

6 OTHER CEQA SECTIONS

6.1 GROWTH INDUCEMENT

CEQA Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an EIR. Section 15126.2(e) of the State CEQA Guidelines provides the following guidance for assessing growth-inducing impacts of a project:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (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, discuss the characteristics of some projects 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.

A project can induce growth directly, indirectly, or both. 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; 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).

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open space land to urban/suburban uses, and other effects.

6.1.1 Summary of Growth-Inducing Impacts

The State CEQA Guidelines require discussion in an EIR of 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. It is not assumed that growth in any area is beneficial or detrimental, consistent with the State CEQA Guidelines (CCR Section 15126.2[e]).

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.

6.1.2 Growth-Inducing Impacts of the Project

This analysis examines the following potential growth-inducing impacts related to implementation of the project and assesses whether these effects are significant and adverse:

- ▶ foster population growth and construction of housing;
- ▶ eliminate obstacles to population growth;
- ▶ foster economic growth;
- ▶ affect service levels, facility capacity, or infrastructure demand; and
- ▶ encourage or facilitate other activities that could significantly affect the environment.

Implementation of the project would foster short-term and long-term economic growth within the City of Arcata as a result of new construction and operation of residences. Construction would likely begin in 2023 and extend for approximately 18–24 months. During construction, the estimated peak level of construction workers at any given time is estimated to be no more than 50 workers. As described in Section 3.9, "Population and Housing," a large number of people are employed in the construction industry in the region, and it would not be reasonable to expect that any construction workers would relocate to the City for a temporary job. During operation, up to 964 new student residents would occupy the on-site units. On-site employment opportunities for retail and other on-site services are anticipated to be absorbed by student residents and existing campus staff. As a result, it is considered unlikely that on-site employment opportunities would be fulfilled by residents outside of the City.

The project would not remove barriers to population growth insofar as the project would involve the accommodation of anticipated growth under Cal Poly Humboldt's current 2004 Master Plan and as a result of the recent designation of the campus as the third California State Polytechnic University. Further, because of the physical constraints imposed by US 101, existing residential development to the northwest, west, and south, and industrial uses to the north, implementing the project would not remove additional barriers to population growth, because no new or expanded (beyond what is currently planned by local and State jurisdictions) public infrastructure facilities would be installed. The project would directly connect to existing utility infrastructure (water, wastewater, natural gas, and electricity) already existing in the project vicinity and serves the surrounding residential and industrial land uses and would not facilitate additional development. Further, the project site is enclosed on all sides by existing development, natural barriers (i.e., Janes Creek), and transportation facilities that present barriers to further growth. Although Cal Poly Humboldt and CSU, in general, are not subject to local regulations, it is worth noting that the project site, which is located within the governmental boundaries of the City of Arcata, is designated as an infill opportunity zone for residential development in the City's 2019 Housing Element (City of Arcata 2019) and in updates to the City's General Plan that are currently in preparation (City of Arcata 2022). Therefore, the type of development anticipated with project implementation is considered to be already incorporated into the City's planning efforts. As a result, the project would not remove a barrier to future growth within the City or region.

Although the project would foster some economic and population growth associated with new employment and housing opportunities within the project site, this growth would not substantially affect the ability of public service providers to serve their existing customers, as shown in Section 3.10, "Public Services and Recreation." The project would increase access to the project site for local service providers and provide greater capacity on local roadway infrastructure. The population and employment growth expected with project implementation would be minor and would not exceed the enrollment projections of Cal Poly Humboldt nor what is considered in regional and local growth projections for communities. Additionally, the project would not extend infrastructure and public services to serve areas outside of the project site. In conclusion, the project has the potential to stimulate the economy both directly (by providing jobs and housing) and indirectly (by creating a demand for local goods and services) in the region. However, the project would address anticipated housing needs. Therefore, the project would not contribute to population growth beyond that anticipated as a direct result of the project, and there is no need to analyze impacts of growth beyond those included and evaluated in Chapter 4, "Cumulative Impacts."

6.2 SIGNIFICANT AND UNAVOIDABLE ADVERSE 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, "Environmental Impacts and Mitigation Measures," 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 would be 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 that 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 proposed development of the project site would result in the following significant and unavoidable environmental impacts, following implementation of feasible mitigation measures:

- ▶ Impact 3.1-1: Result in a Substantial Adverse Effect on a Scenic Vista
- ▶ Impact 3.1-2: Damage Scenic Resources within a State Scenic Highway
- ▶ Impact 3.1-3: Substantially Degrade the Existing Visual Character or Quality of Public Views of the Site and Its Surroundings
- ▶ Impact 3.8-1: Generate Substantial Temporary (Construction) Noise

Cumulative impacts on aesthetics (effects on a scenic vistas, existing visual character or quality of public views of the site and its surroundings, and scenic resources within a State scenic highway corridor) would also be significant and unavoidable as a result of implementation of the Student Housing Project.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines require a discussion of any significant irreversible environmental changes that would be caused by the project. Specifically, the State CEQA Guidelines Section 15126.2(d) states:

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 generation to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable 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 during which irreversible damage could result from 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).

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