

4 ENVIRONMENTAL IMPACT ANALYSIS

4.0 APPROACH TO THE ENVIRONMENTAL ANALYSIS

4.0.1 INTRODUCTION

In accordance with the CEQA Guidelines, this EIR includes an evaluation of potentially significant effects on the physical environment associated with implementing the proposed General Plan Update and identifies feasible mitigation for those effects. CEQA Guidelines Section 15126.2 states:

An EIR shall identify and focus on the significant effects of the proposed project on the environment. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced. Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects. The discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, and human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services. The EIR shall also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected.

This EIR describes potentially feasible measures that could avoid or minimize significant adverse impacts (as required by CEQA Guidelines Section 15126.4(a)(1)) and feasible and practicable measures that are fully enforceable through permit conditions, agreements, or other legally binding process (as required by CEQA Guidelines Section 15126.4(a)(2)). In the case of the adoption of a plan, policy, regulation, or other public project—as is the case for this proposed General Plan Update EIR—CEQA Guidelines Section 15126.4(a)(2) provides that mitigation measures can be incorporated into the plan, policy, regulation, or project design. Mitigation measures are not required for impacts that are found to be less than significant.

The following discussion introduces Chapter 4 of this EIR, which addresses the environmental setting, regulatory framework, environmental impacts, and mitigation measures for each environmental issue area, and explains the organization and general assumptions used in the analysis. Specific assumptions, methodology, and thresholds of significance used in the analysis and determination of significance of impacts are contained in each individual EIR chapter and impact topic section.

4.0.2 CONTENTS OF EIR SECTIONS AND DEFINITION OF TERMS

Chapter 4 of this EIR is organized by issue area, generally corresponding to topics in the CEQA Environmental Checklist (CEQA Guidelines Appendix G). As described below, each section follows the same format.

4.0.2.1 ENVIRONMENTAL SETTING

The “Environmental Setting” subsection provides an overview of the physical environmental conditions (i.e., the environmental baseline) in the Planning Area, and surrounding areas as appropriate, in accordance with the CEQA Guidelines Section 15125(a)(2), at the time the notice of preparation (NOP) was published.

4.0.2.2 REGULATORY FRAMEWORK

The “Regulatory Framework” subsection identifies the plans, policies, laws, regulations, and ordinances that are relevant to each topical section.

4.0.2.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The “Environmental Impacts and Mitigation Measures” subsection identifies the impacts of the proposed General Plan Update on the existing physical environment, in accordance with the CEQA Guidelines Sections 15125 and 15143. The following discussions are included in this subsection.

- ▶ **Methodology** describes the methods, process, procedures, and/or assumptions used to formulate and conduct the impact analysis.
- ▶ **Thresholds of Significance** describes the criteria established by the City to define at what level an impact would be considered significant in accordance with CEQA. Thresholds may be quantitative or qualitative; they may be based on examples found in the CEQA Guidelines; scientific and factual data related to the City’s jurisdiction; legislative or regulatory performance standards of federal, state, regional, or local agencies relevant to the impact analysis; City goals or policies (e.g., General Plan goals or policies) or other locally-adopted policies; policies or adopted standards of affected jurisdictions; or other factors. Generally, however, the thresholds of significance used are derived from Appendix G of the CEQA Guidelines, as amended; factual or scientific information and data; and regulatory standards of federal, state, regional, and local agencies.
- ▶ **Impact Analysis** describes potential adverse physical environmental effects associated with implementation of the proposed General Plan Update. This assessment also specifies why impacts are found to be significant and unavoidable, significant or potentially significant, or less than significant, or why there is no environmental impact, based on the identified thresholds of significance.

The impacts are listed numerically and sequentially throughout each section. For example, impacts in Section 4.3 are identified as 4.3-1, 4.3-2, and so on. An impact statement precedes the discussion of each impact and provides a summary of the impact. The discussion that follows the impact statement includes the evidence on which a conclusion is based regarding the level of impact.

