

CHAPTER 3.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the CEQA Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the SEIR includes the following issues, which are addressed in this chapter:

- a. Growth-inducing impacts of the Project (addressed below in Section 3.1);
- b. Environmental effects of the Project found not to be significant through the scoping process, or through further evaluation in the SEIR (addressed below in Section 3.2);
- c. Significant irreversible environmental effects that would be involved in the Project should it be implemented (addressed below in Section 3.3); and,
- d. Significant environmental effects that cannot be avoided if the Project is implemented (addressed below in Section 3.4).

3.1 Growth Inducing Impacts

As stated in the General Plan Update Program EIR, the CEQA Guidelines require that an EIR include a discussion of the ways in which a project could directly or indirectly foster population growth or economic development, and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[d]). According to CEQA Guidelines Section 15126.2(d), “it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.” A project may result in the potential to directly and/or indirectly induce growth. Direct growth inducement can result from the construction of new housing that would result in new residents moving to an area. Indirect growth can be induced in a number of ways, including the stimulation of economic activity within the region that would result in the need for additional housing and services to support the new employment demand, or through the elimination of obstacles to growth, including both physical and regulatory obstacles. Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. The General Plan serves as the applicable land use plan for the unincorporated area of San Diego County and identifies areas intended for future development of varying land uses, in addition to roadways and infrastructure, to accommodate the forecasted population growth. As the County General Plan defines the location, type, and intensity of growth, it is the primary method through which development and growth within a community are regulated.

The County General Plan is intended to accommodate its fair share of growth within the region, as identified by SANDAG in the Regional Comprehensive Plan (RCP). While the proposed Project would not result in unplanned growth, it would be considered growth inducing, similar to buildout of the General Plan, because it would accommodate an increase in population growth

within the unincorporated County, as compared to existing conditions. The Project proposes land use designations that would allow for construction of new housing and other uses that would result in future growth in areas that may be constrained by a lack of infrastructure. For example, buildout of the Village Core Mixed Use and Rural Commercial designations proposed in the Alpine CPA would eventually require extension of water and sewer services from the west and has the potential to indirectly induce growth where development was previously constrained by reliance on groundwater and septic systems. The CEQA Guidelines state that the environmental effects of induced growth are considered indirect impacts of a project and may be considered significant, adverse environmental impacts.

~~Although the proposed Project would result in revisions to the existing General Plan land use designations on the former FCI lands, potential growth inducing effects for development on these lands were previously evaluated in the General Plan Update Program EIR.~~ The findings and discussion of the growth induction analysis in the General Plan Update Program EIR remain applicable to the proposed Project. The information as provided in the General Plan Update Program EIR applies equally to the proposed Project, and is therefore not repeated here. Potential environmental impacts of growth are discussed in Sections 3.1.1 Direct Population Growth; 3.1.2, Employment Growth; Removing Obstacles to Growth; and, Environmental Impacts of Population Growth, of the General Plan Update Program EIR.

3.2 Environmental Effects Found Not to be Significant

Section 15128 of the CEQA Guidelines requires that an EIR “contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.”

As described in Section 1.1.2, SEIR Review Process, the County of San Diego has engaged the public in the preparation of the environmental document through publication of the Notice of Preparation (NOP) and subsequent public review period and scoping meeting to allow for input from the public, affected agencies, and interested organizations. Comments received during the public scoping period have been considered in the process of identifying issue areas that should receive attention in the SEIR. The contents of this SEIR were prepared in accordance with the CEQA Guidelines and with consideration for public and agency input received during the scoping process. Issues that were found to have no impact or less-than-significant impacts do not need to be addressed further in this SEIR. Based on the findings of the NOP and the results of the scoping process, a determination was made that the SEIR must contain a comprehensive analysis of all environmental issues identified in Appendix G of the CEQA Guidelines, with exception of the following:

- Geology and Soils: The General Plan Update Program EIR determined that potential impacts with regard to geology and soils would be less than significant, and no mitigation measures were required. As existing conditions and future development activities with

regard to geology and soils that were considered and evaluated in the General Plan Update Program EIR remain the same as for the former FCI lands, the analysis and findings given in the General Plan Update Program EIR are applicable to the proposed Project, and therefore, were not further discussed in detail in the SEIR.

- Population and Housing: The General Plan Update Program EIR provides an evaluation of potential impacts with regard to population and housing, displacement of housing, or displacement of people resulting with buildout of the General Plan. Through this analysis, no significant impacts were identified, and no mitigation measures were required. As the General Plan provides the framework for future planned growth within the unincorporated County, and the proposed Project allows for future development on the former FCI lands consistent with the County's planned growth, the analysis and findings given in the General Plan Update Program EIR with regard to population and housing are applicable to the proposed Project, and therefore, were not further discussed in detail in the SEIR.

