

---

## 5.0 Other CEQA Considerations

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. The environmental impact report (EIR) must discuss (1) significant environmental effects of the proposed project and mitigation measures proposed to minimize the significant effects, (2) significant environmental effects that cannot be avoided if the proposed project is implemented, (3) significant irreversible environmental changes that would result from implementation of the proposed project, (4) growth-inducing impacts of the proposed project, and (5) alternatives to the proposed project. The EIR shall also contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR CEQA Guidelines Section 15128).

This chapter summarizes the significant environmental effects that cannot be avoided if the project is implemented (i.e., significant unavoidable impacts). It also addresses growth inducement and whether significant irreversible environmental changes of the project are required to be evaluated. An evaluation of the significant environmental effects of the Proposed Project, applicable mitigation measures, the level of impact significance before and after mitigation, and evaluation of cumulative impacts, is provided in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures. Chapter 4, Alternatives, addresses alternatives to the proposed project.

### 5.1 Effects Not Found to Be Significant

The Initial Study prepared as part of the Notice of Preparation (NOP) identified several topics that were not expected to result in a significant impact. These topics identified in the Initial Study were not discussed in scoping comments received by the lead agency, and are not further evaluated in the EIR. These topics include:

- **Agricultural Resources.** The project sites do not contain farmland, nor are they subject to a Williamson Act contract or zoned for agricultural uses. Project sites do contain oak woodlands, which are discussed as part of biological resources. Project Design Features applicable to Sustainable Forest Management Projects expressly preclude any conversion of forest land to non-forest use.
- **Mineral Resources.** The project sites are not identified as having state or regionally important mineral resources. Sustainable Forest Management Projects are temporary and have no effect on the availability of mineral resources.

### 5.2 Significant and Unavoidable Impacts

The CEQA Guidelines require a description of any significant impacts, including those that can be mitigated but not reduced to a level of insignificance (Section 15126.2[c]). Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described. This EIR identified significant unavoidable impacts to Air Quality, Greenhouse Gas Emissions, and Transportation. These impacts are listed below.

Impact AQ-1: The project would conflict with or obstruct implementation of the applicable air quality plan.

- Impact AQ-2: The project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- Impact AQ-3: The project would potentially expose sensitive receptors to substantial pollutant concentrations.
- Impact GHG-1: The project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- Impact GHG-2: The project would potentially conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
- Impact TRF-2: The project would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

## 5.3 Significant Irreversible Environmental Changes

The CEQA Guidelines require a discussion of significant irreversible environmental changes with project implementation, including uses of nonrenewable resources during the initial and continued phases of the project (Section 15126.2[d]). However, CEQA Guidelines Section 15127 indicates that information concerning irreversible changes needs to be included only in EIRs prepared in connection with:

- A. The adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency;
- B. The adoption by a Local Agency Formation Commission of a resolution making determinations; or
- C. A project which will be subject to the requirement for preparing an environmental impact statement pursuant to the requirements of the National Environmental Policy Act of 1969, 42 United States Code Sections 4321–4347.

As the proposed project is not one of the above project types, this EIR is not required to include an analysis of significant irreversible environmental changes.

## 5.4 Growth Inducement

The CEQA *Guidelines* require that an EIR evaluate the growth-inducing impacts of a proposed action (Section 15126.2[d]). A growth-inducing impact is defined by the CEQA *Guidelines* as:

[T]he 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 which would remove obstacles to population growth.... It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can have direct and/or indirect growth-inducement potential. Direct growth inducement could result if a project involved construction of new housing. A project can have indirect growth inducement potential if it would establish substantial new permanent employment opportunities (e.g., commercial, industrial or governmental enterprises) or if it would involve a substantial construction effort with substantial short-term employment opportunities and indirectly stimulate the need for additional housing and services to support the new employment

demand. Similarly, under CEQA, 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. Increases in population could tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The CEQA *Guidelines* also require analysis of the characteristics of projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

The timing, magnitude, and location of land development and population growth is based on various interrelated land use and economic variables. Key variables include regional economic trends, market demand for residential and non-residential 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. Because general plans define the location, type, and intensity of growth within a given jurisdiction, they are the primary means of regulating development and growth in California.

The proposed project does not include the direct construction of housing. Therefore, the consideration of growth focuses on the following:

1. Growth Inducement (Employment)
2. Removal of obstacles to population growth (such as provision of major new public services to an area where those services are not currently available), including:
  - a. Extension of urban services or infrastructure into a previously unserved area; or
  - b. Extension of a transportation corridor into an area that may be subsequently developed.

