

Chapter 5.0

CEQA Mandated Analysis

The California Environmental Quality Act (CEQA) Guidelines Section 15126.2(b) and (c) require that the significant unavoidable impacts of the project, as well as any significant irreversible environmental changes that would result from project implementation, be addressed in the Environmental Impact Report (EIR). Additionally, CEQA Guidelines Section 15126.2(e) requires that an EIR evaluate the “growth-inducing” effects of a project. The following paragraphs discuss these mandated topics associated with implementation of the project. The analysis area covers the entire City.

5.1 Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented

In accordance with CEQA Guidelines Section 15126.2(b) any significant unavoidable impacts of a project, including those impacts that can be mitigated but not reduced to below a level of significance despite the applicant’s willingness to implement all feasible mitigation measures, must be identified in the Program Environmental Impact Report (PEIR). Implementation of the project would result in significant, unavoidable impacts associated with the following issues: air quality (air quality plan consistency; criteria pollutants; sensitive receptors), cultural resources (historic resources), geology and soils (paleontological resources), greenhouse gas (emissions; policy consistency), noise (ambient noise; vibration), and transportation (vehicle miles traveled).

These impacts would remain significant and unavoidable as a result of the project. A Statement of Overriding Considerations, consistent with CEQA Guidelines Section 15093, will be prepared for certification with the Final PEIR, identifying specific economic, legal, social, technological, or other benefits of the project which allow approval of the project to outweigh the unavoidable impacts.

5.2 Significant Irreversible Environmental Changes Which Would Result if the Project is Implemented

In accordance with CEQA Guidelines Section 15126.2(d):

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 improvements which provide 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.

Nonrenewable resources generally include agricultural land; biological, archaeological, and paleontological resources; mineral deposits; water bodies; and some energy sources. The project has been designed to minimize impacts to sensitive biological resources by primarily focusing future development and redevelopment within the focus areas. These areas are most suited for new growth and development as they are located near existing job centers and are along major travel corridors with access to existing and future public transit opportunities. Furthermore, the project would avoid development within the natural undeveloped portions of Focus Area 3. Focusing development and redevelopment within the urbanized segments of the focus areas would minimize adverse impacts to sensitive species (see Section 4.3). Similarly, focusing future development and redevelopment within the focus areas would minimize impacts on cultural and tribal cultural resources (see Section 4.4).

There exists some potential for paleontological resources to be present within the City, primarily within areas that have been identified as having a high potential for paleontological resources. However, implementation of the paleontological mitigation framework would reduce impacts associated with future grading and development to a less than significant level (see Section 4.5). As described in Section 4.8, implementation of the project would result in less than significant impacts to water bodies (drainage and water quality). Furthermore, the City does not support any mineral extraction activities (see Section 6.0). Therefore, impacts related to mineral resources would be less than significant. Furthermore, while the project would allow for some agricultural properties to be converted to nonagricultural uses, existing agricultural activities on these sites are considered interim uses associated with development limitations related to the former Marine Corps Air Station El Toro and are not designated as Unique, Prime, or Farmland of Statewide Importance. Furthermore, Conservation and Open Space Element Update Objective COS – 7, policy (f) allows for the conversion of interim and permanent agricultural uses to development to provide land for the construction of housing units consistent with the Land Use and Housing elements (see Section 6.0). Therefore, impacts related to agricultural resources would be less than significant.

Actions related to future development would result in an irretrievable commitment of nonrenewable resources, including as energy supplies and construction materials, such as lumber, steel, and aggregate. Nonrenewable energy resources (coal, natural gas, oil) would be used in construction, heating, refrigeration of food and water, transportation, lighting, and other associated energy needs. Residential and mixed-use development anticipated within the focus areas, together with other projects in the City, would require the commitment or destruction of other nonrenewable and slowly renewable resources. These resources include (but are not limited to) lumber and other forested products; sand and gravel; asphalt; petrochemical construction materials; steel, copper, lead, other metals; and water. However, through required compliance with the building code in effect at the time of development, the amount and rate of consumption of these resources would not result in significant environmental impacts or the unnecessary, inefficient, or wasteful use of resources.

