

# Chapter 5.0

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## CEQA Considerations

### 5.1 Introduction

Section 15126 of the CEQA Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. In compliance with §15126, this DEIR includes the following required analyses:

- Significant Environmental Effects
- Significant environmental effects that cannot be avoided if the proposed project is implemented
- Significant irreversible environmental changes that would result from implementation of the proposed project
- Growth-inducing impacts of the proposed project
- Cumulative Impacts
- Conclusion

### 5.2 Significant Environmental Effects

Chapter 3, Summary of Impacts and Mitigation Measures, and Sections 4.2 and 4.3, provide a comprehensive identification of the proposed project's environmental effects, including the level of significance both before and after mitigation.

#### 5.2.1 Significant and Unavoidable Impacts

Section 15126 (b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The environmental effects of the proposed project on various aspects of the environment are discussed in detail in Chapters 4 and 5. Potentially significant impacts that cannot be avoided if the project is approved include:

- 4.3-1: Potentially Significant Noise Impacts at Nearest Residences due to Drilling Noise Levels (During Construction only), and/or
- 5.2.3: Potential to Induce Substantial Population Growth

#### 5.2.2 Significant Irreversible Environmental Effects

Section 15126.2 (c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental change that would be caused by the Proposed Project. Generally, a project would result in significant irreversible changes if:

- The primary and secondary impacts would generally commit future generations to similar uses (such as highway improvement which provides access to a previously inaccessible area); and/or

- The project would involve a large commitment of nonrenewable resources.

Operation of the ASR Program is intended to manage surface and groundwater resources by employing a conjunctive use strategy that promotes sustainability. Energy consumption for operational purposes would be minimal. The ASR program would not cause significant adverse irreversible environmental effects.

### 5.2.3 Growth Inducing Impacts

CEQA Guidelines (Section 15126.2 (d), require that an EIR evaluate the growth-inducing potential of a proposed project. Growth inducing is defined as:

*"...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. Included in this are projects which would remove obstacles to population growth... Also discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively."*

Growth can be induced in a number of ways; through the elimination of obstacles to growth, which refers to the extent to which a proposed project removes infrastructure limitations or provides infrastructure capacity, or removes regulatory constraints that could result in growth unforeseen at the time of project approval.

The elimination of physical obstacles to growth is considered a growth-inducing effect. In terms of water supply, the following physical constraints to growth currently exist in the City:

- Limited surface water supplies available to the City;
- Limited capacity of the potable water treatment, storage and distribution system serving the western portion of the City; and
- Limited capacity of the recycled water system serving the western portion of the City.

The purpose of the ASR Program is to improve groundwater supply reliability rather than generate a new primary source of water supply. The ASR Program would not constitute a primary source of water supply for customers during normal years, nor would it increase the capacity of the distribution system or otherwise add infrastructure in direct support of new development. During normal years however, ASR operations would be conducted for the purpose of potable water storage and to meet peak demand as needed. This removes storage as an obstacle to growth. Also, it could be argued that the project could, indirectly, accommodate demands of new growth by increasing the certainty of the existing groundwater supply, which could allow for more accurate estimates of water available to serve potential growth areas. Therefore, this analysis conservatively assumes that any projects that generate an increase in water supply reliability could be considered an indirect growth-inducing impact. Potential impacts associated with growth inducement could include, but would not be limited to:

- Land Use Changes – land use changes could include urban infill and increased population density and potential annexation projects west and north of the current City limit;
- Traffic Impacts – traffic in the City could increase because of new development and increases in visitor travel and truck traffic serving the region;
- Air Quality Impacts – local air quality could continue to decline as a result of population growth and increased traffic. The local air basin currently does not meet state and federal air quality standards for ozone and particulate matter (PM10 and PM2.5); and/or
- Biological Impacts – the conversion of undeveloped land to homes, roads, businesses, and other uses could adversely affect habitats and associated wildlife.

Other potential impacts from growth include possible urban runoff effects of development from increases in impermeable surfaces, disturbance of known or unknown cultural resources due to ground disturbance, increased temporary and permanent noise impacts because of construction and transportation and industrial land uses, visual resource impacts due to development of currently undeveloped areas, and consumption of energy and natural resources. Potential growth inducing impacts would be mitigated in part by compliance with the City's growth management ordinance.

