change to unknown historical resources or unique archeological resources.
- ▶ **Impact 3.6-3:** Substantial adverse change to a Tribal Cultural Resource.

SECTION 3.8, GREENHOUSE GAS EMISSIONS

- ▶ **Impact 3.8-1:** Generation of greenhouse gas emissions or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

SECTION 3.11, LAND USE, POPULATION, HOUSING, EMPLOYMENT, ENVIRONMENTAL JUSTICE, AND UNINCORPORATED DISADVANTAGED COMMUNITIES

- ▶ **Impact 3.11-4:** Conversion of open space.

SECTION 3.12, NOISE AND VIBRATION

- ▶ **Impact 3.12-1:** Temporary, short-term exposure of sensitive receptors to construction noise.
- ▶ **Impact 3.12-3:** Temporary, short-term exposure of sensitive receptors to potential groundborne noise and vibration from Project construction.
- ▶ **Impact 3.12-4:** Long-term traffic noise levels at existing noise-sensitive receivers.
- ▶ **Impact 3.12-5:** Land use compatibility of on-site sensitive receptors with future traffic noise levels.
- ▶ **Impact 3.12-6:** Land use compatibility of on-site sensitive receptors to or generation of non-transportation noise levels in excess of local standards.

SECTION 3.16 ENERGY

- ▶ **Impact 3.16-1:** Result in the wasteful, inefficient, or unnecessary consumption of energy resources.

6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA requires an EIR to address significant irreversible environmental changes. Specifically, the EIR must consider whether “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” (CEQA Guidelines Section 15126.2[c]). Nonrenewable resources, as used in this discussion, refer to the physical features of the natural environment: land, air, and waterways.

Development of the Project site would result in commitment of land to a mix of urban uses instead of the agricultural uses that exist today. Proposed development would use both renewable and nonrenewable natural resources during both construction and operational phases—both within the Project site and also to construct required off-site improvements. Nonrenewable fossil fuels would be used primarily during construction, but also during Project operation. Other nonrenewable and slowly-renewable resources consumed as a result of development of the Project site would include, but not necessarily be limited to, lumber and other forest products, sand and gravel, asphalt, petrochemical construction materials, steel, copper, and water. Proposed development would consume energy for multiple purposes including, but not limited to, building heating and cooling, lighting, appliances, electronics, office equipment, and commercial machinery. Energy could also be consumed during each vehicle trip associated with these proposed uses. It is important to note that actual energy usage could vary substantially, depending upon factors such as the type of uses that would occupy the buildings, actual miles driven

by future residents and employees, and the degree to which energy conservation measures are incorporated into the design of the various facilities.

Irreversible changes would likely occur as a result of future excavation, grading, and construction activities. Proposed development would also generate additional transportation demand, construction, energy demand, and other activities that would increase emissions of greenhouse gases and other air pollutants, as well as generation of noise. Different air pollutants and different greenhouse gas emissions remain in the atmosphere for different amounts of time, ranging from a few years to thousands of years.

Operation of projects in the vicinity could include the use of hazardous materials, which could increase the risk of an accidental spill or release.

During construction, equipment would be using various types of fuel and material classified as hazardous. In the State of California, the storage and use of hazardous substances are strictly regulated. The enforcement of these existing regulations would preclude credible significant impacts related to environmental accidents.

Detailed assessments for each of the above-mentioned topics are provided throughout Chapter 3 of this SEIR. Cumulative impacts associated with each of these topics are additionally addressed in detail in Chapter 4.

6.3 GROWTH-INDUCING IMPACTS

According to Section 15126.2(d) of the CEQA Guidelines, an EIR should:

[d]iscuss 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 that 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 the construction of new facilities that could cause significant environmental effects. Also discuss characteristics of some projects that 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 has the potential to induce growth both directly and indirectly. 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 substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises); or a construction effort with substantial short-term employment opportunities that indirectly stimulates the need for additional housing and services to support the new employment demand; and/or removal of an obstacle to additional growth and development, such as improving the capacity of a 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 lead to environmental effects. These environmental effects may include increased demand on other services and infrastructure, 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, or other adverse impacts.

6.3.1 GROWTH-INDUCING IMPACTS OF THE PROJECT

The Project site is located outside of the existing City limits; however, the proposed Project site would ultimately be annexed to the City and was considered as part of the recently updated Elk Grove General Plan, adopted in 2019.

In addition to residential development in the mixed-use area that could occur in the future, the proposed regional commercial, and light and heavy industrial development would generate a substantial amount of employment-generating land uses. As described in Chapter 2, “Project Description,” of this SEIR, the Project site could accommodate a broad range of uses that could generate approximately 8,000 jobs. SACOG estimates the City of Elk Grove would have approximately 60,070 jobs by 2036 and 122,160 jobs at buildout of the City.

Development of the Project site would require construction workers. Because construction workers typically do not change where they live each time they are assigned to a new construction site, it is not anticipated that there would be any substantial relocation of construction workers to Elk Grove or Sacramento County associated with the proposed Project

The additional population associated with the proposed Project could spur an increase in demand for goods and services in the surrounding area, which could potentially result in additional development to satisfy this demand. In this respect, the proposed Project would be growth inducing. It would be speculative to attempt to predict where and when any such new services would be developed, and whether or not existing and future planned industrial and commercial development would satisfy additional demand for goods and services created by the project.

In summary, the proposed Project may indirectly induce population growth because the increased population and employment opportunities associated with the future development could increase demand for goods and services, thereby fostering population and economic growth in the City and surrounding unincorporated Sacramento County and other nearby communities. It is possible that the proposed Project could place pressure on adjacent areas to seek development entitlements or annexation applications. However, the proposed Project, along with other areas planned for development of the City’s General Plan, would provide sufficient acreage to accommodate population and employment growth. Therefore, the proposed Project would likely not induce substantial growth outside of the Project site.