5.0 OTHER CEQA CONSIDERATIONS

This section describes the other statutorily required topics including growth inducing impacts, significant and unavoidable impacts, significant irreversible environmental changes, and mandatory findings of significance.

5.1 GROWTH-INDUCING IMPACT

PRC Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an EIR. Section 15126.2(e) of the State CEQA Guidelines provides the following guidance for assessing growth-inducing impacts of a project:

> *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 wastewater 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 characteristics 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 induce growth directly, indirectly, or both. Direct growth inducement could result if a project involved construction of new housing. Indirect growth inducement could result, for instance, if implementing a project resulted in substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it would involve a substantial construction effort with substantial short-term employment opportunities that indirectly generates the need for additional housing and services to support the temporary demand. Under CEQA, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

It should be noted that growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open space land to urban uses, and other effects. As such, to address this issue, potential growth-inducing effects were addressed by evaluating whether the Project would result in the following:

- Remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the Project area)?
- Expansion of public services to maintain desired levels of service?
- Encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Encourage or facilitate other activities that could significantly affect the environment?

5.1.1 Remove Obstacles to Growth

The implementation of the Project would not remove obstacles to additional growth in this manner as it would be undertaken in an area that currently is served by all utilities and services. Section 3.12, Population and Housing, analyzes the Project's overall effect on population and housing, including growth-inducing considerations.

In terms of housing, implementation of the Project would provide for development of 1,606 maximum dwelling units, resulting in approximately 2,891 residents. The addition of 2,891 residents would increase the City's existing population of 24,350 residents to 27,241 residents, representing an 11.9 percent increase. The maximum buildout of the Project with 1,606 dwelling units would increase the City's total dwelling units from 14,678 to 16,284, resulting in a 10.9 percent increase.

Additionally, this EIR includes a discussion of the residential component of the ORCC Specific Plan Project based on the proposed buildout of 167 dwelling units included within the City's site inventory as a pipeline site. Therefore, with the residential component of the ORCC Specific Plan Project incorporated, the resulting maximum buildout potential would increase to 1,773 dwelling units. The development 1,773 dwelling units would contribute an estimated population increase of 3,191 residents, which is an approximately 13.1 percent increase to the City's 2024 population of approximately 24,350 residents. Maximum buildout of these sites would increase the City's total dwelling units from 14,678 to 16,451. This growth would exceed the City's population projection for 2045 of 25,400 residents by 2,141 residents. The population growth associated with the Project and ORCC Specific Plan Project pipeline site would exceed SCAG's population 2045 projection for the City of 25,400 residents.

However, the maximum scenario is highly conservative as it is unlikely that 100 percent of sites would be developed at the capacity analyzed in this EIR. Therefore, a "realistic development capacity" was used to determine the most probable yield of units at sites in the City's Housing Element site inventory. This scenario assumed development of the five Housing Opportunity Sites being rezoned MC/RHD at 80 percent of maximum allowable density with the remaining three Housing Opportunity Sites at 70 percent of the maximum allowable density. Additionally, the site inventory includes the ORCC Specific Plan Project as a pipeline site that would provide 167 additional units. While under this scenario the Project and the residential component of the ORCC Specific Plan Project would provide for development of 1,332 dwelling units resulting in approximately 2,397 residents and a total population of 26,747 residents, the Project and the residential component of the ORCC Specific Plan Project would increase the City's population by 9.8 percent and still exceed SCAG's 2045 population projection for the City.

The purpose of the Housing Element Update is to plan for and promote housing growth within the City to meet the housing needs of the region and the state. While the scenarios exceed the population projections identified by SCAG, it is important to note that the identification of Housing Opportunity Sites in the City's Housing Element Update does not mean that they will be developed at the estimated unit counts or level of affordability. Additionally, several laws passed in recent years, including the Housing Crisis Act of 2019 (SB 330), aimed to address the need for more housing and expedite approvals for housing projects in order to respond to the state's housing crisis. Implementation of the Project and future developments consistent with the Project would not directly induce substantial unplanned population growth but rather would address an existing need for housing and plan for future housing demand in the City. As such, the Housing Element Update is the City's proposed plan to accommodate anticipated future growth and would not induce unplanned population growth and the impact would be less than significant.

5.1.2 Expansion of Public Services

The Project would increase residents in the City. The Project is expected to incrementally increase the demand for public services for fire and police protections services, which would contribute to the needs to expand facilities to accommodate future growth. The need for additional or expansion of existing public services as a result of future discretionary developments would need to go under CEQA review at a project-specific level. In the event new public service facilities or expansion of public services are required, they would be disclosed and mitigated, as feasible, at a project-specific level. As discussed in Section 3.13, Public Services, existing programs and policies would ensure that the increase in uses and impacts related to police and fire protection services would be less than significant.

