

CHAPTER 18

GROWTH INDUCEMENT

CEQA Guidelines (Title 14 CCR 15126.2[d]) and federal NEPA regulations (40 CFR § 1508.8[b]), require that an EIR/EIS discuss how a project, if implemented, could induce growth. This chapter discusses the potential growth-inducing impacts of the Proposed Yuba Accord.

As described in Chapter 1, the purpose of the Proposed Yuba Accord is to resolve instream flow issues associated with operation of the Yuba Project in a way that protects and enhances lower Yuba River fisheries and local water-supply reliability. Additionally, YCWA has a goal to provide revenues for local flood control and water supply projects, while Reclamation and DWR seek to obtain water to use for fisheries protection and for improvements in statewide water supply management, including supplemental water for the CVP and the SWP. Along with in-river actions to help meet YCWA's goals in the Yuba Region, the Yuba Accord Alternative also is expected to improve water supply reliability for the Yuba County farming economy through a conjunctive use program. To help meet Reclamation and DWR's goals for the CVP/SWP, the Yuba Accord Alternative is expected to improve water supply reliability for Reclamation and DWR with a firm commitment of 60 TAF per year for fisheries and other protective actions in the Delta (through the EWA Program or a program equivalent to the EWA), and up to an additional 140 TAF per year of water in drier years for the CVP and SWP, which also could be used for water quality or fish and wildlife purposes. Depending on whether there are willing purchasers and sufficient available capacity at the Delta pumping facilities, water provided for meeting these objectives also could be sold to downstream water users, and ultimately go to consumptive uses in CVP and SWP export service areas.

This chapter defines growth-inducing impacts and evaluates the potential for the Proposed Project/Action and alternatives to directly or indirectly induce growth. The organizational format of this chapter varies slightly from that of other resources presented in this EIR/EIS because there are no specific thresholds from which to measure potential impacts. Rather, the question is how growth could lead to physical environmental impacts in the various resource categories (e.g., reduced air quality, changes in land use, or the demand for public services). Growth in itself does not have physical environmental impacts and is thus not treated as an environmental resource.

18.1 ENVIRONMENTAL SETTING/AFFECTED ENVIRONMENT

18.1.1 YUBA REGION

Yuba County's population has grown at a slow to moderate rate over the last few decades (County of Yuba 2006). Since 2000, the Yuba County population has grown at a steady rate, with a 10.8 percent change from 2000 to 2005. In addition, lower land costs compared to other areas (e.g., Sacramento), particularly related to housing, are expected to keep growth steady and positive (County of Yuba 2006). Overall, the population in Yuba County is forecasted to increase from about 60,000 in 2000 to about 110,000 people by 2025 (County of Yuba 2006). The City of Marysville is the most populous city in the county, and its population has increased 2.9 percent from 2000 to 2005. During that same period, the City of Wheatland population has experienced an increase of 50.8 percent (County of Yuba 2006). The Wheatland area is projected to be the fastest growing city in Yuba County (County of Yuba 2006), and General Plan

projections estimate Wheatland's population will increase from 3,000 in 2004 to approximately 30,100 in 2025 (City of Wheatland 2005).

To accommodate this level of previously approved growth, several city and county General Plans have been updated in recent years and have authorized conversion of M&I water supplies from groundwater to surface water sources. Additionally, several community-based planning documents have identified goals of providing a high level of public services and reducing the dependence on groundwater supplies in the Sierra foothills (County of Yuba 1992; PMC 2005). As an example of local efforts to ensure that an adequate supply of water is available to serve existing and future needs, Yuba City is evaluating options related to converting from a groundwater supply to a surface water supply, or treating groundwater to meet all primary and secondary standards (City of Yuba City 2004). Consistent with the goals to ensure a safe and adequate water supply for existing and future development identified in the City of Wheatland General Plan, YCWA has received approval and funding for a Yuba/Wheatland In-Lieu Groundwater Recharge and Storage Project (Wheatland Project), anticipated to begin construction in 2007. Although unrelated to the Proposed Yuba Accord, the purpose of the Wheatland Project is to extend the YCWA surface water delivery capabilities to the Wheatland area through additional conveyance facilities (see Chapter 5 for additional details).

18.1.2 CVP/SWP UPSTREAM OF THE DELTA REGION

In California, the majority of projected growth is anticipated to occur in the south coast region and in the Central Valley, part of which is in the CVP/SWP Upstream of the Delta Region (WEF Website 2006). Within this region, the primary areas of consideration for the Proposed Yuba Accord include the Central Valley portions of Shasta, Glenn, Colusa, Yolo, Solano, Butte, Sutter, Yuba, Nevada, Placer, and Sacramento counties, as well as CVP and SWP service areas located upstream of the Delta. Over the 25-year period from 1995 to 2020, projected growth rates for the counties within this region range from 40 to over 100 percent (DWR 2005). From 1990 through 1999, the population in the Central Valley increased faster than in any other California region, and it is predicted to grow by another 24 percent between 2000 and 2010 (Great Valley Center 2005). Land uses in the CVP/SWP Upstream of the Delta Region vary. Developed areas range in character from the City of Sacramento, which is heavily populated, to smaller communities such as Willows and Colusa. Most of the region, however, is rural in character and used primarily for agriculture.

Although growth is projected to occur in the CVP/SWP Upstream of the Delta Region, it is likely to occur regardless of whether or not the Proposed Project/Action or an alternative is implemented. Growth in this area has been planned for in city and county general plans, it is not dependent on implementation of any of the alternatives evaluated in this EIR/EIS, nor would the additional water supplied by any of the alternatives be used to support growth in this region.

18.1.3 SACRAMENTO-SAN JOAQUIN DELTA REGION

The areas considered for this region are based on the legal definition of the Delta¹, and encompass portions of Alameda, Contra Costa, Sacramento, San Joaquin Solano and Yolo

¹ The Delta refers to all tidal waters contained within the legal definition of the San Francisco Bay-Sacramento-San Joaquin River Delta, as specified in Section 12220 of the California Water Code of 1969.

counties, as well as various state and federal jurisdictions (DWR 2005). According to the 2000 Census, it is estimated that approximately 462,000 people are residing in areas of these counties located in the legal Delta (DWR 2005). Although the majority of land in the Delta is used for agricultural purposes, other land uses include urban and commercial properties, open water and areas consisting of undeveloped natural vegetation. Water use in the Delta is primarily for agricultural purposes. Small communities in the Delta primarily use groundwater wells for their water needs, and urban water use in the Delta only accounts for a small percentage of the total developed supply² (DWR 2005).

Although growth is projected to occur in the Delta Region, it is likely to occur regardless of whether or not the Proposed Project/ Action or an alternative is implemented. Water transfers potentially occurring under the Yuba Accord Alternative would be conveyed to CVP/SWP export service areas and, thus, would not be expected to directly or indirectly affect community services in the Delta Region. Although growth in this area has been planned for in city and county general plans, it is not dependent on implementation of any of the alternatives evaluated in this EIR/EIS, nor would the additional water supplied by any of the alternatives be used to support growth in this region.