After further study and environmental review in this SEIR, direct, indirect, and cumulative impacts of the Project would be less than significant or could be reduced to less-than-significant levels with mitigation measures for the following issue areas:

- Aesthetics;
- Cultural Resources;
- Land Use;
- Recreation; and,
- Climate Change

3.3 Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines defines an irreversible impact as an impact that uses nonrenewable resources during the initial and continued phases of a project. Irreversible impacts can also result from damage caused by environmental accidents associated with a project. Irretrievable commitments of resources should be evaluated to ensure that such consumption is justified. As stated in the General Plan Update Program EIR, Section 15126.2(c) of the CEQA Guidelines describes significant irreversible environmental changes that would be caused by a project as:

Uses of nonrenewable resources during the initial and continued phases of a project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses.

Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

1. The primary and secondary impacts would generally commit future generations to similar uses;
2. The project would involve a large commitment of nonrenewable resources;
3. The project involves uses in which irreversible damage would result from any potential environmental accidents associated with the project; or,
4. The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Implementation of the proposed Project would accommodate future development that would result in the conversion of presently undeveloped land to residential and commercial uses. Development consistent with the proposed Project would constitute a long-term commitment to these land uses. Additionally, irreversible changes would likely occur due to future excavation, grading, and construction activities associated with future land uses consistent with the General Plan Update. Although the environmental impacts of these changes can generally be addressed by mitigation measures, the potential for disturbance would represent an irreversible change. Restoration of the region to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Renewable, nonrenewable, and limited resources that would likely be consumed as part of future development consistent with the proposed Project would include, but are not limited to oil, gasoline, lumber, construction aggregates, asphalt, surface water and groundwater, energy, steel, and similar materials. Development of land uses consistent with the proposed Project would require the consumption of lumber, aggregates, asphalt, steel, and other construction materials. Both construction and operation of land uses would require the consumption of oil, gasoline, water, and energy. For example, construction equipment would require oil and gasoline for operation, and residents of new housing units in the County would consume energy and water during daily activities.

In addition, development of the proposed Project would result in increased demand on public services and utilities (see Section 2.11, Public Services, and Section 2.14, Utilities and Service Systems). This increased demand would require expansion of infrastructure that would result in the irreversible conversion of land similar to other development types and would also result in the permanent commitment of resources such as water and energy by making these resources available to more consumers. The proposed Project would also result in significant unavoidable effects related to air emissions (see Section 2.3, Air Quality). Long-term impacts would also result from an increase in vehicular traffic and associated noise emissions (see Section 2.13,

Transportation and Traffic, and Section 2.10, Noise). Additional development that would occur under the proposed Project could result in the loss of significant historical resources (see Section 2.5, Cultural Resources) or important farmland or forestry resources (see Section 2.2, Agriculture and Forestry Resources) as lands containing these resources are converted to other land uses. Additionally, besides increasing consumption of mineral resources for development, new development has the potential to make mineral resource deposits unavailable for future extraction by placing structures on top of resources or by developing land uses that would be incompatible with extraction operations in the vicinity of known mineral deposits (see Section 2.9, Mineral Resources).

As stated in the General Plan Update Program EIR, the CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the proposed Project. As described in Section 2.6, Hazards and Hazardous Materials, implementation of the proposed Project would allow for the development of land uses that may store, use, or dispose of hazardous materials. Additionally, businesses using hazardous materials may expand or increase to accommodate the projected population growth under implementation of the proposed Project. Compliance with the following applicable federal, State and local hazardous materials regulations would avoid irreversible environmental damage related to the accidental release of hazardous materials: the Chemical Accident Prevention Provision, Emergency Planning and Community Right-to-Know Act, the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the California Health and Safety Code, California Code of Regulations Title 23, the Aboveground Petroleum Storage Act, California Accidental Release Prevention Program, the California Emergency Services Act, and the County Consolidated Fire Code.

3.4 Significant and Unavoidable Impacts

As stated in the General Plan Update Program EIR, CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects. Specifically, Section 15126.2(b) states:

“Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reason why the project is being proposed, notwithstanding their effect, should be described.”

