CHAPTER 7.0
GROWTH INDUCEMENT AND SIGNIFICANT IRREVERSIBLE IMPACTS

7.1 GROWTH-INDUCING IMPACTS

Section 15126.2 of the California Environmental Quality Act (CEQA) requires a discussion of the ways in which a project may induce growth in an area. Growth-Inducement, as defined by the CEQA Guidelines, concerns consequences of a proposed project that "…could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are project which would remove obstacles to population growth…" Population growth, in turn, can tax community facilities and may require construction of new infrastructure that could cause significant environmental effects at a later time. However, growth should not be assumed to be necessarily beneficial, detrimental, or of little significance to the environment.

Typically, the growth-inducing potential of a project would have a significant impact if it either fostered growth or created a capacity to accommodate growth above and beyond levels expected in the absence of the project. Of particular concern are those projects that, when constructed, serve to remove an existing barrier to growth, such as a major upgrade to a wastewater treatment facility, construction of a new road in an undeveloped area, or the provision of sewer, water, or other utility lines with excess capacity that could accommodate substantial local development. However, the creation of growth-inducing potential does not automatically lead to growth, because growth at the local level is controlled by a variety of different influences, including economic market forces, local politics, and existing development conditions.

As discussed in Chapter 3.0, Project Description, the proposed project would be an accessory facility to an approved oil development expansion project (Phase IV) designed to increase crude oil production of the Price Canyon Unit's Arroyo Grande Oil Field, which has occurred in the project area since 1906. The proposed project itself would not specifically expand oil development activities, but rather would serve to address the production and disposal of water produced under a previously-approved expansion. In summary, the project would not introduce a new land use into the area, nor would it cause a conversion of surrounding land uses (which are primarily agricultural) to more intensive land uses.

The employment generated by the project would not induce growth in the community. PXP currently employs 30 permanent and contract employees consisting of a supervisor, an office clerk, engineers, and maintenance and operation employees. The proposed project will require six or seven new permanent employees during operation. The workers needed during the construction phase would be drawn from the San Luis Obispo area. The project would not create additional public infrastructure, (i.e. public roads), and would not extend existing utility lines, including water and sewer.

7.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL IMPACTS

Section 15126.2 of the CEQA Guidelines requires a discussion of irreversible environmental changes that would occur as a result of project implementation. According to Section

15126.2(c) of the CEQA guidelines, "…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 consumption is justified." The RO Produced Water project would result in the following irreversible environmental changes:

- Use of nonrenewable resources in the construction of the proposed facilities;
- Long-term commitment of land for the new well pads; and,
- Greater long-term use of nonrenewable resources through the oil development operations.

The following sections describe both the direct and indirect irreversible changes that would result from project implementation, as well as the justification for the approval of such changes at this time.

7.2.1 USE OF NATURAL RESOURCES BY THE PROJECT

Project implementation would consume non-renewable resources for four main purposes:

- The mobilization of equipment, supplies, and manpower at construction sites;
- The use of natural resources as construction material for the project components;
- The consumption of resources in the course of long-term project operations and maintenance; and,
- Such use would not be wasteful and would be focused on achieving the worthwhile goal of energy production.

7.2.2 IRREVERSIBLE COMMITMENT OF LAND

The proposed project would not involve the additional irreversible commitment of land for construction of the proposed project beyond that which has previously been committed under the Phase IV project. The project will be conducted in an existing oil production area that has been in operation since 1906. Construction of tanks and other infrastructure is reversible, such that they may be abandoned and demolished after the life of the project.

7.2.3 INCREASED USE OF NON-RENEWABLE RESOURCES

If the proposed project is not implemented, current oil production rates and associated activities approved under the Phase IV expansion will be limited. The amount of non-renewable resources consumed under the Phase IV Expansion project, in addition to the currently proposed project which consists of natural gas for operation of the steam generators, is outweighed by the resources that will be developed as a result of this project. The main goal of the proposed project is to develop a disposal system for produced water generated by oil extraction, and thus increase the amount of oil that can be obtained under the approved Phase IV expansion. Therefore, the non-renewable resources demand by the proposed project itself is not considered significant.

The proposed project would indirectly increase the volume of oil and gas extracted and produced locally, but would not increase the net consumption of oil and gas. The production levels facilitated by implementation the water reclamation facility would be used to satisfy existing demand.

The proposed project could result in environmental accidents (e.g., produced water, oil and fuel spills) that have the potential to create irreversible impacts to biological resources if local populations of special-status plant and wildlife species were to be reduced below self-sustaining levels; however, a Spill Contingency Plan (see Mitigation Measure BIO-4D) has been built in to address this potential threat through the use of contingency measures. Additionally, p~~P~~otential impacts can be reduced through the use of adequate water reclamation facility design and operating procedures and effective emergency response plans specifying staffing and equipment needs. However, as the proposed project facilitates build-out of the Phase IV Expansion, the potential remains for irreversible damage as an unlikely upset associated with the operation of the proposed project.