18.1.4 EXPORT SERVICE AREA

The CVP supplies water to more than 250 long-term water contractors in the Central Valley, the Santa Clara Valley, and the San Francisco Bay area. Historically, approximately 90 percent of CVP water has been delivered to agricultural users. Total annual contracts exceed 9 MAF. The SWP provides water to 29 long-term contractors in northern California, the San Joaquin Valley, the San Francisco Bay area, the Central Coast, and Southern California. In these areas, the SWP provides water to an estimated population of more than 23 million people and approximately 755,000 acres of irrigated farmland (DWR Website 2006b). As described in Chapters 3 and 5, Reclamation could allocate Component 2, 3 and 4 water to CVP contractors in proportion to their CVP contract allocations, and DWR could allocate water to SWP contractors in proportion to their Table A amounts, under the Tier 3 Agreements. Full Table A amounts for the SWP total approximately 4,133 TAF. CVP and SWP service areas south of the Delta that could be affected by implementation of the Proposed Project/ Action or an alternative are shown on Figure 2-5.

18.1.5 OTHER REGIONAL CONSIDERATIONS

Although CVP and SWP Export Service Areas south of the Delta generally are not included as one of the regions evaluated for other resource categories being addressed in this EIR/EIS, these areas are considered on a programmatic level in this chapter because of the potential growth-inducing concerns associated with the Proposed Project/ Action and alternatives.

² One important exception is the Contra Costa Water District, which provides treated Delta surface water to approximately 500,000 people, but not all of the serviced population is within the legal Delta (DWR 2005).

18.2 REGULATORY SETTING

18.2.1 NEPA AND CEQA REQUIREMENTS

CEQA Guidelines require an EIR to discuss how a proposed project may induce growth and the potential impacts of this induced growth upon project implementation. Specifically, CEQA requires an EIR to:

“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 waste water 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” (Title 14 CCR 15126.2[d]).

The guideline also states that, *“It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”* In other words, growth inducement must be considered on an individual and neutral basis. Also, impacts on resources resulting from growth might be too far removed from the actions of the lead agency or ultimate retail water delivery agency to require mitigation.

Under NEPA, environmental compliance documents are required to analyze indirect growth-inducing impacts, defined in the following way:

“Indirect effects shall include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems” (40 CFR § 1508.8[b]).

In general, an action would be considered growth inducing if it caused or contributed directly or indirectly to economic growth, population growth, or an increase in population density. Growth-inducing effects include indirect impacts such as changes in land use and related impacts on the environment beyond those that would have occurred from other factors. Thus, a growth-inducing action would promote or encourage growth beyond that which could be attributed to other factors known to have a relationship to economic or population growth. For operational impacts, this analysis looks at increases in water availability created by the Proposed Yuba Accord and whether they would have a determinative impact on decisions related to permitting of land use changes; that is, whether the supplemental water supply created by the Proposed Yuba Accord would remove an impediment to growth.

Except where supply limitations have been identified as the impediment to development approvals, water supply reliability alone is not the determinative factor inducing growth in any region of California. Water supply reliability for urban population growth and development is taken into account to varying degrees by local planning agencies, in general plans of land use jurisdictions and water supply master plans of water-serving organizations (water districts, irrigation districts, private utilities, cities, etc.) The sophistication and complexity of this process has increased in the past decade as better predictive models for assessing demands and supply, and data available to these models, have been developed. Public attention has also focused on the recognition that water supply is one of the key factors to consider when

planning new developments. Community planners, developers, industries, and others seeking to implement or realize urban growth in California are required to demonstrate that a reliable water supply will exist under specified conditions.

18.2.2 RELATIONSHIP TO SENATE BILL 610 AND SENATE BILL 221

Land use planning agencies in California plan growth based on a number of different factors, many of which are unrelated to available water supplies, including economic factors and population dynamics. Under California law, water suppliers are required to serve the needs of users within their service areas (see, e.g., *Swanson v. Marin Municipal Water Dist.* (1976) 56 Cal.App.3d 512, 524 [water district has a “continuing obligation to exert every reasonable effort to augment its available water supply in order to meet increasing demands”]).

The coordination between water supply and land use planning was strengthened in 2001 by the passage of SB 610 (Costa) and SB 221 (Kuehl), which require cities and counties to obtain assessments of the availability of water to supply new developments over a certain size (more than 500 housing units, or their equivalent in demands for commercial and industrial projects), and to obtain assurance from water suppliers that sufficient water is available before approving such new developments. For small jurisdictions, projects representing a 10 percent increase in demand trigger the need for water supply assessments. SB 221 defines “sufficient water supply” as the “total water supplies available during normal, single-dry, and multiple-dry years within a 20-year projection that would meet the projected demand.” The law does not speak, however, to levels of service, allowing local jurisdictions to define sufficiency in terms of how often and severe water shortages due to droughts and other events can be. Therefore, one jurisdiction might conclude from its own perspective that a sufficient supply exists, while another, under exactly the same hydrologic conditions, might conclude otherwise.

The ultimate decision on water supply sufficiency in the context of land development approval rests with the land use jurisdiction and not the water supply entity, unless they are the same entity. Therefore, unless a local agency has imposed growth restrictions due to a water supply constraint, or has specified a standard of reliability against which a new supply can be assessed, determining a specific growth-inducing impact due to the added supply is difficult without knowledge of the facts surrounding specific development situations. There are areas within the state, and some within the SWP service areas, where water supply is acting as a constraint in the development approval process. Where this occurs and where it could be determined that a new supply would relieve that constraint, growth inducement would occur.

The combined effect of SB 610 and SB 221 is to impose upon cities and counties the ultimate responsibility for determining the sufficiency and availability of water as part of their environmental review and approval processes. In addition, a recent court case (*Save Our Peninsula Committee v. Monterey County Board of Supervisors* [2001] 87 Cal.App.4th 99) discussed how water supply sufficiency and the impacts of a proposed project on limited local supply sources were the key factors in deciding the adequacy of an EIR. Water supply availability in this instance also was clearly a determining factor in whether development was allowable.

SB 610 and 221 require only that water supply agencies inform land use jurisdictions regarding the availability of water supplies, the types of infrastructure necessary to deliver the water, and the impacts of new development on supply reliability. SB 610 allows local land use agencies to approve a development despite a water agency’s conclusion that the supplier’s reliability levels would be compromised. Specifically, a water supplier could report to the local land use agency

that water supplies are insufficient and development could still proceed, should the land use authority decide to procure alternate supplies or, in the case of SB 610, adopt a statement of overriding considerations with respect to significant water supply impacts. Further, while SB 610 and SB 221 do attempt to increase the consideration of water supply factors in development decision-making, many proposed projects are not large enough (i.e., 500 or more residences, non-residential uses that would supply more than 1,000 persons, or mixed-use projects that would have a water demand equivalent to the demand of 500 residential units) to trigger the requirement to prepare a water supply assessment pursuant to SB 610.

