CHAPTER 5.0
CEQA CONSIDERATIONS

This chapter includes the following other considerations that are required to be discussed in an environmental impact report (EIR):

- Effects Not Found to be Significant (Section 5.1)
- Significant and Unavoidable Environmental Impacts (Section 5.2)
- Significant and Irreversible Environmental Changes (Section 5.3)
- Growth Inducement (Section 5.4)

5.1 Effects Found Not To Be Significant

This section discusses potential environmental impacts from the Yosemite Avenue-Gardner Avenue to Hatch Road Annexation Project (proposed project) that were found not to be significant based on the analysis in the Notice of Preparation (NOP), Initial Study, and Draft EIR.

5.1.1 Notice of Preparation

An NOP was initially published in December 2016 based on the original project applications. In 2019, the project applicant, University Village Merced, LLC, on behalf of Cliff Caton, property owner, submitted revised applications and site plans, increasing the number of residential units from 330 to 540 and increasing the associated parking. The City issued a revised NOP in May 2020. The NOP identified that less than significant impacts or no impacts would occur in the following resource areas:

- **Geology, Soils, and Seismicity -** The project site contains flat topography and no known earthquake faults exist in the project vicinity. Construction would include grading and soil engineering activities intended to abate any adverse soil conditions that may exist and would ensure that project buildings have adequate structural support.

- **Hazards and Hazardous Materials -** The project involves residential and commercial uses and does not propose uses that would require the generation or use of hazardous materials beyond common hazardous materials used in residential and commercial uses such as cleaning products and landscape maintenance products, and would not create a risk to the public or to schools in the project vicinity. The project site is not within two miles of an airport and would not interfere with emergency response activities or emergency evacuation.

- **Mineral Resources -** The project site does not support mineral extraction operations. Neither the State of California nor the City of Merced designates the project site as a location of known mineral deposits (City of Merced 2012a). Thus the project would not result in a loss of mineral resources of statewide or local importance.

- **Population and Housing -** The project would introduce new residents into the City of Merced but would not displace any housing or require the construction of housing elsewhere.

5.1.2 Initial Study

An Initial Study was completed as part of preparation of this EIR. The Initial Study is provided in Appendix B. The analysis in the Initial Study demonstrates that several discrete impacts within other environmental resource areas would be less than significant, or no impact would occur. These are noted in each of the environmental analysis chapters in this EIR and summarized in the following list.

- **Aesthetics -** The project would not have an adverse effect on a scenic vista because the project site is not within any of the City's 11 designated scenic corridors (City of Merced 2012a). The project would not substantially damage scenic resources within a State scenic highway because none of the three highways that pass through the City of Merced (140, 59, and 99) are listed as state scenic highways.

- **Agricultural and Forestry Resources -** The project would not conflict with a Williamson Act contract because site is not under any such contracts. The project site does not contain any forest or timberland resources and is not zoned for forest land, timberland, or timberland production. The project would have no impact on these resources.

- **Biological Resources -** The project would have a less than significant impact related to wildlife movement or nursery sites because it is a non-linear feature and bound by existing roads, development, and agricultural production, thus it has little value as a potential wildlife corridor, habitat linkage or native wildlife nursery site. The project site is not located within or adjacent to any preserve or conservation area and no Habitat Conservation Plan or Natural Community Conservation Plan that include the project site have been adopted.

- **Hydrology, Drainage and Water Quality -** The project site is outside of Federal Emergency Management Act designated flood zones for a 100-year storm, 500-year storm or dam failure inundation zone. The site would be subject less than 3-foot deep flooding from Black Rascal Creek and Cottonwood Creek in a 200-year storm event. The site is not subject to inundation by seiche, tsunami or mudflow.

- **Land Use and Planning.** The project would not divide an established community. There are residential subdivisions to the south and west, rural residences to the east, and agricultural land to the north. These are each separate areas and not part of a contiguous community that could be subject to disruption or division from development of the project site.

- **Noise** The project would result in no impacts related to air traffic noise because the site is more than 4 miles from the nearest airport and is not located within any Airport Influence Area or Noise Compatibly Zones.