THIS PAGE LEFT INTENTIONALLY BLANK

CHAPTER 8.0
CUMULATIVE ANALYSIS

8.1 INTRODUCTION

CEQA Guidelines (Office of Planning and Research, 1999) refer to cumulative impacts as "…two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

a. The individual effects may be changes resulting from a single project or a number of separate projects.

b. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other costly related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." (CEQA Guidelines Section 15355).

The Guidelines require a discussion of significant cumulative impacts, the severity of the impacts, and the likelihood of occurrence; however, the discussion need not provide as great a detail as is provided of the effects attributable to the project alone. The discussion of cumulative impacts should be guided by "standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. The cumulative analysis must include the following:

a. A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or

b. A summary of projects contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

8.2 DISCUSSION

The cumulative analysis of this EIR is based on a list of 11 projects that are located near the project area, and are in various stages of project planning or development. The list was compiled on the basis of the environmental resources that could potentially be affected by each project, the type of project, and the location of the impact relative to the proposed project. These projects are summarized below:

8.2.1 Tract Map 2388 – Spanish Springs

The 470-acre Spanish Springs Ranch (King Ventures) is located along Price Canyon Road northeast of the Pismo Beach city limits (see Figure 8-1). The site is currently designated Agricultural by the County of San Luis Obsipo General Plan, which allows a total of 47 dwelling units on ten-acre parcels.

The Spanish Springs Ranch site has been included within an areawide planning analysis *City of Pismo Beach, Price Canyon Constraints and Opportunities Study (2002).* This study is incorporated by reference into this document. As indicated therein, one alternative for the 470-acre Spanish Ranch includes: a) 103 acres of rural residential/visitor-serving uses that may include as many as 400 hotel or resort-type units, b) 22 acres of rural residential use containing a total of 29 low density residential dwelling units, c) 62 acres of agricultural/recreation uses involving a combination of vineyards, a visitor's center, public trails, and an extension of a golf course from an adjacent parcel. The King South Ranch is also identified on the Land Use Element of the City of Pismo Beach General Plan for the following uses: an 18 to 27 hole golf course, a clubhouse, restaurant and other recreational uses (tennis courts, sports facilities, trails, etc.). As of the preparation of this document, the vineyards have been planted.

On-site topography ranges from steep slopes and hillsides that generally run parallel to Price Canyon Road. These heavily-wooded north- and west-facing slopes contain dense oak woodland habitat. Lower elevations of the site contain stands of oaks, sycamores, cottonwoods, eucalyptus and other large tree species. Gently sloping to flat areas contain sage scrub, chaparral, and native grassland vegetation.

The April 2002 Sphere of Influence Update for the City of Pismo Beach concluded that the Spanish Springs Ranch would be an appropriate addition to the City's Sphere of Influence to provide orderly planning and expansion of the community.

8.2.2 Tract Map #2554 (PVP Investments)

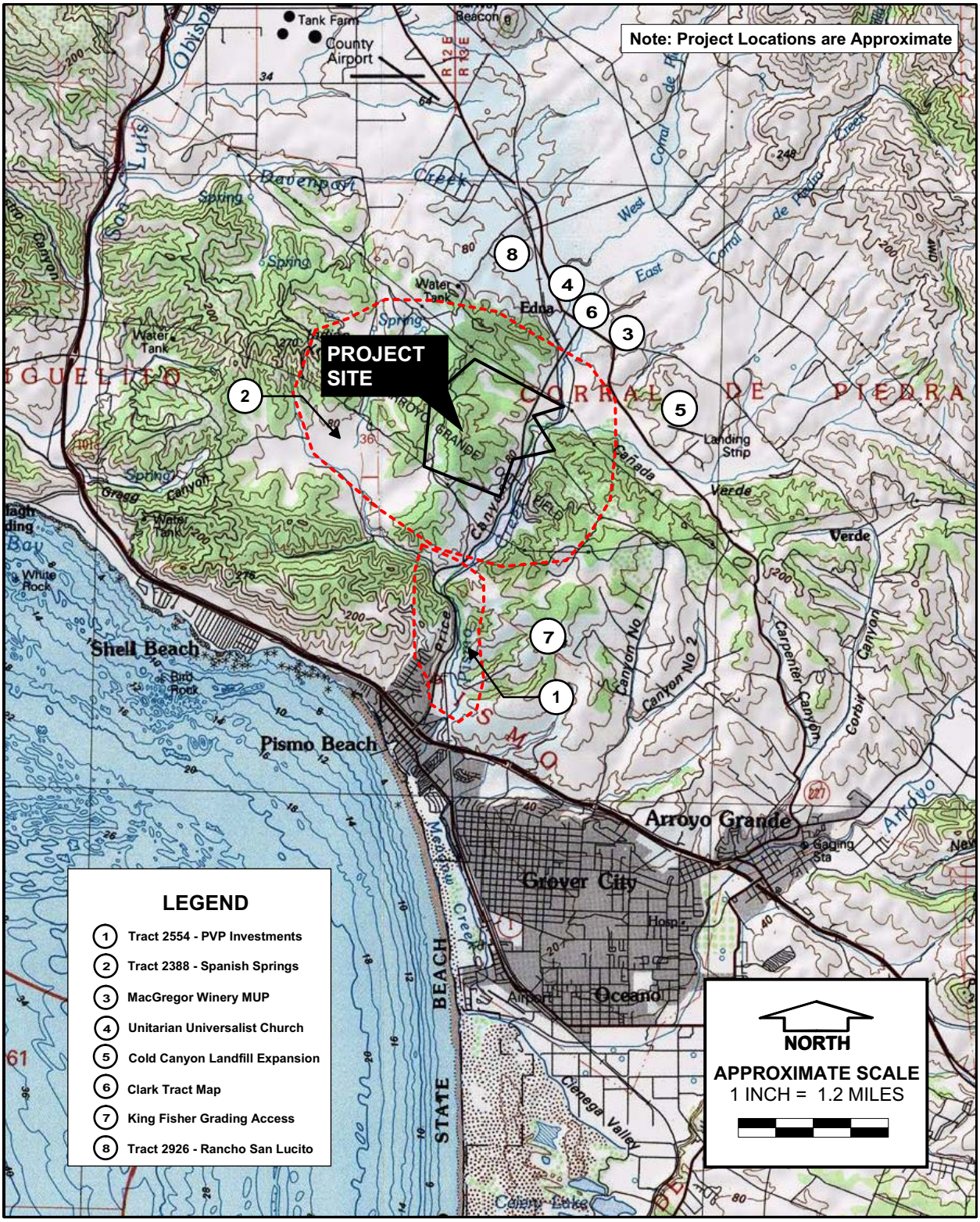
This project involves the subdivision of a 1,022-acre site into sixteen lots ranging in size from 20.0 acres to 28.7 acres, an agricultural lot of 470 acres and a remainder parcel of 204 acres, including construction of roads, and water storage tank. The property is located in the County of San Luis Obispo on the west side of Price Canyon Road, approximately ½-mile north of the City of Pismo Beach (see Figure 8-1). The project was approved by the SLOPC on April 19, 2002 and has been since annexed into the City of Pismo Beach.