In summary, construction and operation of future housing sites would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses. However, the project would update the City's General Plan and Zoning Ordinance to comply with state law and implement the City's Housing Element, which would meet the City's future housing needs and meet the City's Regional Housing Needs Assessment (RHNA) allocation provided by the Southern

California Association of Governments (SCAG). Therefore, use of such resources would not exceed what is already anticipated to occur under SCAG's regional growth forecasts for the City. Therefore, although irreversible environmental changes would result from future development, such changes would not be considered significant.

5.3 Growth Inducement

CEQA Guidelines Section 15126.2(e) requires that an EIR:

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 (for example, a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population might tax existing community services 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.

A project can directly or indirectly induce growth. Construction of new housing would directly induce population growth. However, if a project creates substantial new permanent employment opportunities, it could indirectly induce growth by stimulating the need for additional housing and services to support the new employment demand. It could also indirectly induce growth by removing infrastructure limitations or regulatory constraints on a required public service, such as roads or water service.

5.3.1 Population and Housing Growth

The project does not propose the construction of new housing or other development; rather it provides capacity for future development consistent with state Housing Element Law and regional plans including the SCAG Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. The California Department of Finance is responsible for developing the total statewide housing demand projection. With the state Department of Housing and Community Development, this demand is apportioned to each of the state's regions. SCAG is responsible for allocating the region's projected new housing demand in each of its member jurisdictions through the RHNA process (see Chapter 3.0, Project Description). The allocation takes into account factors such as market demand for housing, employment opportunities, the availability of suitable sites and public facilities, commuting patterns, type and tenure of housing need, and others. Therefore, the project contains policies and implementation programs that would provide for housing development consistent with the City's share of the regional housing need as identified in the RHNA.

Compared to the 57,656 units proposed under the Conservative Alternative, the Reduced Project Alternative would only propose 42,637 residential units. The 42,637 residential units proposed under

the Preferred Alternative would exceed the City's RHNA allocation of 23,610 units. This exceedance of the RHNA allocation would ensure that the City can continue to provide a buffer in housing units for all income categories and would ensure the City can meet the no net loss provisions of the state Housing Element law throughout the planning period. The project has been designed to primarily focus future development and redevelopment within the focus areas that are most suited for new growth and development as they are located near existing job centers and are along major travel corridors with access to existing and future public transit opportunities. As such, future development under the project would be in developed areas that are already served by infrastructure. Given these conditions and the City's existing development and housing occupancy patterns, it is not anticipated that future housing development facilitated by the project would induce population growth indirectly through extension of roads or other infrastructure. Therefore, the project would accommodate projected future housing needs in the City and would not induce population growth.

5.3.2 Removal of an Impediment to Growth

The project does not propose the construction or expansion of new housing, services, or other infrastructure development; rather it provides for future development consistent with state Housing Element Law. The project has been designed to primarily focus future development and redevelopment within focus areas that are most suited for new growth and development as they are located near existing job centers and are along major travel corridors with access to existing and future public transit opportunities. Future development outside of the focus areas would occur in areas that are already served by infrastructure and would not require extensions into unserved portions of the City. Therefore, future infrastructure development would occur within areas that are already served by essential roads, utilities, and public services, and the project would not remove an impediment to growth.

5.3.3 Foster Economic or Employment Growth

The project does not propose or provide direct development rights to new major retail, commercial or employment centers that would encourage substantial economic or employment growth. Rather, it provides opportunities for housing development in close proximity to existing job centers. New housing would increase the workforce in the City but would not increase substantial amounts of economic or employment growth, as the project does not introduce new employment centers. Therefore, future economic and employment growth associated with the project would not induce growth.

5.4 Conclusion

Overall, the project would not be growth-inducing as it would accommodate projected growth as required by state law. The project would not remove an impediment to growth, nor does it propose to develop, or permit the encroachment into an isolated area adjacent to open space, or foster economic and employment expansion. As discussed above, the project would accommodate projected population growth and would not be considered growth inducing because it would provide housing capacity for projected population growth. The opportunities to provide housing would be consistent with the City's need to establish a resilient housing base for the community and comply with state law.