

5 OTHER CEQA REQUIREMENTS

In accordance with Section 15126 of the State CEQA Guidelines, all aspects of a project should be considered when evaluating its impacts on the environment, including planning, acquisition, development, and operation. As part of the analyses, this chapter of the DEIR identifies the following components that are referred to collectively as other CEQA requirements:

- ▶ Growth-Inducing Impacts (Section 5.1);
- ▶ Significant Irreversible Environmental Changes (Section 5.2); and
- ▶ Significant and Unavoidable Environmental Effects (Section 5.3).

5.1 GROWTH-INDUCING IMPACTS

5.1.1 GROWTH-INDUCING IMPACTS—INTRODUCTION

CEQA (State CEQA Guidelines, Section 15126.2[d]) requires an examination of the direct and indirect impacts of a proposed project, including the potential of the project to induce growth leading to changes in land use patterns, population densities, and related impacts on environmental resources. Specifically, CEQA states that the EIR shall:

[d]iscuss 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 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 the construction of new facilities that could cause significant environmental effects. Also discuss characteristics of some projects that 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. Indirect growth inducement would result if, for instance, implementing a project resulted in any of the following:

- ▶ substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- ▶ a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new temporary employment demand; 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) or adding development adjacent to undeveloped land.

Growth inducement itself is not an environmental impact, but it may lead to foreseeable environmental impacts. These environmental impacts may include increased demand on other community and public services and

infrastructure, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or wildlife habitats, or conversion of agricultural and open space land to urban uses.

5.1.2 GROWTH-INDUCING IMPACTS OF THE PROJECT

A project could result in growth-inducing impacts if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public utility or service. Development of the project would contribute to a diversified statewide energy portfolio that would assist the state in meeting renewable energy requirements. The project would install up to 60 utility-scale wind turbine generators with a nameplate generating capacity (theoretical maximum energy generation) of 155 megawatts, which would be delivered to the Pacific Gas and Electric Company transmission grid. The project applicant is proposing to develop and operate the project in response to projections of growth in energy demand on a statewide basis. Rather than removing an obstacle to growth, it is a response to market demand driven in part by state policy, which calls for an expanded statewide portfolio of renewable energy sources that must account for 50 percent of California's electrical load by 2030 and 100 percent of retail sales of electricity by 2045. Renewable energy generated by project operation would be accepted into the state's energy transmission system and sold in the bulk power market to meet existing and future demands. Therefore, the renewable energy generated by the project would not result in any growth-inducing impacts.

Project implementation would generate direct demand for approximately 300 construction workers for 12–18 months. The total labor force in Humboldt County was approximately 63,050 people in 2017. The unemployment rate was 4.2 percent. In the county, an estimated 1,930 people are employed in the construction trades, which is approximately 4 percent of the total employed workforce in all industries. Based on the pool of residents who are employed in the construction industry, project construction is not anticipated to induce substantial population growth. Furthermore, if workers from outside the region are employed for project construction, the temporary nature of the work would be unlikely to induce nonlocal workers to relocate permanently. Up to 15 operations and maintenance (O&M) staff would be employed for an estimated 30 years; thus, project operations would not require sizeable numbers of new O&M workers from outside the county because demand would be minimal. Therefore, the project would not generate sufficient jobs during either construction or operations to foster population growth in Humboldt County or nearby communities.

The project would not induce substantial population growth indirectly through the extension of roads or other infrastructure. The project would rely on an existing network of logging roads to provide permanent access to the wind turbine generator pads and ancillary facilities. Improvements to the logging roads are intended to support transport of large project components to the site and allow for ongoing O&M over the project's lifespan. These roadway improvements would not create a new point of access to an area that was previously inaccessible, and they would not be available for use by the public. In addition, the project would not construct new wastewater or water infrastructure that would serve uses outside the project boundary. New stormwater drainage facilities would be limited to improvements at road crossings to stabilize the drainage channels for use by heavy trucks, and at turbine pads to direct runoff away from turbine foundations. The project would not alter the existing site drainage patterns of the project area.

