

## 6 CEQA-REQUIRED ASSESSMENT CONCLUSIONS

This chapter provides an overview of the impacts of the proposed project based on the technical analyses presented in Chapters 4 and 5 of the Supplement to the DEIR. The topics covered in this chapter include growth inducement, unavoidable significant impacts and significant irreversible changes. A more detailed analysis of the effects the proposed project would have on the environment is provided in Chapter 4 of this document. Project alternatives are summarized in Chapter 5 of this Supplement to the DEIR.

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss the ways 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.

This Supplement to the DEIR includes analysis of a new project component that would transfer water from the Sacramento River Delta to the proposed project site. In order to provide value to either the City of American Canyon or the City of Napa, or both, for their services in conveying water from the delta to the project site, the project applicant has obtained an option to acquire water rights that would yield water in excess of the demands of the Napa Pipe project that could be used by the cities within their respective water service areas. Such water supplies could be used by the cities to increase the reliability of their respective portfolios of water sources in light of declining reliability of their State Water Project and other water entitlements. In addition, both cities have identified deficiencies in their water supplies to serve existing levels of development in their respective water service areas. For this reason, it is reasonable to assume that the water made available to either city would be used to increase reliability and reduce costs, and not necessarily to facilitate additional growth, as discussed further below.

### *A. Growth Inducement*

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indi-

rectly, in the surrounding environment. Typical growth inducing factors might be the extension of urban services or transportation infrastructure to a previously unserved or under-served area, or the removal of major barriers to development. This section evaluates the potential of the changes proposed to the project to create such growth inducements. It should be noted that not all growth inducement is negative. Negative impacts associated with growth inducement occur only where the project growth would cause adverse environmental impacts.

#### **1. Population Generation**

The 2009 DEIR includes a discussion of population generation as it relates to the construction of new residential dwelling units, and an estimated population of approximately 5,901 persons. Additionally, the 2009 DEIR states that growth under the proposed project could have positive environmental impacts by reducing the need of workers to commute into the county, thereby reducing associated traffic and energy consumption impacts, as well as criteria air pollutant emissions.

Increased water supply and the construction of a new water supply pipeline could indirectly induce growth if the addition of water service facilitated the permitting and construction of new homes and businesses that are not proposed as part of the project. The applicant plans to acquire water right that would yield an average of 2,160 acre-feet per year (AFY) of surface water, which exceeds the amount of water needed to meet the project's expected demand of 620 AFY. By importing surface water to the project site, the project could make groundwater resources available for agricultural uses off site and/or provide surplus or substitute surface water supplies to the City of American Canyon or the City of Napa. (The applicant has specifically precluded the possibility that groundwater would be provided to support existing or proposed urban uses outside of the project site. If surplus or substitute water is supplied to either or both of the Cities, it would be imported surface water.)

In allowing additional water supplies to be provided to one or more of the cities, the need for other water to be imported to support City users would be

reduced. Both cities have identified deficiencies in their water supplies to serve existing levels of development in their respective water service areas, and both cities have General Plans and growth boundaries that delineate the amount and location of planned growth within their jurisdictions. For these reasons, it is likely that additional water supplies will be used to improve reliability of existing services, reduce the cost to existing users (i.e. by making a less expensive water supply available that is currently available), and to support growth that is already planned and accounted for within local general plans and regional growth projections.

## **2. Improvements to Transportation Infrastructure**

As discussed in the 2009 DEIR, several mitigation measures recommended in Section 4.3, Traffic and Transportation, of the 2009 DEIR would, if implemented, result in modifications to existing intersections or roadway segments in the County's transportation network. However, these changes would be made to existing facilities and would not result in the extension of new roadways into undeveloped portions of the County. As a result, they are not expected to induce growth.

## **3. Employment Generation**

Development under the proposed project would generate some construction-related employment opportunities. The project's labor force would be expected to be primarily local. Given the number of workers with applicable skills who reside in Napa County and other adjacent counties, it is unlikely that a substantial number of construction workers would relocate to Napa County to work on the proposed project. Thus the proposed project would not be considered growth-inducing from an employment perspective.

