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## **6.0 OTHER CEQA CONSIDERATIONS**

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This section discusses additional topics statutorily required by the California Environmental Quality Act (CEQA) concerning the long-term implications of the proposed project. The topics include growth-inducing impacts, significant irreversible environmental effects, including irretrievable commitment of resources, and significant and unavoidable environmental impacts.

### 6.1 GROWTH-INDUCING IMPACTS

#### INTRODUCTION

CEQA Guidelines Section 15126.2(d) requires that an Environmental Impact Report (EIR) evaluate the growth-inducing impacts of a proposed action. A growth-inducing impact is defined by the CEQA Guidelines as:

*The way in which a 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 . . . It is not assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.*

A project can have direct and/or indirect growth inducement potential. For example, direct growth inducement would result if a project involved construction of new housing. A project would have indirect growth-inducement potential if it established substantial new permanent employment opportunities or involved a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand. Similarly, a project would indirectly induce growth if it removed an obstacle to additional growth and development, such as removing a constraint on a required public service. A project providing an increased water supply in an area where water service historically limited growth could be considered growth-inducing.

The CEQA Guidelines further explain that the environmental effects of induced growth are considered indirect impacts of the proposed action. These indirect impacts or secondary effects of growth may result in significant, adverse environmental impacts. Potential secondary effects of growth include increased demand on other community and public services and infrastructure, increased traffic and noise, and adverse environmental impacts such as degradation of air and water quality, degradation or loss of plant and animal habitat, and conversion of agricultural and open space land to developed uses.

Growth inducement may constitute 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. Local land use plans provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by adequate urban public services, such as water supply, roadway infrastructure, sewer service, and solid waste service.

#### GROWTH EFFECTS OF THE PROJECT

Adoption of the proposed project would not result in direct physical growth as it does not include development proposals or grant site-specific development entitlement. However, the nature and purpose of the proposed project is inherently growth-inducing as it is intended to facilitate and encourage affordable housing development throughout the County in order to comply with state law. The County's General Plan indicates that population growth is anticipated in the County and that the intent of the General Plan policies and programs is to ensure the quality of such growth rather than to prevent it. The project is consistent with the General Plan, and the sites facilitating

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density/intensity increases as a result of the proposed project are generally located along major transportation corridors and/or on sites in the vicinity of future urban development and public service/utility infrastructure anticipated by the County's General Plan in order to facilitate growth where it can be best accommodated. Therefore, it is unlikely that the proposed project would result in growth or intensification of development or sprawl in the surrounding region. Even so, the project would increase density/intensity capacity on sites throughout the County, which could increase growth beyond that already planned for and accommodated by the General Plan, thus resulting in substantial growth effects.

Future development facilitated by the project would be subject to all policies, plans, procedures, and standards in the Riverside County General Plan, as well as federal and state regulations, that collectively serve to mitigate and reduce, where possible, the severity of the environmental effects associated with growth and buildout of Riverside County.

The specific environmental effects resulting from the growth effects of the project are discussed in Sections 3.0 and 4.1 through 4.10 of this Draft EIR.

### 6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Sections 21100(b)(2) and 21100.1(a) require that EIRs prepared for the adoption of a plan, policy, or ordinance of a public agency must include a discussion of significant irreversible environmental changes that would result from project implementation. In addition, CEQA Guidelines Section 15126.2(c) describes irreversible environmental changes in the following manner:

*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. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.*

It is in this context that the potential for the various components of GPA No. 1122 to result in significant irreversible environmental changes are discussed herein. It should be noted that unlike standard significance findings for impacts that cannot be reduced through mitigation, a significant irreversible change may occur when an action commits "future generations to similar uses," irrespective of any mitigation applied to the specific action (County of Riverside 2014).

#### RESULT IN A LARGE COMMITMENT OF NONRENEWABLE RESOURCES

A large commitment of nonrenewable resources represents a significant irreversible environmental change if these resources are used in a manner that makes their later removal or nonuse unlikely. This includes, in particular, the use of nonrenewable resources during either construction or operational phases of development. A nonrenewable resource is one that comes from the earth and cannot be readily replenished within the human timescale. This includes mineral resources, particularly aggregate and metal ores, and fossil energy resources, such as oil, coal, and natural gas (County of Riverside 2014).