5.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA requires a discussion of the significant irreversible environmental changes that would be caused by project implementation (State CEQA Guidelines, Section 15126.2[c]).

The irreversible and irretrievable commitment of resources would be the permanent loss of resources for future or alternative purposes. Irreversible and irretrievable resources would be those that could not be recovered or recycled, or that would be consumed or reduced to unrecoverable forms. Implementing the proposed project would result in the irreversible and irretrievable commitment of energy and material resources during project construction and maintenance, including:

- ▶ energy expended in the form of electricity, gasoline, diesel fuel, and oil for construction equipment and transportation vehicles that would be needed for project construction and O&M;
- ▶ construction materials, including such resources as soil and rocks;
- ▶ commitment of land area to new/expanded project facilities; and
- ▶ uses in which irreversible damage would result from any potential environmental accidents associated with the project.

Energy used during project construction would be expended in the form of electricity, gasoline, and diesel fuel, which would be used primarily by construction equipment, trucks delivering equipment and supplies to the site, and construction workers driving to and from the site. No unusual project characteristics would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the county. Therefore, fuel consumption during project construction is not expected to be more inefficient, wasteful, or unnecessary than fuel consumption at similar construction sites in the region.

Other nonrenewable and slowly renewable resources that would be consumed because of project development would include lumber and other forest products, sand and gravel, concrete, petrochemical construction materials, and water. The use of these nonrenewable resources is expected to account for only a small portion of the region's resources.

The project would convert forestland and require the commitment of a small amount of grazing land. This conversion would represent a long-term commitment of land to another land use for the lifetime of the project (i.e., 30 years); however, it would not be irreversible because the project area could be restored to its preproject conditions and uses after decommissioning.

The project would not result in irreversible damage from environmental accidents, such as an accidental spill or explosion of a hazardous material. During construction and operations, equipment would use various types of fuel and materials classified as hazardous. In California, various state, regional, and local agencies strictly regulate and enforce the storage and use of hazardous substances to prevent impacts related to environmental accidents. Project construction would not require the use of unusual amounts or types of hazardous materials that could be accidentally released and cause irreversible damage.

5.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15216.2(b) of the State CEQA Guidelines requires an EIR to discuss any significant environmental impacts that could not be avoided if the project were implemented.

Chapter 3, “Environmental Setting, Impacts, and Mitigation Measures,” of this DEIR presents a detailed analysis of all significant and potentially significant environmental impacts of the proposed project; identifies feasible mitigation measures, where available, that could avoid or reduce these impacts; and identifies whether these mitigation measures would reduce these impacts to less-than-significant levels. Chapter 4, “Cumulative Impacts,” of this DEIR identifies the significant cumulative impacts that would result from the combined effects of the proposed project and related projects.

If a specific impact identified in either of these chapters could not be fully reduced to a less-than-significant level, it would be significant and unavoidable. The project-level and cumulative impacts listed below would be significant and unavoidable.

SECTION 3.2, “AESTHETICS”

- ▶ **Impact 3.2-1:** Project Impacts on Scenic Vistas and Potential for Substantial Degradation of Existing Visual Character or Quality of Public Views of the Site and Surroundings
- ▶ **Impact 3.2-3:** New Source of Substantial Light or Glare that Would Adversely Affect Day or Nighttime Views in the Area

SECTION 3.4, “AIR QUALITY”

- ▶ **Impact 3.4-1:** Short-Term, Construction-Generated Emissions of ROG, NO_x, and PM₁₀

SECTION 3.5, “BIOLOGICAL RESOURCES”

- ▶ **Impact 3.5-2:** Operational Impacts on Marbled Murrelet
- ▶ **Impact 3.5-11:** Operational Impacts on Raptors

SECTION 3.6, “CULTURAL RESOURCES, INCLUDING TRIBAL CULTURAL RESOURCES”

- ▶ **Impact 3.6-3:** Change to the Significance of a Historical Resource
- ▶ **Impact 3.6-4:** Change to the Significance of a Tribal Cultural Resource

CUMULATIVE IMPACT AREAS

- ▶ Air Quality
- ▶ Biological Resources
- ▶ Cultural Resources, Including Tribal Cultural Resources