

## 6.0 OTHER CEQA CONSIDERATIONS

This section describes the other statutorily required topics, including growth inducing impacts, significant and unavoidable impacts, significant irreversible environmental changes, and mandatory findings of significance. It also provides a discussion of energy conservation as required by Section 15126.4 of the CEQA Guidelines.

### 6.1 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that an EIR evaluate the growth-inducing impacts of a proposed action:

*Discuss the way 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. 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 construction of new facilities that could cause significant environmental effects. Also discuss the characteristic 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-inducing impacts occur when the development of a project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional developments in the same area. Also included in this category are projects that remove physical obstacles to population growth (such as a new road into an undeveloped area or a WWTP with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure projects cannot be considered isolated from the development they facilitate and serve. Projects that physically remove obstacles to growth, or projects that indirectly induce growth, may provide a catalyst for future unrelated development in an area, such as a new residential community that requires additional commercial uses to support residents.

#### 6.1.1 Direct Population Growth

The proposed project would cause direct population growth by constructing 320 residential units and 22,000 square feet of commercial uses on undeveloped land. These dwelling units would directly generate population growth of an estimated 778 new residents to the County's population. As discussed in Section 3.13, Population and Housing, the proposed project's population growth is within HCD population projections that show a population growth of 4,978 residents between 2018 and 2027. The population growth attributable to the proposed project would represent approximately 16 percent of the HCD's forecasted growth between 2016 and 2027. The proposed project would be phased over 10 to 20 years, and this growth would be further spread out. Additionally, the proposed project would provide up to 9 percent of the housing stock required under RHNA. Moreover, the Humboldt County Housing Element identifies the project site as a Housing Opportunity Zone. Because the proposed project's population growth figures are within HCD growth projections and the site has been considered for development in the County's long range plans, it can be concluded that the proposed project would be considered planned growth and, therefore, is not growth inducing.



The commercial uses are anticipated to employ as many as 44 persons. The California Employment Development Department indicates that as of January 2020, there were 2,500 unemployed persons in the County. Accordingly, it would be expected that the proposed project's new jobs could readily be filled from the local workforce. Therefore, no substantial indirect growth from the proposed project's employment opportunities would occur. In summary, the proposed project would not have the potential to cause substantial direct or indirect population growth.

### **6.1.2 Removal of Barrier to Growth**

The proposed project would be served by existing utilities in the project area and require annexation into the HCSD service boundary for water and sewer demand. The proposed high-pressure sewer line would be installed to specifically serve the development and would not result in growth inducement. The proposed project also includes construction of an off-site water storage tank. HCSD is currently preparing the Water Supply and Storage Study for the project's water storage tank, and the results of the study are not currently available. However, construction of a new water storage tank would not be considered growth inducing, since any project seeking HCSD's services would have to go through a separate discretionary review process. The additional demand for utilities and public services generated by operation of the proposed project would be met by supplies and service from existing facilities, as described in Section 3.18, Utilities and Service Systems. The proposed project was considered in the Eureka Community Plan and is contemplated for urban development by both the General Plan and Zoning Ordinance. As such, the extension of this urban infrastructure is "growth accommodating," because it is intended to facilitate planned growth.

## **6.2 SIGNIFICANT UNAVOIDABLE IMPACTS**

CEQA Guidelines Section 15126(b) requires an EIR to "describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

Section 3.0, Environmental Impact Analysis, provides a description of the potential environmental impacts of the proposed project and recommends MMs to reduce impacts to a less than significant level, where possible. Section 4.0, 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 MMs, the following resource areas would have significant unavoidable impacts:

### **6.2.1 Greenhouse Gas**

Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Cause a cumulatively considerable adverse impact from greenhouse gases.



## 6.2.2 Wildfire

Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Cause a cumulatively considerable adverse impact from wildfires.

## 6.3 SIGNIFICANT IRREVERSIBLE CHANGES

As mandated by the CEQA Guidelines, the EIR must address any significant irreversible environmental change that would result from implementation of the proposed project. Specifically, pursuant to the CEQA Guidelines (Section 15126.2[c]), such an impact would occur if:

- The project would involve a large commitment of nonrenewable resources;
- Land area committed to new project facilities;
- Irreversible damage can result from environmental accidents associated with the project; and
- The proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

Development of the proposed project would result in an irretrievable commitment of nonrenewable natural and energy resources, such as water resources during construction and operation. The energy resource demands would be used for construction, heating, and cooling of buildings, transportation of people and goods, heating and refrigeration, lighting, and other associated energy needs. However, the proposed project would implement a number of design features and MMs that would reduce energy demand, water consumption, wastewater generation, and solid waste generation that would collectively reduce the demand for resources. This would result in the emission and generation of less pollution and effluent and lessen the severity of corresponding environmental effects. Although the proposed project would result in an irretrievable commitment of non-renewable resources, the commitment of these resources would not be significantly inefficient, unnecessary, or wasteful.

The proposed project would develop residential and commercial uses within an 81-acre area. The residential uses would consist of single-family and multi-family dwelling units. The exact type of commercial uses would be based on market conditions but are expected to serve the local community and could consist of retail and restaurants. None of these uses would handle large quantities of hazardous materials or engage in activities that have the potential to result in serious environmental accidents (chemical manufacturing, mineral extraction, refining, etc.). As such, the proposed project would not have the potential to cause serious environmental accidents.



Resources that would be permanently and continually consumed by proposed project implementation include water, electricity, natural gas, and fossil fuels; however, such consumption would not be unusually high or disproportionate relative to similar land uses (refer to Section 3.14, Public Services, and Section 3.18, Utilities and Service Systems, for further discussion). The proposed project would incorporate design features and MMs to reduce energy and water consumption. These design features would include EV charging stations in commercial and multi-family uses and rooftop solar to the extent feasible and permitted by the County. These measures, planning policies, standard conservation features, and MMs would ensure that natural resources are conserved to the maximum extent possible. Although the proposed project would result in an irretrievable commitment of nonrenewable resources, the commitment of these resources would not be significantly inefficient, unnecessary, or wasteful.