- **Wildfire** The project site is not located within or near a State Responsibility Area or a High Fire Severity Hazard Area. The project would result in less than significant impacts associated with physically interfering with an adopted emergency response plan or emergency evacuation plan, exacerbating wildfire risks, exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, or exposing people to post-fire hazards such as flooding, landslides, and changes in drainage patterns. The project would not require installation or maintenance of infrastructure related to wildfire prevention or response (such as roads, fuel breaks, emergency water sources, power lines or other utilities) and thus would result in no impacts associated with exacerbating fire risk or creating environmental impacts during construction or maintenance of such infrastructure.

5.1.3 Draft EIR

This Draft EIR contains 11 environmental analysis sections, each of which provides a detailed evaluation of several impacts related to the section topic. In many cases, those impacts were determined to be less than significant. These are listed below by impact number and a brief summary of the impact statement. Full details of the impact analysis are presented in the associated analysis section indicated by the impact number (in other words, Impact 3.1-1 is found in Section 3.1).

3.1-1: Degrade existing visual character or quality or conflict with applicable zoning and other regulations governing scenic quality

3.1-3: Contribute to cumulative changes in visual character

3.1-4: Contribute to a cumulative increase in light and glare

3.2-2: Result in conversion of Farmland to non-agricultural use

3.3-1: Conflict with or obstruct implementation of applicable air quality plans

3.3-2: Increase the emissions of criteria pollutants in the San Joaquin Valley Air Basin

3.3-4: Result in odors or other emissions

3.3-5: Result in a cumulatively considerable net increase of criteria pollutants

3.4-4: Conflict with the City of Merced plans, policies, regulations, or ordinances that address biological resources

3.5-3: Disturb human remains

3.5-5: Contribute to cumulative impacts to historical and archaeological resources

3.6-1: Result in wasteful, inefficient, or unnecessary consumption of energy

3.6-2: Conflict with existing energy standards and regulations

3.6-3: Contribute to a cumulative increase in the region of wasteful or inefficient energy consumption

3.7-1: Generate greenhouse gas emissions in excess of applicable standards

3.7-2: Conflict with plans, policies or regulations adopted for the purpose of reducing greenhouse gas emissions

3.8-1: Violate water quality standards or waste discharge requirements or otherwise substantially degrade water quality

3.8-2: Alter the drainage pattern resulting in substantial erosion or siltation, increase runoff resulting in flooding, or exceed the capacity of existing or planned stormwater drainage systems

3.8-3: Substantially decrease groundwater supplies or interfere with groundwater recharge

3.8-4: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan

3.8-5: Contribute to cumulative effects on water quality, drainage patterns, flooding, or groundwater supply

3.9-1: Create land use incompatibilities

3.9-2: Conflict with a regional land use plan, policy or regulation

3.10-3: Result in off-site roadway noise level increases for noise sensitive land uses

3.10-4: Adversely affect vibration sensitive uses during construction

3.10-5: Adversely affect vibration sensitive uses during operation

3.10-6:Contribute to cumulative changes in ambient community noise levels

3.11-1:Increase demand for public services and utilities requiring provision of new or physically altered governmental facilities

3.11-2: Exceed existing wastewater capacity

3.11-3: Require relocation or construction of new or expanded water treatment facilities

3.11-4: Generate solid waste that would exceed the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals

3.11-5: Contribute to a cumulative increase in public services resulting in the need for new or physically altered facilities

3.11-6: Contribute to a cumulative increase in demand for wastewater treatment facilities resulting in inadequate capacity and construction of new or expanded wastewater treatment facilities

3.11-7: Contribute to a cumulative increase in demand for water treatment facilities requiring construction of new or expanded water treatment facilities or require development of additional water supplies

3.11-8: Contribute to a cumulative increase in solid waste in excess of State of local standards, or in excess of the capacity of local infrastructure

3.12-1: Conflict with circulation system programs, plans, ordinances, or policies

