

## 5 OTHER CEQA SECTIONS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must also identify the following: 1) significant environmental impacts that cannot be avoided if the project is implemented, 2) significant irreversible environmental changes that would result from implementation of the project, and 3) growth-inducing impacts of the project. Although growth inducement itself is not considered an environmental effect, it could potentially lead to foreseeable physical environmental effects, which are discussed under Growth Inducing Impacts below.

### 5.1 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 21100(b)(2)(A) of the State CEQA Guidelines provides that an EIR shall include a detailed statement setting forth “in a separate section: any significant effect on the environment that cannot be avoided if the project is implemented.” Accordingly, this section provides a summary of significant environmental impacts of the project that cannot be mitigated to a less-than-significant level.

Chapter 3, “Existing Environmental Setting, Impacts, and Mitigation,” provides a description of the potential environmental impacts of the project and recommends various mitigation measures to reduce impacts, to the extent feasible. Chapter 4, “Cumulative Impacts,” determines whether the incremental effects of this project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. After implementation of the recommended mitigation measures, most of the impacts associated with development of the project would be reduced to a less-than-significant level. The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available or the mitigation measures available were not enough to reduce the project’s impacts to a less-than-significant level. Note, this is only a summary of those impacts; it is important to review the discussions in Chapters 3 and 4 of this EIR to understand the full context of the impact determinations.

Implementation of the 2018 LRDP would result in the following significant unavoidable environmental impacts, following implementation of feasible mitigation measures:

- ▲ Impact 3.1-1: Result in a substantial adverse effect on a scenic vista.
- ▲ Impact 3.2-1: Convert agricultural uses, including lands designated as Important Farmlands, to non-agricultural use or involve changes in the existing environment that could result in conversion of Important Farmland to non-agricultural use.
- ▲ Impact 3.3-1: Construction-generated emissions of ROG, NO<sub>x</sub>, and PM<sub>10</sub>.
- ▲ Impact 3.3-2: Operational emissions of criteria air pollutants and precursor emissions.
- ▲ Impact 3.3-6: Land use compatibility with off-site sources of toxic air contaminants and ultrafine particulates.
- ▲ Impact 3.4-4: Impacts to historical resources.
- ▲ Impact 3.5-11: Conflict with local policies or ordinances related to the protection of biological resources.
- ▲ Impact 3.13-1: Directly or indirectly induce substantial population growth and housing demand.

- ▲ Impact 3.16-1: Freeway level of service impacts.
- ▲ Impact 3.16-2: Intersection level of service impacts.
- ▲ Impact 3.16-6: Cumulative impacts to freeway level of service.

Cumulative impacts to Aesthetics (effects on a scenic vista), Agriculture (conversion of farmland in the region), Air Quality (criteria air pollutant emissions during construction and operation), Historic Resources (alteration of historic structures), Population and Housing (direct population growth), and Transportation (freeways level of service) would also be significant and unavoidable as a result of implementation of the 2018 LRDP.

## 5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the project. Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, because 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. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

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

Development of the 2018 LRDP would result in the continued commitment of the UC Davis campus to institutional uses, irreversibly removing the plan area from any other potential uses. UC Davis's ownership of the campus represents a long-term commitment of the campus to an institutional use. Restoration of the campus to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Additional irreversible commitments to future use include those related to new housing or academic/administrative space development. Development of lands currently used for agricultural uses would constitute an irreversible change of use on these lands because once buildings or pavement are constructed, underlying soils would no longer be available for agricultural production. Implementation of the 2018 LRDP would result in the loss of 175 acres of Important Farmland, including 30 acres of farmland in the West Village project-specific component of the 2018 LRDP. For biological resources, development under the 2018 LRDP could result in the loss of approximately 143 acres of ruderal annual/grassland habitat in addition to the loss of agricultural lands used by wildlife species for foraging. As discussed in Section 3.5, "Biological Resources," UC Davis would implement mitigation measures to reduce impacts to these sensitive biological communities, as well as provide appropriate habitat elsewhere within the campus lands.