18.2.3 CALIFORNIA DEPARTMENT OF WATER RESOURCES WATER DELIVERY RELIABILITY REPORT

In 2002, DWR published the first in a biannual series of SWP delivery reliability reports to provide information on the ability of the SWP to deliver water under existing and future development conditions. DWR issued this report to assist SWP contractors to assess the adequacy of the SWP component of their overall water supplies. The report states, *“Information in this report may be used by local agencies in preparing or amending their water management plans and identifying the new facilities or programs that may be necessary to meet future water needs.”* The report also states, *“Agencies will also find this report useful in conducting analyses mandated by legislation authored by Senator Sheila Kuehl (SB 221) and Senator Jim Costa (SB 610).”*

The heart of the report is an analysis that provides forecasts of the delivery capability of the SWP under a variety of hydrologic circumstances with both 2001 and 2021 demands. These forecasts were created using the CALSIM hydrologic model. This information was not used directly in the analysis for this EIR/EIS, but it was described here because it provides some context for the overall water supply capabilities of DWR.

18.2.4 CALFED PROGRAMMATIC RECORD OF DECISION

The Proposed Yuba Accord would provide water for the CALFED EWA Program (or functional equivalent) for use in the protection of Delta fisheries and to improve water supply reliability for Reclamation and DWR. The EWA Program is one of the key water conveyance projects identified in the CALFED ROD. Therefore, for background purposes, it is useful to understand what conclusions regarding the relationship between increased water supply and growth were presented in the CALFED ROD. Although the full CALFED ROD (CALFED 2000) text is incorporated by reference, a synopsis of the conclusions related to the relationship between increased water supply and growth is presented in the bulleted list below.

- ❑ *“The Preferred Program Alternative is expected to result in an improvement in water supply reliability for beneficial use in the Bay Region, Sacramento River Region, and San Joaquin River Region, and South-of-Delta SWP and CVP Service Areas....”*
- ❑ *With respect to how an increase in water supply reliability could affect growth, the CALFED ROD concluded that, “. . . because this issue cannot be determined with certainty at this programmatic level of analysis, the assumption was made for this document that the improvement in water supply reliability that is associated with the Program could stimulate growth.”*
- ❑ *“At this programmatic level, it is unknown what level of growth or the likely location of any increases in population or construction of additional housing would take place. Increases in the*

population in the solution area are projected over the next 30 years, regardless of CALFED actions. "

- *"When additional growth occurs, these changes will be subject to local land use and regulatory decisions by individual cities and counties in the areas where they occur. Future development at the local level is guided by many considerations, only one of which is the reliability of water supply. These other factors include the policies in local general plans and zoning ordinance restrictions; the availability of a wide range of community services and infrastructure, such as sewage treatment facilities and transportation infrastructure; the availability of developable land; the types and availability of employment opportunities; and the analysis and conclusions based on an environmental review of proposed projects pursuant to CEQA. When additional population growth or new development occurs, and additional information is available, local, regional, State, and Federal governments will need to consider and address these potential adverse environmental impacts and methods to avoid or mitigate them."*

Based on the CALFED ROD findings, there are other growth-inducing factors to be considered besides water supply reliability, and each municipality or county controls growth at the local level through land use policies in each jurisdiction. Additionally, it is important to note that the Lower Yuba River Accord EIR/EIS stands on its own and does not rely on the analysis contained in the CALFED Programmatic EIR/EIS. The CALFED ROD conclusions summarized above are provided for informational purposes only. The Lower Yuba River Accord EIR/EIS includes an independently developed analysis, including analysis of potential growth-inducing impacts.

18.2.5 GROWTH PROJECTIONS

There is little doubt that California is expected to experience substantial growth over the next two decades. Numerous state, regional, and local agencies prepare estimates of growth to assist in planning for the effects of that growth, including the need for water supply, additional housing, roads and bridges, sewerage infrastructure, schools, hospitals, police and fire services, and to mitigate the projected negative impacts.

State and regional service and planning agencies, such as the California Department of Finance, Southern California Association of Governments, Bay Area Association of Governments, Sacramento Area Council of Governments, Council of Fresno County Governments, and the Butte County Association of Governments have prepared extensive studies and reports forecasting California's economy, population, and resources. These studies and reports have been approved and adopted by the respective agencies, in cooperation with local jurisdictions, as the most likely scenarios for growth in California.

The primary objectives of these demographic projections, and the planning policies on which they are based, are to evaluate the potential social, economic, environmental, and fiscal impacts that may result from this level of projected growth and to identify mitigation measures required to reduce or eliminate these impacts (MWD and BLM 2001). These projections take into account the predicted adverse impacts of growth. In other words, state and regional planning agencies project growth to occur despite possible shortfalls in water supply, heavy traffic, and other factors that are sometimes assumed to be growth limiting. These assumptions suggest that some level of growth will occur with or without the Proposed Yuba Accord or CALFED programs (e.g., EWA).

18.3 ENVIRONMENTAL IMPACTS/ENVIRONMENTAL CONSEQUENCES

18.3.1 IMPACT ASSESSMENT METHODOLOGY

The benchmark for analysis of the No Project Alternative, the No Action Alternative and the Proposed Project/Action, in terms of the impact of water supply on growth, is current conditions. Current conditions include meeting all current Bay-Delta water quality objectives, as required under SWRCB's D-1641 and BOs governing flows to and through the Delta. Because this EIR/EIS is evaluating the implementation of alternatives that are of a relatively short-term duration (eight years), the No Project/No Action benchmark, or baseline, assumes Bay-Delta water quality objectives would continue to be implemented by Reclamation and the DWR during this period. It should be noted, however, that supplies available to the downstream water users prior to D-1641 and the governing BOs were greater than supplies subsequent to D-1641 (i.e., a higher or more reliable supply baseline). While SWP demand levels never approached full delivery capability prior to current Bay-Delta standards, full CVP contract amounts were delivered before D-1641. In other words, supplies were more plentiful from the federal and state water projects prior to D-1641, and an additional water supply that may be provided from the Proposed Project/Action or an alternative would not restore them to anywhere near their prior levels. This analysis compares project conditions to baseline conditions subsequent to D-1641. The analysis also assumes that existing conditions would continue in the future under the No Project Alternative and the No Action Alternative. Thus, the benchmark for the growth inducement analysis would be growth that would have occurred without the Proposed Project/Action or an alternative under existing supply conditions. The analysis benchmark also assumes currently available supplies to upstream water users (i.e., north of the Delta) would continue under the No Project Alternative and the No Action Alternative.

