6 STATUTORILY REQUIRED SECTIONS

6.1 Introduction

The Statutorily Required Sections chapter of the EIR includes discussions regarding those topics that are required to be included in an EIR, pursuant to the CEQA Guidelines Section 15126.2. The chapter includes a summary of cumulative impacts related to the proposed project, potential effects related to energy consumption, the significant irreversible environmental changes resulting from project implementation, and significant environmental effects which cannot be avoided.

6.2 Cumulative Impacts

CEQA Guidelines Section 15130 requires that an EIR discuss the cumulative and long-term effects of the proposed project that adversely affect the environment. "Cumulative impacts" are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355; see also Pub. Resources Code, Section 21083, subd. [b]). Stated another way, "[…] a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." (CEQA Guidelines Section 15130, subd. [a][1])

"[I]ndividual effects may be changes resulting from a single project or a number of separate projects." (CEQA Guidelines Section 15355, subd. [a]) "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." (CEQA Guidelines Section 15355, subd. [b])

The need for cumulative impact assessment reflects the fact that, although a project may cause an "individually limited" or "individually minor" incremental impact that, by itself, is not significant, the incremental effect may be "cumulatively considerable" and, thus, significant when viewed together with environmental changes anticipated from past, present, and probable future projects (CEQA Guidelines Section 15064, subd. [h(1)], Section 15065, subd. [c], and Section 15355, subd. [b]). This formulation indicates that particular impacts may be less-than-significant on a project-specific basis, but significant on a cumulative basis, because their small incremental contribution, viewed against the larger backdrop, is cumulatively considerable.

The lead agency should define the relevant geographic area of inquiry for each impact category (CEQA Guidelines Section 15130, subd. [b][3]), and should then identify the universe of "past, present, and probable future projects producing related or cumulative impacts" relevant to the various categories, either through the preparation of a "list" of such projects or through the use of "a summary of projections contained in an adopted general plan or related planning document, or

in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact" (id., subd. [b][1]).

The possibility exists that the "cumulative impact" of multiple projects will be significant, but that the incremental contribution to that impact from a particular project may not itself be "cumulatively considerable." Thus, CEQA Guidelines Section 15064, Subdivision (h)(5) states, "[…] the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable." Therefore, it is not necessarily true that, even where cumulative impacts are significant, any level of incremental contribution must be deemed cumulatively considerable.

In accordance with CEQA Guidelines section 15130(b), "the discussion of cumulative impacts must reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone."

Scope of Cumulative Analysis

In accordance with Section 15130(b)(1)(B) of the CEQA Guidelines, the cumulative analysis in this section is based upon a summary of projections for existing and future development within Granite Bay. Specifically, as discussed in Chapter 5, Transportation and Circulation, of this EIR, the cumulative traffic analysis relied on a 2036 travel forecasting model that was developed for the Granite Bay Community Plan Circulation Element Update in 2018. The Granite Bay 2036 travel forecasting model includes approved and planned development throughout the SACOG planning region according to development forecasts used in the 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). Within Granite Bay, the travel forecasting model has additional travel analysis zone, roadway network, and land use detail than the Sacramento Regional Travel Demand Model upon which the model is based. Because the cumulative noise analysis focuses primarily on traffic noise associated with the local roadway network, the cumulative setting for the noise and traffic analyses presented in Chapters 4 and 5, respectively, are similar.

6.3 Energy Conservation

Appendix F of the CEQA Guidelines requires that EIRs include a discussion of the potential energy impacts of a proposed project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

(1) Decreasing overall per capita energy consumption;
(2) Decreasing reliance on fossil fuels such as coal, natural gas and oil; and
(3) Increasing reliance on renewable energy sources.

The main forms of available energy supply are electricity, natural gas, and oil. A description of the 2016 California Green Building Standards Code, with which the proposed project would be

required to comply, as well as discussions regarding the proposed project's potential effects related to each form of energy supply during construction and operations is provided below.

California Green Building Standards Code

The 2016 California Green Building Standards Code, otherwise known as the CALGreen Code (CCR Title 24, Part 11), is a portion of the California Building Standards Code (CBSC), which became effective with the rest of the CBSC on January 1, 2017. The purpose of the CALGreen Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices. The provisions of the code apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout California.