The level of impact is determined by comparing the environmental effects of the proposed project with baseline environmental conditions. Under CEQA, the physical environmental conditions as they exist at the time the NOP is published (as defined above and as described in the “Environmental Setting” sections of Chapter 4) normally represents baseline physical conditions.

Proposed changes to the existing General Plan goals and policies are listed within each impact, shown in **bold underlined** text for additions and ~~striketrough~~ text for deletions. An evaluation of the potential impacts of these policy changes is provided.

Relevant proposed General Plan Update policies and implementation measures that would reduce or avoid impacts are summarized and the mitigating benefits of these policies and programs are described.

- ▶ **Mitigation Measures** to avoid, minimize, rectify, reduce, or compensate for significant and potentially significant impacts of the proposed General Plan Update, in accordance with the CEQA Guidelines Sections 15370, 15002(a)(3), 15021(a)(2), and 15091(a)(1), where feasible, are recommended for each significant impact. Each mitigation measure is identified numerically to correspond with the number of the impact being reduced by the measure. For example, Impact 4.3-1 would be mitigated by Mitigation Measure 4.3-1. Where no mitigation is required because the impact conclusion is “less than significant,” the conclusion “no mitigation measures are required” is stated. Where no feasible mitigation is available to reduce impacts to a less-than-significant level, the impacts are identified as remaining “significant and unavoidable” and the conclusion “no feasible mitigation measures are available” is stated with an explanation. (In some cases, all feasible and available mitigation measures are not sufficient to reduce an impact to a “less-than-significant” level. When this occurs, the impacts are described as remaining “significant and unavoidable.”) Significant and unavoidable impacts are also summarized in Chapter 5, “Other CEQA Considerations,” under the subsection “Significant and Unavoidable Environmental Impacts.”
- ▶ **Cumulative Impacts** are discussed in Chapter 5, “Other CEQA Considerations.” Cumulative impacts are those impacts of the proposed General Plan Update that would result from the incremental effect of implementing the proposed General Plan Update in combination with other past, present, and reasonably foreseeable future projects producing related impacts, and which are cumulatively considerable.

4.0.2.4 TERMINOLOGY USED TO DESCRIBE IMPACTS

Determining the Level of Impact

The EIR for this project uses the following terminology to denote the significance of environmental impacts of the proposed General Plan Update:

- ▶ **No impact** indicates the environmental resource being discussed would not be adversely affected by implementation of the proposed General Plan Update. It means no change from existing conditions. This impact level does not need mitigation.
- ▶ A **less-than-significant impact** is one that would not result in a substantial or potentially substantial adverse change in the physical environment. Under CEQA, this impact level does not require mitigation, even if feasible.
- ▶ A **significant impact** would have a substantial adverse effect on the physical environment, but can be reduced to a less-than-significant level with mitigation. Impacts may also be considered “potentially significant” if the analysis cannot definitively conclude that an impact would occur as a result of the implementation of the proposed General Plan Update. Under CEQA, mitigation measures must be identified, where feasible, to reduce the magnitude of significant or potentially significant impacts.

- ▶ A **significant and unavoidable impact** is one that would result in a substantial adverse effect on the environment, and no known feasible mitigation measures are available to reduce the impact to a less-than-significant level. Under CEQA, a project with significant and unavoidable impacts may be approved, but the lead agency (in this case, the City) must prepare a “statement of overriding considerations” in accordance with CEQA Guidelines Section 15093, explaining how the benefits of the project outweigh the potential for significant impacts.

Impact Mechanisms

Mechanisms that could cause impacts are discussed for each issue area. Impacts from implementing the proposed General Plan Update fall into the following categories:

- ▶ A **temporary impact** would occur only during construction or demolition activities.
- ▶ A **short-term impact** would last from the time construction ceases to within 3 years following construction.
- ▶ A **long-term impact** would last longer than 3 years following completion of construction. In some cases, a long-term effect could be considered a permanent effect.
- ▶ A **direct impact** is an effect that would be caused by an action and would occur at the same time and place as the action.
- ▶ An **indirect impact** is an effect that would be caused by an action but would occur later in time, or at another location, yet is reasonably foreseeable in the future.