18.3.1.1 LEVEL OF ANALYSIS

Referring to the discussion of CEQA regulations described in Section 18.2.1, two CEQA-related concepts are important to consider in determining the level of analysis to be provided. First, CEQA is concerned with identifying impacts related to physical changes in the environment. To evaluate the growth-related physical changes in the environment that may occur from a project, it is necessary to identify where and to what extent future growth will occur. The direct growth-related effects of a water supply project would involve localized economic effects such as job growth and temporary increased demand for housing related to project construction. The indirect effects of water supply projects are related to the physical changes (i.e., new construction) that would occur as a result of the additional water supplies being available to local governments. It can be difficult to identify with any degree of precision potential indirect growth-related effects resulting from an increase in water supply (*Napa Citizens for Honest Government v. Napa County Board of Supervisors* [2001] 91 Cal. App. 4th 342; *Defend the Bay v. City of Irvine* [2004] 119 Cal. App. 4th 1261).

The second important concept to consider is that CEQA does not require undue speculation in predicting actual environmental consequences (see CEQA Guidelines Title 14 CCR 15144, 15145). Thus, while it is acknowledged that additional water supplies can be growth-inducing, it is the responsibility of the lead agencies to describe the impacts of their projects only to the extent that those impacts can be either known or reasonably predicted. Further, they are not required to adopt mitigation for impacts that require a great deal of speculation even to

describe, and that are ultimately not within their control or statutory authority (*Napa Citizens for Honest Government v. Board of Supervisors* [2001] 91 Cal.App.4th 342).

METHODOLOGY FOR EVALUATING GROWTH-RELATED EFFECTS IN THE YUBA REGION

Existing water supply conditions and delivery procedures serve as the benchmark for analysis of the Proposed Project/Action and alternatives. In Yuba County, elements of the Proposed Project/Action that would extend from 2016 to 2025 are evaluated to determine whether there would be a potential to increase water supply availability for either agricultural or M&I purposes, which could increase growth beyond levels identified in local planning documents. For operational impacts, the analysis considers potential increases in water availability created by the Proposed Project/Action and alternatives and evaluates whether these changes would have a determinative impact on decisions related to permitting of land use changes; that is, whether new supply created by the Proposed Project/Action and alternatives would remove an impediment to growth.

METHODOLOGY FOR EVALUATING GROWTH-RELATED EFFECTS ASSOCIATED WITH INCREASED CVP AND SWP WATER DELIVERIES

Implementation of the Proposed Project/Action and alternatives could potentially result in growth via three types of operations-related impacts: (1) effects resulting from changes in agricultural land and water use patterns because of increased CVP and SWP water deliveries; (2) growth in urban areas resulting from increases in CVP and SWP water deliveries; and (3) growth in urban areas resulting from third-party water transfers facilitated by the increase in allowable exports. For the purposes of this analysis, third party entities may include upstream CVP and/or SWP water supply contractors that could acquire water through the EWA Program or an equivalent program, or the SVWMP³, or other CVP and/or SWP contractors that could acquire water in the Sacramento Valley and export it from the Delta.

For operational impacts, the analysis considers potential increases in water availability created by the Proposed Project/Action or an alternative and evaluates whether these changes would have a determinative impact on decisions related to permitting of land use changes; that is, whether new supply created by the Proposed Project/Action or an alternative would remove an impediment to growth.

This EIR/EIS refers to the analysis conducted for the existing EWA Program, and uses a methodology for evaluating potential growth-inducing impacts similar to that which was used in other recent Reclamation documents. It is assumed that EWA operations (or a functionally equivalent program) in the future would continue as they are under the CEQA Existing Condition. The analytical approach described below is developed to mimic the analyses conducted for the existing EWA Program; however, it is designed only to evaluate potential changes that would be expected to occur with the alternatives considered in this EIR/EIS. To satisfy CEQA and NEPA analytical requirements pertaining to growth-related issues, separate

³ As described in Chapter 3, while it is uncertain at this time whether a long-term EWA Program or a program equivalent to the EWA, and the SVWMP, or similar programs will be implemented in the future, it is possible that such implementation will occur. The analyses in this EIR/EIS that concern future conditions therefore assume that a long-term EWA Program, or an equivalent program, and the SVWMP will be implemented.

findings have been determined for the Proposed Lower Yuba River Accord based on a combination of the following: (1) independent review (also see Chapter 5) of the previously approved CVP/SWP service area analysis conducted for the existing EWA Program EIS/EIR, which is incorporated by reference; and (2) a quantitative analysis of potential impacts associated with changes to CVP and SWP water contractor deliveries provided to the Export Service Area as a result of the Proposed Project/Action and alternatives, which is discussed below and supported by model output presented in Appendix F1.

ANALYTICAL APPROACH FOR EVALUATING POTENTIAL GROWTH-INDUCING EFFECTS IN THE EXPORT SERVICE AREA

To evaluate potential service area impacts associated with the provision of water under the Tier 2 and Tier 3 Agreements proposed in the Yuba Accord Alternative, this EIR/EIS includes an analysis of the quantities of Component 2, 3 and 4 water likely to be provided to CVP and SWP contractors, by water year type. Under the Tier 3 Agreements, Reclamation would allocate Component 2 through 4 water to CVP contractors in proportion to their CVP contract allocations, and DWR would allocate water to SWP Contractors in proportion to their Table A⁴ amounts (see Chapter 3). Water transfers also could occur under the Modified Flow Alternative, although the amount of water available for transfer would be less than that which is considered for the Yuba Accord Alternative.

Potential impacts associated with CVP service areas and water allocations previously were evaluated and approved through Reclamation's CVPIA Long-term Water Service Contract renewal process. Transfer water that could be furnished by the Proposed Project/Action and alternatives is considered to be an additional supply that could be delivered under existing authorized water supply contracts, which have previously completed all necessary environmental compliance documentation. No new or amended contracts are required, and existing contracts have NEPA and ESA coverage in place.

Potential impacts associated with SWP service areas and water allocations are addressed by comparing changes associated with the Proposed Project/Action and alternatives to previously approved Table A allocations. DWR also considers the transfer water that could be furnished by the alternatives evaluated in this EIR/EIS as an additional supply of water that could be delivered under existing water supply contracts and Table A allocations. To address south of Delta export service area considerations, the EIR/EIS will address potential changes in SWP water contractor allocations by providing information on the Table A amounts available for each contractor under the basis of comparison, and then describing how an additional increase in Component 2 through 4 water under the Proposed Project/Action and alternatives could be allocated to participating contractors in proportion to their respective Table A percentages.

As previously described for the Yuba Accord Alternative in Chapter 5, Component 1 water is designed for EWA uses and purposes described in the certified EIS/EIR (Reclamation *et al.* 2004) for the existing EWA Program, which is anticipated to expire on December 31, 2007. If the existing EWA Program ends, it is anticipated that Component 1 water would continue to be

⁴ A "Table A" amount is the maximum contractual quantity of water that a SWP long-term water contractor can request each year. A 100 percent allocation amounts to 4.13 MAF of water, distributed among the 29 SWP Contractors that provide water to more than 23 million Californians and about 750,000 acres of irrigated farmland throughout the state (DWR Website 2006a).

used for similar purposes. Currently, Reclamation and DWR plan to temporarily extend the existing EWA Program, and they are in the process of completing supplemental environmental documentation for this extension of the program that is anticipated to be released by the end of the year. While it is uncertain at this time whether a long-term EWA Program or a program equivalent to the EWA will be implemented in the future, or what the elements of such a program will be, the best assumption that can be made at this time is that the EWA Program of an equivalent program will continue, with conditions similar to those for the existing EWA Program. For this reason, the analyses in this EIR/EIS that concern future conditions assume that a long-term EWA Program or a program equivalent to the EWA will be implemented, with conditions similar to those for the existing EWA Program. Because it is anticipated that the Proposed Project/Action or alternatives would provide water to DWR for EWA-related purposes, it is necessary for this EIR/EIS to address potential service area issues associated with this water in a manner sufficient to provide interim coverage until the environmental documentation for the extension of the EWA Program is completed. The impact assessment methodology used to address these issues is presented below.