3.12-2: Result in residential VMT that is greater than 15% below the regional average or develop regional-serving commercial development

3.12-3: Substantially increase hazards due to roadway design or incompatible uses

3.12-4:Result in inadequate emergency access

3.12-5:Contribute to cumulative impacts due to conflicts with circulation system programs, plans, ordinances, or policies

3.12-6: Result in cumulative impacts associated with VMT

3.12-7: Contribute to cumulative impacts regarding roadway hazards or emergency access

5.2 Significant and Unavoidable Environmental Impacts

A summary of the potentially significant and significant impacts of the project, the applicable mitigation measures, and the level of impact significance after implementation of mitigation measures is provided in Chapter 1, Executive Summary. As shown in the summary table, implementation of the project-specific mitigation measures identified in Chapter 3, Environmental Analysis, would reduce all of the project's significant impacts to less than significant levels, with the exception of one significant and unavoidable cumulative impact to agricultural resources. As discussed in Section 3.2, Agricultural Resources, the project would make a consideration contribution to the cumulative loss of farmland in the City of Merced and Merced County generally. Both the City of Merced General Plan EIR and the Merced County General Plan EIR found that implementation of those plans would result in significant and unavoidable losses of farmland, with 1,898 acres of Prime Farmland expected to be lost in the City's Sphere of Influence and SUDP and 1,695 acres of Prime Farmland expected to be lost in the County (City of Merced 2012b, County of Merced 2013). The project would contribute to these impacts by converting 26.3 acres of Prime Farmland and 2.1 acres of Unique Farmland to residential and commercial land uses.

Both the City and County General Plans policies and implementing actions intended to reduce impacts to farmland but the associated EIRs found that these measures would not be sufficient to reduce the impacts due to loss of farmland to less than significant levels. The proposed project would not conflict with the City's General Plan policies that:

- encourage property owners outside the City limits but within the City's Sphere of Influence/Specific Urban Development Plan (SOI/SUDP) to maintain their land in agricultural production until the land is converted to urban uses;
- encourage working cooperatively with land trusts and other non-profit organizations to preserve agricultural land in the region, such as through conservation easements; and
- promote infill development and sequential and contiguous development over fringe and leap-frog development.

Under Mitigation Measure 3.2a, this Draft EIR requires the proposed project to offset the impact to agricultural resources by establishing a conservation easement over 28.4 acres of land designated under the California Department of Conservation Farmland Mapping and Monitoring Program as Prime Farmland (26.3 acres) and Unique Farmland (2.1 acres). This would ensure that an equal amount of Prime Farmland and Unique Farmland that would be lost due to project

development is retained as agricultural land in perpetuity. However, it is not feasible to create new agricultural land and thus a conservation easement would not offset or compensate for cumulative losses of agricultural land, and there are no feasible mitigation measures to offset or compensate for these cumulative losses. Thus, the project's contribution to this cumulative impact is a **significant and unavoidable** impact.

5.3 Significant and Irreversible Environmental Changes

CEQA Guidelines Section 15126(c) requires that an EIR include discussion of any significant irreversible environmental changes that would be caused by the proposed project. Generally, a project would result in significant irreversible changes if:

- The project would involve a large commitment of nonrenewable resources.
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses (such as highway improvement that provides access to a previously inaccessible area).
- The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project.
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the proposed project may result in significant irreversible changes requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them.

The project site is located adjacent to urban uses in the City of Merced and would be annexed to the City. Implementation of the proposed project would result in the long-term commitment of resources of the project site to urban land use. The development of the proposed project would likely result in or contribute to the following irreversible environmental changes:

- **Conversion of agricultural land.** As discussed in Section 5.3, approximately 26.3 acres of land designated as Prime Farmland and 2.1 acres of Unique Farmland within The Crossings component of the project would be converted to urban uses. In addition, the proposed annexation and pre-zoning of the Remainder Area would make future development in that area more likely. As discussed in Section 3.2.2, such development could lead to conversion of 7.9 acres of Farmland of Local Importance to suburban uses. While it is possible to demolish urban uses and reestablish agricultural activities within a project site, this is unlikely to occur, particularly once the project site has been annexed to the City.