Potential impacts include impacts to visual resources, biological resources, cultural resources, and traffic.

8.2.3 Additional Projects

Other projects located in the vicinity of the Arroyo Grande Oil Field include the following (see Figure 8-1):

- MacGregor Winery MUP (Approved);
- Unitarian Universalist Church on Highway 227 (Approved);
- Cold Canyon Landfill Expansion and fill material project (In process);
- Clark Tract Map – 8 lots (On hold);
- King Fisher Grading for emergency access (In process);
- Tract 2926 – Rancho San Lusito 11 Lots (Received); and,



Source: TOPO! c 2001 National Geographic Holdings (www.topo.com)

padre associates, inc.
ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS

CUMULATIVE PROJECTS MAP

FIGURE 8-1

8.3 Impact Analysis

Implementation of the Spanish Springs and PVP Investments projects would result in the development of a cumulative total of 1,492 acres. New development will affect a number of resources, most notably biological resources, air quality, hydrology/water quality, noise, and visual resources. The cumulative effects of these projects are detailed in each resource chapter.

Although the additional projects listed in Section 8.2.3 would have less of a cumulative impact with the proposed project than the projects noted above, they are located within the watershed; thus, there would be a minor, but cumulative impact - most likely to biological resources and hydrology/water quality.

Because implementation of the proposed project would facilitate build-out of the Phase IV Expansion Plan, the cumulative impacts likely to have the greatest long-term impacts include air quality, biological resources, and hydrology/water quality.

THIS PAGE LEFT INTENTIONALLY BLANK

CHAPTER 9.0
RESPONSE TO COMMENTS

Comments from the following individuals, organizations and governmental agencies listed below were received on the Draft EIR. The Response to Comments Matrix is contained in Appendix G, along with copies of the letters with individually numbered comments

Private Organizations

1. Plains Exploration and Production (PXP)
2. Central Coast Salmon Enhancement
3. Hollister & Brace Law Corporation (on behalf of PXP)

Governmental Agencies

4. San Luis Obispo Air Pollution Control District
5. California Regional Water Quality Control Board

THIS PAGE LEFT INTENTIONALLY BLANK

CHAPTER 10.0
REPORT PREPARERS

The following persons were responsible for the preparation of this Public Draft SEIR:

San Luis Obispo County

Jeff Oliveira, Planning and Building Department
Murry Wilson, Planning and Building Department

Padre Associates, Inc.

Simon Poulter (Principal-in-Charge)
Eric Snelling (San Luis Obispo Office Manager)
Matt Ingamells (Quality Control/Quality Assurance)
Brian Dugas (Project Manager)
Rob Linn (Assistant Project Manager)
Jessica Peak
Ken Gilliland
Chris Santala
Scott Santala

HydroTerra Consulting (Steelhead Survey and Habitat Assessment)

Freddy Otte

MapSmith (GIS Graphics)

Andrea Miller

THIS PAGE LEFT INTENTIONALLY BLANK