Resources that would be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would be reduced as a result of continued and expanded implementation of the UC Sustainable Practices Policy, as well as the UC Davis energy efficiency and conservation programs (e.g., Smart Lighting Initiative and TherMOOstat) identified in Section 3.6, “Energy.” As such, implementation of the 2018 LRDP would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources as stated in Section 3.6, “Energy.” Notwithstanding the project benefits identified in Section 3.6, construction and operational activities related to the project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment.

With respect to operational activities, compliance with and exceedance of applicable building codes, as well as continued implementation of UC Davis energy efficiency and conservation programs along with project-specific mitigation measures or project requirements, would ensure that natural resources are conserved or recycled to the maximum extent feasible. It is also possible that new technologies or systems would emerge, or would become more cost-effective or user-friendly, which would further reduce the site’s reliance upon nonrenewable natural resources. Nonetheless, even with implementation of conservation measures, consumption of natural resources would generally increase with implementation of the 2018 LRDP as campus enrollment, staffing, and structures are generally expected to increase.

### 5.3 GROWTH-INDUCING IMPACTS

CEQA specifies that growth-inducing impacts of a project must be addressed in an EIR (Public Resources Code Section 21100[b][5]). Specifically, the State CEQA Guidelines (California Code of Regulations [CCR] Section 15126.2[d]) states that the EIR shall 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. Included in this analysis 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 tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, the EIR should discuss the characteristics of the project which 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.

Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- ▲ substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- ▲ substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; and/or
- ▲ removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

The State CEQA Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth. Therefore, for purposes of this EIR, to reach the conclusion that a project is growth-inducing as defined by CEQA, the EIR must find that the project would foster (i.e., promote or encourage) growth in economic activity, population, or housing, regardless of whether the growth is already approved by and consistent with local plans. The conclusion does not determine that induced growth is beneficial or detrimental, consistent with the State CEQA Guidelines (CCR Section 15126.2[d]).

Environmental effects resulting from induced growth fit the CEQA definition of “indirect” effects in the State CEQA Guidelines (CCR Section 15358[a][2]). These indirect or secondary effects of growth may result in significant environmental impacts. CEQA does not require that the EIR speculate unduly about the precise location and site-specific characteristics of significant, indirect effects caused by induced growth, but a good-faith effort is required to disclose what is feasible to assess. Potential secondary effects of growth could include consequences – such as conversion of open space to developed uses, increased demand on community and public services and infrastructure, increased traffic and noise, degradation of air and water quality, or degradation or loss of plant and wildlife habitat – that are the result of growth fostered by the project.

### **5.3.1 Growth-Inducing Impacts of the 2018 LRDP**

This analysis examines the following potential growth-inducing impacts related to implementation of the 2018 LRDP:

- 1) foster population growth;
- 2) foster the construction of new housing in the surrounding environment;
- 3) foster economic growth; and
- 4) remove obstacles to growth by expanding facility capacity, or infrastructure.

Per a recent report published by the California Department of Finance (DOF), Yolo County is anticipated to experience substantial population growth (107,735 new residents) between 2018 and 2050 (at 48 percent, this is the third highest percentage growth in the state) (DOF 2018). Solano County would also experience substantial population growth (151,058 new residents) over that same period, a 34 percent increase over existing population levels in the county (DOF 2018). Other existing growth projection tools for local jurisdictions in the region are either undergoing updates or have recently been adopted. These include the Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), which must be updated and adopted by February 2020; the Dixon General Plan Update, which is currently underway; and the Cities of Woodland and West Sacramento recently adopted comprehensive updates to their respective General Plans, in May 2017 and November 2016. The City of Davis also anticipates initiating a citywide General Plan update upon completion of amendments to the Core Area plan, as of January 10, 2017 (City of Davis 2017).