Significant, unavoidable adverse impacts are identified and described for several environmental issues in Chapter 2.0, Significant Environmental Effects of the Proposed Project and are summarized below; however, despite these unavoidable effects, the Project is proposed because the existing General Plan designations for the FCI lands are based on outdated information and are therefore not considered to be a sound basis for current land use decisions. Additional

reasons in support of implementation of the proposed Project, including the Project objectives, are given in Chapter 1.0, Project Description, Location, and Environmental Setting of this SEIR.

The CEQA Guidelines state that after a lead agency considers an EIR, the lead agency may decide whether to approve or carry out the project (Section 15092). If a project is determined to have unavoidable adverse environmental effects, the lead agency may approve the project only when it finds that specific economic, legal, social, technological, or other benefits of the project outweigh such effects. Additionally, Section 15093 requires that the lead agency document and substantiate any such determinations in a “Statement of Overriding Considerations” as a part of the administrative record.

- **Aesthetics (Section 2.1)**

- **Issue 3 – Visual Character or Quality:** Implementation of the proposed Project would accommodate intensified development, especially in town centers, which has the potential to result in the degradation of, or substantial change in, the existing visual character or quality of communities throughout the unincorporated County. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to visual character and quality, but not to below a level of significance.
- **Issue 4 – Light or Glare:** The proposed Project would have the potential to result in increased light within the County that would adversely affect day or nighttime views. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts associated with increased light, but not to below a level of significance.

- **Agricultural and Forestry Resources (Section 2.2)**

- **Issue 1 – Direct Conversion of Agricultural Resources:** Implementation of the proposed Project would result in the direct conversion of 5,989 acres of agricultural resources to non-agricultural land uses. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to conversion of farmland, but not to below a level of significance.
- **Issue 3 – Indirect Conversion of Agricultural Resources:** Implementation of the proposed Project would redirect high density growth into areas containing agricultural resources and potentially cause some indirect conversion of agricultural resources to non-agricultural use because of incompatibility between development accommodated by the proposed Project and existing agricultural activity. The proposed Project policies and mitigation measures would reduce indirect and cumulative impacts from the conversion of farmland, but not to below a level of significance.
- **Issue 4 - Direct and Indirect Loss or Conversion of Forestry Resources:** Implementation of the proposed Project would result in the direct, indirect, and

cumulative loss or conversion of forestry resources on private lands from land clearing, grading, or excavation, as well as incompatibility with adjacent land uses or CNF lands. The proposed Project policies would reduce direct, indirect, and cumulative impacts to forestry resources, but not to below a level of significance.

- **Air Quality (Section 2.3)**

- **Issue 2 – Air Quality Violations:** The proposed Project would have the potential to result in a significant violation of an air quality standard because emissions of criteria pollutants associated with new development consistent with the proposed Project would exceed the screening-level thresholds for air pollutants. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to air quality violations, but not to below a level of significance.
- **Issue 3 – Non-Attainment Criteria Pollutants:** The proposed Project would have the potential to result in a direct cumulatively considerable net increase in pollutants for which the SDAB is listed as non-attainment. The SDAB is considered a nonattainment area for ozone and respirable particulate matter. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts related to non-attainment criteria pollutants, but not to below a level of significance.
- **Issue 4 – Sensitive Receptors:** The proposed Project would have the potential to result in exposure of sensitive receptors to diesel particulate matter. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to sensitive receptors, but not to below a level of significance.

- **Biological Resources (Section 2.4)**

- **Issue 1 – Special Status Plant and Wildlife Species:** The proposed Project would have the potential to result in significant impacts to special status species and their habitats. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to special status species, but not to below a level of significance.
- **Issue 2 – Riparian Habitat and Other Sensitive Natural Communities:** The proposed Project would have the potential to result in significant impacts to riparian habitat and other sensitive natural communities. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to riparian and other sensitive habitats, but not to below a level of significance.
- **Issue 3 – Wildlife Movement Corridors and Nursery Sites:** The proposed Project would have the potential to result in significant impacts to wildlife movement corridors and nursery sites. The proposed Project policies and mitigation measures would reduce

direct and cumulative impacts to wildlife corridors and nursery sites, but not to below a level of significance.

- **Hazards and Hazardous Materials (Section 2.6)**

- **Issue 7 – Wildland Fires:** Implementation of the proposed Project would result in land uses that allow development in areas that are prone to wildland fires. This is due to the fact that the majority of the unincorporated County is located in very high or extreme fire threat hazard areas. Implementation of the proposed Project would result in a potentially significant impact from the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands. The policies and mitigation measures proposed with the Project would reduce direct and cumulative impacts related to wildland fires, but not to below a level of significance.