5.1.3 Encourage or Facilitate Economic Effects

The construction of future development projects anticipated under the Project would create a number of design, engineering, and construction jobs. Jobs created by the Project would occur until construction of a Project is completed. Additionally, construction employees would be absorbed from the regional labor force, and the construction of future projects are not anticipated to attract new workers to the region. The Project would result in an increase in residents (see Section 3.12, Population and Housing). Future residents of the Project would seek economic opportunities within the City and surrounding area. This would create an increased demand for such economic goods and services and would, therefore, encourage the creation of new businesses and/or expansion of existing businesses that address these needs. Therefore, impacts would be less than significant.

5.1.4 Encourage or Facilitate Environmental Effects of Growth

As discussed, the Project would result in a zone change for six of the eight Housing Opportunity Sites. Implementation of the proposed zone change could further induce non-residential zoned sites to be zoned for residential uses. Future development proposals may change districts in the vicinity of the Project. However, these would require full environmental analysis of the impacts of such actions. The Project does not propose changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes). The Project would comply with all applicable City plans,

policies, ordinances, etc. and mitigation measures identified in this EIR to ensure that there are no conflicts with adopted land development regulations and that any environmental impacts are minimized. Therefore, the Project would not result in precedent-setting actions. The impacts of subsequent similar actions would require environmental analysis and associated mitigation to ensure that such subsequent impacts would not significantly affect the environment.

5.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126(b) requires an EIR to "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 reasons why the project is being proposed, notwithstanding their effect, should be described."

The Executive Summary contains Table ES-1, which summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. While actions from the Project and mitigation measures, where feasible, would reduce the level of impact to less than significant, the following impacts would remain significant and unavoidable after mitigation measures are applied.

5.2.1 Air Quality

- *The Project would conflict with or obstruct implementation of the applicable air quality plan.*
- *The Project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.*
- *The Project would expose sensitive receptors to substantial pollutant concentrations.*
- *The Project would result in a cumulatively considerable impact related to air quality.*

5.2.2 Greenhouse Gas Emissions

- *The Project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.*
- *The Project would result in a cumulatively considerable impact related to greenhouse gases.*

5.2.3 Public Services

- *The Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks and recreation.*
- *The Project would result in a cumulatively considerable public services impact related to parks and recreation facilities.*

5.2.4 Recreation

- *The Project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.*
- *The Project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.*
- *The Project would result in a cumulatively considerable impact related to parks and recreation facilities.*

5.2.5 Transportation

- *The Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision(b).*
- *The Project would result in a cumulatively considerable transportation impact related to VMT.*

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Pursuant to Section 15126.2(c) of the CEQA Guidelines, an EIR must consider any significant irreversible environmental changes that would be caused by a project should it be implemented. Section 15126.2(c) states:

> *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 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.*

Resources that would be permanently and continually consumed by implementation of the Project include water, electricity, natural gas, and fossil fuels; however, 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. As discussed in Section 3.5, Energy, construction of future developments facilitated by the Project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of diesel and gasoline fuel from the use of off-road equipment (i.e., tractors, excavators, cranes) and on-road vehicles (i.e., construction employee commutes, haul trucks). Construction is not anticipated to require natural gas. Temporary electricity may be required to provide as-necessary lighting and electric equipment; such electricity demand would be met by portable generator sets and, possibly, local distribution. With respect to the operational activities associated with future developments facilitated by the Project, compliance with all state and local regulations, development standards, and applicable building codes would ensure that natural resources are conserved to the maximum extent practicable. As future construction and operational activities anticipated to occur under the Project would result in the

irretrievable commitment of non-renewable energy resources, consumption of such resources is associated with any development in the region and is not unique or unusual to the Project. Furthermore, new technologies or systems may emerge or become more cost-effective or user-friendly and would further reduce reliance upon nonrenewable energy resources.

The Project would not be expected to result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment. The Project primarily involves the planning for development of future residential projects, which do not generate substantial hazardous materials. Future construction activities associated with the development projects anticipated under the Project would result in the limited use, transport, storage, and disposal of common hazardous materials. However, all activities would comply with applicable federal and state laws related to hazardous materials transport, use, and storage, which would significantly reduce the likelihood and severity of accidents that could result in irreversible environmental damage. As the Project does not involve substantial environmental hazards or unreasonably consume non-renewable resources, the irreversible environmental changes that would result from the implementation of the Project would be less than significant.