

6. Other CEQA Sections

6.1 Significant Unavoidable Effects

Section 2100(b)(2)(A) of CEQA and Section 15126.2(b) of the CEQA Guidelines require identification of significant environmental effects that cannot be avoided if the proposed project were implemented.

Detailed mitigation measures proposed by the County of Humboldt have been identified throughout Chapter 4 of this EIR and would mitigate project effects to the extent feasible. The mitigation measures also are summarized in Table 1-1. After implementation of the proposed mitigation measures, there are no significant unavoidable impacts.

6.2 Significant Irreversible Environmental Changes

Section 21100(b)(2)(B) of CEQA requires that an EIR include a discussion of significant irreversible environmental changes that would result from Project implementation. CEQA Guidelines Section 15126.2(c) describes irreversible environmental changes in the following manner:

“Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

Construction activities associated with the project would result in an irretrievable and irreversible commitment of non-renewable resources through the use of construction materials. This would include the use of fossil fuels (such as gasoline, diesel and oil) during the construction period, and the use of earth minerals and ores (such as concrete and steel). The project would result in improvements to the Approved Samoa WWTF, and would install collection and disposals systems in areas that have already been developed (existing roadways) or approved for development (Approved Samoa WWTF) and would not expand or modify off-site roadways; therefore, the project would not modify regional access or result in access to a previously inaccessible area. As a proposed utility infrastructure project, the project is not representative of a land use type that would result in accidents that could lead to irreversible environmental damage. Overall, given the project’s low consumption of irretrievable resources, such commitment is justified.

6.3 Growth-Inducing Impacts of the Project

CEQA Guidelines Section 15126.2(d) requires an EIR to discuss the growth-inducing impact(s) of a proposed project. Specifically, CEQA Guidelines state that the EIR shall:

“Discuss the ways in which the 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 (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing

community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

Projects can have direct and/or indirect growth inducement potential. An example of direct growth inducement would be the construction of new housing. Examples of indirect growth inducement could include establishing substantial new permanent employment opportunities and removing obstacles to population growth (e.g. the expansion or improvement of utilities which allows for more growth within a service area).

Growth inducement itself is not an environmental effect but may lead to an environmental effect(s). Environmental effects may include increased demand on other public services and infrastructure, increased noise and traffic, degradation or loss of plant or animal habitats, degradation of air and water quality, or conversion of open space land to urban development.

The project would provide sewer service to the communities of Fairhaven and Finntown. The project would not provide sewer service to facilities within the STMP. The project's Short-Term Phase would allow existing facilities within the service area to connect to the project facilities. The project's Short-Term Phase would not induce substantial population growth, as it would only serve existing commercial and industrial facilities within the project's service area.

The project's Long-Term Phase would allow future infill development consistent with the adopted HBAP and existing zoning to connect to the project facilities. The assumed number of potential connections and population served by the project's Long-Term Phase is provided in Section 3.5.1. As detailed within that section, the Long-Term Phase may allow up to 62 new sewer connections to residential units and serve associated secondary dwelling units, supporting an estimated population of 273 persons on available infill lots in Fairhaven, development of which has already been evaluated in the Certified Humboldt County General Plan EIR.

Fairhaven is located in the Humboldt Local Agency Management Program Variance Prohibition Areas, as detailed in Section 3.3.1 (Existing Unsewered Condition in Fairhaven and Finntown). Variances cannot be granted for new onsite wastewater treatment system construction. Therefore, development of new residences is restricted within the community of Fairhaven due to the area's current unsewered condition.

Because the Long-Term Phase would allow future infill structures, consistent with HBAP and zoning, to connect to the project's collection system and be served by the wastewater treatment plant, the project would remove an existing restriction to residential development. However, the Humboldt General Plan previously identified that within the Eureka Plain Watershed, within which the project is located, approximately 896 new housing units would be constructed by 2028 with a corresponding population increase of approximately 2,070 persons (Humboldt County 2017b). The population that may be supported by future infill development was estimated using the known average residential occupancy in Samoa, consistent with the Humboldt County certified General Plan Update EIR. Therefore, the estimated population increase of 273 persons has been previously accounted for by the General Plan and analyzed within the certified Humboldt County General Plan EIR (Humboldt County 2017b). The project would not allow any other new development to connect to the Approved Samoa WWTF other than the 62 infill lots identified under the Long-Term Phase. Because the project

would not allow any new development other than that previously evaluated in a Certified EIR, it is not considered growth inducing.

Construction of the proposed project is not anticipated to generate growth, as the construction jobs would be temporary and are anticipated to draw from the local workforce. Additionally, operation of the project is not anticipated to generate new job opportunities beyond those provided by the Approved Samoa WWTF. The proposed additions to the facility would not require additional staff members to maintain and operate the facility. For these reasons, the proposed project would not be expected to generate a substantial demand for new housing, nor be growth-inducing.

6.4 References

GHD/SHN. 2018. Samoa Peninsula Wastewater Project, Planning and Design Study. May.

Humboldt County. 2017a. Humboldt County General Plan for the Areas Outside the Coastal Zone. October 23.

Humboldt County. 2017b. Humboldt County General Plan Update Revised Draft Environmental Impact Report. April 19.

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