
Chapter 10
Mandatory CEQA Sections

CHAPTER 10

MANDATORY CEQA SECTIONS

10.1 INTRODUCTION

This chapter of the *Final EIR* focuses on several specific topics that the *State CEQA Guidelines* mandates be addressed in EIRs. The *Guidelines* indicates a preference that these subjects be discussed in separate sections or paragraphs, but allows for the inclusion of a table showing where each of the subjects is discussed within the EIR. This chapter combines the two approaches, with separate discussions for each mandatory topic and references to appropriate sections elsewhere in the *Final EIR* for elaboration on the discussion included here.

10.2 ALTERNATIVES

REQUIREMENTS

The following paragraphs discuss the requirement that EIRs include a description of the alternatives to a proposed project that have been considered. The first section describes the general requirements of CEQA and the second section summarizes the directions of the *California General Plan Guidelines* with respect to the consideration of alternatives in general plan projects.

State CEQA Guidelines

According to the *State CEQA Guidelines*, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, and evaluate the comparative merits of the alternatives." Following are the directions that the *State CEQA Guidelines* provides regarding the discussion of alternatives within an EIR.

- (1) If there is a specific proposed project or a preferred alternative, explain why the other alternatives were rejected in favor of the proposal if they were considered in developing the proposal.
- (2) The specific alternative of "no project" shall also be evaluated along with the impact. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.
- (3) The discussion of alternatives shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- (4) If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed but in less detail than the significant effects of the project as proposed. (County of Inyo v. City of Los Angeles, 124 Cal. App. 3d 1.)

- (5) The range of alternatives required in an EIR is governed by "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The key issue is whether the selection and discussion of alternatives fosters informed decision-making and informed public participation. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. (*Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979) 89 Cal. App. 3d 274.)

General Plan Guidelines

The State's *General Plan Guidelines* further elaborates on CEQA's requirements as they pertain to the preparation of general plans, stating as follows:

For any set of goals and objectives, there will be a number of possible courses of action a community may pursue. Alternative plan proposals should be developed and tested at this stage to enable a community to examine its possible planning scenarios. Besides the goals and objectives, the varying plans should consist of alternative sets of principles, policies, standards and plan proposals.

The nature and detail of the alternatives will depend upon the extent of the planning program. For new general plans and comprehensive general plan revisions, the alternatives will often focus on population levels and on the scale, location, and type of development. The alternatives in a more limited planning program, such as for a single element, will deal with a narrower range of options. To the extent possible, the alternatives should be developed with implementation measures in mind. This will ensure the feasibility of the basic policies.

The alternatives need not be mutually exclusive. Ultimately, the decision makers may select an amalgamation of two or more alternatives as the best choice. (*General Plan Guidelines, page 53.*)

ALTERNATIVES CONSIDERATION PROCESS

The County formally considered alternatives to the project during two phases of the General Plan Update process. The County's approach to considering alternatives satisfies CEQA requirements and follows the directions set forth in the *General Plan Guidelines*,

Issues and Options

The first, and most extensive, consideration of alternatives occurred in Phase 5, the "Issues and Options" phase, during which the County considered a series of policy and program options and several broad land use alternatives. The primary vehicle for this consideration was the *General Plan Issues and Options Report*, which was published in January 1993. The report was subjected to an extensive round of public review, including six townhall meetings at various locations throughout the county and seven public meetings before the Board of Supervisors.

The purpose of the *Issues and Options Report* was to solicit policy direction from the Board of Supervisors on key issues to be addressed in the General Plan Update and to provide the framework for developing the goals, policies, implementation programs, and land use and circulation plans of the *General Plan Policy Document*. The comparative analysis contained in the *Issues and Options Report* provided the basis for the Board of Supervisors' decision among the alternatives presented in that report.

Appendix A to this *EIR* describes the contents of the *Issues and Options Report* in detail, including a summary of the directions that the Board of Supervisors provided as a result of consideration of the report.