Adoption of the proposed project does not include development proposals in that it neither requires the construction of housing nor grants site-specific development entitlement. However, the proposed project is intended to encourage the future development of affordable housing at

high densities throughout the County. Although future construction and operation of future development facilitated by the project could result in the use of mineral and fossil energy resources, no refineries, large-scale manufactories, or large-scale infrastructure development (hydroelectric dams, nuclear reactors, wastewater treatment facilities, canals, interstate freeways, etc.) or other massive structures (skyscrapers, penitentiaries, etc.) which would necessitate the commitment of large amounts of aggregates, including rock, sand, gravel, cement, or other minerals, would occur or be required. Furthermore, any use of mineral and fossil energy resources in association with future development would occur incrementally commensurate with the growth rate, which is dependent on economic factors, market forces, and regulatory restrictions.

As such, the proposed project would not necessitate a large commitment of nonrenewable resources in a manner that makes their later removal or nonuse unlikely, and would not result in a significant irreversible change in the environment due to the use of nonrenewable resources.

#### RESULT IN THE UNJUSTIFIED CONSUMPTION OF NONRENEWABLE RESOURCES

The Riverside County EIR No. 521 (State Clearinghouse Number 200904105) prepared for the General Plan Update Project (GPA 960) defines nonrenewable fuels as those coming from the earth that cannot be replenished on a human timescale, with petroleum (oil), coal, natural gas, and the associated materials and byproducts of the pumping and refining of these fuels, collectively "fossil fuels," representing the most common and widely used nonrenewable energy sources.

As discussed above, a project may be deemed to have significant irreversible changes if it would result in the unjustified consumption of nonrenewable resources, in this case, fossil fuels. Future development accommodated by the project would require the consumption of fossil fuels (oil and other petroleum products) during both construction and operation, as well as a result of increased vehicular use, which represents the largest source of fossil fuel use in the County. Even so, the residential and mixed-use development facilitated by the project is intended to encourage housing development in order to comply with state law and, as such, would meet the housing needs of population growth already anticipated in the County as determined by the 5th cycle RHNA plan. The County's General Plan indicates that population growth is anticipated in the County and that the intent of the General Plan policies and programs is to ensure the quality of such growth rather than to prevent it. Therefore, the use of nonrenewable energy sources associated with future development would not be considered "unjustified."

Furthermore, the sites facilitating density/intensity increases as a result of the proposed project are generally located along major transportation corridors and/or on sites in the vicinity of future urban development and public service/utility infrastructure anticipated by the County's General Plan. Therefore, the growth pattern encouraged by the project would ensure that energy resources (renewable and nonrenewable) would be used in an efficient and nonwasteful manner.

For these reasons, it is anticipated that the project would not result in the unjustified consumption of nonrenewable resources and would not cause a significant irreversible environmental change as a result.

#### COMMIT FUTURE GENERATIONS TO SIMILAR USES

The Riverside County EIR No. 521 prepared for GPA 960 defines an environmental change committing future generations to similar uses as one resulting in a transformation of the

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fundamental character of a site such that it would no longer be suitable for certain uses (e.g., the conversion of vacant open space with natural vegetation to an urban or suburban use).

As previously discussed, the sites facilitating density/intensity increases as a result of the proposed project are generally located along major transportation corridors and/or on sites in the vicinity of future urban development and public service/utility infrastructure anticipated by the County's General Plan. The majority of sites proposed for land use changes are currently designated/classified for urban development by GPA 960. In these instances, the proposed changes would not cause new impacts due to the commitment of future generations to similar (urban) uses.

However, as described above, the project would induce growth in the County. The exact scope, timing, and location of future off-site infrastructure improvements needed to serve future development is not currently known. It is possible that the project could lead either to irreversible change in the middle of vacant, undeveloped land with intact native vegetation and other natural resources, and possibly require further disturbances to provide access, water, sewer collection, and other infrastructure, or would represent the extension of an existing general pattern of land use (typically rural or agricultural) into natural open space located on the border between developing areas and natural open space. Therefore, the project would represent significant irreversible changes in the environment and commit future generations to perpetuating the developed uses that would result.