- **Energy and Resource Consumption.** Construction of the project would require irreversible use of fuel for construction vehicles, vendors, and workers. It would also consume resources used to construct buildings and site improvements, such as wood products, asphalt, and concrete. While it is possible to deconstruct buildings and recycle a large portion of the building materials, this is unlikely to occur. In addition, long-term use of the residential and commercial uses would be an on-going source of energy consumption.

- **Water and Wastewater Capacity Consumption.** The long-term use of the residential and commercial uses proposed to be constructed at the project site would consume potable water and generate wastewater. Thus the project would use a portion of the City's currently remaining capacity in both systems, including capacity of groundwater pumping and treatment, capacity of the wastewater treatment plants, and capacity in the water and sewer lines that convey water and wastewater to and from the site. The proposed project would support population growth that the City has planned for, both under the General Plan and in the water and wastewater master plans, and thus while the use of water and wastewater infrastructure capacity is irreversible, it would not result in any significant adverse environmental effects.

The site does not support sources of nonrenewable resources, such as mineral resources, and is not known to support unique or significant discrete resources, such as rock outcroppings, unique geologic formations, historic or archaeological resources.

The Crossings component of the project site is largely devoid of trees and the trees within the Remainder Area are landscape and ornamental trees. Loss of trees due to site development would be replaced with newly planted trees as part of the development's landscaping plans. Natural resources in the form of building materials (wood products, asphalt, and concrete) would be used in construction along with gas and diesel fuel. These resources have varying degrees of renewability. However, their use would be characteristic of typical development projects and use of these resources for construction of the proposed project is not expected to negatively impact the availability of these resources for other uses. Nonetheless, construction activities related to the proposed project would result in irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels, natural gas, and gasoline and diesel for automobiles and construction equipment. Due to the scale of the proposed project, the use of construction materials and nonrenewable resources would not be unusual or extraordinary, and as a result there would be no significant irreversible environmental effects related to resource consumption during construction.

The project would not result in impacts that commit future generations to similar uses. The Crossings component of the project would construct 570 residential units, commercial uses, and

associated infrastructure and would make future development of residential uses in the Remainder Area more likely. The project would be uniquely suited to the proposed residential and commercial uses. However, should the buildings become vacant in the future it would be feasible for interior renovations to be made to adjust the buildings to a different user or to demolish buildings and develop the site for a different land use. Changes to the land uses would likely require amending the General Plan and zoning designations, which would require approval from the City.

Regarding potential irreversible damage caused by environmental accidents associated with the project, the project would result in the use, transport, storage, and disposal of minor amounts of hazardous materials during project construction and operation. As described in the Initial Study, all such activities would comply with applicable local, state and federal laws related to the use, storage and transport hazardous materials, which significantly reduces the likelihood and severity of accidents that could result in irreversible environmental damage. The project itself does not include any uniquely hazardous uses that would require any special handling or storage. Further, the project does not contain any industrial uses that would use or store acutely hazardous materials.

On a permanent, long-term basis, the proposed project would consume energy, resulting in irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels, natural gas, and gasoline and diesel for automobiles. However, the project would incorporate a number of sustainable practices that reduce the consumption of energy in compliance with state and local building codes. This would ensure that resources are conserved to the maximum extent possible. However, as discussed in Section 3.6, Energy, the project's energy consumption does not constitute a significant environmental impact because it would not use energy wastefully, inefficiently, or unnecessarily.

5.4 Growth Inducement

CEQA requires a discussion of ways in which the proposed project could induce growth in the project area. The CEQA Guidelines identify a project as growth inducing if it fosters economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (14 CCR 15126.2(d)). New population from residential development represents direct forms of growth. Such direct growth often has a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. A project could indirectly induce growth by reducing or removing barriers to growth, by creating a condition that attracts additional population or new economic activity, or by establishing policies or other precedents that directly or indirectly encourage additional growth. Thus, the consideration of a project's potential to induce growth includes discussion of the characteristics of the project that

could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

Under CEQA, induced growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth would be considered a significant impact if it can be demonstrated that the potential growth, directly or indirectly, significantly affects the environment.

