2.15 <u>Significant Irreversible Environmental Changes Resultant From</u> Project Implementation

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 Local Agency Formation Commission (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 involves an amendment to the General Plan (a) and a LAFCO determination (b).

As required by Section 15126.2(c) of the CEQA Guidelines, irretrievable commitments of resources should be evaluated to ensure that the current consumption is justified. The following analysis addresses project changes that would be considered irreversible.

The irreversible change to the existing topography and biology. Approximately 776 acres of the 1,985-acre site would be altered by grading and development of the project Site (including fuel modification zones), resulting in the permanent removal of on-site habitat as detailed in Section 2.4, Biological Resources. This loss has been mitigated to less than significant.

Commitment of resources (energy, natural resources, and building materials). The project would be constructed over approximately 10 years in response to market demands and in accordance with a logical and orderly expansion of roadways, public utilities, and infrastructure. Construction of the project would require the consumption of resources that are not renewable or that may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel, and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; water; and fossil fuels such as gasoline and oil.

Fuels would be used by equipment during grading and construction, by trucks transporting construction materials to the Site, and by construction workers during their travel to and from the project Site. Energy also would be used in the harvesting, mining, and/or manufacturing materials for structure and roadway construction, although some construction materials would be generated from the project Site source. These construction materials and fuels would likely be committed to other similar projects in the region if not used for this project. Resources used for the project would be typical of similar residential projects in the region.

Increased consumption of resources (fossil fuels, electricity, and water). Post-construction operational energy uses of the facilities associated with the project would include water for

drinking and bathing, and fossil fuels for electricity, natural gas, and transportation. Fossil fuels would represent the primary non-renewable energy source associated with construction and ongoing operation of the project, and the existing, finite supplies of these natural resources would be incrementally reduced. Energy use would be a long-term commitment, and the use of energy would be irretrievable, although any energy-saving features of the project would reduce this commitment. The proposed project would improve the jobs/housing balance by providing housing for the workforce in the surrounding job centers. This would result in fewer miles commuted, and thereby less gasoline and diesel consumed. Provision of services and utilities are discussed in Chapter 1, Section 2.14, Utilities and Service Systems, Section 3.5, Public Services, and Section 3.1 Energy.

In summary, construction and operation of the project would result in the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these particular resources for future generations or for other uses during the life of the project. However, the loss of such resources would not be highly accelerated when compared to existing conditions and growth projections for the County of San Diego. Therefore, although irretrievable commitment of resources would result from the project, such changes would be considered less than significant.