ANALYTICAL APPROACH FOR EVALUATING TRANSFER OF COMPONENT 2 THROUGH 4 WATER TO CVP AND SWP LONG-TERM WATER CONTRACTOR SERVICE AREAS

For CEQA purposes related to DWR and the SWP, a technical review of the existing EWA EIS/EIR was first conducted to determine the evaluated parameters (e.g., volume of water, timing and duration), assessment methodology, impact indicators and significance criteria used to support the conclusions presented in the existing EWA EIS/EIR. The existing EWA water supply analysis was separated into the potential effects on agencies and their users from transferring water to the EWA, water users receiving water from the EWA, and water users not selling water to the EWA (Reclamation *et al.* 2003). To provide maximum flexibility, the EWA analysis included many potential transfers when the EWA Project agencies would likely not need all transfers in a given year. The EWA analysis also evaluated the timing of transfers to the timing of the demand. To compare potential water supply changes associated with the Proposed Project/Action and alternatives compared to those identified for the existing EWA Program, a separate analysis designed to mimic the approach used in the existing EWA EIS/EIR was conducted for this EIR/EIS. Because conditions associated with the existing EWA Program represent the basis of comparison (i.e., Existing Condition), the modeling used to characterize the CEQA Existing Condition includes operational assumptions for the existing EWA Program, as modeled in Reclamation's OCAP Study 3. Using OCAP Study 3 as the modeling baseline, transfer water provided to the EWA Program under the Proposed Project/Action and alternatives is post-processed to determine the amount of change expected to occur in evaluated Delta parameters (e.g., export pumping), relative to the existing EWA Program. The modeling results for the Proposed Project/Action and alternatives are compared to the modeled existing EWA EIR/EIS results to determine whether potential changes in water supply deliveries associated with transfers to the EWA Program (or functionally equivalent state program) under the Proposed Project/Action and alternatives would produce hydrologic changes similar to those occurring under the Existing Condition and, thus, be within the range of effects identified by the existing EWA Program. Following independent review and comparison of these two analyses, separate findings are made for this project and presented in this EIR/EIS.

Secondly, under the Tier 2 Agreement between Reclamation and DWR, the agencies would make a 50-50 split of Component 2 through 4 water for delivery to CVP and SWP water

contractors, respectively. Under the Tier 3 Agreements, Reclamation could allocate Component 2 through 4 water to CVP contractors in proportion to their CVP contract allocations, and DWR could allocate water to SWP Contractors in proportion to their Table A amounts. Full Table A amounts for the SWP total approximately 4,133 TAF. Table A amounts for SWP contractors upstream of the Delta (not including North Bay Aqueduct) total 37.1 TAF (0.9 percent). Table A amounts for SWP long-term contractors served by the North Bay Aqueduct total 76.8 TAF (1.9 percent). Because these percentages are so small, the modeling assumes that all Yuba River water for the SWP would be exported to service areas south of the Delta.

The analysis evaluates how annual CVP and SWP contract allocations could change as a result of the Proposed Project/Action and alternatives, relative to the bases of comparison. Reclamation and DWR would elect to proportionally distribute the additional water supplied by the Yuba Accord Alternative to CVP and SWP contractors according to authorized federal CVP contracts and state SWP Table A allocations, respectively. The increase in annual allocation of Component 2, 3 and 4 water, by contractor and water year type, is compared to current delivery allocations under the basis of comparison to determine the percent change that would be expected to occur as a result of the Proposed Project/Action and alternatives. Additionally, the percent increase in CVP and SWP dry and critical year deliveries provided by the Component 2, 3 and 4 water is calculated for comparative purposes. Because the Proposed Project/Action and alternatives, relative to the bases of comparison, could change the frequency of CVP and SWP allocations, the frequency of modeled changes occurring by water year type and over the 72-year simulation period is evaluated to determine whether potential water supply impacts are expected to occur.

18.3.2 ENVIRONMENTAL IMPACTS/ENVIRONMENTAL CONSEQUENCES COMMON TO ALL ALTERNATIVES

Impact 18.3.2-1: Potential local growth-inducing considerations in the Yuba Region

The direct effects of the Proposed Project/Action and alternatives, through the stimulation of the local economy in Yuba County by increased water supply reliability, are not expected to accommodate or induce growth. Although growth is projected to occur in Yuba County, it would occur whether or not the Proposed Project/Action or an alternative is implemented. Growth in Yuba County has been planned for in city and county general plans, and many of these planning documents also identify water supply sources, which do not include the Proposed Yuba Accord, to accommodate previously approved levels of growth. Because the Proposed Project/Action or an alternative would be in place for a period of approximately eight years and would provide water for agricultural purposes only, new Yuba County development projects requiring long-term water supply sources for M&I purposes would not be served by this project.

After 2016, there also is the potential that YCWA could identify the need to divert up to an additional 30 TAF per year of water from Daguerre Point Dam, which would be used for M&I purposes in Yuba County. Although this projected need was on the planning horizon when the Water Purchase Agreement was developed, there is a high degree of uncertainty as to when the demand for this water will arise in the future. At the earliest, local General Plan information and preliminary growth estimates do not anticipate a need for this water until 2016, but this demand may not even be likely to occur until 2025 or later.

Because future water supply demands are related to the rate of continued growth, specific details regarding population demands and related project facilities necessary to supply this water have yet to be developed. Multiple factors could influence future Yuba County population growth and the need for community facilities in various service areas, many of which are beyond the control of this project. To illustrate, several potential considerations associated with these uncertainties are identified below:

- ❑ Changes in local and county governments may occur, which could alter future general plan decisions regarding land use and agricultural land conversion;
- ❑ The U.S. Government may decide to close Beale AFB, which could result in substantial impacts to the local economy;
- ❑ It is not possible, with certainty, to identify the specific areas or communities in Yuba County that will develop the most rapidly and, thus, the proximity of these fast-growing areas to the underlying groundwater basins cannot yet be determined;
- ❑ Using existing technology, it is not possible to accurately predict what the safe yield of the aquifer underlying the North Yuba and South Yuba subbasins would be in 2016;
- ❑ Because impacts could be dispersed throughout Yuba County, it is not possible to quantitatively determine, based on modeling tools available to date, where potential impacts would be likely to occur because of the highly speculative nature of modeling assumptions available to date, which would render any results almost meaningless. However, there is the potential that improved modeling tools and real-time monitoring data will be available in the future, which could provide decision-makers with a better understanding of groundwater/surface water interactions and other environmental interactions and processes; and
- ❑ Potential water management constraints may be imposed as a result of the 2016 FERC relicensing for the Yuba Project, which could limit or preclude YCWA's ability to provide additional water supplies to meet increased future demands.