### ***B. Unavoidable Significant Impacts***

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Chapter 6 of 2009 DEIR includes a list of the impacts for the proposed project that were found to be significant and un-

avoidable, including Impact PEH-1, Impact TRA-1, Impact TRA-19, Impact AQ-1, Impact AQ-3, Impact CULT-1 and Impact GHG-1. This Supplement to the DEIR results in the addition of one significant and unavoidable air quality impact related to NO<sub>x</sub> emissions during the remediation and grading phase of the project (Impact AQ-2), based on a reevaluation of air pollutant emissions during construction, as required by the revised guidelines promulgated by the Bay Area Air Quality Management District (BAAQMD). Mitigation has been included to address this temporary impact, but it is unclear whether the mitigation is desirable or feasible from a public policy perspective, and the NO<sub>x</sub> emissions are therefore considered *significant and unavoidable*.

Similarly, this Supplement to the DEIR includes a reevaluation of greenhouse gas (GHG) emissions impacts based on new thresholds adopted by BAAQMD. Although the updated analysis of GHG emissions in this Supplement to the DEIR indicates that the project would not result in emission in excess of BAAQMD's per capita threshold, Impact GHG-1 (discussed in the 2009 DEIR, and included in the list above) is still considered a significant and unavoidable impact because the project's emissions would be considerable, and would make it much more difficult for the County to reduce community-wide emissions to 1990 levels by 2020, as called for in the General Plan.

### *C. Significant Irreversible Changes*

Section 15126.2(c) of the CEQA Guidelines requires an EIR to discuss the extent to which a proposed project would commit nonrenewable resources to uses that future generations would probably be unable to reverse. The 2009 DEIR discussed the following three CEQA-required categories of irreversible changes.

#### **1. Changes in Land Use that Commit Future Generations**

The 2009 DEIR states that the proposed development would be located on land that has historically been used for heavy industrial uses since the 1930s.

Once the site is remediated and developed as proposed, it would not be feasible to return it to its existing (pre-project) condition. As such, future generations of residents and visitors to the site and areas in proximity to it would be committed to the proposed change in land use for the foreseeable future.

The new project components discussed in this Supplement to the DEIR include the construction and operation of a water supply pipeline and a treated wastewater pipeline. Similar to the project site, after construction is complete, it would not be feasible to return a pipeline alignment to its pre-project condition.

## **2. Irreversible Damage from Environmental Accidents**

Potential environmental accidents of concern include those that would have adverse effects on the environment or public health due to the nature or quantity of material released during an accident and the receptors exposed to that release.

The 2009 DEIR provides a discussion regarding site remediation, demolition, handling of contaminated material, construction and operation of the project. The 2009 DEIR concludes that because activities would be monitored by County, State and federal agencies, and would follow professional industry standards for safety and construction, the project would not pose a substantial risk of environmental accidents. Because the new project components would be incorporated as part of the project, the same standards would apply to the construction and operation of the new project components. As a result, the project would not pose a substantial risk of environmental accidents.

## **3. Large Commitment of Nonrenewable Resources**

Construction and ongoing maintenance of the proposed project would irreversibly commit some materials and non-renewable energy resources. Materials and resources used would include, but are not limited to, nonrenewable and limited resources such as oil, gasoline, sand and gravel, asphalt, and steel. These materials and energy resources would be used for remediation, grading, infrastructure development, transportation of people and goods, and utilities. During the operational phase of the project (post-construction), energy

sources including oil and gasoline would be used for construction, lighting, heating, and cooling of residences, and transportation of people within, to, and from the project site.

Section 4.7, Greenhouse Gas Emissions, of the 2009 DEIR explains that the proposed project includes features that would reduce its amount of energy demand over the long-term. In addition, as identified in Section 4.7, several mitigation measures are recommended for inclusion as part of the project that would serve to further reduce long-term energy demand. This Supplement to the DEIR updates the discussion of GHG emissions based on updated thresholds issued by BAAQMD. Based on new modeling techniques that provide a more refined calculation of GHG emissions, the project is not expected to result in emissions in excess of the BAAQMD's per capita threshold. However, as identified in the 2009 DEIR, energy usage by new development under the proposed project would result in the overall increased use of nonrenewable resources. Overall, the implementation of the proposed project would require a large commitment of nonrenewable resources, and this represents a significant irreversible environmental change.