Chapter 7
# Other CEQA Considerations

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## Introduction

Section 15126 of the State CEQA Guidelines requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must also identify (a) significant environmental effects of the proposed project, (b) significant environmental effects which cannot be avoided if the proposed project is implemented, (c) significant irreversible environmental changes which would be involved in the proposed project should it be implemented, (d) growth-inducing impacts of the proposed project, (e) mitigation measures proposed to minimize significant effects, and (f) alternatives to the proposed project.

A discussion of growth-inducing impacts is found in Chapter 6, all proposed mitigation measures are found in Chapter 3, Sections 3.1–3.14, and alternatives to the proposed project are found in Chapter 5. As required by CEQA, a table showing where each of these requirements is discussed is also included in Chapter 1 (see Table 1-1).

## Significant Environmental Effects

Chapter 3 (Environmental Analysis) of this EIR, which includes Sections 3.1 through 3.14 of this EIR, provides a comprehensive analysis of the proposed project's environmental effects, including the level of significance both before and after mitigation.

## Significant and Unavoidable Environmental Effects

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided even with the implementation of feasible mitigation measures. The environmental effects of the proposed project on various aspects of the environment are discussed in detail in Chapter 3 of this EIR. Significant impacts that cannot be avoided if the project is approved as proposed include those listed below.

### Aesthetics

The project would substantially damage scenic resources, including scenic vistas from public parks and views from designated scenic highways or arterial roadways. The proposed project would substantially cut into the native hillside, resulting in a denuded slope and visually scarred landscape. The cut slopes that form the ridgeline of the project are a critical component in this setting, and highway motorists would have an extended view. This would be considered a significant long-term impact. Even with the implementation of mitigation measures, the natural features of the project site would be permanently lost through landform modification, and revegetation may not significantly block the visual effects of the light poles, whose numbers, height, and geometry would appear as contrasting and negative features in the skyscape.

New light sources associated with the sports field complex would include the illumination of 13 athletic fields and associated parking lots and walkways. When in operation, night views for nearby receptors would be adversely affected by project lighting. Because impacts from nighttime lighting are highly subjective to individual viewers, individual experiences may vary, and may be considered substantial to some area residents. Sky glow would be increased over existing conditions, and residents and the public in the area would be adversely affected. Impacts would be significant and unavoidable.

The project would substantially degrade the existing visual character or quality of the site and its surroundings. Most of the serene natural setting and the natural features of the project site would be permanently lost through landform modifications. Because the visual impacts of cut slopes and landform modifications would occur over an extended period of years, and it cannot be guaranteed that impacts would be avoided by mitigation measures; impacts would be significant and unavoidable. In addition, lighting features would be prominent and would intrude on skyline views resulting in significant and unavoidable impacts.

## Air Quality

Two grading options are proposed and were evaluated in the EIR. Mitigated emissions for Grading Plan 1, high-pad scenario, are provided in Table 3.2-9 and mitigated emissions for Grading Plan 2, low-pad scenario, are provided in Table 3.2-10. As shown in the two tables, regional emissions of $NO_X$ for Grading Plan 1 and Grading Plan 2 would remain above the SCAQMD Significance Threshold. As such, if Grading Plan 1 or 2 are selected, impacts from construction would be considered significant and unavoidable.

Mitigated onsite emissions for Grading Plan 1 are provided in Table 3.2-15, and mitigated onsite emissions for Grading Plan 2 are provided in Table 3.2-16. As shown therein, localized emissions of $PM_{10}$ and $PM_{2.5}$ for both grading plans would remain above the SCAQMD Localized Significance Threshold. As such, construction impacts under either grading option would be considered significant and unavoidable.

## Greenhouse Gases

With regard to climate change and proposed project-related GHG emissions, the amounts of construction- and operations-period GHG emissions that would result from development of the proposed project have been quantified and shown in Section 3.6, Greenhouse Gases. Implementation of Mitigation Measures GHG-1 through GHG-10 would reduce the incremental GHG emissions associated with implementation of the proposed project, although the precise degree of the reduction is not quantifiable and therefore not known. No additional feasible mitigation measures exist. Even with these mitigation measures, implementation of the proposed project will continue to contribute to the global climate change impacts of development. Therefore, GHG emissions that occur as a result of proposed project implementation are considered significant and unavoidable. The cumulatively considerable incremental contribution to the worldwide increase in GHG emissions represented by development that is anticipated to occur with implementation of the proposed project is considered significant and unavoidable.

## Mineral Resources

The grading concept for the Rados property involves removal of a significant quantity of material. A significant impact to mineral resources would occur if the material is (a) removed from the site and not processed for utilization of the mineral resources, or (b) if the material remains onsite and development of the project precludes future mining of the resource.

Future market conditions for mineral resources at the time grading for the sports park occurs is unknown. It is also unknown whether, at the time the Rados property becomes available, the ETMC will have an operating mine that would be available to process the surplus material to be excavated at the Rados property. Even if some materials from the Rados property were to be processed at the ETMC facility, some unknown quantity of mineral resources may remain. The EIR analysis assumes that the proposed project would be constructed and would preclude future mining of the mineral resources on the 13 acre Rados property, resulting in a significant and unavoidable impact.

# Significant Irreversible Environmental Effects

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

> 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.

A project would result in significant irreversible environmental changes if:

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

## Analysis of Significant Irreversible Changes

The proposed project would require the use of nonrenewable resources such as lumber, metal alloys, and aggregate resources for the physical construction components of the project. Furthermore, fossil fuels, energy, and water would be consumed during construction and operation activities. Fossil fuels in the form of diesel oil and gasoline would be used for construction equipment and vehicles. During operations, diesel oil and gasoline would be used by trucks and passenger vehicles. Electrical energy and natural gas would also be consumed during construction and operation. These energy resources would be irretrievable and their loss irreversible. However, the project does not represent an uncommon construction project that uses an extraordinary

amount of raw materials in comparison to other urban development projects of a similar scope and magnitude.

Impacts associated with operation of the proposed project would occur as described in Chapter 3, Environmental Analysis. Implementation of the proposed project would result in the conversion of open space and mining into a park and recreation center. The proposed project would result in significant unavoidable visual impacts from the permanent loss of open space and natural character of the site resulting in the degradation of the visual character and quality of the site. Significant impacts to mineral resources would also occur due to the loss of future mining opportunities at the Rados Parcel.

In addition, development of the project would result in irreversible changes to the biological character of the site, due to the loss of natural vegetation, wildlife communities from the conversion of undeveloped open space to a sports park and community center. The proposed project would also result in additional traffic, with corresponding increases in air pollutants and noise emissions generated by traffic. Development of the proposed project would constitute a long-term commitment to urban use. It is unlikely that circumstances would arise that would justify the return of the land to its original condition.

The State CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the proposed project. The proposed project would not involve the transport or storage of hazardous materials on site. Construction activities may include the temporary use of some hazardous agents such as paints, oils, solvents, and cleansers, as well as temporary storage of these materials and fuel on site. However, the amount of chemical agents typically used during construction would be limited. The recreational uses proposed are not anticipated to create hazards related to the release of hazardous materials. Adherence to the regulations contained in the City's Municipal Code (Chapter 15.12.030 and Chapter 6.16.040, Hazardous Materials Disclosure) would ensure that potential impacts related to the accidental release of hazardous materials would be less than significant.

As previously discussed, the proposed project would result in significant irreversible changes due to the use of energy resources and fossil fuels during construction and operation and the permanent loss of open space and mineral resources. While many of these impacts can be avoided, lessened, or mitigated, some of these impacts are irreversible consequences of urban growth, which are described in greater detail in Chapter 3.