Because future water supply demands are related to the rate of continued growth, specific details regarding population demands and related project facilities necessary to supply this water as early as 2016, or as late as post-2025, also are very uncertain at this time. Recognizing that FERC is expected to issue a new long-term license for the Yuba Project around 2016, it is anticipated that water supply issues and Yuba County demands will be better understood as that process nears implementation. Although there is the possibility that future delivery of an additional 30 TAF after 2016 could have some effect on growth and community facilities in Yuba County, these effects, if they occur, would likely be extremely small, especially in comparison to other social and economic variables that can influence growth and services. Nevertheless, preliminary mechanisms are identified in the Water Purchase Agreement to provide a partial means of addressing water supply needs associated with this increased demand, which most likely would involve future environmental analyses and possible development of mitigation measures (e.g., Feather River second point of diversion, groundwater substitution), if deemed necessary.

As part of the planning and environmental compliance activities associated with the FERC relicensing process, this additional 30 TAF of water to meet future M&I demands will be considered in more detail, along with more up-to-date local community information related to clarifying the uncertainties listed above, as conditions changes and more accurate information

becomes available. Moreover, it is likely that if YCWA were to pursue these actions, separate environmental documentation would be required to address regulatory compliance requirements associated with the construction of a second point of diversion and related operations and maintenance activities associated with a new water supply component (i.e., 30 TAF). For the reasons described above, potential local growth-inducing impacts associated with the Proposed Project/ Action and alternatives would not be expected to occur.

Impact 18.3.2-2: Potential regional growth-inducing considerations in the Export Service Area

Review of land use plans and interviews with planning officials indicate that water supply is not currently viewed as an impediment to urban growth. With no directly identifiable water-related impediments to growth, potential increases in supply are not expected to change the amount of growth that would have occurred without the Proposed Yuba Accord. Further, given the 8-year duration of this project and the unknown disposition of water supplies which could exist at its termination, the likelihood is low that a water supply growth impediment would arise during the term of this project that could be alleviated by the supplies created under the Proposed Project/ Action or an alternative.

Water supply improvements of up to 140 TAF per year per year are expected in CVP and SWP export service areas through the Proposed Project/ Action, over the 8-year term of the Water Purchase Agreement. Any extension of these supplies would be subject to additional discretionary action and review. It is currently anticipated that the SWP would receive 50 percent of additional supplies, up to 70 TAF in some years, particularly in the drier years when supplies are generally more constrained. Approximately half of these supplies would be available to the Metropolitan Water District of Southern California, and the remaining additional water would be available to the other Southern California SWP contractors, as provided under current SWP contract allocations.

With respect to potential growth-inducing concerns associated with specific uses of Components 2 through 4 water provided to the Export Service Area, the following discussion is provided to address the following: (1) Reclamation and federal CVP water contractor service area considerations; and (2) DWR and SWP water contractor service area considerations. Although the Proposed Yuba Accord is intended to improve water supply reliability and provide a supplemental water supply during drier years, the actions (e.g., increased flows, water transfers) required to implement these benefits only would extend for a relatively short period of time (i.e., 8 years). When cities and counties plan for increased local or regional growth, the law requires the obtainment of assurances that sufficient water supplies would be available over a range of normal and dry year conditions within a 20-year planning projection. Because the Proposed Yuba Accord would only have a duration of approximately eight years, it could not be used to fulfill this requirement. Thus, it would not be expected to cause or remove an obstacle to growth and, thus, would not be expected to contribute to new growth-inducing effects. In support of these findings, the quantitative analyses presented in subsequent sections discuss the anticipated water delivery changes resulting from the Proposed Project/ Action and alternatives in comparison to existing authorized CVP contract allocations and SWP Table A amounts.

For organizational and comparative purposes, this information is presented in a format similar to that which is used for the water rights, CEQA, and NEPA analytical purposes in other chapters of this EIR/EIS.

As discussed in Chapter 4, CEQA and NEPA have different legal and regulatory standards that require slightly different assumptions in the modeling runs used to compare the Proposed Project/Action and alternatives to the appropriate CEQA and NEPA bases of comparison in the impact assessments. Although only one project (the Yuba Accord Alternative) and one action alternative (the Modified Flow Alternative) are evaluated in this EIR/EIS, it is necessary to use separate NEPA and CEQA modeling scenarios for the Proposed Project/Action, alternatives and bases of comparisons to make the appropriate comparisons. As a result, the scenarios compared in the impact assessments below have either a “CEQA” or a “NEPA” prefix before the name of the alternative being evaluated. A detailed discussion of the different assumptions used for the CEQA and NEPA scenarios is included in Appendix D.

As also discussed in Chapter 4, while the CEQA and NEPA analyses in this EIR/EIS refer to “potentially significant,” “less than significant,” “no” and “beneficial” impacts, the first two comparisons (CEQA Yuba Accord Alternative compared to the CEQA No Project Alternative and CEQA Modified Flow Alternative compared to the CEQA No Project Alternative) presented below instead refer to whether or not the proposed change would “unreasonably affect” the evaluated parameter. This is because these first two comparisons are made to determine whether the action alternative would satisfy the requirement of Water Code section 1736 that the proposed change associated with the action alternative “*would not unreasonably affect fish, wildlife, or other instream beneficial uses.*”

18.3.3 ENVIRONMENTAL IMPACTS/ENVIRONMENTAL CONSEQUENCES OF THE CEQA YUBA ACCORD ALTERNATIVE COMPARED TO THE CEQA NO PROJECT ALTERNATIVE

Impact 18.3.3-1: Increases in water deliveries to CVP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

Model output demonstrates that slight increases and decreases in total CVP contractor deliveries would occur during some water years. Because changes in long-term water deliveries to CVP contractor service areas would be relatively small, (no greater than 1 percent) and only for the duration of the Yuba Accord, the additional water supply and reliability provided by the CEQA Yuba Accord Alternative, relative to the CEQA No Project Alternative, would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts associated with changes in water deliveries to CVP contractor service areas would not be expected to occur (see Appendix F1, Table F1-3).

Impact 18.3.3-2: Increases in water deliveries to SWP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

As previously described in Chapter 5, the proportional distribution of water supplied by the CEQA Yuba Accord Alternative to individual SWP contractors would result in slight increases and decreases that would vary by water year. Because changes in long-term water deliveries to SWP contractor service areas would be relatively small (no greater than 1 percent) under the CEQA Yuba Accord Alternative, and only for the duration of the Yuba Accord, these changes would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts

associated with changes in water deliveries to SWP contractor service areas would not be expected to occur (see Appendix F1, Table F1-4).

