5.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines require that all phases of a project be considered when evaluating its impact on the environment, including during construction and operation. Further, the evaluation of significant impacts must consider direct and reasonably foreseeable indirect impacts of the project over the short-term and long-term. As detailed in CEQA Guidelines Section 15126, the EIR must discuss the following:

- Significant environmental effects of the proposed project
- Mitigation measures proposed to minimize significant effects
- Significant environmental effects that cannot be avoided if the proposed project is implemented
- Significant irreversible environmental changes that would result from implementation of the proposed project
- Growth-inducing impacts of the proposed project
- Alternatives to the proposed project.

Chapter 4, Environmental Evaluation, Sections 4.1 through 4.3 provide a comprehensive discussion and analysis of the proposed project's environmental impacts, proposed mitigation measures, and conclusions regarding the level of significance of each impact before and after mitigation. Chapter 6, Alternatives, presents a comparative analysis of alternatives to the proposed project. All other CEQA-required topics are presented herein.

In addition, this Chapter of the EIR also includes a discussion of the Mandatory Findings of Significance as provided in Appendix G of the CEQA Guidelines.

5.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

This DEIR does not identify any significant and unavoidable impacts.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the CEQA Guidelines states that an EIR must include a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Generally, a project would result in significant irreversible environmental changes if:

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

5.2.1 COMMIT FUTURE GENERATIONS TO SIMILAR USES

Implementation of the proposed project includes subdivision of the existing site into 20 individual lots for future development of single-family homes. The site's General Plan Land Use Designation and zoning is Rural Residential – Hillside, which supports low density residential development and serves as a buffer between agricultural uses to the south, east, and west of the site, and urban uses along Foothill Boulevard north of the site. The site was previously developed with over 15 buildings and structures including a single-family home, apartment building, pool and cabana, four detached garages, outbuildings, work and storage sheds, and also contained shipping containers, abandoned cars, trucks, tractors, and construction equipment. The site is now vacant and is proposed to be developed with residential uses consistent with the General Plan and zoning designations for the site. The project includes improvements to existing roadways that serve existing residential and agricultural uses near the project site. The project does not involve improvements that would result in secondary impacts, such as construction of a new highway, that would commit future generations to similar uses.

5.2.2 CONSUMPTION OF NATURAL RESOURCES, INCLUDING NON-RENEWABLE RESOURCES

The proposed project involves subdivision of the existing 30.11-acre site into 20 lots to accommodate future development of single-family residences. Resources such as lumber and other forest products are generally considered renewable and would be replenished over the life of the project. Non-renewable resources, such as natural gas, petroleum-based products, asphalt, petrochemical construction materials, steel, copper, and other metals, are resources that are available in finite supply as the processes that create these resources occur over a long period of time and regeneration of these materials is not likely to occur over the lifetime of the project, and therefore represents an irreversible commitment of non-renewable resources.

The proposed project will commit the site to a new type of land use as compared to the existing vacant condition and involves an irreversible commitment of renewable resources in the near term and non-renewable resources in the long term. However, the project reduces its use of non-renewable resources in the long-term through exclusion of natural gas infrastructure in single-family residences.

If the anticipated renewable and non-renewable resources are not consumed by the proposed project, they will be committed to other residential or agricultural projects that may occur within the City of Calistoga, including on the project site. The investment of resources in the proposed project are typical of the level of investment normally required for residential developments of this size and the project will not involve a large commitment of non-renewable resources that may cause a significant irreversible environmental change.

5.2.3 IRREVERSIBLE DAMAGE FROM ENVIRONMENTAL ACCIDENTS

CEQA requires a discussion of the potential for irreversible environmental damage caused by an accident associated with the project. Apart from the construction phase, single-family residences do not require routine transport, storage, or on-site use of hazardous material which, if inadvertently released, could result in irreversible damage to the environment. During project construction, hazardous materials will be transported, stored, and handled consistent with state, local and federal regulations and as such, the proposed project will not result in irreversible damage from environmental accidents.

5.3 GROWTH INDUCING IMPACTS

As required by Section 15126.2(e), an EIR must discuss 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. The EIR must also discuss the characteristics of the project that could encourage and facilitate other activities that could significantly impact the environment, either individually or cumulatively.

Growth can be induced in several ways, including through elimination of obstacles to growth, stimulation of economic activity within the region, or through establishment of policies or precedents that directly or indirectly encourage additional growth.