Requirements of the CALGreen Code include, but are not limited to, the following measures:

- Compliance with relevant regulations related to future installation of Electric Vehicle charging infrastructure in residential and non-residential structures;
- Indoor water use consumption is reduced through the establishment of maximum fixture water use rates;
- Outdoor landscaping must comply with the California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), or a local ordinance, whichever is more stringent, to reduce outdoor water use;
- Diversion of 65 percent of construction and demolition waste from landfills;
- Mandatory periodic inspections of energy systems (i.e., heat furnace, air conditioner, mechanical equipment) for nonresidential buildings over 10,000 sf to ensure that all are working at their maximum capacity according to their design efficiencies; and
- Mandatory use of low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particle board.

<u>Building Energy Efficiency Standards</u>

The 2016 Building Energy Efficiency Standards is a portion of the CBSC, which expands upon energy efficiency measures from the 2013 Building Energy Efficiency Standards resulting in a five percent reduction in energy consumption from the 2013 standards for non-residential structures. The California Energy Commission is responsible for adopting, implementing and updating the standards every three years. Local city and county enforcement agencies have the authority to verify compliance with all applicable building codes including the Building Energy Efficiency Standards. Energy reductions relative to previous Building Energy Efficiency Standards are achieved through various regulations including requirements for the use of high efficacy lighting, improved water heating system efficiency, and high-performance attics and walls.

The California Energy Commission recently approved updates to the CBSC. The 2019 CBSC will take effect January 1, 2020, and all building constructed following January 1, 2020 must be built in compliance with the 2019 CBSC. The 2019 CBSC includes various provisions that would

increase the energy efficiency of new nonresidential buildings within California beyond the efficiency standards included in the 2016 CBSC. Per the California Energy Commission, nonresidential buildings built in compliance with the 2019 CBSC will use approximately 30 percent less energy due mainly to lighting upgrades.[1]

Construction Energy Use

Appendix F of the CEQA Guidelines identifies several potential sources of energy conservation impacts, including the project's construction energy requirements and energy use efficiencies by amount and fuel type. Construction of the proposed project would result in a temporary increase in energy consumption in the area.

While the project applicant proposes to phase development of the project, with construction occurring over multiple years, the analysis presented herein assumes that the project would be developed in one phase over a one-year period in order to provide a worst-case estimate of energy use.

All construction equipment and operation thereof would be regulated per the California Air Resources Board (CARB) In-Use Off-Road Diesel Vehicle Regulation, which includes measures to reduce emissions from vehicles by subjecting fleet owners to retrofit or accelerated replacement/repower requirements and imposing idling limitations on owners, operators, renters, or lessees of off-road diesel vehicles. Project construction would also be required to comply with all applicable PCAPCD rules and regulations, such as Rule 218 related to architectural coatings and Rule 228 related to fugitive dust. As a result, construction equipment operating at the project site would occur over a relatively short duration in comparison to the operational lifetime of the proposed project, and such equipment would be subject to applicable CARB and PCAPCD regulations.

The CARB has prepared the *2017 Climate Change Scoping Plan Update* (2017 Scoping Plan),[2] which builds upon previous efforts to reduce greenhouse gas (GHG) emissions and is designed to continue to shift the California economy away from dependence on fossil fuels. Appendix B of the 2017 Scoping Plan includes examples of local actions (municipal code changes, zoning changes, policy directions, and mitigation measures) that would support the State's climate goals. The examples provided include, but are not limited to, enforcing idling time restrictions for construction vehicles, utilizing existing grid power for electric energy rather than operating temporary gasoline/diesel-powered generators, and increasing use of electric and renewable fuel-powered construction equipment. The regulations described above, with which the proposed project must comply, would be consistent with the intention of the 2017 Scoping Plan and the recommended actions included in Appendix B of the 2017 Scoping Plan.