18.3.4 ENVIRONMENTAL IMPACTS/ENVIRONMENTAL CONSEQUENCES OF THE CEQA MODIFIED FLOW ALTERNATIVE COMPARED TO THE CEQA NO PROJECT ALTERNATIVE

Impact 18.3.4-1: Increases in water deliveries to CVP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

Total CVP contractor deliveries would increase and decrease slightly during most water years; however, these changes would be no greater than 1 percent compared to total amount of CVP contractor deliveries. Because changes in long-term water deliveries to CVP contractor service areas would be relatively small, the additional water supply and improved reliability provided by the CEQA Modified Flow Alternative, relative to the CEQA No Project Alternative, would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts associated with changes to water deliveries in CVP contractor service areas would not be expected to occur (see Appendix F1, Table F1-11).

Impact 18.3.4-2: Increases in water deliveries to SWP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

The proportional distribution of water supplied to individual SWP contractors would result in slight increases and decreases that would vary by water year under the CEQA Modified Flow Alternative, relative to the CEQA No Project Alternative. Because changes in long-term water deliveries to SWP contractor service areas would be relatively small (no greater than 1 percent) under the CEQA Modified Flow Alternative, these changes would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts associated with changes in water deliveries to SWP contractor service areas would not be expected to occur see Appendix F1, Table F1-12).

18.3.5 ENVIRONMENTAL IMPACTS/ENVIRONMENTAL CONSEQUENCES OF THE CEQA YUBA ACCORD ALTERNATIVE COMPARED TO THE CEQA EXISTING CONDITION

Impact 18.3.5-1: Increases in water deliveries to CVP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

Because changes in long-term water deliveries to CVP contractor service areas would be relatively small and only for the duration of the Yuba Accord, the additional water supply provided by the CEQA Yuba Accord Alternative, relative to the CEQA Existing Condition, would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts are considered less than significant (see Appendix F1, Table F1-19).

Impact 18.3.5-2: Increases in water deliveries to SWP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

The proportional distribution of water supplied to individual SWP contractors generally would decrease slightly in most water years, and would increase slightly in critical years under the CEQA Yuba Accord Alternative, relative to the CEQA Existing Condition. Because changes in long-term water deliveries to SWP contractor service areas would be relatively small (no greater than 1 percent) under the CEQA Yuba Accord Alternative, and only for the duration of the Yuba Accord, these changes would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts associated with changes in water deliveries to SWP contractor service areas would not be expected to occur (see Appendix F1, Table F1-20).

18.3.6 ENVIRONMENTAL IMPACTS/ENVIRONMENTAL CONSEQUENCES OF THE CEQA MODIFIED FLOW ALTERNATIVE COMPARED TO THE CEQA EXISTING CONDITION

Impact 18.3.6-1: Increases in water deliveries to CVP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

Although total CVP contractor deliveries would decrease slightly during all water years, these reductions would not be greater than about 1 percent of the total amount of CVP contractor deliveries under the CEQA Existing Condition. Changes in long-term water deliveries to CVP contractor service areas would be relatively small under the CEQA Modified Flow Alternative, relative to the CEQA Existing Condition and, thus, would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts are considered less than significant (see Appendix F1, Table F1-27).

Impact 18.3.6-2: Increases in water deliveries to SWP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

Because changes in long-term water deliveries to SWP contractor service areas would be relatively small (1 percent or less) under the CEQA Modified Flow Alternative, these changes would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts associated with changes in water deliveries to SWP contractor service areas would not be expected to occur (see Appendix F1, Table F1-28).

18.3.7 ENVIRONMENTAL IMPACTS/ENVIRONMENTAL CONSEQUENCES OF THE CEQA NO PROJECT/NEPA NO ACTION ALTERNATIVE COMPARED TO THE CEQA EXISTING CONDITION/NEPA AFFECTED ENVIRONMENT

As discussed in Chapter 3, the key elements and activities (e.g., implementation of the RD-1644 Long-term instream flow requirements) for the CEQA No Project Alternative would be the same for the NEPA No Action Alternative. The primary differences between the CEQA No Project and NEPA No Action alternatives are various hydrologic and other modeling

assumptions (see Section 4.5 and Appendix D). Because of these differences between the No Project and No Action alternatives, these alternatives are distinguished as separate alternatives for CEQA and NEPA evaluation purposes.

Based on current plans and consistent with available infrastructure and community services, the CEQA No Project Alternative in this EIR/EIS is based on current environmental conditions (e.g., project operations, water demands, and level of land development) plus potential future operational and environmental conditions (e.g., implementation of the RD-1644 Long-term instream flow requirements in the lower Yuba River) that probably would occur in the foreseeable future in the absence of the Proposed Project/Action or another action alternative. The NEPA No Action Alternative also is based on conditions without the proposed project, but uses a longer-term future timeframe that is not restricted by existing infrastructure or physical and regulatory environmental conditions. The differences between these modeling characterizations and assumptions for the CEQA No Project and the NEPA No Action alternatives, including the rationale for developing these two different scenarios for this EIR/EIS, are explained in Chapter 4⁵.

Although implementation of the RD-1644 Long-term instream flow requirements would occur under both the CEQA No Project and the NEPA No Action alternatives, the resultant model outputs for both scenarios are different because of variations in the way near-term and long-term future operations are characterized for other parameters in the CEQA and NEPA assumptions. As discussed in Chapter 4, the principal difference between the CEQA No Project Alternative and the NEPA No Action Alternative is that the NEPA No Action Alternative includes several potential future water projects in the Sacramento and San Joaquin valleys (e.g., CVP/SWP Intertie, FRWP, SDIP and a long-term EWA Program or a program equivalent to the EWA), while the CEQA No Project Alternative does not. Because many of the other assumed conditions for these two scenarios are similar, the longer-term analysis of the NEPA No Action Alternative compared to the NEPA Affected Environment builds upon the nearer-term analysis of the CEQA No Project Alternative compared to the CEQA Existing Condition.

Because the same foundational modeling base (OCAP Study 3) was used to characterize near-term conditions (2001 level of development) both the CEQA No Project Alternative and the CEQA Existing Condition, it was possible to conduct a detailed analysis to quantitatively evaluate the hydrologic changes in the Yuba Region and the CVP/SWP system that would be expected to occur under these conditions. Building on this CEQA analysis, the analysis of the NEPA No Action Alternative compared to the NEPA Affected Environment consists of two components: (1) an analysis of near-term future without project conditions quantified through the CEQA No Project Alternative, relative to the CEQA Existing Condition, and (2) a qualitative analysis of longer-term future without project conditions (the NEPA No Action Alternative)⁶.

⁵ For modeling purposes related to CEQA analytical requirements, OCAP Study 3 (2001 level of development) is used as the foundational study upon which the modeling scenarios for the CEQA No Project Alternative and the CEQA Existing Condition were developed. For modeling purposes related to NEPA analytical requirements, OCAP Study 5 (2020 level of development) is used as the foundational study upon which the modeling scenarios for the NEPA No Action Alternative was developed.