Draft General Plan

The second consideration of alternatives occurred during review of the *Draft General Plan*. Between October 1993 and February 1994, the Planning Commission conducted nine meetings to review the *Draft General Plan* and *Draft EIR*, seven of which included formal opportunities for public input. These meetings were held on the following dates:

October 14, 28, and 29, 1993;
November 11 and 18, 1993;
January 13 and 19, 1994;
February 2, 1994; and
May 12, 1994.

The result of these meetings was a set of recommendations to the Board of Supervisors regarding the full range of issues discussed in the *Draft Policy Document*.

Based on the Planning Commission's recommendations, County Staff and Consultants prepared another version of the *Draft Policy Document* for review by the Board of Supervisors. This version was published on February 18, 1994. The Board of Supervisors then held public hearings on March 22, 1994, and April 5, 1994. At the latter meeting, the Board endorsed the Commission's recommendations and provided County Staff and Consultants with several other important directions. The Board held additional meetings on May 3, June 7, and June 21, 1994, at which it elaborated its earlier directions.

As a result of public hearings held by the Planning Commission and Board of Supervisors and several months of deliberation by those two bodies, the project defined in the *Draft EIR* was modified to produce the final project (i.e., the adopted *General Plan*).

DESCRIPTION OF ALTERNATIVES CONSIDERED

As a practical matter, because of the comprehensive nature of general plans, the number of ways that various policy and program alternatives could conceivably be combined with alternative land use scenarios is infinite. For most policies in the plan, there is at least one alternative, and for many, if not most, individual parcels of land, there is at least one possible alternative land use designation. The task of constructing alternatives for a general plan--particularly for an entire county--can, therefore, be extremely complicated.

To simplify this exercise, based on economic analysis conducted as part of the General Plan Update, County Staff and Consultants established the assumption that demand for development would be fixed; in other words, the total amount of growth expected to occur throughout the county would be the same, absent local government action to constrain the supply or availability of land for development. This assumption relies on population projections for the region and for Placer County prepared by the State of California Department of Finance (DOF) and the Center for the Continuing Study of the California Economy (CCSCE); population and employment projections for the region and the county prepared by the Sacramento Area Council of Governments (SACOG); and population and employment projections prepared by the Tahoe Regional Planning Agency (TRPA). All of these projections anticipate strong growth in the absence of significant constraints to land availability or accessibility; analysis conducted

early in the General Plan Update process indicated that no such constraints were in effect in Placer County.

Based on the economic analysis conducted for the General Plan Update and the projections described above, the County settled on a set of two assumptions about growth through the year 2010: the total population of Placer County would be approximately 310,000 and the total employment would be approximately 153,000.

Having established these basic development assumptions, County Staff and Consultants had to construct alternatives that represented a reasonable range of choices, given the County's limited capacity to influence market forces. Accordingly, Staff and Consultants isolated those influences that the County can effectively exercise in the development process: location, type, and timing of development approved. They then developed three scenarios, each based on a different set of policy assumptions representing broad philosophical distinctions about how the County could influence the location, type, and timing of growth in unincorporated Placer County, and therefore the distribution of assumed future growth between the unincorporated area of the county and the cities.

The three Issues and Options alternatives are described below. In addition, two other alternatives are described. The first is the *Draft Plan* that resulted from the Board of Supervisors' consideration of the three Issues and Options Alternatives and the second is the *General Plan* adopted in 1994, which reflects the Board's modifications to the *Draft Plan* based on public review and debate. The following paragraphs, therefore, describe the five land use alternatives that the County has considered during the General Plan Update process.

Issues and Options Alternative 1: New Urban Growth Directed to Cities

Alternative 1 from the *Issues and Options Report* emphasized the shifting of jurisdictional control over new growth and development from the County to the cities within the county. According to this alternative, County General Plan policies would be drafted to encourage most new urban-scale growth to occur within the incorporated cities of Placer County (including currently unincorporated areas within city spheres of influence to be annexed to cities), rather than in unincorporated areas of the county.

