

CHAPTER 7.0

OTHER CEQA CONSIDERATIONS

California Environmental Quality Act (CEQA) Guidelines Section 15128 requires that an Environmental Impact Report (EIR) contain a brief statement disclosing the reasons why various possible significant effects of a proposed project were found not to be significant and, therefore, would not be discussed in detail in the EIR. The proposed project was reviewed against the potential environmental issues contained in Appendix G of the CEQA Guidelines. Environmental issue areas found to have potentially significant impacts are addressed in Chapter 4.0 of this EIR. Issues that were found to have no potential for a significant impact are discussed below in Section 7.1.

Section 15126 of the CEQA Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must identify the following three components, which are also addressed in this chapter:

- Growth-inducing impacts of the proposed project (addressed below in Section 7.2);
- Significant environmental effects that cannot be avoided if the proposed project is implemented (addressed below in Section 7.3); and
- Significant irreversible environmental effects that would be involved in the proposed project should it be implemented (addressed below in Section 7.4).

7.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

The City of El Cajon, as the lead agency, identified that the following environmental effects of the proposed project would not be significant: agricultural resources, mineral resources, population and housing, and recreation. These effects are briefly discussed below along with the reasons that these effects are not considered to be significant.

7.1.1 AGRICULTURAL RESOURCES

Based on farmland maps prepared by the California Department of Conservation, the project site is not located in an area designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation, 2000). In addition, the project site is not currently nor has it been used in the past for agricultural purposes. Agricultural uses are allowed under the Open Space land use designation, which occurs in the northern portion of the project site. However, this area of the site is

relatively small and would not be conducive to agricultural uses. Much of the area in the northern portion of the site has been developed for use as an outdoor concrete storage area and the concrete-lined Forrester Creek channel. Therefore, the proposed project would not affect any past, present or future agricultural uses on the site and this issue is not addressed in the EIR.

7.1.2 MINERAL RESOURCES

The California Department of Mines and Geology does not identify the project site as an area with high potential for aggregate or mineral resources. Further, project implementation would not result in the loss of availability of a known or locally important mineral resource. No long-term impacts to mineral resources are anticipated from project implementation. Therefore, this topic is not evaluated in the EIR.

7.1.3 POPULATION AND HOUSING

The proposed project would not induce substantial population growth, or displace existing housing or persons, that would create a direct significant impact on the environment. Therefore, this issue is not evaluated in the EIR. The EIR addresses the project's potential impacts to public services, utilities, transportation/circulation, and other environmental topics that are indirectly related to population growth.

7.1.4 RECREATION

The proposed industrial project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration would occur or be accelerated. In addition, the project does not include the construction or expansion of recreational facilities which would have an adverse physical effect on the environment. Therefore, the proposed project would not create a significant impact to recreational resources and this issue is not evaluated further in the EIR.

7.2 GROWTH INDUCEMENT

As required by the CEQA Guidelines, an EIR must include a discussion of the ways in which the proposed project could directly or indirectly foster economic development or population growth, or the construction of additional housing and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[d]). In general terms, a project may foster population growth in a geographic area if it meets any one of the criteria that are identified below.

- Removal of an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area).
- Economic expansion or growth (e.g., construction of additional housing, changes in revenue base, employment expansion, etc.).
- Establishment of a precedent-setting action (e.g., an innovation, a change in zoning or general plan designation).
- Development or encroachment in an isolated or adjacent area of open space (being distinct from an "infill" type of project).

Should a project meet any one of these criteria, it can be considered growth inducing. According to CEQA Guidelines Section 15126.2(d), "it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment." An evaluation of the proposed project compared against these growth-inducing criteria is provided below.

7.2.1 REMOVAL OF AN IMPEDIMENT TO GROWTH

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., sewer service), while planning impediments may include restrictive zoning and/or general plan designations.

The project site is accessible through the existing street system in El Cajon and also located within the service area for all major utilities. Existing utilities infrastructure would be available to serve the project. The proposed project does include a General Plan Amendment and a rezone, however, the existing SDA-1 land use designation located on the majority of the project site allows for the development of industrial uses. Therefore, the proposed project would not be growth-inducing because it would not remove an impediment to growth.