## 5.3 Cumulative Impacts

### 5.3.1 Definition and Scope of Cumulative Analysis

In accordance with CEQA Guidelines §15130(a), this DEIR assesses the potential for cumulative impacts of the proposed project. A cumulative impact is defined as, "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines §15355). Cumulatively considerable impacts as defined by CEQA mean that, "...the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of possible future projects." (CEQA Guidelines §15065(a)(3)). The CEQA Guidelines include specific direction regarding the cumulative impact analysis, including:

*"Where a Lead Agency is examining a project with an incremental effect that is not 'cumulatively considerable,' a Lead Agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable." (§15130(a))*

*"...An EIR shall not discuss impacts which do not result in part from the project evaluated in the EIR." (§15130(a)(1))*

*"When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A Lead Agency shall identify facts and analysis supporting the Lead Agency's conclusion that the cumulative impact is less than significant." (§15130(a)(2))*

*"An EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The Lead Agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable." (15130 (a)(3)).*

### **5.3.2 Potential Cumulative Impacts**

It is the determination of the City (CEQA Lead Agency) that the proposed ASR Program would not create significant cumulatively considerable impacts. The analysis herein includes the facts that provide the basis for this determination.

The potential cumulative impacts considered in this analysis include:

- Adverse effects to groundwater quality;
- Adverse changes to groundwater elevations (lowering the aquifer);
- Increased potential for surface subsidence; and
- Adverse effects to surface water flows.

As stated above, a project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The ASR program would be implemented consistent with the Western Placer County Groundwater Management Plan (WPCGMP), and the Water Forum Agreement (WFA), for which an EIR was certified in 1999. The WPCGMP and WFA represent regional plans for groundwater resource management. This analysis summarizes both of these program concepts as they relate to potential cumulative impacts associated with groundwater.

#### **Western Placer County Groundwater Management Plan (WPCGMP)**

As referenced throughout this DEIR, the proposed ASR Program would be implemented consistent with the direction of the WPCGMP. The WPCGMP is a joint effort by the City of Roseville, City of Lincoln, Placer County Water Agency (PCWA), and California American Water (CAW). Placer County and the California Department of Water Resources also actively participated in development of the WPCGMP.

The overarching goal of the WPCGMP is to, "...maintain the quality and ensure the long term availability of groundwater to meet backup, emergency, and peak demands without adversely affecting other groundwater uses within the WPCGMP area." To achieve the overarching goal, and to comply with the California Water Code, the WPCGMP identifies groundwater basin management objectives (BMOs) and plan components which would alleviate cumulative impacts. The BMO's and plan components are summarized below:

## WPCGMP BMOs

The WPCGMP requires that BMO's be characterized by one or all of the following:

1. Specific objectives that can be scientifically measured;
2. A clearly defined monitoring program designed to collect data necessary to evaluate the BMO's performance;
3. A reporting method of monitored data to identify success or forewarn challenges with the management of the groundwater; and
4. Programs and/or actions available to remedy a problem, if one is determined to exist.

As stated in the WPCGMP, the BMO's were established in compliance with the California State Water Code §10753.7 (a)(1), which require that the BMO's be consistent with the water code as follows:

*"(1) Prepare and implement a groundwater management plan that includes basin management objectives for the groundwater basin that is subject to the plan. The plan shall include components relating to the monitoring and management of groundwater levels within the groundwater basin, groundwater quality degradation, inelastic land surface subsidence, and changes in surface flow and surface water quality that directly affect groundwater levels or quality or are caused by groundwater pumping in the basin."*

The water code emphasizes specific and measurable BMO's, and the following BMO's were developed for the WPCGMP:

- Management of the groundwater basin shall not have a significant adverse effect on groundwater quality;
- Manage groundwater elevations to ensure an adequate groundwater supply for backup, emergency, and peak demands without adversely impacting adjacent areas;
- Participate in state and federal land surface subsidence monitoring programs;
- Protect against adverse impacts to surface water flows in creeks and rivers due to groundwater pumping; and
- Ensure groundwater recharge projects comply with state and federal regulations and protect beneficial uses of groundwater.