Issues and Options Alternative 2: Expansion of Established Communities (No Project)

Under Alternative 2 from the *Issues and Options Report*, the County would promote new growth in established unincorporated communities within and immediately adjacent to existing developed areas and away from environmentally-sensitive areas. The County would achieve this objective by promoting development in areas with the capacity, or potential capacity, to accommodate additional growth without exacerbating existing or causing new natural resource, infrastructure, or public facilities and services problems. Under this alternative, the County would also have modified existing plans to reduce development potential in unincorporated areas where land use designations in the old general plan reflected unrealistic development potential in light of resource, infrastructure, or service limitations. Alternative 2 would provide for no new communities or other major new growth areas; it instead would call for the intensification of existing unincorporated areas, including areas within the spheres of influence of cities. The most important distinction between Alternatives 1 and 2 is that under Alternative 1, the approval of new urban development would be left up to cities, while under Alternative 2, the County would continue to approve such development.

As noted above, CEQA requires that the specific alternative of "no project" be evaluated along with the impact. For purposes of this *EIR*, the "no-project" alternative would be the continued implementation of the County's 1967 *General Plan* and all existing community plans (neither amended nor updated). Because Issues and Options Alternative 2 closely approximated the 1967 *General Plan*, the *Issues and Options Report* analysis of Alternative 2 provided the information necessary for the Board of Supervisors to consider the impacts of the "no project" alternative.

Issues and Options Alternative 3: New Growth Area

Under Alternative 3 from the *Issues and Options Report*, the County would identify an area or areas suitable for the establishment of new urban development. This alternative would redirect growth from the established unincorporated communities, thereby relieving development pressure on potentially sensitive areas. Development in new growth areas under this alternative would emphasize "neo-traditional" planning principles (e.g., compact pedestrian- and transit-oriented development). In conjunction with the identification of new growth areas, the County would explore a transfer of development rights (TDR) program as a means of reallocating development potential from existing communities and surrounding agricultural land to the new community site. While under Alternative 1 the County would direct new urban development to the cities, and under Alternative 2 it would continue to approve new urban development in some of the same areas as the cities (e.g., within city spheres of influence), under Alternative 3 the County would provide an opportunity for urban development in an entirely new location.

For purposes of analysis, the *Issues and Options Report* assumed that new urban development would be designed to function as a discrete "new town" with a buildout population of approximately 20,000 and an area of about four square miles. Community design would emphasize urban densities with compact urban form, implement neo-traditional urban planning concepts where feasible, and de-emphasize typical suburban development. Commercial development would emphasize "village commercial" character.

Draft Countywide General Plan (Issues and Options Alternative 5)

The Board of Supervisors' direction regarding land use alternatives from the *Issues and Options Report* reflected a composite of various considerations. The Board chose not to provide its direction in terms of one of the three alternatives described in Chapter 2 of the *Issues and Options Report*. It, instead, opted to provide its direction in the form of a hybrid alternative, which was labeled "Alternative 5," which became the *Draft Countywide General Plan* (October 1, 1993). Rather than including a single new growth area, as would be the case under Alternative 3, the Board decided to designate four new growth areas: Bickford Ranch, with a population capacity of approximately 5,900; Placer Villages, with a holding capacity of 37,300 residents; Stanford Ranch West, with capacity for approximately 19,900 residents; and the Villages of Dry Creek, with a population capacity of 33,600. The *Draft Plan* constituted the project that was analyzed in the *Draft EIR*, also published in October 1993.

The Project (Modified Draft Plan)

As a result of its deliberations on the *Draft General Plan*, as well as consideration of the Planning Commission's recommendation, the Board of Supervisors made several changes to the *Draft Policy Document*, including several significant changes to the *Land Use Diagram*. These changes are reflected in the *General Plan* that is the subject of this *EIR* (i.e., the project). The most important changes pertained to the new growth areas identified in the *Draft Plan*. The Board of Supervisors directed that all references to these new growth areas be deleted from the *Policy Document* and that the Specific Plan Area (SP) designations for these new growth areas be removed from the *Land Use Diagram*. These

