SUBCHAPTER 2.8

SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE INVOLVED IN THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

2.8 Significant Irreversible Environmental Changes Which Would be Involved in the Proposed Project Should it be Implemented

CEQA Guidelines Section 15127 requires irreversible changes be evaluated in EIRs prepared for projects that would involve: (a) the adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency; (b) the adoption by a LAFCO of a resolution making determinations; and (c) the requirement for preparing an environmental impact statement pursuant to the National Environmental Policy Act. The Proposed Project would involve a GPA as well as LAFCO determinations regarding annexation to SDCWA and RMWD, which would provide water and wastewater services. The following analysis addresses Project changes that would be considered irreversible and Project commitments/use of resources that would be considered irretrievable.

The construction and implementation of the Project would result in irreversible environmental changes to the Project site. The on-site physical effects of these changes are fully addressed in Chapters 2.0 and 3.0 of this EIR. In general, conversion of currently vacant land, with sensitive habitat (as well as agriculture/orchard and eucalyptus woodland), to urbanized uses (paved roadways and graded lots with buildings and landscaping) would represent an irreversible loss of existing biological resources on approximately 96 acres of on-site habitat. On-site woodlands include southern riparian forest, southern riparian scrub, coast live oak woodland, Diegan coastal sage scrub, and non-native grassland. These impacts are considered permanent and the losses are considered irreversible.

Biological open space would be dedicated on site. Some of these lots would preserve wetlands and wetland buffers on the northern, eastern and southern portions of the Project planning areas north of SR-76/Pala Road, and in the western and southern portions of the planning area south of SR-76/Pala Road. Two lots comprised of manufactured slopes, landscaped areas, detention basins, and drainage facilities would be dedicated as open space and maintained by a Homeowners' Association. The proposed open space lands would account for approximately 27 percent of the Project site area. Only the lots that are kept in undisturbed condition would be considered to not constitute an irreversible change to biological resources. The open space areas with manufactured slopes and drainage facilities would add to the irreversibly changed footprint of the Project.

The cut and fill proposed to create the developed footprint of the Project would result in an irreversible change to the existing topography. Also, any potential paleontological and cultural resources that may be buried could be irreversibly changed if they were excavated, though their collection and preservation for study would constitute acceptable mitigation and could prove beneficial. The changes in topography and overall conversion of the Project area from rural and vacant to developed uses also would result in irreversible aesthetic changes. Likewise, the imposition of urban activities into the existing area would irreversibly change the noise environment, and modification of drainage patterns would irreversibly change on-site hydrology.

Known on-site mineral resources in the San Luis Rey River valley were found not to be available for extraction due to their proximity to existing residences. These resources are considered to be

already lost, so the conversion of the parcels south of SR-76 to other uses would not represent an irreversible change to mineral resources caused by the Project.

More generally, the Project construction would require the commitment of energy, natural resources, and building materials. Non-renewable fuels would be used by construction equipment, haul trucks, and worker vehicles. Non-renewable energy also would be expended during the harvesting and mining of natural resources such as wood and aggregate and during the subsequent manufacturing of construction materials such as framing and concrete. This commitment of resources and energy would be commensurate with that of other projects of similar size but would be irretrievable.

Post-construction consumption of non-renewable resources would include the use of electricity and natural gas by Project residents, workers, and visitors. This energy use would be a long-term commitment and irretrievable, although any energy-saving features of the Project would reduce this commitment.