

## 7 OTHER CEQA-REQUIRED SECTIONS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must also identify the following: (1) significant environmental impacts of the 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, and (4) growth-inducing impacts of the proposed project. Although growth inducement itself is not considered an environmental effect, it could potentially lead to foreseeable physical environmental effects, which are discussed under Growth Inducing Impacts below.

### 7.1 SIGNIFICANT ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT THAT CANNOT BE AVOIDED

Section 21100(b)(2)(A) of the State CEQA Guidelines provides that an EIR shall include a detailed statement setting forth "in a separate section: any significant effect on the environment that cannot be avoided if the project is implemented." Accordingly, this section provides a summary of significant environmental impacts of the project that cannot be mitigated to a less-than-significant level.

Chapter 4, "Environmental Setting, Environmental Impacts, and Mitigation Measures," provides a description of the potential environmental impacts of the project and recommends various mitigation measures to reduce impacts, to the extent feasible. Chapter 5, "Cumulative Impacts," determines whether the incremental effects of this project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. After implementation of the recommended mitigation measures, most of the impacts associated with development of the 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.

Chapter 5, Cumulative Impacts, Transportation:

- ▶ Cumulative Plus Project Intersection Operations
- ▶ Cumulative Plus Project Roadway Segment Operations

### 7.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. 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 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.

Generally, a project would result in significant irreversible environmental changes if:

- ▶ 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).

Development of the proposed project would result in the continued commitment of the landfill to solid waste disposal, thereby precluding any other uses for the lifespan of the project.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the project. While the project would result in the use, transport, storage, and disposal of some hazardous wastes, as described in Section 4.6, Hazards and Hazardous Materials, future activities would be substantially similar to those that are already occurring. They would continue to be required to comply with applicable state and federal laws related to the use, storage, and disposal of hazardous materials, which significantly reduces the likelihood and severity of accidents that could result in irreversible environmental damage.

Implementation of the proposed project would result in the continued long-term commitment of resources to support landfill operation within the project site. The most notable significant irreversible impacts are increased generation of pollutants, and the short-term commitment of non-renewable and/or slowly renewable natural and energy resources, such as water and power resources during construction. Modified operations at the landfill would also consume water, electricity, and fossil fuels. These consequences of the project are described in the appropriate technical sections in Chapter 4 of this EIR. Some of these resources, however, would be committed to operating and monitoring the LFG system. In light of this and the limited scope of resource use (primarily monitoring and flaring of methane gas), the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources.

## 7.3 GROWTH-INDUCING IMPACTS

CEQA specifies that growth-inducing impacts of a project must be addressed in an EIR (CCR Section 21100[b][5]). Specifically, CCR Section 15126.2(d) states that the EIR shall:

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.

Direct growth inducement would result if a project involved construction of new housing, which would facilitate new population to an area. 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).

The State CEQA Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth. Therefore, for purposes of this EIR, to reach the conclusion that a project is growth inducing as defined by CEQA, the EIR must find that it would foster (i.e., promote, encourage, allow) additional growth in economic activity, population, or housing, regardless of whether the growth is already approved

by and consistent with local plans. The conclusion does not determine that induced growth is beneficial or detrimental, consistent with Section 15126.2(d) of the State CEQA Guidelines.

If the analysis conducted for the EIR results in a determination that a project is growth-inducing, the next question is whether that growth may cause adverse effects on the environment. Environmental effects resulting from induced growth fit the CEQA definition of “indirect” effects in Section 15358(a)(2) of the State CEQA Guidelines. 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(ies) 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.

### 7.3.1 Growth Variables

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. Because 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.

### 7.3.2 Growth-Inducing Impacts

Mechanisms by which a project may directly induce growth may include creating jobs that attract economic or population growth to the area, promoting the construction of homes that would bring new residents to the area, or removing an obstacle that impedes growth in the area. With implementation of the project, no change to staffing levels are proposed and the project does not include the construction of new homes. Therefore, the project would not directly bring new residents into the project area.

As described in Chapter 3, “Project Description,” construction of the project, primarily related to installation of the required base liner containment system on 20-acres within the Triangle and excavation for the realigned drainage ditch segment along the southern boundary of the Triangle, would occur over the summer of 2021 and 2022. The project workforce would vary according to construction phase and type of facilities being constructed; however, the number of construction workers at any given time would be less than 30. In addition to on-site construction workers, additional workers would be involved in delivery of construction materials to the site. Deliveries of construction materials to and from the landfill would be limited, approximately 2 to 5 per day. This number of workers would be minor such that workers would likely come from the labor pool already available in the County and the region. No substantial relocation of workers would occur, and no new demand for housing and public services would result. Therefore, project construction would not be growth inducing.

Post-project operations and maintenance would not require any additional employees. Therefore, long-term operation of the proposed project would not result in workers relocating to the area and requiring housing, and

would not be growth inducing. Additionally, the proposed project would not spur secondary job growth such as jobs or retail services to serve employees.

While expansion of a facility that serves both municipal and commercial customers in the region (San Francisco Bay Area and the Sacramento Valley) could remove an obstacle to growth, there are many other more influential factors affecting population growth than solid waste disposal capacity: land use, housing demand, employment, and availability of other basic services including water supply, wastewater treatment and disposal capacity, and roadway and highway access. These factors have a more direct role in encouraging or limiting population growth and landfill capacity is not currently considered a population growth constraint. In addition, expansion of the landfill is not expected to influence the location or rate of population growth in the landfill's service area. It is intended to maintain long-term solid waste disposal capacity within the region. The area surrounding the landfill is sparsely populated and construction or expansion of the facility would not attract new residential development to the surrounding area.

Because construction and operation of the project would not create a substantial number of jobs that would fuel economic or population growth, promote new residential construction, or remove an obstacle that impedes growth, the proposed project would not be growth inducing.

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