changes are reflected in the elimination of the Stanford Ranch West and Placer Villages new growth areas from the *Land Use Diagram* and reversion of these areas to the designations that appeared on the previous general plan land use map (a mix of industrial and agricultural designations for Stanford Ranch West and agricultural designations for Placer Villages). The reversion of these two areas resulted in a reduction in residential development potential of approximately 24,000 dwelling units (or 60,000 potential residents) and a reduction in commercially- and industrially-designated land of approximately 1,300 acres. In addition, the Bickford Ranch new growth area was designated Rural Residential and the Villages of Dry Creek new growth area was included as part of the *Dry Creek/West Placer Community Plan* (and accordingly removed from the *Countywide General Plan Land Use Diagram*). The designation of the Bickford Ranch new growth area as Rural Residential resulted in a reduction of the residential holding capacity of the area by approximately 550 units. The shift of the Villages of Dry Creek project resulted in no change in the intensity of the proposed development.

Chapter 1 of this *EIR* includes a detailed description of the current project, including an explanation of how it differs from the *Draft Plan* and how those differences affected this *EIR* analysis.

COMPARISON OF SIGNIFICANT PROJECT IMPACTS WITH IMPACTS OF ALTERNATIVES

This section compares the *Countywide General Plan* with the alternatives considered by the County in the General Plan Update process. The analysis concentrates on the relative effects of the alternatives with respect to those eight impact areas in which this *EIR* determines the *General Plan* would result in significant or potentially significant impacts (see Section 1.8 of Chapter 1, Impact Summary).

The distinctions among the alternatives are a function of how future development is assumed to be distributed throughout the county (i.e., among unincorporated areas and between unincorporated and incorporated areas), as well as the form that such development is assumed to take. The mitigating effects of the policies and programs of the *Policy Document* are *not* considered in the comparisons.

The following paragraphs summarize the relative impacts of each of the alternatives for each of the eight impact categories in which the *General Plan* could have significant or potentially significant impacts. Following each summary is an ordinal ranking of the alternatives, with 1 indicating the alternative with the least impact and 5 indicating the greatest impact. Note that some of the impact categories have been combined because of the similarity of the methodology for determining their impacts. Table 10-1 summarizes the ordinal rankings of the comparative analyses.

Land Use

Since development under the *Land Use Diagram* would result in changes to the unincorporated area's existing land use pattern, the *Countywide General Plan* would result in a potentially significant adverse impact. This impact category is based on the magnitude of land use changes within the county.

The alternative that would result in the least amount of change to the existing land use pattern is Issues and Options Alternative 1. This alternative would concentrate growth within the cities of Placer County, and presumably result in a higher density, less land-consumptive form of development. The degree of impact of the other alternatives would relate to the amount of land that would change from existing uses. The following list ranks the five alternatives considered in the General Plan Update process in order from least to most severe impact.

1. *Issues and Options Alternative 1*
2. *Issues and Options Alternative 3*
3. *Issues and Options Alternative 2*
4. *The Project*
5. *The Draft Plan*

Traffic Congestion/Increase in Air Pollutant Emissions/Traffic Noise

Because all three of these impact categories are based on the results of a regional travel model, their potential impacts are virtually the same. Given that the total amount of development at 2010 would be the same for all alternatives considered, the most critical distinction for purposes of these impacts is the location of development. A more dispersed pattern would result in longer vehicle trips, the need for greater transportation system improvements, more air pollutant emissions from automobiles, and more traffic noise. On the other hand, a more concentrated pattern would result in shorter trips, fewer required system improvements, less automobile-related pollutant emissions, and less traffic noise.

Since Issues and Options Alternative 1 concentrates development in the cities and defers unincorporated area development, it would have the least severe impacts of the alternatives considered. The other alternatives would have increasingly worse effects that relate to their degree of dispersion, with the *Draft Plan* having the most severe impacts. The five alternatives considered would rank as follows in terms of their relative traffic-related impacts.