In general, a project could foster spatial, economic, or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public service such as by removing infrastructure limitations or increasing infrastructure capacity, the provision of new access to an area, or a change in zoning or General Plan amendment approval), or economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion) including potential "multiplier effects," which consider the direct employment effect of a project as well as indirect and induced employment growth.

5.4.1 Limitations on Analysis of Growth Inducement

Under the provisions of SB 375, an EIR prepared for a residential or mixed-use residential project that is consistent with the general land use designation, density, building intensity, and applicable policies specified for the project area a sustainable communities strategy (SCS) "is not required" to discuss growth inducing impacts, or any project specific or cumulative impacts from cars and light-duty truck trips on global warming, or on the regional transportation network (Pub. Res. Code, § 21159.28, subd. (a); Gov. Code, § 65080, subd. (b)(2)(I)).

The Merced County Association of Governments (MCAG) has adopted the 2018 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS), which identifies a preferred land use and transportation investment scenario for the region. The RTP/SCS anticipates residential development within the City's SOI/SUDP. However, because the project proposes annexation to the City and changes to the General Plan land use designations for the site, this EIR does not rely on consistency with the SCS to limit this analysis of growth inducement.

5.4.2 Consistency with the Regional Transportation Plan/Sustainable Communities Strategy

The RTP/SCS identifies that Merced County is expected to grow substantially over the next 20 years. Factors that contribute to this growth include lower housing costs relative to neighboring regions, with people choosing longer commutes in exchange for affordability, and increasing availability of health care and service jobs within the County. Specifically, between 2010 and 2015, the population of Merced County increased by approximately 6 percent. By the year 2042, Merced County is projected to grow by approximately 107,000 persons (a 38% increase), 34,000

households, and 23,000 jobs. Within the City of Merced, the population was 77,080 in 2010. This increased to 84,125 people in 2015 and the City is projected to grow by 42% to 119,536 people by 2042 (MCAG 2018).

The RTP/SCS identifies that the increase in countywide population is expected to be driven primarily by the "local availability of affordable housing and the proximity of Merced County to employment centers in Sacramento and the Bay Area, making the region a viable option for those priced out of other housing markets and willing to commute" including housing demand and employment opportunities associated with UC Merced (MCAG 2018).

Preferred Land Use Scenario

The RTP/SCS was developed based on population growth projections for the region and consideration of the general land use patterns that could accommodate this growth while achieving the RTP/SCS goals of providing an adequate transportation network, including non-automobile transportation modes, meeting the region's greenhouse gas reduction targets, and protecting and enhancing the natural environment. The land use patterns evaluated in the RTP/SCS were developed based on consideration of "development patterns, such as where to locate new housing, new job centers, and new mixed-use areas relative to existing communities (e.g., infill vs. converted farmland or open space). They also included the density of new development, which dictates the relative proportion of large-lot-single-family housing to small-lot-single-family housing to multifamily housing, and the proximity to complementary uses such as services and employment centers. Transportation investment choices in a given scenario include decisions for spending levels on new roadway capacity, roadway maintenance, transit, and alternative modes of travel (e.g., bike, pedestrian)" (MCAG 2018).

The analysis in the RTP/SCS demonstrates that the identified goals would best be achieved under the preferred land use scenario, which focuses on infill development in downtowns and centers in close proximity to jobs and services. This scenario anticipates residential neighborhoods that are more compact with an average housing density of 10.3 units per acre, which would be accomplished with a greater reliance on multi-family housing as well as a relative emphasis on smaller-lot single-family homes over large-lot single-family homes (MCAG 2018). Compared to the other scenarios evaluated, this scenario increases investment in active transportation modes (pedestrian and bicycle) while slightly reducing investment in automobile transportation modes. Further, this scenario is expected to achieve the region's GHG reduction targets established by the California Air Resources Board (CARB). Specifically, the SB 375 targets require a 5% reduction in GHG emissions by 2020 and a 10% reduction by 2035 while the RTP/SCS is expected to achieve a 15% reduction by 2020 and a 25% reduction by 2035 (MCAG 2018).