### POTENTIAL FOR ACCIDENTAL IRREVERSIBLE DAMAGE

Another source of significant irreversible change is from accidents causing irreparable environmental damage. Such accidents could occur through a variety of human activities, including: spill or release of a hazardous material or radioactive substance to land, air, or water; accidental fires in wildlands due to human carelessness or inattention, or fires resulting from mechanical or industrial failures (pipe ruptures, airplane or vehicle crashes, etc.); flooding or dam inundation due to failure of a man-made structure for channeling or retaining water (dams, canals, etc.); or landslides or mudslides resulting from failure of an engineered slope or soil, or improper hydrological improvements (drainage). As discussed throughout this EIR, these risks can be mitigated by compliance with standard regulatory requirements as determined during the environmental and/or development review process. It is not anticipated that the project would result in significant irreversible changes in the environment from accidents causing irreparable environmental damage.

### 6.3 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. In addition, Section 15093(a) of the CEQA Guidelines allows the decision-making agency to determine whether the benefits of a proposed project outweigh the unavoidable adverse environmental impacts of implementing the project. The County can approve a project with unavoidable adverse impacts if it prepares a Statement of Overriding Considerations setting forth the specific reasons for making such a judgment.

The impacts of the proposed project identified in **Table 6.3-1** have been recognized as significant and unavoidable and are identified and discussed in detail in either Section 3.0 or Sections 4.1 through 4.10 of this Draft EIR, as noted. The reader is referred to the various environmental issue areas of these sections for further details and analysis of these significant and unavoidable impacts.

**TABLE 6.3-1  
SUMMARY OF SIGNIFICANT AND UNAVOIDABLE IMPACTS**

<b>Section</b>	<b>Impact Analysis Number</b>	<b>Impact</b>
3.0 (Countywide Impact Analysis)	<b>Impact Analysis 3.3.1</b>	Subsequent land use activities associated with implementation of the proposed project could conflict with or obstruct implementation of applicable air quality management plans. This impact is considered to be <b>cumulatively considerable</b> .
3.0 (Countywide Impact Analysis)	<b>Impact Analysis 3.3.2</b>	Subsequent land use activities associated with implementation of the proposed project could result in short-term construction emissions that could violate or substantially contribute to a violation of federal and state standards for ozone and coarse and fine particulate matter. This is considered a <b>cumulatively considerable</b> impact.
3.0 (Countywide Impact Analysis)	<b>Impact Analysis 3.3.3</b>	Subsequent land use activities associated with implementation of the proposed project could result in long-term operational emissions that could violate or substantially contribute to a violation of federal and state standards for ozone and coarse and fine particulate matter. This is considered a <b>cumulatively considerable</b> impact.
3.0 (Countywide Impact Analysis)	<b>Impact Analysis 3.3.4</b>	The project would be considered to have a cumulatively considerable impact if implementation of the proposed project update, in combination with existing, approved, proposed, and reasonably foreseeable development in the South Coast Air Basin, could significantly contribute to cumulative increases in emissions of criteria air pollutants that could contribute to future concentrations of pollutants for which the region is currently designated nonattainment. The impact would be considered <b>cumulatively considerable</b> .
3.0 (Countywide Impact Analysis)	<b>Impact Analysis 3.9.2</b>	At the Countywide level, increased water demand resulting from the project could lead to groundwater extractions cumulatively exceeding groundwater basins' safe yields or causing a net deficit in aquifer volume. This is a <b>cumulatively considerable</b> impact.
3.0 (Countywide Impact Analysis)	<b>Impact Analysis 3.12.1</b>	Future development accommodated by the project would result in a substantial permanent increase in ambient noise levels, as well as exposure of persons to or generation of noise levels in excess of standards established in the County's General Plan or noise ordinance, or in applicable standards of other agencies. This impact would be <b>cumulatively considerable</b> .
3.0 (Countywide Impact Analysis)	<b>Impact Analysis 3.12.3</b>	Project construction could result in the exposure of persons to or generation of short-term construction noise. This impact would be <b>cumulatively considerable</b> .
3.0 (Countywide Impact Analysis)	<b>Impact Analysis 3.13.1</b>	The proposed changes to HHDR and MUA land use designations and zone classifications on approximately 4,972 acres of land would result in an increase in density/intensity potential on those sites and would therefore have the potential to result in more housing units and population in the unincorporated County as a whole. This impact is considered to be <b>cumulatively considerable</b> .
3.0 (Countywide Impact Analysis)	<b>Impact Analysis 3.17.2</b>	Reliable water supply sources cannot be definitively identified for buildout of the project; therefore, potential impacts associated with water supply and demand are considered <b>cumulatively considerable</b> .
4.1 (Elsinore Area Plan)	<b>Impact Analysis 4.1.10</b>	Future development facilitated by the project could result in an increase in ambient noise levels in the vicinity, as well as exposure of sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a <b>significant</b> impact.