1. *Issues and Options Alternative 1*
2. *Issues and Options Alternative 3*
3. *Issues and Options Alternative 2*
4. *The Project*
5. *The Draft Plan*

Cultural Resources

As with land use impacts, potential impacts on cultural resources are directly related to how much land would change from its existing use. The more that land uses change, the greater the possibility that the resulting land development activities could disturb valuable resources. The likelihood of encountering previously-unknown cultural resource sites is greater in largely rural areas, because they are less likely to have been surveyed in the past. Built-up urban areas, on the other hand, are more likely to have known resources, either as a result of surveys conducted in conjunction with earlier development or as a result of accidental discoveries related to development. Accordingly, Issues and Options Alternative 1 would be the least likely of the alternatives considered to result in accidental disruption of important sites. The remaining alternatives would rank in order according to their potential for resulting in development in areas where knowledge of resources is most limited. From lowest to highest potential the alternatives would rank as follows:

1. *Issues and Options Alternative 1*
2. *Issues and Options Alternative 2*
3. *The Project*
4. *Issues and Options Alternative 3*
5. *The Draft Plan*

Loss of Farmland/Loss of Agricultural Production

These two impact categories are directly related; the more farmland that is lost, the greater the loss in agricultural production value. The criterion for these impacts is very simple. The severity of the impact is a function of how much farmland stands to be converted, either directly or indirectly.

Issues and Options Alternative 1 would result in the least amount of farmland conversion, and thus loss of agricultural production. It would be followed by Issues and Options Alternatives 3 and 2, respectively, the project, and the *Draft Plan*. The ranking would, therefore, be as follows:

1. *Issues and Options Alternative 1*
2. *Issues and Options Alternative 3*
3. *Issues and Options Alternative 2*
4. *The Project*
5. *The Draft Plan*

Habitat Conversion and Habitat Quality Reduction

Again, the extent and intensity of development and associated habitat conversion is the criterion for determining the severity of impacts of habitat conversion or quality reduction. The ranking of the alternatives in terms of their impacts on habitat conversion and habitat quality reduction is similar to the ranking associated with the loss of farmland and loss of agricultural production. That ranking is as follows:

1. *Issues and Options Alternative 1*
2. *Issues and Options Alternative 3*
3. *Issues and Options Alternative 2*
4. *The Project*
5. *The Draft Plan*

TABLE 10-1

COMPARISON OF PROJECT IMPACTS WITH ALTERNATIVES

Impact Category	The Project	I&O #1	I&O #2 (No Project)	I&O #3	Draft GP (I&O #5)
Land Use	4	1	3	2	5
Traffic Congestion	4	1	3	2	5
Cultural Resources	3	1	2	4	5
Loss of Farmland	4	1	3	2	5
Loss of Agricultural Production	4	1	3	2	5
Habitat Conversion/Quality Reduction	4	1	3	2	5
Increase in Air Pollutant Emissions	4	1	3	2	5
Traffic Noise	4	1	3	2	5

CEQA GUIDELINES DIRECTIONS REGARDING CONSIDERATION OF ALTERNATIVES

The beginning of this section describes the directions that the *State CEQA Guidelines* provides with respect to the consideration of alternatives in the environmental review process. The following paragraphs summarize how the Placer County General Plan Update process has addressed these guidelines.

Rejected Alternatives

As indicated above, the *State CEQA Guidelines* require that, in cases where there is a specific proposed project or a preferred alternative, EIRs must explain why the other alternatives were rejected in favor of the proposal if they were considered in developing the proposal. In the case of the Placer County General Plan Update, alternatives were considered, and rejected, at two points in the process. During the Issues and Options process (Phase 5), the Board of Supervisors considered and rejected all three alternatives described in the *Issues and Options Report* in favor of the hybrid Alternative 5, which became the October 1, 1993, *Draft General Plan*. In selecting Alternative 5, the Board majority expressed a concern that the alternatives described in the *Issues and Options Report* did not provide enough opportunities for private market decisions to determine the location of future development. The Board majority further expressed an interest in relieving growth pressure on existing communities (both unincorporated and incorporated) by providing opportunities for development of distinct new communities (i.e., new growth areas).