Nonetheless, construction of the proposed project would involve on-site energy demand and consumption related to use of oil in the form of gasoline and diesel fuel for construction worker vehicle trips, hauling and materials delivery truck trips, and operation of off-road construction

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1 California Energy Commission. *2019 Building Efficiency Standards, Frequently Asked Questions*. March 2018.
2 California Air Resources Board. *The 2017 Climate Change Scoping Plan Update.* January 20, 2017.

equipment. In addition, diesel-fueled portable generators may be necessary to provide additional electricity demands for temporary on-site lighting, welding, and for supplying energy to areas of the site where energy supply cannot be met via a hookup to the existing electricity grid. Project construction would not be anticipated to involve the use of natural gas appliances or equipment. Consistent with Section 9.36.030 of the Placer County Noise Ordinance, construction activities would be limited to the following hours: a) Monday through Friday, 6:00 AM to 8:00 PM during daylight savings; b) Monday through Friday, 7:00 AM to 8:00 PM during standard time; and c) Saturdays, 8:00 AM to 6:00 PM. Construction activities are not permitted on Sundays and federal holidays.

Electricity Demand During Construction

Typically, at construction sites, electricity from the existing grid is used to power portable and temporary lights or office trailers. Because grid electricity would be used primarily for steady sources such as lighting, not sudden, intermittent sources such as welding or other hand-held tools, the increase in electricity usage at the site during construction would not be expected to cause any substantial peaks in demand. However, the base demand for electricity in the area would increase. Overall, construction of the project would be over a relatively short duration in comparison to the operational lifetime of the proposed project and electricity demand from the site would occur intermittently throughout the development of the proposed office buildings and associated improvements. Upon completion of project construction, operational electricity demand would become the dominant demand source. Operational electricity demand would be much greater than construction, and is discussed further below. It should be noted that standards or regulations specific to construction-related electricity usage do not currently exist.

The Pacific Gas and Electric Company (PG&E) currently supplies electricity to the project site, and would continue to serve the site during construction of the proposed project. Electricity is provided from PG&E-owned sources, and additional electricity supplies are purchased by PG&E from other energy providers. Thus, PG&E relies on a variety of electricity sources including hydropower, natural-gas-fired generators, nuclear, and renewable energy sources.[3] Construction of the proposed project, which would result in temporary increases in electricity demand, would not cause a permanent or substantial increase in demand that would exceed PG&E's demand projections or exceed the ability of PG&E's existing infrastructure to handle such an increase. Therefore, project construction would not result in any significant impacts on local or regional electricity supplies, the need for additional capacity, or on peak or base period electricity demands. In addition, standards or regulations specific to construction-related electricity usage do not currently exist. As such, the temporary increase in electricity due to project construction activities would not be considered an inefficient, wasteful, and unnecessary consumption of energy, and significant adverse impacts on electricity resources would not occur.

[3] California Energy Commission. *2016 Power Content Label: Pacific Gas and Electric Company*. Version September 2017

Oil Demand During Construction

Construction of the proposed project would involve vehicle trips to and from the project site by workers, delivery vehicles, and hauling trucks. Worker vehicle trips are assumed to utilize gasoline, and delivery and hauling trucks are assumed to utilize diesel fuel. Diesel fuel would also be used to power the construction and off-road equipment necessary for construction activities, including rubber tired dozers, tractors, excavators, cranes, and other types of equipment. In addition, diesel-fueled portable generators may be used where electricity from the grid cannot be provided or for where more immediate electricity is needed, such as for welding or other hand tools. Overall, operation of construction equipment at the project site would occur over a relatively short duration in comparison to the operational lifetime of the proposed project and would be intermittent over the period of construction for the project. Operational oil demand would be much greater than construction, and is discussed further below.

A number of federal, State, and local standards and regulations exist that require improvements in vehicle efficiency, fuel economy, cleaner-burning engines, and emissions reductions. For example, as noted above, CARB has adopted the In-Use Off-Road Diesel Vehicle Regulation, which is intended to reduce emissions from in-use, off-road, heavy-duty diesel vehicles in California by imposing limits on idling, requiring all vehicles to be reported to CARB, restricting the addition of older vehicles into fleets, and requiring fleets to reduce emissions by retiring, replacing, or repowering older engines, or installing exhaust retrofits. The In-Use Off-Road Diesel Vehicle Regulation would subsequently help to improve fuel efficiency and reduce GHG emissions. Any licensed contractor for the project and equipment would have to be in compliance with all applicable regulations, such as the in-use, off-road, heavy-duty vehicle regulation. Thus, the proposed project would comply with existing standards related to construction fuel efficiency. Technological innovations and more stringent standards are being researched, such as multi-function equipment, hybrid equipment, or other design changes, which could help to reduce demand on oil and emissions associated with construction.