5.4.3 Elimination of Obstacles to Growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect, though not necessarily a significant one. 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.

Removal of Infrastructure Limitations or Provision of Capacity

The proposed project includes sizing of on-site infrastructure to serve the proposed development. Land west, south, and east of the project site is already developed, with the land west and south served by the City's existing water and wastewater infrastructure and land east of the site on private wells and septic systems. No additional development of the properties west, south, and east of the site is likely. The property north of the project site is in agricultural production and is also include in the City's SOI/SUDP, thus development of that property is anticipated as part of ongoing implementation of the City's General Plan. However, the proposed project would not extend infrastructure to that property or increase the City's capacity to provide water and wastewater services.

Due to the location of the project site, the proposed project would not eliminate any constraints that are currently obstacles to growth in this portion of the City that would hasten development of this area.

Economic Effects

The proposed project would affect the local economy by constructing new residences that would facilitate an increase in the City's population. The project site is approximately two miles from UC Merced and the new residences and neighborhood commercial center could encourage people to live in the City and take advantage of proximity to the educational and employment opportunities at the campus.

Additional local employment can be generated through the multiplier effect, as residents within the project site patronize existing businesses and services in the community. The multiplier effect tends to be greater in regions with larger, diverse economies due to a decrease in the requirement to import goods and services from outside the region. The project is expected to support approximately 147 new jobs in the neighborhood commercial center.

Two different types of additional employment are tracked through the multiplier effect. *Indirect* employment includes those additional jobs that are generated through the expenditure patterns of direct employment associated with the project. Indirect jobs tend to be in relatively close proximity to the places of employment and residence.

The multiplier effect also calculates *induced* employment. Induced employment follows the economic effect beyond the expenditures of the residents within the project area to include jobs created by the stream of goods and services necessary to support residences within the proposed project. When a manufacturer buys or sells products, the employment associated with those inputs or outputs are considered *induced* employment.

For example, when an employee of the project goes out to lunch, the person who serves the employee lunch holds a job that is *indirectly* related to the proposed project. When the server then goes out and spends money in the economy, the jobs generated by this third-tier effect are considered *induced* employment.

The multiplier effect also considers the secondary effect of employee expenditures. Thus, it includes the economic effect of the dollars spent by those employees and residents who support the employees of the project.

Increased future employment generated by employee spending ultimately results in physical development of space to accommodate those employees. It is the characteristics of this physical space and its specific location that will determine the type and magnitude of environmental impacts of this additional economic activity. The environmental implications of this type of economic growth are too speculative to predict or evaluate, since they can be spread throughout the City and Merced County. However, the General Plan anticipates additional development in the City's SOI/SUDP that could accommodate the indirect and induced economic activity, such as within the Bellevue Community Plan area which is expected to include mixed-use and commercial development.

Impacts of Induced Growth

The growth induced directly and indirectly by the proposed project could contribute to the environmental impacts, discussed in Chapter 3, in the City and the County. Any such environmental effects, however, are too diffuse and speculative to predict or describe with any particularity.

Indirect and induced population growth in the City's SOI/SUDP would further contribute to the loss of open space because it would encourage the conversion of undeveloped land to urban uses for additional housing and infrastructure.

In summary, although the proposed project can be said to induce growth, the consequences of such growth-inducement are too speculative to predict and thus cannot be said to contribute meaningfully to any significant environmental effect. Growth-inducing effects are **less than significant.**

5.5 References Cited

City of Merced. 2012a. *City of Merced 2030 General Plan*. Adopted January 2012. https://www.cityofmerced.org/departments/development-services/planning-division/merced-vision-2030-general-plan

City of Merced. 2012b. *City of Merced 2030 General Plan EIR.* Adopted January 2012. https://www.cityofmerced.org/departments/development-services/planning-division/merced-vision-2030-general-plan-adoption

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