## WPCGMP Components

Component Category 1: Stakeholder Involvement (Required)

- Involving the Public
- Involving other agencies within and adjacent to the WPCGMP Area
- Utilizing advisory committee
- Developing Relationship with State and Federal Agencies

Component Category 2: Monitoring Program (Required)

- Groundwater Elevation Monitoring
- Groundwater Quality Monitoring
- Land Surface Elevation (Subsidence) Monitoring
- Protocols for the Collection of Groundwater Data
- Groundwater Data Management System

Component Category 3: Groundwater Resource Protection

- Well Construction Policies
- Well Abandonment and Well Destruction Policies
- Wellhead Protection Measures
- Protection of Recharge Areas
- Control of the Migration and Remediation of Contaminated Groundwater
- Control of Saline Water Intrusion

Component Category 4: Groundwater Sustainability

- Conjunctive Management Activities
- Demand Reduction

Component Category 5: Planning Integration

- Existing Integrated Planning Effort
- Potential Future Integrated Planning Efforts

**Water Forum Agreement (WFA) EIR (SCH No. 95082041)**

The ASR Program is intended to meet the objectives of the regional conjunctive use program prescribed by the Water Form Agreement and the Regional Water Master Plan developed by the American River Basin Cooperating Agencies.<sup>1</sup> The focus of the Water Forum Agreement is meeting the water supply availability and reliability needs of Placer County and Sacramento County while protecting the environmental values of the lower American River. The ASR Project would enable the City to meet drought year water demands with groundwater, while mitigating any long-term impacts to the groundwater basin. This meets the goal of the Regional Water Master Plan which is to develop equitable, cost-effective water resource management strategies for enhancing water supply reliability and operation flexibility for water uses of Folsom Lake, the lower American River, and the connected groundwater basin. This cumulative analysis for groundwater injection and extraction considers the potential environmental effects of injecting surface water and extracting groundwater to maintain groundwater as a

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<sup>1</sup> ARBCUP is comprised of seven local water purveyors - Citrus Heights Water District, Fair Oaks Water District, Placer County Water Agency, San Juan Water District, Sacramento Suburban Water District, and the cities of Roseville and Sacramento

sustainable resource, and improve the City's water supply reliability. Specifically, this analysis also considers the provisions of the WFA which addresses supplying regional water demands generated in Placer County and Sacramento County. The WFA provides a framework for providing surface water and groundwater supplies to the region through 2030. It is likely that water supply will come from the following sources: existing surface water supplies from the American River, expanded use of groundwater, additional cooperative agreements between water purveyors, mandatory conservation measures in the future, and new surface water supplies from the Sacramento River.

An EIR was prepared for the WFA that addresses impacts and mitigation measures resulting from implementation of the water supply program outlined in the WFA. As a certified CEQA document, the WFA EIR constitutes a legally satisfactory analysis of all the issues addressed therein, including groundwater and water quality impacts. For the purpose of this analysis, the focus is on the potential groundwater impacts evaluated in the WFA EIR.

The WFA EIR listed the environmental impacts that could occur when implementing water diversions under the WFA and concluded that there was the possibility for environmental impacts in the following areas: groundwater resources, water supply, water quality, fisheries and aquatic habitat, flood control, hydropower supply, vegetation and wildlife, recreation, land use and growth inducement, aesthetics, cultural resources, and soils and geology. Impacts specific to groundwater listed below, were determined to be less than significant with no required mitigation measures.

#### **WFA EIR Less Than Significant Impacts**

- Groundwater Quality (Impact 6.2-1)
- Movement of Groundwater Contaminants (Impact 6.2-2)
- Land Subsidence (Impact 6.2-3)
- Reduced Efficiency of Wells (Impact 6.2-4)

#### **5.4 Conclusion**

Ultimately, the objectives of the BMO's, components in the WPCGMP, and mitigation measures identified in the WFA EIR, are designed to sufficiently provide a sustainable, long-term, source of water supply in the project area and surrounding region. Currently, no reasonably foreseeable projects in the groundwater basin, similar to the proposed ASR program are known. However, such projects would be implemented consistent with the WPCGMP with regional coordination called for under this plan which would ensure that cumulative impacts of the ASR Program would be less than cumulatively considerable.