### 5.4.1 Growth Inducement Employment

Section 3.12, Population and Housing, of the EIR analyzes the project's overall effect on population and housing, including growth-inducing considerations. In terms of housing, the Golden State Natural Resources Forest Resiliency Demonstration Project would not result in direct construction of housing. The project would provide additional employment opportunities. The labor force for both the Lassen and Tuolumne sites would be drawn from the local communities, as well as the larger region. This is consistent with existing conditions in these rural areas, as discussed in Section 3.12, Population and Housing, and Section 3.14, Transportation. While some employees may seek to move closer to the facilities, longer commutes are typical in these regions. The Port of Stockton, in contrast, has access to a large existing labor force in the Stockton area and the surrounding communities. The project would not induce substantial population growth.

### 5.4.2 Removal of Obstacles to Population Growth

Section 15126.2(d) of the CEQA *Guidelines* states that an EIR should 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." Growth can be induced in a number of ways, including through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through precedent-setting action. CEQA requires a discussion of how a project could increase population, employment, or housing in the areas surrounding the project as well as an analysis of the infrastructure and planning changes that would be necessary to implement the project.

## Extensions of Urban Services or Infrastructure

Projects that are characterized as having significant impacts associated with the inducement of growth are frequently those that would remove obstacles to additional growth, such as the expansion of sewer or water facilities that would permit construction of more development in the service area covered by the new facilities. Similarly, if a project would overburden existing infrastructure so as to require construction of new facilities that could result in significant impacts, then the project may be deemed to have a significant growth-inducing impact.

As discussed in the Section 3.13, Utilities and Service Systems, the project would require electrical transmission upgrades to serve the Lassen and Tuolumne Wood Pellet Processing Facilities. However, the proposed electrical transmission upgrades would only service the project sites and would not increase electrical load capacity for any of the surrounding properties. No other infrastructure upgrades or construction new facilities would be required to support the project. Nor would operation of project necessitate additional infrastructure upgrades or the construction of new facilities. As such, the project would not induce growth in the project vicinity or broader area due to extension of urban services or infrastructure.

The two pellet facility sites, Lassen and Tuolumne, will rely on existing on-site wells and septic systems for processing water and wastewater. In addition, secondary wells may be required to provide potable water to employees. These systems would only serve the project site. Water and sewer at the Port site would be provided by existing service systems, which would not require expansion to serve the project.

## Extension of Transportation Corridors

As discussed in Section 3.14, Transportation, the Lassen, Tuolumne, and Port of Stockton project sites are served by existing roadways. Employees and haul trucks accessing the Lassen Facility would use existing roadways, including State Route 299 and Babcock Road. The project does not propose improvements to the roadways, beyond maintenance activities, or railway lines surrounding the Lassen Facility. Railway improvements are limited to on-site rail spurs to serve the production facility and would not serve other properties or increase mainline capacity.

Truck traffic at the Tuolumne Facility would utilize the State Route 108/120 intersection with La Grange Road to the north and the State Route 132 intersection with La Grange Road to the south. Additionally, vehicular and truck traffic access into the Tuolumne Facility would be provided via two existing roadways from La Grange Road – CR J59. The project proposes improvements to the northern site access driveway at the Tuolumne Facility to serve as an employee access to the site. The proposed improvements are intended to enhance vehicle circulation and site access. Additionally, the project includes improvements to the railroad crossing located on the Tuolumne Facility site and construction of additional rail spur capacity. The improvements would not serve other properties or increase mainline capacity.

Additional on-site railway spurs would be constructed at the Port of Stockton site. However, these sidings would not create additional roadway crossings and would only serve the proposed project site . No other roadway or railway improvements are proposed at the Port of Stockton site.

As discussed above and in Section 3.14 of this EIR, the project would include minor roadway and railway improvements. However, these improvements are to enhance circulation and site access, and to support project activities, rather than increasing the capacity of the existing transportation corridors. Consequently, the project would not induce growth in the project vicinity or broader area due to extension of transportation corridors.

## 5.5 Conclusions

The proposed project would not develop residential land uses, increase or affect population growth, and/or expand infrastructure systems beyond what is needed to support the project. Although new on-site infrastructure would occur as part of the proposed project, the project would have limited facilities and would connect to existing infrastructure. There would be no amendments made to the Lassen County General Plan, Tuolumne County General Plan, or City of Stockton General Plan land use designations nor any changes to zoning-designations at the project sites. The project does not include extensions or expansions of infrastructure systems or roads beyond what is needed to serve project-specific demand. Consequently, the project would not induce growth in the project vicinity or broader area due to extension of urban services or infrastructure. For the above-described reasons, the project would not cause a new impact related to a substantial increase in population growth and would be in line with the projected growth planned for the area as defined in the Lassen County General Plan, Tuolumne County General Plan, and City of Stockton General Plan.

## 5.6 References

California Governor's Office of Planning and Research (OPR). 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 2018. Accessed March 7, 2023 at [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).

INTENTIONALLY LEFT BLANK