- **Hydrology and Water Quality (Section 2.7)**

- **Issue 1 – Water Quality Standards and Requirements:** The development of future land uses as designated in the proposed Project would contribute pollutants such as sediments, hydrocarbons and paints in quantities that would otherwise significantly degrade surface water quality. It is also anticipated that non-point source pollutants, resulting from development of future land uses as designated with the proposed Project, would otherwise degrade surface water quality. Additionally, the proposed Project would result in potentially significant impacts to water quality from proposing land uses in groundwater dependent areas that are currently experiencing groundwater contamination. The proposed policies and mitigation measures would reduce direct and cumulative impacts to hydrology and water quality, but not to below a level of significance.
- **Issue 2 – Groundwater Supplies and Recharge:** There are multiple areas in the unincorporated County that are currently experiencing groundwater supply and recharge impacts. Implementation of the proposed Project would allow land uses and development to occur in these areas, thereby worsening an already unsustainable groundwater supply. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to groundwater supplies and recharge, but not to below a level of significance.

- **Mineral Resources (Section 2.9)**

- **Issue 1 – Mineral Resource Availability:** The Project proposes land uses in areas designated MRZ-2, MRZ-3, or those areas underlain by Quaternary alluvium that would be incompatible with these resources and would result in the loss of availability of known or suspected mineral resources that would be of value to the region and the residents of

the State. The proposed Project policies and mitigation measures would reduce direct impacts to mineral resource availability, but not to below a level of significance.

- **Issue 2 – Mineral Resource Recovery Sites:** The Project proposes potentially incompatible land uses that would have the potential to encroach on areas where mines are active or where future resource recovery sites would have otherwise been permitted. The proposed Project policies and mitigation measures would reduce direct impacts to mineral resource recovery sites, but not to below a level of significance.
- **Noise (Section 2.10)**
 - **Issue 3 – Permanent Increase in Ambient Noise Levels:** Traffic on new roadways or roadway improvements, as well as operation of new agricultural operations and other noise-generating uses, under the proposed Project would permanently increase ambient noise and would result in a potentially significant impact. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to permanent increase in ambient noise levels, but not to below a level of significance.
- **Public Services (Section 2.11)**
 - **Issue 3 – School Services:** The proposed Project is projected to increase housing and population within the unincorporated County, which would result in an increase in school enrollment. To maintain acceptable service ratios, the construction of new or expanded school facilities would be required. The construction of these facilities would have the potential to result in significant environmental impacts; however, the construction of school facilities is not under the jurisdiction of the County. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to school services, but not to below a level of significance.
- **Transportation and Traffic (Section 2.13)**
 - **Issue 1 – Unincorporated County Traffic and Level of Service Standards:** Based on analyses of trip generation and forecast deficiencies in the General Plan Update, it was determined that Alpine would be the only community with a potential for significant traffic-related impacts as a result of implementation of the proposed Project; however, the impacted roadway segments would not be improved beyond the current classification shown in the General Plan Update for these roadways, and deficient LOS E or F operations would be accepted. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to unincorporated County traffic and LOS standards, but not to below a level of significance.
 - **Issue 2 – Rural Road Safety:** The proposed Project would increase trips on roads in rural areas that are not developed to current road safety standards and would add traffic to

roads with slow moving agricultural equipment. Additional traffic resulting with the proposed Project would also contribute to road safety conflicts with alternative transportation (pedestrians and bicyclists) and at grade railroad crossings. In addition, there may be older rural roadways surrounding some of the Project areas that would not be adequate by existing roadway standards. The proposed Project policies and mitigation measures would reduce direct impacts to rural road safety, but not to below a level of significance.

- **Utilities and Service Systems (Section 2.14)**

- **Issue 4 – Adequate Water Supplies:** Implementation of the proposed Project would increase the number of housing units and populations served within the service areas of SDCWA-member water districts and groundwater dependent water districts. Although multiple planning documents exist to ensure a reliable water supply is available for future growth within the County, issues such as cutbacks in imported water and unprecedented drought years were unaccounted for in these documents. Additionally, some groundwater basins throughout the County would be impacted upon buildout of the proposed Project. This would result in some groundwater dependent water districts having a potentially inadequate water supply. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to water supplies, but not to below a level of significant.
- **Issue 6 – Sufficient Landfill Capacity:** If additional landfills are not constructed and existing landfills are not expanded, it is estimated that the County will run out of physical landfill capacity by 2016. Therefore, the development of future land uses as designated in the proposed Project would have the potential to be served by landfills with insufficient capacity to accommodate future solid waste disposal needs. The proposed Project policies and mitigation measures would reduce direct and cumulative impacts to landfill capacity, but not to below a level of significance.