⁶ The second analytical component cannot be evaluated quantitatively due to the differences in the underlying baseline assumptions for OCAP Study 3 and OCAP Study 5.

18.3.7.1 CEQA NO PROJECT ALTERNATIVE COMPARED TO THE CEQA EXISTING CONDITION

Impact 18.3.7.1-1: Increases in water deliveries to CVP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

Total CVP contractor deliveries would not be greater than about 1 percent of the total amount of CVP contractor deliveries under the CEQA Existing Condition (Appendix F1, Table F1-43). Because changes in long-term water deliveries to CVP contractor service areas would be relatively small, the No Project Alternative, relative to the CEQA Existing Condition, would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts are considered less than significant (see Appendix F1, Table F1-35).

Impact 18.3.7-2: Increases in water deliveries to SWP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

The proportional distribution of water supplied to individual SWP contractors generally would decrease slightly (1 percent) in below normal and dry years and would increase slightly (1 percent) in critical years under the CEQA No Project Alternative, relative to the CEQA Existing Condition. Because changes in long-term water deliveries to SWP contractor service areas would be relatively small under the CEQA No Project Alternative, relative to the CEQA Existing Condition, these changes would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts associated with changes in water deliveries to SWP contractor service areas would not be expected to occur (see Appendix F1, Table F1-36).

18.3.7.2 NEPA NO ACTION ALTERNATIVE COMPARED TO THE NEPA AFFECTED ENVIRONMENT

Under the NEPA No Action Alternative, the long-term average annual CVP contract and SWP Table A deliveries to the Export Service Area would be expected to increase for the following reasons:

- ❑ Implementation of CVP/SWP conveyance projects (e.g., SDIP, CVP/SWP Intertie);
- ❑ Implementation of CVP/SWP operational changes (e.g., CVP/SWP Integration); and
- ❑ Increased SWP Table A demands associated with the future level of development.

CVP deliveries (excluding single-year water transfer volumes) to water service contractors with service areas south of the Delta are expected to increase by an average of 70 TAF per year. However, critical year deliveries are expected to increase by an average of 18 TAF per year. Most of this increase in water supply would be delivered to agricultural water districts for irrigation rather than for M&I purposes.

Table A deliveries (excluding single-year water transfer volumes) to SWP contractors with service areas south of the Delta are expected to increase by an average of approximately 230 TAF per year. SWP Table A deliveries in critical years would increase by approximately 150 TAF per year.

18.3.8 ENVIRONMENTAL IMPACTS/ENVIRONMENTAL CONSEQUENCES OF THE NEPA YUBA ACCORD ALTERNATIVE COMPARED TO THE NEPA NO ACTION ALTERNATIVE

Impact 18.3.8-1: Increases in water deliveries to CVP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

Because changes in long-term water deliveries to CVP contractor service areas would be relatively small and only for the duration of the Yuba Accord, the additional water supply provided by the NEPA Yuba Accord Alternative, relative to the NEPA No Action Alternative, would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts are considered less than significant (see Appendix F1, Table F1-43).

Impact 18.3.8-2: Increases in water deliveries to SWP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

Although the amount of water supplied to individual SWP contractors generally would increase slightly in most years (i.e., wet, above normal, below normal and dry) under the NEPA Yuba Accord Alternative, relative to the NEPA No Action Alternative, these changes represent an increase in deliveries of about 1 percent for individual SWP contractors. Comparatively, delivery reductions that would occur in critical years under the NEPA Yuba Accord Alternative also represent a change of about 1 percent compared to the NEPA No Action Alternative.

Because changes in long-term water deliveries to SWP contractor service areas would be relatively small under the NEPA Yuba Accord Alternative, relative to the NEPA No Action Alternative, and only for the duration of the Yuba Accord, these changes would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts associated with changes in water deliveries to SWP contractor service areas would not be expected to occur (see Appendix F1, Table F1-44).

18.3.9 ENVIRONMENTAL IMPACTS/ENVIRONMENTAL CONSEQUENCES OF THE NEPA MODIFIED FLOW ALTERNATIVE COMPARED TO THE NEPA NO ACTION ALTERNATIVE

Impact 18.3.9-1: Increases in water deliveries to CVP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

Total CVP contractor deliveries would decrease slightly during critical years and would increase slightly during all other years. However, none of these changes would be greater than about 1 percent of the total amount of CVP contractor deliveries under the NEPA No Action Alternative. Changes in long-term water deliveries to CVP contractor service areas would be relatively small under the NEPA Modified Flow Alternative, relative to the NEPA No Action Alternative and, thus, they would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts are considered less than significant (see Appendix F1, Table F1-51).

Impact 18.3.9-2: Increases in water deliveries to SWP contractor service areas that could remove an impediment to growth or contribute to growth inducement in the Export Service Area

The proportional distribution of water supplied to individual SWP contractors generally would increase slightly (1 percent) in below normal years, and would decrease slightly (1 percent) in critical years under the NEPA Modified Flow Alternative, relative to the NEPA No Action Alternative. Because changes in long-term water deliveries to SWP contractor service areas would be relatively small (no greater than 1 percent) under the NEPA Modified Flow Alternative, relative to the NEPA No Action Alternative, these changes would not be of sufficient quantity to remove an impediment to growth or contribute to growth inducement in the Export Service Area. Therefore, potential growth-inducing impacts associated with changes in water deliveries to SWP contractor service areas would not be expected to occur (see Appendix F1, Table F1-52).

18.4 MITIGATION MEASURES/ENVIRONMENTAL COMMITMENTS

Because specific growth-inducing impacts associated with the Proposed Project/Action and alternatives were not identified in the analysis, no mitigation is required. Should Export Service Area conditions change and additional growth occur as a result of water being made available by this project, mitigation responsibility would reside with the land use jurisdiction approving that growth under CEQA, and the federal agencies that might be involved in those developments should NEPA or other federal statutes apply, not Reclamation or DWR. The impacts of this growth, if any, would be (and in some cases have been) analyzed in detail either in general plan EIRs for the local jurisdictions or in project-level CEQA compliance documents. Mitigation measures could include locating the growth in areas where sensitive resources are absent, minimizing the loss of these resources, or replacing any loss.

18.5 POTENTIALLY SIGNIFICANT UNAVOIDABLE IMPACTS

Environmental impacts most commonly identified as significant and unavoidable from planned growth may include conversion of farmland and agricultural resources, increases in air pollution in a non-attainment area and cumulative loss of wildlife habitat. Overall, the authority to implement mitigation for these types of impacts associated with planned growth resides with the jurisdictions in the study area identified for a particular project.

However, as presented in the analytical sections above, the Proposed Project/Action and the action alternatives, relative to the CEQA and NEPA bases of comparisons, would not result in potentially significant impacts or contribute to growth inducement. Thus, implementation of the Proposed Project/Action or an action alternative would not result in any potentially significant unavoidable growth-inducing impacts.