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Section	Impact Analysis Number	Impact
4.1 (Elsinore Area Plan)	<b>Impact Analysis 4.1.17</b>	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on one roadway segment within the Elsinore Area Plan planning area that is already projected to operate at an unacceptable level under buildout of the General Plan (Bonita Avenue). This is a <b>significant</b> impact.
4.2 (Mead Valley Area Plan)	<b>Impact Analysis 4.2.10</b>	Future development resulting from the project would be required to comply with the March Air Reserve Base Land Use Compatibility Plan. Therefore, the project will not result in an airport-related safety hazard for people residing or working in the project area. However, the density of neighborhoods 1 and 2 cannot be met. Therefore, this is a <b>significant</b> impact.
4.2 (Mead Valley Area Plan)	<b>Impact Analysis 4.2.13</b>	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a <b>significant</b> impact.
4.2 (Mead Valley Area Plan)	<b>Impact Analysis 4.2.16</b>	Future development could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites. This is a <b>significant</b> impact.
4.2 (Mead Valley Area Plan)	<b>Impact Analysis 4.2.21</b>	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on several roadway segments within the Mead Valley Area Plan planning area that are already projected to operate at an unacceptable level under buildout of the General Plan. This is a <b>significant</b> impact.
4.3 (Temescal Canyon Area Plan)	<b>Impact Analysis 4.3.10</b>	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a <b>significant</b> impact.
4.3 (Temescal Canyon Area Plan)	<b>Impact Analysis 4.3.12</b>	Future development could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites. This is a <b>significant</b> impact.
4.3 (Temescal Canyon Area Plan)	<b>Impact Analysis 4.3.17</b>	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on two roadway segments in the Temescal Canyon Area Plan planning area that is already projected to operate at an unacceptable level under buildout of the General Plan (Indiana Avenue and McKinley Street). This is a <b>significant</b> impact.
4.4 (Highgrove Area Plan)	<b>Impact Analysis 4.4.11</b>	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a <b>significant</b> impact.
4.4 (Highgrove Area Plan)	<b>Impact Analysis 4.4.19</b>	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on two roadway segments within the Highgrove Area Plan planning area that are already projected to operate at an unacceptable level under buildout of the General Plan. This is a <b>significant</b> impact.
4.4 (Highgrove Area Plan)	<b>Impact Analysis 4.4.14</b>	Future development could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites. This is a <b>significant</b> impact.
4.4 (Highgrove Area Plan)	<b>Impact Analysis 4.4.20</b>	County regulation of the construction of septic tanks in future development resulting from the project would ensure both adequate capacity for wastewater treatment and the protection of water quality consistent with all applicable wastewater treatment requirements; however, the feasibility of such systems is dependent on the specifics

