

5 SIGNIFICANT EFFECTS AND GROWTH INDUCING IMPACTS

Section 15126 of the State CEQA Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the PEIR must also identify the following: 1) significant environmental impacts that cannot be avoided if the project is implemented, 2) significant irreversible environmental changes that would result from implementation of the project, and 3) growth-inducing impacts of the project. Although growth inducement itself is not considered an environmental effect, it could potentially lead to foreseeable physical environmental effects, which are discussed under "Growth-Inducing Effects" below.

5.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE CalVTP

Public Resources Code (PRC) Section 21100(b)(2)(A) directs that an EIR shall include a detailed statement setting forth "in a separate section: any significant effect on the environment that cannot be avoided if the project is implemented." Accordingly, this section provides a summary of significant environmental impacts of the CalVTP that cannot be mitigated to a less-than-significant level.

Section 2.7 of Chapter 2, "Program Description," presents the SPRs for the CalVTP. The SPRs will be incorporated by CAL FIRE or other project proponent into all proposed vegetation treatments seeking to qualify for coverage under the CalVTP as a standard part of treatment design and implementation. SPRs would be implemented for all treatments to the extent they are applicable, analogous to standard operating procedures or best management practices. SPRs are intended to avoid and minimize environmental impacts and, in some cases, promote compliance with applicable laws and regulations. For some environmental resources in specific locations or circumstances, there may be residual impacts that cannot be adequately avoided or minimized with implementation of SPRs. Chapter 3, "Existing Environmental Setting, Impacts, and Mitigation," provides a description of the potential environmental impacts of the CalVTP, implementation of applicable SPRs, and includes various mitigation measures to reduce residual impacts, to the extent feasible. Chapter 4, "Cumulative Effects Analysis," determines whether the incremental effects of the CalVTP are significant when viewed in connection with the effects of past, present, and probable future projects and programs. After implementation of SPRs and mitigation measures, most of the impacts associated with the CalVTP would be reduced to a less-than-significant level.

The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available or the mitigation measures available were not enough to reduce the impact to a less-than-significant level. It is reasonably anticipated that the majority of qualifying treatments under the CalVTP would result in less-than-significant impacts or impacts that can be reduced to less than significant with implementation of mitigation. However, in some cases (e.g., Air Quality, Greenhouse Gas Emissions and Utilities), impacts are described as significant and unavoidable, even though the potential exists for impacts to be less than significant, because of uncertainty related, in part, to predicting future wildfire occurrence, evolving research and development related to carbon sequestration rates and the solid organic waste processing industry, among other factors pertaining to a long-term and unprecedented increase in the pace and scale of vegetation treatments in California. Note, this is only a summary of potentially significant and unavoidable impacts; it is important to review the discussions in Chapters 3 and 4 of this PEIR to understand the full context of the impact significance determinations.

Implementation of the CalVTP would result in the following significant unavoidable environmental impacts after implementation of feasible mitigation measures:

- ▶ Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type
- ▶ Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS

- ▶ Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk
- ▶ Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning
- ▶ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications
- ▶ Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources
- ▶ Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource
- ▶ Impact GHG-2: Generate GHG Emissions through Treatment Activities
- ▶ Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP
- ▶ Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity

Cumulative impacts for the issues listed above would also be significant and unavoidable (cumulatively considerable) as a result of implementation of the CalVTP.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the project. Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, because 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.

Generally, a project would result in significant irreversible environmental changes if:

- ▶ the primary and secondary impacts would generally commit future generations to similar uses;
- ▶ the project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project;
- ▶ the project would involve a large commitment of nonrenewable resources; or
- ▶ the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

The CalVTP would include implementation of the treatment activities described in Chapter 2, "Program Description," which include various methods of treating vegetation to reduce wildfire risk. Vegetation removal is generally a temporary change, and the CalVTP would not include any changes to land use or construction of any structures that would commit future generations to similar uses. The CalVTP would not involve any construction that would use nonrenewable resources. Energy would be consumed for implementation of the CalVTP in the form of fossil fuel (e.g., diesel and other petroleum fuels) combustion in the engines of vehicles and equipment that would be used for vegetation removal. However, as discussed in Section 3.9, "Energy Resources," the CalVTP would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources. For these reasons, the CalVTP would not result in significant irreversible environmental changes.

5.3 GROWTH-INDUCING EFFECTS

CEQA specifies that growth-inducing impacts of a project must be addressed in an EIR (Public Resources Code Section 21100[b][5]). Specifically, the State CEQA Guidelines (Section 15126.2[d]) states that the EIR shall discuss 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. Included in this analysis are projects that would remove obstacles to population growth (e.g., 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, the EIR should discuss the characteristics of the project 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 inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- ▶ substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- ▶ substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; and/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).

