

Chapter 4

Other CEQA-Required Discussions

This chapter includes the following other discussions and analyses required by the California Environmental Quality Act (CEQA).

- Cumulative impacts
- Significant and unavoidable impacts
- Significant irreversible environmental changes
- Growth-inducing impacts

4.1 Cumulative Impacts

4.1.1 Approach to Impact Analysis

4.1.1.1 Legal Requirements

State CEQA Guidelines require that the cumulative impacts of a project be addressed in an environmental impact report (EIR) when the cumulative impacts are expected to be significant and when the project's incremental effect is cumulatively considerable (State CEQA Guidelines Section 15130(a)). Cumulative impacts are impacts on the environment that result from the incremental impacts of a proposed action when added to other past, present, and reasonably foreseeable future actions (State CEQA Guidelines Section 15355(b)). Such impacts can result from individually minor but collectively significant actions taking place over time.

State CEQA Guidelines Section 15130 states that the discussion of cumulative impacts need not provide as much detail as the discussion of effects attributable to the project alone. The level of detail should be guided by what is practical and reasonable.

4.1.1.2 Methodology

According to the State CEQA Guidelines Section 15130, an adequate discussion of significant cumulative impacts should contain the following discussions.

- An analysis of related future projects or planned development that would affect resources in the project area similar to those affected by the project
- A summary of the expected environmental effects to be produced by those projects, with specific reference to additional information stating where that information is available
- A reasonable analysis of the cumulative impacts of the relevant projects

An EIR must examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative impacts.

When evaluating cumulative impacts, CEQA recommends one of the following two methods.

1. The cumulative analysis would consider any past, present, and probable future projects producing related or cumulative impacts, including projects outside the control of the lead agency (i.e., project list approach).
2. The cumulative analysis would consider projections contained in an adopted local, regional, or statewide plan, or would use a prior environmental document which has been adopted or certified for such a plan (i.e., plan approach).

The present EIR uses the latter approach. The adopted general plans for the County and the incorporated cities of Cloverdale, Cotati, Healdsburg, Petaluma, Rohnert Park, Sebastopol, and Sonoma, and town of Windsor are used as the basis for consideration of reasonably probable future projects for most of the resource topics. Exceptions include air quality, energy, and greenhouse gas emissions, which use the plans of the North Coast Air Basin and the Bay Area Air Quality Management District; and hydrology and water quality, which uses the basin plan of the Bay Area Regional Water Quality Control Board and the North Coast Regional Water Quality Control Board.

The cumulative analysis is limited to those impacts that are cumulatively significant and to which the *Climate Action 2020: Community Climate Action Plan* (CAP) would contribute. Put another way, where the CAP in conjunction with past, present, and reasonably probable future projects would not result in a significant cumulative impact, no analysis is undertaken. Where there is the potential for a significant cumulative impact, the CAP's incremental contribution to that impact is examined to determine whether the contribution is considerable. If a contribution is found to be feasible, the EIR recommends mitigation to reduce the CAP's contribution, when feasible.

4.1.2 Analysis of Cumulative Impacts

The project would not contribute to cumulative impacts concerning minerals or population and housing. Therefore, these resources will not be discussed further in this context.

The cumulative impact analysis for each of the resource topics analyzed in the EIR (aesthetics; agriculture and forestry resources; air quality; biological resources; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and recreation; noise; public services, utilities, and energy; and traffic and transportation) is presented in Sections 3.2 through 3.14. These sections describe the potential for the CAP, in combination with the cumulative projects, to result in cumulatively significant environmental impacts. Each analysis considers the cumulative setting of the potential impacts. The evaluations identify whether the cumulative impact would be significant, and whether the CAP's contribution to a significant cumulative impact would be considerable.

Overall, with mitigation, the CAP's contribution to cumulative impacts would not be substantial and thus are considered less than significant, with the exception of its contribution to cultural resources. The CAP could substantially change character-defining features of individual historic buildings that cannot be fully mitigated. Thus, the CAP may contribute to a cumulatively considerable impact to historic resources even with mitigation.

4.2 Significant and Unavoidable Impacts

Section 21067 of CEQA and Sections 15126(b) and 15126.2(b) of the State CEQA Guidelines require that an EIR describe any significant impacts, including those that can be mitigated but not reduced

to a less-than-significant level. Furthermore, where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the CAP is being proposed, notwithstanding their effect, should also be described.

Table 4-1 shows the significant and unavoidable impacts resulting from implementation of the CAP and mitigation measures that would be required but would not reduce the impact to a less-than-significant level. This impact is related to historic resources and how implementation of CAP-promoted rooftop solar facilities could substantially change the character-defining features of historic buildings.

Due to this significant and unavoidable environmental impact, approval of the CAP would require that a Statement of Overriding Considerations be adopted, indicating that the Regional Climate Protection Authority (RCPA) is aware of the significant environmental consequences and believe that the benefits of approving the CAP outweigh its unavoidable significant environmental impact.