Therefore, the temporary increase in gasoline and diesel consumption due to project construction activities would not be an inefficient, wasteful, and unnecessary consumption of energy, and a significant adverse impact on oil resources would not occur.

Conclusion

Construction of the proposed project would result in a temporary increase in demand for energy resources. However, the temporary increase would not result in a significant increase in peak or base demands or require additional capacity from local or regional energy supplies. In addition, the proposed project would be required to comply with all applicable regulations related to energy conservation and fuel efficiency, which would help to reduce the temporary increase in demand. As such, the project would not result in an inefficient, wasteful, and unnecessary consumption of energy. Therefore, the proposed project would result in a less-than-significant impact on energy resources during construction.

Operational Energy Use

In order to ensure energy implications are considered in project decisions, Appendix F of the CEQA Guidelines requires a discussion of the potential energy impacts of a project, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F identifies several potential methods of evaluating a project's energy use, which are listed as follows and discussed in further detail below, with the exception of the project's construction-related energy requirements and energy use efficiencies, which are discussed above:

- The project's energy requirements and energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal.
- The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- The effects of the project on peak and base period demands for electricity and other forms of energy.
- The degree to which the project complies with existing energy standards.
- The effects of the project on energy resources.
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Building Energy

Currently, the proposed project site is vacant and undeveloped. Following implementation of the proposed project, PG&E would provide electricity and natural gas to the project site. Energy use associated with operation of the proposed project would be typical of office uses, requiring electricity and natural gas for interior and exterior building lighting, HVAC, electronic equipment, machinery, refrigeration, appliances, security systems, and more. In addition, maintenance activities during operations, such as landscape maintenance, would involve the use of electric or gas-powered equipment. Potential demand for electricity and natural gas associated with operation of the proposed project is 0.00011 gigawatt hours per year (GWh/yr), and 0.0000027-million therms, respectively[4]. In 2016, development within Placer County consumed a total of 2,938.51 GWh of electricity and 84.07 million therms of natural gas.[5] The project's energy demands listed above would represent 0.000000037 percent of the County's total electricity consumption and 0.000000032 percent of the County's gas consumption. The energy demands of the proposed project would represent a small proportion of total energy demand within the County.

While the proposed project would introduce new operational energy demands to the project area, increased electricity and natural gas demand does not necessarily mean that a project would have an impact related to energy resources. Based on Appendix F of the CEQA Guidelines, a proposed project would result in an impact related to energy resources if a project would result in the inefficient use or waste of energy.

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4 Trinity Consultants. *CalEEMod. Version 2016.3.2.* October 2018.
5 California Energy Commission. *Gas and Electricity Consumption by County*. 2016.

Structures included in the proposed project would be subject to all relevant provisions of the 2016 update of the CBSC, including the 2016 Building Energy Efficiency Standards. Adherence to the most recent CALGreen and the 2016 Building Energy Efficiency Standards would ensure that the proposed structures would consume energy efficiently through the incorporation of such features as efficient water heating systems, high performance insulation, and high efficiency lighting. Furthermore, future updates to the CBSC will likely provide increasingly stringent efficiency standards, and structures built in compliance with future CBSC would be increasingly more energy efficient. As such, the proposed project would not result in the inefficient or wasteful consumption of electricity or natural gas.

Transportation Energy

California leads the nation in registered alternatively-fueled and hybrid vehicles. In addition, State-specific regulations encourage fuel efficiency and reduction of dependence on oil. Improvements in vehicle efficiency and fuel economy standards help to reduce consumption of gasoline and reduce the State's dependence on petroleum products. The proposed project would be required to comply with all applicable regulations associated with vehicle efficiency and fuel economy.