The State CEQA Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth. Therefore, for purposes of this PEIR, to reach the conclusion that a project is growth-inducing as defined by CEQA, the PEIR must find that the CalVTP would foster (i.e., promote or encourage) growth in economic activity, population, or housing, regardless of whether the growth is already approved by and consistent with local plans. The conclusion does not determine that induced growth is beneficial or detrimental, consistent with the State CEQA Guidelines (Section 15126.2[d]).

Environmental effects resulting from induced growth fit the CEQA definition of “indirect” effects in the State CEQA Guidelines (Section 15358[a][2]). These indirect or secondary effects of growth may result in significant environmental impacts. CEQA does not require that the EIR speculate unduly about the precise location and site-specific characteristics of significant, indirect effects caused by induced growth, but a good-faith effort is required to disclose what is feasible to assess. Potential secondary effects of growth could include consequences – such as conversion of open space to developed uses, increased demand on community and public services and infrastructure, increased traffic and noise, degradation of air and water quality, or degradation or loss of plant and wildlife habitat – that are the result of growth fostered by the project.

5.3.1 Growth-Inducing Effects of the CalVTP

The most recent projections by California Department of Finance indicate that the state’s population is expected to grow by 28 percent over the next 40 years. Seven counties are anticipated to grow by over 50 percent, including Imperial County in the south; Kern, Madera, Merced, San Joaquin, and Yolo Counties in the central valley; and Placer County spanning from the central valley into the Sierra Nevada (see Table 3.12-3 in Section 3.12, “Land Use and Planning, Population and Housing”) (DOF 2018a, 2018b).

As noted in Section 3.12, “Land Use and Planning, Population and Housing,” CAL FIRE currently has an estimated 110 employees implementing vegetation treatment projects throughout the state. These employees are typically not dedicated solely to vegetation treatment and may work on other projects or tasks for CAL FIRE; however, achieving the identified treatment acreage target under the CalVTP would require dedicated vegetation treatment crews. Vegetation treatments associated with CalVTP would be implemented by a number of different entities including the 21 CAL FIRE Units throughout the state, six contract counties; other state, regional, and local agencies with land management or ownership authority; and Fire Safe Councils or other non-governmental organizations. Staff for

vegetation treatments are provided by these entities and others, including from Resource Conservation Districts, California Conservation Corps (CCC), local fire districts, and local contractors.

The increase in pace and scale of vegetation treatments that would occur with implementation of CalVTP would increase the number of people employed across the state to conduct treatment activities. It is anticipated that the majority of employment demand, especially for project proponents other than CAL FIRE, would be seasonal. CAL FIRE estimates that the number of CAL FIRE employees implementing vegetation treatment projects could double and add approximately 110 new employees under the scenario where approximately 250,000 acres are treated per year. This would result in an average of five new employees within each CAL FIRE Unit.

As shown in Table 3.12-5 in Section 3.12, "Land Use and Planning, Population and Housing," the statewide unemployment rate is 4.8 percent. The unemployment rate for individual counties in California ranges between 2.7 percent in San Mateo County to 19.1 percent in Imperial County. More than half of the counties in the state have unemployment rates that exceed the statewide unemployment rate. For the purposes of this PEIR, an increase in permanent employment demand would also result in an increase in population growth. A substantial increase in population growth would likely necessitate the construction of housing or other infrastructure to support the population increase; this construction could cause physical environmental effects. Any new housing or infrastructure would be required to undergo project-level environmental review to assess environmental effects. Employee demand could be met by residents near treatment activities or could result in some people relocating to those areas where treatment activities would occur. However, because of the location of these entities (e.g., CAL FIRE Units, CCC crews, local contractor crews) and treatment activities would be dispersed within the state, implementation of the CalVTP would not result in substantial demand for permanent employment in any one area. Thus, the increase in employment needs for CalVTP would not induce substantial population growth.

The state also has allocated budget to expand and improve residential bed space for CCC members and includes plans for three new CCC residential centers and renovation of the Fortuna residential center. The state's plans to increase vegetation treatment staff capacity and residential capacity could meet the needs for additional vegetation treatment employees generated by the proposed CalVTP. Any new residential facilities would be required to undergo project-level environmental review to assess environmental effects. The project-level review for future residential facilities may identify significant impacts and mitigation measures and significant and unavoidable impacts.

Growth in an area may also result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., water service), while planning impediments may include restrictive zoning and/or land use designations. The CalVTP would not include any changes to land use or zoning and would not include construction of any infrastructure (e.g., roads, water distribution, wastewater and drainage collection, and energy distribution). Therefore, there is no potential for the CalVTP to induce growth as a result of land use changes or removing obstacles to growth by expanding facility capacity.

In summary, implementation of the CalVTP would increase the number of employees implementing vegetation treatments. However, because the increase in demand would be dispersed within the state there would not be specific areas that would experience a substantial increase in demand for vegetation treatment employees, it is expected that the demand could be met by existing residents in the vicinity of where treatments would occur. Therefore, the CalVTP would not induce substantial direct or indirect growth.