As noted in Section 3.13, “Population and Housing,” development under the 2018 LRDP would allow for increased campus population, thereby increasing local student population, as well as the number of faculty/staff on-campus on a daily basis. While there is an overall increase, the LRDP allows for development of more housing units than students, which would, overall, reduce the need for students to seek off-campus housing compared with existing conditions. Therefore, the 2018 LRDP

would not foster population growth at off-campus locations and within local jurisdictions to house students. With respect to employment growth, the 2018 LRDP's provision of up to 2,440 new jobs (UC and non-UC employees) would result in additional housing needs at off-campus locations for employees. Some employees would be located on campus; however, the majority of new employees would reside off-campus. As evaluated in Section 3.13, "Population and Housing," implementation of the 2018 LRDP could result in minor population growth within the region; however, the projected increase in UC Davis employees is far less than the combined level of available housing and housing construction planned in nearby communities and is well within regional growth projections and would be absorbed by communities in the area (e.g. cities of Woodland, Winters, and West Sacramento). As such, implementation of the 2018 LRDP would not, by itself, be expected to foster or create a need for construction of new housing in the surrounding (off-campus) environment.

The on-campus population growth may induce economic growth through an increased demand for goods, services, which could create new jobs in the area, including within the downtown area of the city of Davis. Based on a 2016 study conducted for UC Davis regarding economic impacts associated with campus, one new job would be created in the region for every three new jobs on-campus (UC Davis 2016). Based on the anticipated increase in campus employment of 2,135 and assuming that one job would be created for every three new UC jobs, the 2018 LRDP could result in 712 additional jobs (additional to UC Davis jobs) within the region. Due to the limited level of commercial growth that the city of Davis has seen over the past several years, as well as the low commercial retail vacancy rates compared to the rest of the region (City of Davis 2017), it is anticipated that some of the new, indirect jobs would be created elsewhere within the region (e.g., Sacramento, West Sacramento, Woodland, and Winters). This indirect and induced economic growth may result in additional commercial development in the region, which would be subject to local planning and discretionary actions by local jurisdictions, including the City of Davis. The potential environmental impacts associated with such development would be identified consistent with local planning requirements and evaluated through local jurisdictions' General Plans and project-level evaluations of commercial development proposals.

As with this LRDP EIR, the CEQA review for future regional growth may identify significant impacts and mitigation measures and significant and unavoidable impacts. These impacts are generally part of overall regional growth and the 2018 LRDP would, minorly, contribute to this growth and to the impacts related to the growth. In considering proposals for future developments, these regional entities would evaluate the details, alternatives, and mitigation measures to decide whether potential impacts were significant and unavoidable.

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., water service), while planning impediments may include restrictive zoning and/or land use designations. The 2018 LRDP would be implemented within the existing UC Davis campus boundaries which contain established land uses and supporting infrastructure (roads, water distribution, wastewater and drainage collection, and energy distribution). The 2018 LRDP includes redevelopment of areas within the campus, primarily in proximity to the central campus, and would intensify the uses over what currently exists in some areas. This intensification may require the modification and/or replacement of existing infrastructure (e.g. water and sewer mains) to support the increased land use intensity associated with the 2018 LRDP. However, as the UC Davis utility infrastructure (in terms of sizing and need) is maintained separate from other local jurisdictions, there is no potential for additional growth (off the campus) to occur beyond that anticipated under the 2018 LRDP.

In summary, implementation of the 2018 LRDP would foster on-campus student and employee population growth. Environmental impacts of on-campus population growth are accounted for in the 2018 LRDP and considered in this EIR (e.g., impacts to agricultural resources, air quality, and traffic; see discussions within the relevant chapters of this EIR). On-campus population growth may induce some off-campus growth, which is minor in relationship to the region and well within regional growth plans. However, the detailed potential environmental effects cannot be specifically known or analyzed at this time and are subject to the review and approval of regional municipal and regulatory agencies, including environmental review required under CEQA. The general plans of surrounding communities that support housing, including housing that would accommodate faculty and staff, are required to address the environmental impacts of their land use designations that support such growth. The cumulative sections of this EIR provide a description of the cumulative impacts that are expected and can be forecast at this time. Therefore, the 2018 LRDP could result in adverse growth-inducing impacts off-campus beyond those inherent to the plan itself which are analyzed in this EIR.