Section	Impact Analysis Number	Impact
		of the development proposal and property-specific conditions that cannot be determined at this time. Therefore, this impact would be <b>significant</b> .
4.5 (Harvest Valley/Winchester Area Plan)	<b>Impact Analysis 4.5.11</b>	Future development facilitated by the project could result in an increase in ambient noise levels in the vicinity, as well as exposure of sensitive receptors to noise levels in excess of the Riverside County noise standards. The proposed project could result in groundborne noise vibrations and potentially result in temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. This is a <b>significant</b> impact.
4.5 (Harvest Valley/Winchester Area Plan)	<b>Impact Analysis 4.5.13</b>	Future development could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites under the current land use designations. This is a <b>significant</b> impact.
4.5 (Harvest Valley/Winchester Area Plan)	<b>Impact Analysis 4.5.18</b>	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on five roadway segments within the Harvest Valley and Winchester Area Plan planning area that are already projected to operate at an unacceptable level under buildout of the General Plan. This is a <b>significant</b> impact.
4.5 (Harvest Valley/Winchester Area Plan)	<b>Impact Analysis 4.5.19</b>	Future development would require construction of an individual or community on-site wastewater treatment system (OWTS) or alternative system, the feasibility of which is uncertain. Therefore, this impact is <b>significant</b> .
4.6 (Southwest Area Plan)	<b>Impact Analysis 4.6.12</b>	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a <b>significant</b> impact.
4.6 (Southwest Area Plan)	<b>Impact Analysis 4.6.20</b>	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on one roadway segment within the Southwest Area Plan planning area that is already projected to operate at an unacceptable level under buildout of the General Plan (Clinton Keith Road). This is a <b>significant</b> impact.
4.7 (Western Coachella Valley Area Plan)	<b>Impact Analysis 4.7.10</b>	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a <b>significant</b> impact.
4.7 (Western Coachella Valley Area Plan)	<b>Impact Analysis 4.7.12</b>	Future development could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites under the current land use designations. This is a <b>significant</b> impact.
4.7 (Western Coachella Valley Area Plan)	<b>Impact Analysis 4.7.17</b>	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on seven roadway segments within the Western Coachella Valley Area Plan planning area that are already projected to operate at an unacceptable level under buildout of the General Plan. This is a <b>significant</b> impact.
4.7 (Western Coachella Valley Area Plan)	<b>Impact Analysis 4.7.19</b>	Implementation of the proposed project will increase the amount of allowable development in the Western Coachella Valley Area planning area, thereby increasing demand for water supply that could result in significant effects on the physical environment. This is considered a <b>significant</b> impact.
4.8 (Eastern Coachella Valley Area Plan)	<b>Impact Analysis 4.8.6</b>	The proposed project would rezone approximately 525 acres of land in the Mecca Town Center and Oasis Town Center communities that are currently designated/zoned for agricultural uses. This is a <b>significant</b> impact.

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Section	Impact Analysis Number	Impact
4.8 (Eastern Coachella Valley Area Plan)	<b>Impact Analysis 4.8.13</b>	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a <b>significant</b> impact.
4.8 (Eastern Coachella Valley Area Plan)	<b>Impact Analysis 4.8.15</b>	Future development of the neighborhood sites could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites under the current land use designations. This is a <b>significant</b> impact.
4.8 (Eastern Coachella Valley Area Plan)	<b>Impact Analysis 4.8.20</b>	The proposed increase in density/intensity potential on the neighborhood sites would result in three roadway segments within the Eastern Coachella Valley Area Plan planning area operating at LOS E or F as a result of project-related traffic volumes. This is a <b>significant</b> impact.
4.9 (Lakeview/Nuevo Area Plan)	<b>Impact Analysis 4.9.12</b>	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a <b>significant</b> impact.
4.9 (Lakeview/Nuevo Area Plan)	<b>Impact Analysis 4.9.15</b>	Future development of the neighborhood sites could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites under the current land use designations. This is a <b>significant</b> impact.
4.9 (Lakeview/Nuevo Area Plan)	<b>Impact Analysis 4.9.20</b>	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on three roadway segments within the Lakeview/Nuevo Area Plan planning area that are already projected to operate at an unacceptable level under buildout of the General Plan. This is a <b>significant</b> impact.
4.9 (Lakeview/Nuevo Area Plan)	<b>Impact Analysis 4.9.22</b>	Implementation of the proposed project will increase the amount of allowable development in the Lakeview and Nuevo Area planning area, thereby increasing demand for water supply that could result in significant effects on the physical environment. This is considered a <b>significant</b> impact.
4.10 (The Pass Area Plan)	<b>Impact Analysis 4.10.9</b>	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a <b>significant</b> impact.
4.10 (The Pass Area Plan)	<b>Impact Analysis 4.10.11</b>	Future development of the neighborhood sites could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites under the current land use designations. This is a <b>significant</b> impact.
4.10 (The Pass Area Plan)	<b>Impact Analysis 4.10.16</b>	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on one roadway segment in The Pass Area Plan planning area that is already projected to operate at an unacceptable level under buildout of the General Plan (Bonita Avenue). This is a <b>significant</b> impact.
4.10 (The Pass Area Plan)	<b>Impact Analysis 4.10.17</b>	Future development would require construction of an individual or community on-site wastewater treatment system (OWTS) or alternative system, the feasibility of which is uncertain. This is a <b>significant</b> impact.
4.10 (The Pass Area Plan)	<b>Impact Analysis 4.10.18</b>	Adequate water supplies for all potential future development associated with the project cannot be assured at this time given the lack of information regarding the safe yield and hydrology of the Cabazon Basin. This is a <b>significant</b> impact.