

2.13 Significant Irreversible Environmental Changes Resultant from Project Implementation

California Environmental Quality Act (CEQA) Guidelines Section 15127 requires irreversible changes be evaluated in Environmental Impact Reports (EIRs) prepared for projects that would involve (a) the adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency; (b) the adoption by a Local Agency Formation Commission (LAFCO) of a resolution making determinations; and (c) the requirement for preparing an environmental impact statement pursuant to the National Environmental Policy Act. The proposed project involves an amendment to the General Plan (a) and a LAFCO determination (b).

As required by Section 15126.2(c) of the CEQA Guidelines, irretrievable commitments of resources should be evaluated to assure that the current consumption is justified. The following analysis addresses project changes that would be considered irreversible.

Restriction of access to mineral resources (construction aggregate) for future mining. Portions of the site contain construction-grade alluvium, which may be used as aggregate (Section 2.9, Mineral Resources, of this EIR). The project would prevent this material from being mined in three separate ways:

- **On-site material designated as Biological Open Space.** Approximately 18 acres of potential material lie within the areas to be placed in Biological Open Space. This is likely an irreversible loss, as the protective open space easement would not permit mining of aggregate.
- **Off-site material within the buffer zone.** Approximately 41 acres of potential material lie off site to the south. These are within the planning buffer between mining operations and residences. This loss is not physically prevented but prevented by policy to buffer the residential uses to ensure land use compatibility. It is unlikely that the policy would be changed to allow mining in this area at some future time.
- **On-site material within the development envelope.** This material would be irreversibly lost if construction is placed on top of it. The area covers approximately 39.8 acres. The applicant has committed to using as much of the material as is feasible for the on-site construction (see mitigation measure **M-MR-1**). However, due to the limited amount that is estimated to be used on-site, only approximately 1 percent of the 39.8 acres, impacts to on-site material would be unavoidable. As noted in Section 2.9, due in part to the environmental and regulatory constraints of permitting and extraction, on-site use of the minerals is likely the only feasible method of utilization.

Overall, the mineral resource is not unique and is probably not rare in the vicinity of the project (floodplain of the San Luis Rey River). This would provide a justification for the long-term commitment of the project site.

The irreversible change to the existing topography and biology. A total of approximately 154 acres of the 513-acre site would be altered by 2.4 million cubic yards of grading and the permanent removal of on-site habitat as detailed in Section 2.3, Biological Resources. This loss has been mitigated to less than significant.

Commitment of resources (energy, natural resources, and building materials). The project would be constructed over a period of approximately seven and a half years with the construction of the different planning/phasing areas depending on market forces. Construction of the project would require the commitment of energy, natural resources, and building materials (e.g., wood, concrete). Fuels would be used by equipment during the grading and construction period, by trucks transporting construction materials to the site, and by construction workers during their travel to and from the project site. Energy also would be used in the harvesting, mining, and/or manufacturing materials for structure and roadway construction, although some construction materials would be generated from the project site source. These construction materials and fuels would likely be committed to other similar projects in the region if not utilized here. Resources used for the project would be typical of similar residential projects in the region.

Increased consumption of resources (fossil fuels, electricity, and water). Post-construction operational energy uses of the facilities associated with the project would include the use of electricity and water by project residents (no natural gas will be available). This energy use would be a long-term commitment and the use of energy would be irretrievable, although any energy-saving features of the project would reduce this commitment. One of the objectives of the project is to improve the jobs/housing balance by providing housing for the workforce in the area. This would result in fewer miles commuted, and thereby less gasoline and diesel consumed. Provision of services and utilities are discussed in Chapter 1 (Project Description), Section 3.6 (Public Services), and Section 2.12 (Utilities and Service Systems) of this EIR. The project requires extension of services and annexation of the project site for water service, but impacts would be mitigated to less than significant.

Irreversible damage from environmental accidents. Five potential sources of hazardous materials have been identified on the proposed project site (see Section 2.7, Hazards and Hazardous Materials). All of these would be remediated and removed with the project. The project would not present an additional or unacceptable risk of environmental damage from environmental accidents.