Table 4-1. Significant and Unavoidable Impacts and Mitigation Measures

Impact	Significance before Mitigation		Significance after Mitigation
		Mitigation	
Impact CUL-1: Implementation of the CAP (solar roof installations) could result in the potential disturbance of historical resources	Significant	Mitigation Measure CUL-1a: Review of alternatives for solar roofs on historic buildings Mitigation Measure CUL-1b: Studies documenting the presence/absence of historical resources Mitigation Measure CUL-1c: Historical resources investigations	Significant and unavoidable

4.3 Significant Irreversible Environmental Changes

Section 15126.2(c) of the State CEQA Guidelines requires that an EIR consider any significant irreversible environmental changes that would be caused by the CAP should it be implemented. Section 15126.2(c) reads as follows.

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.

A project would result in significant irreversible environmental changes if any of the following criteria are met.

- The primary and secondary impacts would generally commit future generations to similar uses.
- The project would involve a large commitment of nonrenewable resources.
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.

- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

The CAP would not involve uses in which irreversible damage could result from any potential environmental accident associated with the project. The CAP proposes to reduce greenhouse gas (GHG) emissions in the County. In general, the CAP and the co-benefits of reducing GHG emissions (e.g., improving air quality, reducing electricity and gas usage, reducing water use, protecting the long-term viability of natural landscapes) are beneficial to the environment and would not result in irreversible damages in the event of environmental accidents.

As discussed throughout the draft EIR, the CAP does not propose any changes to land use or zoning designations that would alter the planned population or job growth anticipated under the local general plans such that there would be additional growth. The project does not propose new development; the CAP encourages transit-oriented and mixed-use development consistent with the policies adopted by the County and local jurisdictions. The CAP also encourages construction of energy-efficient retrofits, new facilities aimed at increasing renewable energy use, solid waste facilities to increase waste diversion, and transit/transportation facilities to encourage a shift in the mode of transportation used, all of which would entail a small commitment of energy and building materials. This commitment of energy and building materials would be commensurate with that of other projects of similar magnitude. Operation of new energy-generating facilities and solid waste facilities may entail a further commitment of energy resources in the form of natural gas, electricity, and water resources. However, this commitment would be minimal, consisting of routine maintenance of the facilities.

In fact, the CAP would be beneficial in the conservation of energy and nonrenewable resources. The CAP measures would reduce energy use through increasing energy-efficiency of buildings; reduce fossil fuel use through switching equipment to electricity, increasing vehicle and equipment efficiency, and encouraging a shift toward low-carbon fuels; and increase forest conservation and afforestation through enhancing open and working lands and increasing carbon sequestration. The CAP does not propose any development that would entail a wasteful commitment of energy or non-renewable resources. The CAP would reduce long-term energy demand and the corresponding impacts.

4.4 Growth-Inducing Impacts

Section 21100(b)(5) of CEQA requires an EIR to discuss how a project, if implemented, may induce growth and the impacts of that induced growth (see also State CEQA Guidelines Section 15126). CEQA requires the EIR to discuss specifically “the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment” (State CEQA Guidelines Section 15126.2(d)). The State CEQA Guidelines do not provide specific criteria for evaluating growth inducement and state that “it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.” CEQA does not require separate mitigation for growth inducement, as it is assumed that these impacts are already captured in the analysis of environmental impacts (see Chapter 3, *Setting, Impacts, and Mitigation Measures*). Furthermore, the State CEQA Guidelines require that an EIR “discuss the ways” a project could be growth inducing and that it “discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment.”

According to the State CEQA Guidelines, a project would have potential to induce growth if it would result in either of the following.

- Remove obstacles to population growth (e.g., through the expansion of public services into an area that does not currently receive these services), or through the provision of new access to an area, or a change in a restrictive zoning or General Plan land use designation.
- Result in economic expansion and population growth through employment opportunities and/or construction of new housing.

In general, a project could be considered growth-inducing if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way. However, the State CEQA Guidelines do not require a prediction or speculation of where, when, and in what form such growth would occur (State CEQA Guidelines, Section 15145).

Typically, the growth-inducing potential of a project is considered significant if it fosters growth or a concentration of population in a different location or in excess of what is assumed in pertinent general plans or land use plans, or projections made by regional planning agencies such as the Association of Bay Area Governments.

As described in Chapter 2, *Project Description*, implementation of the CAP would not result in a population increase greater than projected for the buildout of local land use plans. The CAP would not change local land use plans, and the additional facilities supported by the CAP would result in only minor employment increases and associated population growth. Rather, the CAP supports existing land use plan and policies that seek to concentrate the expected population growth in city centers and along transit corridors. Densifying the population in city centers could result in localized incremental impacts, but this is the result of existing land use plans and policies and not an incremental change with the CAP. Thus, the CAP would not be growth inducing.

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