

6 Other CEQA Required Discussions

This section discusses other issues for which the California Environmental Quality Act (CEQA) requires analysis in addition to the specific issue areas discussed in Section 4, *Environmental Impact Analysis*. These additional issues include the project's potential to induce growth and create significant and irreversible impacts on the environment.

6.1 Growth Inducement

CEQA Guidelines Section 15126.2(d) requires a discussion of a project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. A project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

6.1.1 Population and Economic Growth

This Environmental Impact Report (EIR) identifies a maximum buildout for Ukiah 2040, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The following estimate of population growth is a conservative estimate based on the maximum buildout scenario. As discussed in EIR Section 2, *Project Description*, buildout of the project in the maximum buildout could accommodate an estimated 2,350 additional housing units and 5,640 additional residents in the City. The land use plan and policies in Ukiah 2040 prioritize infill development, reuse of underutilized parcels, contiguous development, high-density and mixed-use design, compactness, and consistency with existing uses within City boundaries to support growth in areas already well-served by existing public facilities and services.

Under the maximum buildout scenario, Ukiah 2040 could result in an increase of approximately 4,514,80 square feet of nonresidential development that would generate permanent employment opportunities in the City for residents. Additionally, Ukiah 2040 would generate temporary employment opportunities during construction of future residential and nonresidential projects. As construction workers would be expected to be drawn from the existing regional work force, construction of future development projects would not be considered growth-inducing.

As discussed in Section 2, *Project Description*, the City contains approximately 120 acres of vacant parcels, with the rest of the City occupied by development or open space. Due to the availability of developable areas, any economic expansion induced by the project is not anticipated to result in direct physical environmental effects beyond those described throughout Section 4, *Environmental Impact Analysis*. Specifically, buildout is projected to occur within the existing City limits and Annexation Areas. Future development within the remaining sphere of influence (SOI) and Planning Area will be analyzed under CEQA on a project-level basis.

6.1.2 Removal of Obstacles to Growth

The land use plan and policies in Ukiah 2040 prioritize infill development, reuse of underutilized parcels, contiguous development, high-density and mixed-use design, compactness, and consistency with existing uses within City boundaries to support growth in areas already well-served by existing public facilities and services. New development would occur primarily where existing roads, water, and sewer and other utilities are in place and in a manner that minimizes the impact of development on existing infrastructure and services. Despite the anticipated change in land use designations, the project would generally preserve the existing pattern of land uses in the City.

As described in Section 2.7.6, *Proposed Annexation Areas*, the City of Ukiah is pursuing approximately 1,617 acres of County-owned land for annexation. The annexation areas are split into three distinct categories. The first, Annexation Area A, consists of 16 City-owned properties that currently host City operations, such as landfill, airport, and wastewater treatment uses. Once annexed, Annexation Area A would continue to be utilized as agriculture, open space, or municipal uses and the lands would be designated as Public and Open Space. Annexation Area B consists of 63 properties containing commercial, industrial, and manufacturing uses (both existing and decommissioned), as well as areas containing vacant and agricultural lands. Once annexed, most of Annexation Area B would be designated by the City as a new land use category proposed under Ukiah 2040, Mixed-Use: Brush Street Triangle, which is consistent with its existing designation under the UVAP. Other portions of Annexation Area B would be designated as Industrial, while the lands currently vacant or developed with agriculture uses would be designated as Agriculture. Annexation Area C is being pursued as part of the Open Land Acquisition and Limited Development Agreement Project, most of which is pre-zoned as Public Facilities and would be preserved for open space conservation. The remaining portions of Annexation Area C are pre-zoned as Rural Residential with a Single-Family Residential-Hillside Overlay designation. However, development on these parcels would be restricted to a maximum number of 14 units total (seven-single family homes and seven accessory dwelling units) due to the existing Development Agreement with the current property owner.

By maintaining the current land uses associated with Annexation Areas A and B, limiting residential development on Annexation Area C, and focusing most of the development in the City within already urbanized areas, implementation of Ukiah 2040 would reduce the growth pressure in undeveloped areas along the periphery of the City. This constrained growth pressure would reduce the potential for impacts as compared to development on lands beyond urban limits. Furthermore, Ukiah 2040 does not include development within the proposed SOI or the larger Planning Area. Any future uses developed within the proposed SOI would be subject to annexation to the City of Ukiah in compliance with procedures identified by the Mendocino County Local Agency Formation Commission. Future land use designations within the SOI or Planning Area are not specifically defined or included within the buildout assumptions of Ukiah 2040. Because Ukiah 2040 does not include any future development, utilities, or transportation improvements in the proposed SOI or Planning Area, the project would not result in the removal of an obstacle to growth.

6.2 Irreversible Environmental Effects

When an EIR evaluates a project that would amend public plans, ordinances, or policies, the *CEQA Guidelines* require a discussion of significant irreversible environmental changes. CEQA also requires decision-makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. This section addresses

nonrenewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the development that would be facilitated by implementation of Ukiah 2040.

Construction activities associated with future development that would be accommodated under Ukiah 2040 would require the use of building materials and energy, some of which are nonrenewable resources. Consumption of these resources would occur with any development in the region and are not unique to Ukiah or Ukiah 2040.

Growth facilitated by Ukiah 2040 would require an irreversible commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. As discussed in Sections 4.10, *Public Services and Recreation*, and 4.13, *Utilities and Service Systems*, potential impacts to public services and utilities would be less than significant following implementation of policies included in Ukiah 2040, as well as future environmental review that would be required for any future facilities needed to accommodate Ukiah 2040.

The anticipated increase in vehicle trips associated with buildout of Ukiah 2040 would incrementally contribute to local traffic, air quality emissions, greenhouse gas emissions, and noise. As described in Section 4.11, *Transportation*, impacts on transportation were found to be less than significant through adherence to the proposed goals and policies in Ukiah 2040 and because the City's diversity score with Ukiah 2040 would remain below the existing countywide average. Impacts related to air quality were determined to be less than significant with mitigation, except for the impacts related to criteria air pollutants due to operational emissions from traffic. As discussed in Section 4.3, *Air Quality* of this EIR, overall VMT would increase, and operational emission impacts would be significant and unavoidable even after the application of mitigation to reduce air quality emissions during the operation phase of future projects. Impacts related to greenhouse gas emissions were found to be significant and unavoidable. As discussed in Section 4.6, *Greenhouse Gas Emissions* of this EIR, although Ukiah 2040 proposed goals and policies would assist in reducing emissions and although mitigation measures would require that the City implement CEQA greenhouse gas emissions thresholds and update the Ukiah Climate Action Plan to establish a Citywide greenhouse gas reduction target, the project's impacts related to greenhouse gas emissions would remain significant and unavoidable until the CEQA greenhouse gas thresholds are adopted and the Climate Action Plan is updated. Impacts related to construction and operational traffic noise were found to be significant and unavoidable. As discussed in Section 4.8, *Noise* of this EIR, although mitigation and policies would be implemented to minimize construction noise, it cannot be ensured that construction noise would be reduced below noise thresholds and impacts would conservatively remain significant and unavoidable. In addition, as discussed in Section 4.8, *Noise* of this EIR, noise along Brush Street due to increases in traffic was found to be significant and unavoidable.

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