

7 OTHER CONSIDERATIONS REQUIRED BY CEQA

This chapter addresses the following other considerations required by CEQA based on the impact analysis in Chapter 4 and the alternatives analysis in Chapter 6: growth inducement, significant irreversible impacts, and significant and unavoidable impacts.

7.1 GROWTH INDUCEMENT

7.1.1 BACKGROUND

A project is defined as growth inducing when it: directly or indirectly fosters economic growth, population growth, or additional housing; removes obstacles to growth; or encourages or facilitates other activities that would significantly affect the environment (CEQA Guidelines Section 15126.2). Growth inducement would be caused by the provision or extension of utilities and public services. For example, the following are examples of growth-inducing activities: the development of water, wastewater, fire, or other services in previously underserved areas; the extension of transportation routes into undeveloped areas; and the establishment of major new employment opportunities.

7.1.2 ECONOMIC GROWTH, POPULATION GROWTH, ADDITIONAL HOUSING

As described in the approved Plan PEIR, from 2016 to 2050, regional population is forecasted to increase by over 436,000 people (13 percent), adding over 280,000 housing units and over 439,000 jobs. The approved Plan's objectives included focusing population and employment growth in existing urbanized areas to protect sensitive habitat and natural resource areas, and providing transportation investments that support compact land development patterns. The approved Plan PEIR determined construction of additional housing and planned transportation network improvements as part of the approved Plan would remove obstacles to growth in some areas of the region, which would support additional housing, population, and economic growth. The proposed Amendment does not include any transportation network changes or new construction and would not support additional housing, population, and economic growth beyond what was identified in the approved Plan PEIR. As discussed in Chapter 2, *Project Description*, the proposed Amendment includes changes to the financial strategies in the approved Plan that would result in a decrease in revenue. However, there would still be sufficient revenue to fund the planned transportation improvements included in the approved Plan, and no changes to those projects would result.

7.2 SIGNIFICANT IRREVERSIBLE IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires a discussion of any significant irreversible environmental change that would be caused by the proposed project. The proposed Amendment does not include any new transportation network improvements, land use changes, or construction beyond what was identified in the approved Plan PEIR. As detailed in Section 4.2, *Energy*, and in Table 4.2-1 of this SEIR, implementation of the proposed Amendment and removal of the regional road usage charge would increase vehicle miles traveled, which would result in an increased and irreversible consumption of nonrenewable energy resources in the form of on-road vehicle gasoline and diesel fuel. However, as determined in Section 4.2, the proposed Amendment would not result in wasteful, inefficient, or unnecessary use of energy because per capita energy use would still decrease between 2016 and each horizon year, and energy impacts would be less than significant.

7.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(c) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided even with the implementation of feasible mitigation measures. Significant and unavoidable impacts from the implementation of the proposed Amendment were identified in Sections 4.1, *Air Quality*, 4.3, *Greenhouse Gas Emissions*, 4.4, *Noise and Vibration*, and 4.5, *Transportation* and are presented in Table 7-1 below.

It was also determined through the analysis in Chapter 5, *Cumulative Impacts*, that implementation of the proposed Amendment would result in significant and unavoidable cumulative impacts related to air quality, greenhouse gas emissions, noise and vibration, and transportation.

**Table 7-1
Significant and Unavoidable Impacts**

Impacts of the Proposed Amendment in 2025, 2035, and 2050	Mitigation Measures	Level of Significance After Mitigation		
		2025	2035	2050
4.1 Air Quality				
<p>AQ-2 Result in a cumulatively considerable net increase in nonattainment criteria pollutants, including VOC, NO_x, PM₁₀, PM_{2.5}, and SO_x Significant impact in 2050 consistent with the approved Plan PEIR.</p>	<p>AQ-2a. Secure Incentive Funding AQ-2b. Purchase Zero Emission Trains GHG-5a. Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects GHG-5g. Prepare/Develop a Regional Climate Action Plan TRA-2. Achieve Further VMT Reductions for Transportation and Development Projects</p>	Not Applicable	Not Applicable	Significant and Unavoidable
<p>AQ-4 Expose sensitive receptors to substantial PM₁₀ and PM_{2.5} concentrations Significant impact in 2025 consistent with the approved Plan PEIR. Substantially more severe significant impact in 2035 and 2050 compared to the approved Plan PEIR.</p>	<p>AQ-2a. Secure Incentive Funding AQ-4. Reduce Exposure to Localized Particulate and/or TAC Emissions GHG-5a. Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide</p>	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable

Impacts of the Proposed Amendment in 2025, 2035, and 2050	Mitigation Measures	Level of Significance After Mitigation		
		2025	2035	2050
	<p>GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects</p> <p>GHG-5g. Prepare/Develop a Regional Climate Action Plan</p> <p>TRA-2. Achieve Further VMT Reductions for Transportation and Development Projects</p>			
<p>AQ-5 Expose sensitive receptors to substantial TAC concentrations Substantially more severe significant impact in 2025, 2035, and 2050 compared to the approved Plan PEIR.</p>	<p>AQ-2a. Secure Incentive Funding</p> <p>AQ-4. Reduce Exposure to Localized Particulate and/or TAC Emissions</p> <p>AQ-5a. Reduce Exposure to Localized Toxic Air Contaminant Emissions</p> <p>AQ-5b. Reduce Exposure to Localized Toxic Air Contaminant Emissions during Railway Design</p> <p>GHG-5a. Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans</p> <p>GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure</p> <p>GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide</p> <p>GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects</p> <p>GHG-5g. Prepare/Develop a Regional Climate Action Plan</p> <p>TRA-2 Achieve Further VMT Reductions for Transportation and Development Projects</p>	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
4.2 Energy				
Not applicable	Not applicable	Not Applicable	Not Applicable	Not Applicable

Impacts of the Proposed Amendment in 2025, 2035, and 2050	Mitigation Measures	Level of Significance After Mitigation		
		2025	2035	2050
4.3 Greenhouse Gas Emissions				
<p>GHG-5 Be inconsistent with the State’s ability to achieve the 2030 reduction target of SB 32, the accelerated 2030 reduction target of the 2022 Scoping Plan and long-term reduction goals of Executive Orders S-3-05, B-55-18, and AB 1279</p> <p>New significant impact in 2030, 2045, and 2050 compared to the approved Plan PEIR.</p>	<p>GHG-5a. Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans</p> <p>GHG-5b. Establish New Funding Programs for Zero-Emissions Vehicles and Infrastructure</p> <p>GHG-5c. Implement Nature-Based Climate Solutions to Remove Carbon Dioxide from the Atmosphere</p> <p>GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide</p> <p>GHG-5e. Implement Measures to Reduce GHG Emissions from Transportation Projects</p> <p>GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects</p> <p>GHG-5g. Prepare/Develop a Regional Climate Action Plan</p> <p>AQ-3b. Reduce Diesel Emissions During Construction from Off-Road Equipment</p> <p>AQ-3c. Reduce Diesel Emissions from On-Road Vehicles</p> <p>AQ-4. Reduce Exposure to Localized Particulate and/or TAC Emissions</p> <p>TRA-2. Achieve Further VMT Reductions for Transportation and Development Projects</p> <p>WS-1a. Implement Water Conservation Measures for Transportation Network Improvements</p> <p>WS-1b. Implement Water Conservation Measures for Development Projects</p>	<p>Significant and Unavoidable (in 2030)</p>	<p>Significant and Unavoidable (in 2045)</p>	<p>Significant and Unavoidable</p>

Impacts of the Proposed Amendment in 2025, 2035, and 2050	Mitigation Measures	Level of Significance After Mitigation		
		2025	2035	2050
4.4 Noise and Vibration				
<p>NOI-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; or generate a substantial absolute increase in ambient noise</p> <p>Significant impact in 2025, 2035, and 2050 consistent with the approved Plan PEIR.</p>	<p>NOI-1a. Implement Construction Noise Reduction Measures for Development Projects and Transportation Network Improvements</p> <p>NOI-1b. Implement Operational Noise Reduction Measures for Transportation Network Improvements</p> <p>NOI-1c. Implement Operational Noise Reduction Measures for Development Projects</p>	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
<p>NOI-2 Generation of excessive groundborne vibration or groundborne noise levels</p> <p>Significant impact in 2025, 2035, and 2050 consistent with the approved Plan PEIR.</p>	<p>NOI-2a. Implement Construction Groundborne Vibration and Noise Reduction Measures</p> <p>NOI-2b. Implement Groundborne Vibration and Noise-Reducing Measures for Rail Operations</p>	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
4.5 Transportation				
<p>TRA-2 Conflict or be inconsistent with CEQA Guidelines Section 15064.3 by not achieving the substantial VMT reductions needed to help achieve statewide GHG reduction goals</p> <p>Significant impact in 2025 consistent with the approved Plan PEIR.</p> <p>Substantially more severe significant impact in 2030, 2035, 2045, and 2050 compared to the approved Plan PEIR.</p>	<p>TRA-2. Achieve Further VMT Reductions for Transportation and Development Projects</p> <p>GHG-5a. Allocate Competitive Grant Funding to Projects that Reduce GHG Emissions and for Updates to CAPs or GHG Reduction Plans</p> <p>GHG-5d. Develop and Implement Regional Digital Equity Strategy and Action Plan to Advance Smart Cities and Close the Digital Divide</p> <p>GHG-5f. Implement Measures to Reduce GHG Emissions from Development Projects</p>	Significant and Unavoidable	Significant and Unavoidable (and in 2030)	Significant and Unavoidable (and in 2045)