During Phase 8 of the Update process (public review of the *Draft General Plan* and *Draft EIR*), the Board of Supervisors, at the recommendation of the Planning Commission, rejected the *Draft Plan* as proposed in favor of a scaled-back version of it. In doing so, the Board reconsidered the necessity of designating the new growth areas for urban development, citing the availability of developable land in the balance of the unincorporated area of the county and in the cities within the county, as well as development forecasts that indicated that the supply of developable land exceeded estimated demand within the 20-year time frame nominally covered by the *General Plan*.

Environmentally Superior Alternative

The *State CEQA Guidelines* requires that EIRs identify the "environmentally superior alternative" among the alternatives considered. As Table 10-1 indicates, Issues and Options Alternative 1, would result in the least severe impacts of the alternatives considered in the categories where the project could have significant or potentially significant impacts. Issues and Options Alternative 1 is, therefore, the environmentally superior alternative among those considered in the General Plan Update.

Alternative(s) Capable of Eliminating Significant Adverse Impacts

According to the *State CEQA Guidelines*, the discussion of alternatives must focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. Because the preparation of a general plan is, by definition, intended to provide for the accommodation of demand for future development, it is extremely difficult, if not impossible, to prepare a general plan that would have no significant adverse impacts. This is particularly true in settings which have strong demand for growth combined with a rich base of natural resources, such as Placer County. None of the alternatives considered in the General Plan Update process would result in the elimination of all significant adverse environmental effects. In fact, the only way to have avoided such impacts would be to construct an alternative that "rolled-back" existing development entitlements and instituted a moratorium on development in unincorporated Placer County. Even with such an alternative, development

that is beyond the jurisdiction of Placer County (i.e., in the cities within the county and in adjacent counties) could result in adverse impacts in the unincorporated area of the county. There is, therefore, no feasible alternative capable of eliminating all significant adverse impacts or reducing them to a level of insignificance.

Additional Significant Impacts of Alternatives Considered

As noted above, the *State CEQA Guidelines* requires that EIRs discuss cases where an alternative to a project would result in one or more significant effects in addition to those that would be caused by the project. In the case of the alternatives considered for this *EIR*, the comparison of impacts concerns the relative severity of the same type of impacts, as opposed to introduction of entirely new categories of impact. As indicated in Table 10-1, the impacts of the *Draft General Plan* would be more severe than those of the project, but they would not have been greater in terms of the number of impact types. The alternatives considered would, therefore, not have resulted in additional impacts not discussed in this *EIR*, but they would result in a higher degree of impact significance.

Range of Alternatives Considered

The *State CEQA Guidelines* states that "the range of alternatives required in an EIR is governed by 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." For purposes of this *EIR*, the range pertains to the County's role in the distribution of countywide development potential. In most EIRs, particularly those related to development projects, or even city general plans, the range of alternatives addresses the magnitude of development, as well as the distribution. For a general plan for a county as large as Placer County with several incorporated cities, however, the magnitude of countywide development is the major consideration, since county boundaries are fixed and county governments play a relatively small role in the regional economic forces that dictate growth and demand for development. Recognizing this, the *Placer County General Plan* and the alternatives considered in its preparation focus on the County's role in accommodating demand for development. The alternatives evaluated in the General Plan Update process considered a wide range of County roles, from an essentially passive role in which the County would direct growth to incorporated cities to an aggressive role in which the County would compete with the same cities for accommodating development. This Update process has, therefore, considered a reasonable range of alternatives.

10.3 SHORT-TERM VERSUS LONG-TERM USES

CEQA requires that EIRs assess the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity. In doing so, the *CEQA Guidelines* states that an EIR should "describe the cumulative and long-term effects of the proposed project which adversely affect the state of the environment." Special attention should be given to impacts which narrow the range of beneficial uses of the environment or pose long-term risks to health or safety. In addition, the reasons why the proposed project is believed by the sponsor to be justified now, rather than reserving an option for further alternatives, should be explained.

By virtue of its designation of substantial areas of land for development, the *Countywide General Plan* represents a first step in committing the environment to uses that may limit "long-term" productivity, particularly with respect to agricultural land and production. The *Plan* does, however, provide a comprehensive regional framework for making trade-offs among competing values and interests within both short-term and long-term time frames. It also sets out policies and programs to address the potentially adverse effects of new development in areas where long-term uses could be compromised.