In general, a project may induce growth in a geographic area if it removes an impediment to growth (e.g., establishment of an essential public service, the provision of new access to an area, a change in zoning or general plan approval), provides opportunities for economic

expansion in response to the project (e.g., employment expansion etc.), or proposes development in an isolated area or an area adjacent to open space (being distinct from an "infill" type of project). If a project meets any of these criteria, it can be considered growth inducing. An evaluation of the project against these growth-inducing criteria is provided below.

5.3.1 REMOVAL OF AN IMPEDIMENT TO GROWTH

In general, growth in an area may result from the removal of physical impediments or restrictions to growth. In this context, physical growth impediments would include non-existent or inadequate access to an area, as well as the lack of essential public services and utilities. In addition to these physical impediments, land use regulations, ordinances, and codes may restrict or deter growth and can be considered an impediment to growth.

The project site is currently vacant and is surrounded by rural residences and agricultural uses to the south, east, and west. The proposed project will subdivide the existing site into 20 lots for single-family residences, which will result in a minor increase in the local population (approximately 54 people). To accommodate future development of single-family homes, the project will install new utility infrastructure that will connect to the existing city water, sewer, and stormdrain systems. As discussed in the Initial Study (Appendix 2-B), the project, as proposed, can be served by existing infrastructure and would not involve expansion of utilities that would constitute removal of an impediment to growth. Furthermore, the project uses are conditionally permitted under the Rural Residential – Hillside General Plan Land Use Designation and associated zoning designation.

5.3.2 POPULATION AND ECONOMIC GROWTH

Project development will result in a temporary increase in construction-related job opportunities in the area. However, employment opportunities provided by construction would not likely result in household relocation by construction workers to the project area. It is anticipated that temporary construction would be completed by local labor. As such, employment opportunities associated with the project will be temporary and will not constitute a substantial growth in employment.

As discussed in the Initial Study prepared for the project, the project will increase the local population by approximately 54 people. As detailed therein, the Development Impact Fee Study, prepared by Economic & Planning Systems, Inc., anticipates a growth of approximately 6,200 people by 2040. Based on these estimates, the proposed project

constitutes one percent of the city's projected growth.

Given that implementation of the proposed project would not result in an increase in population beyond what has been considered in the city's Development Impact Fee Study and the minimal contribution of 54 people, the increase in population and economic growth associated with the proposed project will not contribute substantially to growth in the City of Calistoga and thus will not result in growth inducing impacts under this criterion.

5.3.3 URBANIZATION OF LAND IN ISOLATED LOCALITIES (LEAP-FROG DEVELOPMENT)

The proposed project is conditionally permitted under the General Plan Land Use Designation and implementing zoning designation. The project site is located within the incorporated boundaries of the City of Calistoga and was previously developed. Though the project site is rural in nature, the project is consistent with the rural residential character of the area and will not result in urbanization of land in an isolated area. As such, the project will not result in growth inducing impacts based on this criterion.

5.4 MANDATORY FINDINGS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines (Environmental Checklist) contains a list of mandatory findings of significance that may be considered significant impacts if any of the following occur:

1. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of California history or prehistory?
2. Does the project have impacts that are individually limited, but cumulatively considerable?
3. Does the project have environmental effects which will cause substantial adverse effects on human beings either directly or indirectly?

The following includes a discussion of the mandatory findings of significance for the proposed project.

5.4.1 QUALITY OF THE ENVIRONMENT

Implementation of the project could lead to adverse impacts related to biological

resources, however, as discussed in sections 4.1 of this EIR impacts of the project will be reduced to less than significant through incorporation of mitigation measures. Therefore, implementation of the project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. Additionally, as discussed in the Initial Study prepared for the project, mitigation measures will address potential impacts to cultural and tribal cultural resources.

5.4.2 CUMULATIVE IMPACTS

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of the proposed project. CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, noise impacts of two nearby projects may be less than significant when analyzed separately but could result in a significant impact when analyzed together. An analysis of cumulative impacts allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately ascertain the effects of a series of projects.

Projects within the cumulative context for analysis in this EIR are included in Chapter 4.0 and potential cumulative impacts are discussed in detail in Section 4.1 through 4.3. As provided therein, all project impacts, including cumulative impacts will be less than significant or less than significant with implementation of mitigation measures.

5.4.3 ADVERSE EFFECTS ON HUMAN BEINGS

The project will not result in environmental impacts that cause substantial adverse effects on human beings, either directly or indirectly. Potential impacts on people include air quality and greenhouse gas emissions, site soils and seismic activity, routine hazardous materials use, and wildfire risk; however, these impacts were determined to be less than significant or less than significant with mitigation as described in the Initial Study and in this DEIR. As such, the project would not expose people to substantial new hazards and there would be no other adverse effects on human beings.