5.0 Other CEQA Considerations

This section discusses additional topics statutorily required by the California Environmental Quality Act (CEQA), including growth-inducing impacts, significant irreversible environmental changes, and energy use (CEQA Guidelines Appendix F analysis).

5.1 GROWTH-INDUCING IMPACTS

INTRODUCTION

CEQA Guidelines Section 15126.2(d) requires that an environmental impact report (EIR) evaluate the growth-inducing impacts of a proposed action. A growth-inducing impact is defined by State CEQA Guidelines Section 15126.2(d) as follows:

> *...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 which would remove obstacles to population growth... Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also...the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.*

A project can have direct and/or indirect growth inducement potential. Direct growth inducement would result if a project, for example, involved construction of new housing. A project would have indirect growth inducement potential if it established substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it would involve a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand. Similarly, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. For example, a project providing an increased water supply in an area where water service historically limited growth could be considered growth inducing.

The State CEQA Guidelines further explain that the environmental effects of induced growth are considered indirect impacts of the proposed action. These indirect impacts or secondary effects of growth may result in significant, adverse environmental impacts. Potential secondary effects of growth include increased demand on other community and public services and infrastructure, increased traffic and noise, and adverse environmental impacts such as degradation of air and water quality, degradation or loss of plant and animal habitat, and conversion of agricultural and open space land to developed uses.

The guidelines state that it is not assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment (State CEQA Guidelines Section 15126.2(d)). However, growth inducement may constitute an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Local land use plans provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by adequate urban public services, such as water supply, roadway infrastructure, sewer service, and solid waste service. A project that would induce "disorderly" growth (growth that conflicts with local land use plans) could indirectly cause additional adverse environmental impacts and other public services impacts. Thus, to assess whether a growth-inducing project would result in adverse secondary effects, it is important to assess the degree to which the growth accommodated by a project would or would not be consistent with applicable land use plans.

COMPONENTS OF GROWTH

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.

PROJECT-SPECIFIC GROWTH-INDUCING IMPACTS

Growth Inducement Potential

While the implementation of this Program would contribute to energy supply, which indirectly supports population growth, the proposed development of projects associated with the Renewable Energy Streamlining Program (RESP or Program) is a response to the state's need for renewable energy to meet its Renewables Portfolio Standard. Unlike a gas-fired power plant, projects associated with this program EIR are not being developed as a source of baseload power in response to growth in demand for electricity. The power generated would be added to the state's electricity grid with the intent that it would displace fossil fuel–based power plants and their associated environmental impacts, consistent with the findings and declarations in Senate Bill 2 (2011) that a benefit of the Renewables Portfolio Standard is displacing fossil fuel consumption in the state. In addition, the RESP is also consistent with the County's EnergyWise Plan's renewable rnergy goals to increase the production of renewable energy from small- and commercial-scale energy installations.

Implementation of the RESP would supply energy to accommodate and support existing demand and projected growth, but it would not foster any new growth because (1) the additional energy would be used to ease the burdens of meeting existing statewide energy demands within and beyond the area of the project; (2)displace energy demand currently met by fossil fuels; and (3) the factors affecting growth are so diverse that any potential connection between additional energy production and growth would necessarily be too speculative and uncertain to merit further analysis.

Additionally, RESP implementation would not involve the development of any new roadways, water systems, or sewer; thus, the projects would not further facilitate additional development. Therefore, infrastructure improvements to serve each of the projects approved in association with the RESP are limited and would not be available to serve surrounding areas. In fact, Tier 1 solar electric facilities (SEF) and wind energy conversion systems (WECS) projects would be located on existing developed land uses zoned for development, and Tier 2 and Tier 3 SEF projects would be located in urban areas (vacant or non-vacant) on land uses designated as Commercial (CS) or Industrial (IND). While this document has considered that SEF and WECS projects might foster regional growth, the particular growth that could be attributed to these projects is unpredictable, given the multitude of variables at play, including uncertainty about the nature, extent, and location of growth and the effect of other contributors to growth besides the RESP. However, despite these uncertainties, the RESP is not considered to be growth-inducing since the overall goal of the program helps to achieve the County's renewable energy goals that implement statewide energy goals.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Public Resources Code Section 21100(b)(2), a part of CEQA, requires that certain EIRs include a discussion of significant irreversible environmental changes of project implementation. State CEQA Guidelines Section 15126.2(c) describes irreversible environmental changes 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 non-use 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.*

NONRENEWABLE RESOURCES

Energy resources needed for the construction of projects associated with RESP implementation would contribute to the incremental depletion of nonrenewable resources. Nonrenewable resources such as steel, copper, lead and other metals, gravel, concrete, and other materials are typically considered finite and would not be replenished over the lifetime of each of the projects associated with implementation of the Program. Thus, implementation of the RESP would irretrievably commit resources over the anticipated life span of the projects associated with the program. However, during decommissioning, some of these resources (i.e., steel, concrete, etc.) can be recycled or reclaimed for other uses and as such, would be renewable to a certain degree.

5.3 ENERGY USE

In order to ensure that energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (see Public Resources Code Section 21100(b)(3)). According to Appendix F of the State CEQA Guidelines, the goal of conserving energy implies the wise and efficient use of energy including:

1. **Decreasing overall per capita energy consumption** by creating afforded streamline permitting for renewable energy projects.

2. **Decreasing reliance on natural gas and oil** by increasing the production of renewable energy from small- and commercial-scale energy installations to account for 10 percent of total local energy by 2020.

3. **Increasing reliance on renewable energy sources** by providing a clear process and expectations for renewable energy projects in suitable locations that minimize environmental impacts.

Implementation of the RESP would help achieve these goals because it would develop a renewable source of power, helping to offset the use of nonrenewable resources and contribute to an overall reduction of nonrenewable resources currently used to generate electricity. In addition, Section 3.7, Greenhouse Gases and Climate Change, describes effects on climate change/greenhouse gas emissions that would be caused by implementation of the RESP, including a discussion on the effects of the projects on energy resources.