In addition, the project would include pedestrian improvements that would provide connectivity within the project site and to off-site pedestrian facilities, thereby helping to discourage driving and reduce vehicle trips. Sidewalks would be provided throughout the project site to provide access to the proposed buildings. Building 1 would also be accessible by way of a meandering paved ADA ramp that would extend from the west side of the building and connect to a new attached sidewalk along the project frontage at Berg Street. On the eastern portion of the project site, a sidewalk would extend southward from the parking lot and connect to the existing sidewalk along Douglas Boulevard. Based on the above, the proposed project would not be considered to result in the inefficient or wasteful consumption of transportation energy.

Conclusion

As discussed above, the proposed project operations would involve an increase in energy consumption. However, the proposed project would comply with all applicable standards and regulations regarding energy conservation and fuel efficiency, which would ensure that the future uses would be designed to be energy efficient to the maximum extent practicable. Accordingly, the proposed project would not be considered to result in a wasteful, inefficient, or unnecessary usage of energy, and impacts related to operational energy would be considered less than significant.

6.4 Significant Irreversible Environmental Changes

Per CEQA Guidelines Section 15126.2(c), this EIR is required to include consideration of significant irreversible environmental changes that would be caused by the proposed project, should the project be implemented. An impact would be determined to be a significant and irreversible change in the environment if:

- Buildout of the project area could involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of development could generally commit future generations to similar uses (e.g., a highway provides access to a previously remote area);
- Development of the proposed project could involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The phasing and eventual development of the project could result in an unjustified consumption of resources (e.g., the wasteful use of energy).

The proposed project would likely result in or contribute to the following irreversible environmental changes:

- Conversion of existing undeveloped land to urban land uses, thus precluding alternative land uses in the future;
- Irreversible consumption of goods and services associated with the future patrons of business at the project site; and
- Irreversible consumption of energy and natural resources associated with the future employees and patrons.

Implementation of the proposed project would result in the long-term commitment of resources to serve development of the site, which would include one general office building and three office buildings for which medical use is anticipated. The most notable significant irreversible impacts would be the commitment of non-renewable and/or slowly renewable natural and energy resources, such as lumber and other forest products, and water resources during construction activities. Operations associated with future uses would also consume natural gas and electrical energy. Such irreversible impacts are, as yet, unavoidable consequences of urban growth, and the proposed project would not involve any operations that would be considered an inefficient use of such resources.

6.5 Growth-Inducing Impacts of the Proposed Project

State CEQA Guidelines section 15126.2(d) requires an EIR to evaluate the potential growth-inducing impacts of a proposed project. Specifically, an EIR must 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. Growth can be induced in a number of ways, including the elimination of obstacles to growth, or by encouraging and/or facilitating other activities that could induce growth. Examples of projects likely to have growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of large residential subdivisions or large office parks, for which the demand for housing may increase in order to support employees of such, in areas that are currently only sparsely developed or are undeveloped.

The CEQA Guidelines are clear that while an analysis of growth-inducing effects is required, it should not be assumed that induced growth is necessarily significant or adverse. This analysis examines the following potential growth-inducing impacts related to implementation of the

proposed project and assesses whether these effects are significant and adverse (see CEQA Guidelines, Section 15126.2[d]):

1. Foster population and economic growth and construction of housing.
2. Eliminate obstacles to population growth.
3. Affect service levels, facility capacity, or infrastructure demand.
4. Encourage or facilitate other activities that could significantly affect the environment.

Foster population and economic growth and construction of housing

Implementation of the project would increase economic activity through the short-term creation of jobs during construction. While the construction industry in California is currently experiencing heightened labor demands, the proposed project is relatively small and could be completed in as little as a year. Due to the size of the proposed project, length of the construction period, and size of the existing labor pool within the County and nearby areas, the existing labor pool of construction workers within the County and region would be sufficient to meet the demand for construction workers that would be generated by the project. Furthermore, the relatively short anticipated construction period would reduce the likelihood that construction workers would relocate to the project area, avoiding potential direct population growth. Because construction workers can be expected to come from the construction labor pool in Placer County and nearby communities, and the short construction period reduces the likelihood of construction workers relocating to the project area, population growth or increases in housing demand in the region as a result of such jobs is not anticipated.

