4 ENVIRONMENTAL IMPACT ANALYSIS

APPROACH TO THE ENVIRONMENTAL ANALYSIS

In the context of CEQA compliance, the 2002 Zone 40 WSMP is a "program" that is appropriately addressed by a "program EIR." Consistent with State CEQA Guidelines §15168, the Zone 40 WSMP consists of a "series of actions that can be characterized as one project" and it would involve "rules, regulations, plans, or other criteria to govern the conduct of a continuing program." The water supply and environmental protection objectives of the Zone 40 WSMP relate to a continuing plan and program intended to be in effect between now and 2030.

As a "program EIR," this EIR is intended "to examine the overall effects of the proposed course of action and to take steps to avoid unnecessary adverse environmental effects," as described in the "Discussion" supporting §15168 of the State CEQA Guidelines. The level of analysis in this EIR is intended to comply with the requirements of a program-level document. PRC §21068.5 describes "tiering" as:

> the coverage of general matters and environmental effects in an environmental impact report prepared for a policy, plan, program, or ordinance followed by narrower or site-specific environmental impact reports ….

For the Zone 40 WSMP, the relevant "overall effects of the proposed course of action" and "general matters and environmental effects" relate to the impacts of the water management approaches set forth in the Zone 40 WSMP and defined in the modeling scenarios with regard to the provision of surface water and extraction of groundwater. The program-level focus of the EIR analysis is, therefore, on the overall environmental effects related to the Zone 40 WSMP's water resources management alternatives.

Direct Effects

The primary direct effect of implementation of the 2002 Zone 40 WSMP is on surface and groundwater resources in the region, and these direct effects are the focus of this EIR. In addition, the 2002 Zone 40 WSMP identifies specific facilities required to implement the proposed water supply program. Although specific location, size, and design of facilities are not yet fully defined, the Zone 40 WSMP identifies the need for (1) a surface water diversion structure on the Sacramento River; (2) a surface water treatment facility; (3) raw and treated water pipelines; (4) groundwater extraction, treatment, and conveyance facilities; and (5) recycled water storage and conveyance facilities.

The general locations of these facilities are identified, and for purposes of this EIR, the impacts of construction and operation (air quality, noise, traffic) of facilities are considered direct effects. Impacts are assessed in a programmatic fashion, but site-specific issues related to construction and operation of facilities must be deferred to other environmental documents

because the planning and design of the specific facilities require separate processes and approvals, and sufficient information about the precise nature of the facilities is not yet available.

Indirect, Cumulative, and Growth-inducing Effects

In addition to assessing the effects of the 2002 Zone 40 WSMP on surface and groundwater resources, the program EIR addresses in some detail relevant indirect environmental effects of development in the area that would be supplied water through implementation of the 2002 Zone 40 WSMP. The 2030 Study Area addressed in this EIR is defined in Section 3.2 Project Location, and shown in Exhibit 3-1. Because the primary purpose of the 2002 Zone 40 WSMP is to provide adequate water supplies to serve regional growth to the year 2030, the project is inherently cumulative, and the indirect impacts of growth would have a greater effect on the environment than the direct impacts of facilities. Therefore, in addition to direct effects, relevant indirect and cumulative impacts of regional growth are emphasized in Section 4.1, Land Use and Growth-inducing Impacts; Section 4.6, Biological Resources; and Section 4.7, Water Resources.

CONTENTS OF ENVIRONMENTAL ANALYSIS SECTIONS

The sections in Chapter 4 of this draft environmental impact report (EIR) provide a description of the environmental setting, thresholds of significance, environmental impacts, environmental mitigation guidelines, and level of significance of the impacts after mitigation. Potential environmental issues are described that were identified for review in the notice of preparation (NOP) of the draft EIR and that need to be addressed in a program-level analysis. The complete NOP is presented in Appendix B. Chapter 4 sections are organized as follows:

Existing Conditions: This subsection describes the existing regional and local environmental conditions, in accordance with the State CEQA Guidelines §15125. The discussion of existing conditions is focused on information relevant to the affected study areas described in the project description (Chapter 3) to establish the base conditions for impact analysis.

Thresholds of Significance: This subsection describes the criteria and thresholds that define significant effects on the environment in the impact analysis, consistent with Public Resources Code (PRC) §21082.2 and State CEQA Guidelines §15064. The criteria define the circumstances that would lead to a significant effect on the environment, as defined by PRC §21068 and State CEQA Guidelines §15002(g) and §15382. Thresholds are presented and explained to help apply the significance criteria to the impact analysis where quantitative or qualitative measures, agency standards, or legislative or regulatory requirements are relevant to the impact analysis. The thresholds of significance provide the basis for the EIR's conclusions as to whether impacts will be significant.

Environmental Impacts: Environmental impacts are numbered sequentially in each section throughout the chapter. For instance, impacts in Section 4.3 are numbered Impact 4.3-1,

Impact 4.3-2, Impact 4.3-3, and so on. A brief impact statement precedes the discussion of each impact and provides the summary conclusion of each impact analysis and the level of significance before mitigation. The discussion that follows the impact statement describes the substantial evidence upon which a determination is made as to whether the impact would be significant or less than significant.

Environmental Mitigation Guidelines: This subsection describes environmental mitigation guidelines that would reduce significant effects to the extent feasible, in accordance with State CEQA Guidelines §15002(a)(3), §15021(a)(2), and §15091(a)(1). State CEQA Guidelines §15370 defines mitigation as:

a. avoiding the impact altogether by not taking a certain action or parts of an action;

b. minimizing impacts by limiting the degree or magnitude of the action and its implementation;

c. rectifying the impact by repairing, rehabilitating, or restoring the affected environment;

d. reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and

e. compensating for the impact by replacing or providing substitute resources or environments.

The environmental mitigation guidelines are numbered, corresponding to the impact being addressed. For example, Impact 4.3-1 would be mitigated with Environmental Mitigation Guideline 4.3-1.

Level of Significance after Mitigation: This subsection states whether any significant effects are considered significant and unavoidable, or whether all effects are less than significant after adherence to environmental mitigation guidelines. If mitigation is proposed in the impact analysis, the conclusion will consider whether the environmental mitigation guidelines would or would not reduce impacts to a less-than-significant level. This section is presented in accordance with State CEQA Guidelines §15126(b), which requires identification of significant and unavoidable effects on the environment. If significant and unavoidable effects remain, an agency may approve a project, if it finds, pursuant to PRC §21081, that there are no feasible mitigation or alternatives for the effects and that overriding benefits of the project outweigh the significant effects.