

CHAPTER 5.0 – OTHER CEQA CONSIDERATIONS

This chapter presents the evaluation of other types of environmental impacts required by CEQA that are not covered within the other chapters of this EIR. The other CEQA considerations include environmental effects that were found not to be significant, growth-inducing impacts, and significant and unavoidable adverse impacts.

5.1 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

The Initial Study (IS) for the Proposed Project, completed in April 2019, which is included in the EIR as Appendix B, determined that the Proposed Project would result in no impact or a less than significant impact to 12 of 16 environmental issue areas. The IS for the Proposed Project discusses why the Project would have no impact or less than significant impacts for these issue areas, which are subsequently not discussed in detail in this EIR. The issue areas determined to have no impact or a less than significant impact in the IS and EIR analysis include the following:

- Agricultural Resources
- Biological Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation and Parks
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

After a more detailed evaluation of the environmental issues associated with the Proposed Project, the EIR determined that impacts would be less than significant with incorporation of project design features or mitigation measures for the following environmental issue areas:

- Aesthetics
- Land Use
- Transportation

After a more detailed evaluation of environmental issues associated with the Proposed Project, the EIR determined that significant and unavoidable impacts would occur for the following environmental issue area:

- Air Quality
- Cultural Resources

5.2 IRREVERSIBLE ENVIRONMENTAL CHANGES

According to the *CEQA Guidelines*, “[u]ses 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.” Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of project implementation that cannot be avoided.

Implementation of the Proposed Project will allow construction activities that will entail the commitment of non-renewable and/or slowly renewable energy resources (including fossil fuel), human resources, and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, and water. The commitment of resources will be long-term obligations and resulting construction may result in permanent alteration of land once developed.

Similarly, operation of the Proposed Project will result in the commitment of limited, nonrenewable resources and slowly renewable resources such as natural gas, electricity, petroleum-based fuels, fossil fuels, and water. Natural gas and electricity will be used for lighting, heating, and cooling of buildings and operation of project facilities. The Proposed Project will not result in a significant impact related to the provision of natural gas or electricity. In addition, Title 24 of the California Code of Regulations requires conservation practices that will limit the amount of energy consumed by the proposed Project.

Notwithstanding the energy conservation features of Title 24, and the type and location of proposed land uses being of a nature that supports reductions in VMT, implementation of the Proposed Project will result in increased demands for energy and other resources that represent a long-term commitment of nonrenewable resources. The commitment of limited, slowly renewable, and nonrenewable resources required for construction and operation of the Proposed Project will limit the availability of these resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with regional and local plans and projected growth in the area. No other significant irreversible changes are expected to occur as a result of project implementation.

5.3 GROWTH-INDUCING IMPACTS

Pursuant to the *CEQA Guidelines*: an EIR must address whether a project will directly or indirectly foster growth as follows:

An EIR shall 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 wastewater treatment plant, might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also, discuss the characteristic 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.

Growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment (CEQA Guidelines Section 15126.2 (d)). This issue is presented to provide additional information on ways in which the Proposed Project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this EIR. It should also be noted that while implementation of the Proposed Project would result in the establishment of new businesses within the Project area, the associated increases in development and employment are not considered to be the result of growth inducement, but rather reflects the accommodation of growth anticipated to occur within the region. Therefore, implementation of the Proposed Project would not result in direct or indirect growth inducing impacts.

5.4 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACT

The potentially adverse effects of the Proposed Project are discussed in Chapter 3.0 of this EIR. Although mitigation measures have been recommended for air quality impacts, future development within the Project area would still have the potential to result in significant unavoidable impacts. In addition, although Project mitigation measures have been recommended for cultural and more specifically historic resources, the potential impacts of three-story hotel buildings of up to 45-feet in height on historic structures in the HTC area would remain significant and unavoidable.