Section 2.9
Significant Irreversible Environmental Changes Resulting from Project Implementation

The California Environmental Quality Act (CEQA) Guidelines require that an environmental impact report (EIR) address any significant irreversible environmental changes that would be involved in a project should it be implemented (Sections 15126(c) and 15126.2(c)). State CEQA Guidelines Section 15126.2(c) indicates that "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 likely. 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."

2.9.1 Irreversible Environmental Changes

The project proposes an amendment to the existing Zoning Ordinance governing the development of accessory agricultural operations and required permitting. The Zoning Ordinance Amendment consists of clarifications, deletions, and revisions to provide an updated set of definitions, procedures, and standards for review and permitting of various agriculture-related accessory uses. The amendment would implement differing levels of approvals for the proposed accessory agricultural uses. Some uses would be allowed by-right or with ministerial permits, while others may require one of several types of discretionary permits that would each require individual compliance with CEQA. Irreversible long-term environmental changes associated with the proposed project would include those potential significant impacts described in Sections 2.1 through 2.8 of this EIR.

Thus, implementation of the proposed project would involve the following irreversible environmental changes.

- Incremental increases in vehicular activity within unincorporated portions of the County, and the resultant increase in air pollutants and noise emissions generated by this traffic.
- Where accessory agricultural uses are expanded, there would be a potential for destruction of sensitive biological, cultural, or paleontological resources.
- Temporary and permanent commitment of energy and water resources as a result of the construction, long-term operation, and maintenance of new operations, which may be considered a permanent investment.
- Utilization of various new raw materials (such as lumber, sand, and gravel) for construction.
- Utilization of other non-renewable materials for maintenance and operations, such as pesticides and fertilizers which are made with petroleum.
- Alteration of the human environment as a consequence of developing and expanding agriculture-related accessory uses. These new uses, while generally agricultural in nature and

consistent with the zoning, would still intensify land uses when considering the existing rural character of many portions of the project area.

2.9.2 Potential Environmental Damage from Accidents

Implementation of the proposed project would not involve any uniquely hazardous uses, and its operation would not be expected to cause environmental accidents that would affect other areas. The use and storage of hazardous materials is discussed in Section 2.4, *Hazards*, and is not anticipated to be a significant impact. While fire risks can be minimized through use of fire protection techniques as described in Section 2.4.3.6, *Wildland Fires*, it cannot be assured that fire hazards could be completely avoided upon development and operation of accessory agriculture uses.

The County of San Diego is located within a seismically active region and areas affected by the proposed project would be exposed to ground shaking during seismic events. Accessory agricultural structures, even those constructed as a use by-right, would require, at minimum, a building permit. Conformance with regulatory provisions of the County and the Uniform Building Code pertaining to construction standards would minimize damage and injuries in the event of a seismic occurrence.

2.9.3 Irreversible Commitment of Resources

As described in Chapter 1, *Project Description, Location, and Environmental Setting*, the objectives of the proposed project include streamlining the permitting process for accessory agriculture uses in order to better facilitate the development of such uses within the County of San Diego (County). Therefore, implementation of the Zoning Ordinance Amendment may result in an incremental increase of agricultural uses. This growth in the agriculture industry would entail the commitment of nonrenewable resources, such as natural gas, petroleum products, asphalt, steel, copper, and other metals, and sand and gravel. The commitment of these resources would be irreversible as the processes that created them occurred over a very long period of time. There would also be an incremental increase in demand for both renewable (e.g., lumber) and nonrenewable resources as a result of the proposed project.

In addition to the primary impacts, such as the construction of accessory agricultural operations, long-term impacts may result from an increase in vehicular traffic and the associated air pollutant and noise emissions. This commitment of resources would be a long-term obligation because, practically speaking, it is difficult to return the land to its original condition once it has been developed.

In summary, the proposed project is not expected to result in environmental accidents that would cause irreversible damage. Compliance with required plans, such as a stormwater pollution prevention plan, erosion and grading plan, and hazardous materials management plan, would minimize the potential for accidents resulting in environmental damage. Compliance with all applicable building codes, as well as County policies and the mitigation measures identified in this EIR, would ensure that all natural resources are conserved to the maximum extent possible.