Further, the General Plan Update is justified now, rather than later, due to the age of the existing General Plan and the need for a comprehensive update.

10.4 SIGNIFICANT IRREVERSIBLE EFFECTS

CEQA requires that EIR's describe any significant irreversible environmental changes which would be involved in the proposed action should it be implemented.

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since 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. CEQA requires that irretrievable commitments of resources be evaluated to assure that such current consumption is justified.

While the designation of land for development on the *Land Use Diagram* does not in itself constitute an irretrievable commitment of that land and its associated environmental resources, subsequent development consistent with these designations could result in irreversible environmental changes. This *EIR* identifies several such changes, as well as *General Plan* policies and programs that will minimize the effects of these changes. Of the significant and potentially significant impacts identified in this *EIR*, those that could be considered irreversible are those related to land use changes, loss of farmland and agricultural production, and conversion of vegetation and wildlife habitat.

The *General Plan's* designation of land for development, and thus the commitment of land and resources to future development, is justified given the need to accommodate projected demand for population and employment growth. Furthermore, as noted above, the General Plan Update is justified now, rather than later, due to the age of the existing General Plan and the need for a comprehensive update.

10.5 GROWTH-INDUCING IMPACTS

CEQA requires that EIRs address the growth-inducing impact of the proposed action. The *CEQA Guidelines* directs that EIRs 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. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. The *Guidelines* also call for EIRs to discuss the characteristic of some projects that 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.

Any general plan that designates undeveloped land for future development can be defined as "growth-inducing." Since one of the County's objectives in updating its General Plan is the promotion of economic development and accommodation of demand for residential growth, this is the case with the *Countywide General Plan*. In promoting such development and accommodating such growth, the *General Plan*, however, attempts to address all the potentially adverse implications through policies, programs, and proposals for adequate infrastructure, promotion of a reasonable balance between jobs and housing, and protection of environmentally-sensitive resources.

10.6 CUMULATIVE IMPACTS

As a practical matter, an EIR on a comprehensive general plan is an assessment of the cumulative impacts of development within the area covered by the plan. This is particularly the case with a countywide general plan. Within this cumulative context, the *Countywide General Plan* provides a framework for making tradeoffs among competing values and interests. It also sets out policies and programs to address the potentially adverse cumulative effects of new development.

The cumulative effects of growth would be most demonstrably reflected in increased traffic and the resulting impacts on the regional roadway and highway system, primarily on I-80. A discussion of these impacts is included in Chapter 4, Transportation and Circulation, of this *Final EIR*. The analysis of these impacts is based on a regional travel demand model that inherently addresses the accumulated effects of development not only within unincorporated Placer County, but also in the county's cities and other communities in the greater Sacramento area.

This *EIR* also addresses the contribution of development in unincorporated Placer County to regional impacts including reduction of surface water quality, loss of farmland and agricultural production, conversion and quality reduction of wildlife and vegetation habitat, and degradation of air quality. The analysis of these cumulative impacts concludes that Placer County's contributions to the regional problems do not constitute significant impacts for purposes of this *EIR*.

10.7 MITIGATION MONITORING

CEQA prohibits a public agency from approving or carrying out a project for which an environmental impact report identifies significant environmental effects, unless one of several findings relative to mitigation of those effects has been made. Section 21081.6 of the *Public Resources Code* states that when an agency approves a project subject to implementing mitigation measures (in an EIR or Negative Declaration), the public agency must adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.

The policies and programs of the *Policy Document* operate to mitigate most of the impacts of new development under the *Plan*. Under Implementation Program 10.1, the County must annually review the *General Plan Policy Document*. As stated in the program, this review shall be used to satisfy the requirements for a mitigation monitoring program. To assist with this effort, those policies and programs that are essential to either maintaining less-than-significant impacts below the level of significance or minimizing the effects of impacts judged to be significant have been listed in findings prepared for the adoption of the *General Plan*. This list will be used in the annual review of the *Policy Document* to evaluate the County's application of mitigating policies and implementation of mitigating programs.