7.2.2 ECONOMIC GROWTH

The proposed project involves an industrial park development consisting of 463,000 square feet of industrial space, combining manufacturing and warehouse uses on the 31.5-acre project site. The proposed project would generate some new jobs and additional economic activity in the City; however, based on the size of the project it is unlikely to have a substantial effect on the economic growth of El Cajon. Therefore, the proposed project would not be growth-inducing because it would not foster substantial economic expansion or growth.

7.2.3 PRECEDENT-SETTING ACTION

The proposed project would not involve a precedent-setting action because it would not remove obstacles to growth or encourage growth through the provision of new and essential public services or access opportunities. Nor would it result in urbanization of land in a remote location, resulting in “leapfrog” development. The proposed project site is located in an urbanized area that is served by an existing network of electricity, water, sewer, storm drain, communications, roadways, and other infrastructure sized to accommodate or allow existing and planned future growth. Therefore, the proposed project would not be growth inducing because it would not establish a precedent-setting action.

7.2.4 DEVELOPMENT OF OR ENCROACHMENT INTO ISOLATED OR OPEN SPACE

Development can be considered growth inducing when it requires the extension of urban infrastructure into isolated localities, which are presently devoid of such facilities. The proposed project is not located in an isolated area and is surrounded by existing residential, airport and industrial uses. As mentioned above, existing infrastructure exists in the project area. The northern portion of the proposed project is currently designated as Open Space in the City’s General Plan. However, the proposed project would include a General Plan Amendment to change the land use designation to Industrial Park. The small size of the area currently designated as Open Space on the project site would not result in a substantial loss of an open space area. Therefore, the proposed project would not encroach into isolated or open space areas which would substantially induce growth.

7.3 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

Pursuant to Section 15126.2(b) of the CEQA Guidelines, this section identifies significant impacts that would not be avoided, even with the implementation of feasible mitigation measures. The final determination of significance of impacts and of the feasibility of mitigation measures will be made by the El Cajon City Council as part of their certification action for the EIR. Sections 4.1 through 4.13 and 5.0 of this EIR provide a comprehensive identification of the project's potentially significant adverse environmental effects and any necessary mitigation measures, as well as the level of significance both before and after mitigation. A summary of the environmental impacts and mitigation measures is contained in Executive Summary section of this EIR.

Potentially significant and unavoidable direct and cumulative environmental impacts associated with implementation of the proposed project were identified for air quality. All other direct and cumulative impacts identified for the proposed project would be mitigated to below a level of significance, as identified in Sections 4.1 through 4.13 and 5.0 of this EIR.

7.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, 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.

Generally, 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 involves uses in which irreversible damage would result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Development of the proposed project would result in the commitment of the project site to industrial uses. Restoration of the project site to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment that would result from implementation of the proposed project.

Resources that would be permanently and continually consumed by implementation of the proposed 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. The proposed project would develop the project site with industrial uses compatible with the Industrial Park land use designation identified in the General Plan. Nonetheless, construction activities related to the proposed project, though previously analyzed, would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment.

With respect to operational activities of the Forrester Creek Industrial Park project, compliance with all applicable building codes, as well as EIR mitigation measures, would ensure that all natural resources are conserved to the maximum extent practicable. It is also possible that new technologies or systems would emerge, or would become more cost-effective or user-friendly, to further reduce the project reliance upon nonrenewable energy resources.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the proposed project. Development of the proposed project site with industrial land uses consistent with the Industrial Park land use designation identified in the General Plan could involve the use, transport, storage, or disposal of hazardous wastes. However, these hazardous wastes, such as chemicals, fuels, cleaners, paints, and fertilizers would be used and disposed of in accordance with applicable regulations and laws. Therefore, the potential for the proposed project to cause significant irreversible environmental damage from an accident or upset of hazardous materials would be less than significant.

This page is intentionally left blank.