Considering the small scale of the proposed project, the total number of employees at the project site during project operations would be relatively small. Similar to construction workers, employees at the proposed general office/medical offices would be anticipated to be drawn from the existing labor pool in Placer County and Granite Bay in particular. While some workers may relocate to the project area as a result of operations at the project site, such relocations would not be considered substantial in comparison to the overall population of the project area, including Granite Bay and the City of Roseville.

The construction workers and project-related employees, as well as economic activities associated with the project operations, could result in indirect growth in the region. An increase in office employment could result in demand for new restaurants and other commercial activities; however, such amenities are currently located directly south of the project site. Whether or not this would lead to construction of new facilities or reuse/expansion/more efficient use of existing facilities is speculative.

Eliminate obstacles to population growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services, would be expected

to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

As discussed in Chapter 3, Project Description, of this EIR, the proposed project would include connections to existing infrastructure, located in rights-of-way adjacent to the project site. In addition to the utility demand of the proposed project being served by existing utility infrastructure, public service providers in the project area would provide public services such as fire protection, law enforcement, and waste management without the need for additional infrastructure. Consequently, construction of on- or off-site infrastructure for the provision of utilities or public services to the project site would not be necessary.

The proposed project site has been previously designated and zoned for residential development. Although the proposed project includes a request for a redesignation and rezoning of the project site from residential to commercial, because the project site was previously planned for development the redesignation would not remove an obstacle to growth. Furthermore, development of the project site under the existing land use and zoning designations would result in direct population growth, whereas development of the proposed project would involve non-residential development that would not result in direct population growth.

Considering the above, the proposed project would involve use of existing infrastructure on a site previously planned for development. Therefore, the proposed project would not result in the elimination of obstacles to growth resulting in population growth.

Affect service levels, facility capacity, or infrastructure demand

The area surrounding the project site is currently developed with residential and commercial land uses that are served by existing public service providers such as the Placer County Sheriff's Office, the South Placer Fire District, and Western Placer Waste Management Authority. The project site has been previously anticipated for development, and service projections for the project area would have anticipated buildout of the project site and subsequent increases in demand for public services. As discussed in the Initial Study prepared for the proposed project, the Placer County Sheriff's Office and South Placer Fire District would be capable of adequately providing law enforcement and fire protection services to the proposed project with existing facilities. Similarly, as discussed in the Initial Study, adequate capacity remains in the Western Placer Waste Management Authority's landfill to serve the project's solid waste disposal needs. Additionally, because the proposed project would not include residential development, the proposed project would not result in an increase in population that would cause an increased demand on other public services such as libraries, schools, or recreational facilities. As such, adequate public services exist to meet the demand from buildout of the project site, and the proposed project would not affect service levels, facility capacity, or infrastructure.

Encourage or facilitate other activities that could significantly affect the environment

This EIR provides a comprehensive assessment of the potential for environmental impacts associated with implementation of the proposed project. Please refer to Chapters 4 and 5 of this

EIR, as well as the Initial Study prepared for the project, which comprehensively address the potential for impacts from urban development on the project site.

Conclusion

The proposed project would not require the construction of housing, nor would the project eliminate obstacles to population growth. Furthermore, the project would be provided adequate utility and public services through existing infrastructure, and, thus, the proposed project would result in a less-than-significant impact related to growth inducement.

6.6 Significant Environmental Effects Which Cannot Be Avoided

According to the CEQA Guidelines Section 15126.2(b), an EIR must include a description of impacts identified as significant and unavoidable, should the proposed action be implemented. When the determination is made that either mitigation is not feasible or only partial mitigation is feasible, such that the impact is not reduced to a less-than-significant level, such impacts would be considered significant and unavoidable. Based on the analysis throughout this EIR, the proposed project would not result in any significant impacts that could not be eliminated or reduced to a less-than-significant level by mitigation measures imposed by the County. The final determination of the significance of impacts and the feasibility of mitigation measures would be made by the County Board of Supervisors as part of the County's certification action.