3.1.10 Significant Irreversible Environmental Changes Resultant from Project Implementation

The California Environmental Quality Act (CEQA) Guidelines Section 15127 requires irreversible changes be evaluated in environmental impact reports (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 of a resolution making determinations; or (c) the requirement for preparing an environmental impact statement pursuant to the National Environmental Policy Act. Otay Ranch Village 14 and Planning Areas 16/19 (Proposed Project) would involve (a), the adoption of a specific plan.

CEQA Guidelines Section 15126.2(c) indicates the following (14 CCR 15126.2(c)):

> Use of non-renewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or non-use 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.

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 Proposed Project changes that would be considered irreversible.

This section tiers from the 1993 Otay Ranch Final Program EIR (Otay Ranch PEIR) (City of Chula Vista and County of San Diego 1993a) because the Project Area is within the boundaries of the Otay Ranch General Development Plan/Otay Subregional Plan (Otay Ranch GDP/SRP) (City of Chula Vista and County of San Diego 1993b) area, and development of the Project Area was analyzed in the Otay Ranch PEIR. The Otay Ranch PEIR determined there would be irreversible changes to the existing environment resulting from the conversion of property from open space and agricultural uses to an urban development, an irretrievable commitment of important biological, agricultural, mineral, prehistorical, and paleontological resources. Finally, the PEIR determined additional losses to water, wood, aggregate materials and consumption of non-reviewable fossil fuels would occur. As explained in Section 1.5, since certification of the Program EIR, changes in either the regulatory environment or physical setting have occurred and necessitated additional technical analyses which have been performed specific to the Proposed Project. Similarly, as the development concept for the Proposed Project was refined, more

precise and site-specific technical analyses were performed to determine the potential impacts of the Proposed Project. The Proposed Project would not propose more homes in Village 14 or Planning Areas 16/19 than approved in the Otay Ranch GDP/SRP as analyzed in the certified Otay Ranch PEIR; would reduce the size of Proctor Valley Road from four lanes to two lanes; and would eliminate Proctor Valley Road easterly toward SR-94 through Planning Area 16. These changes are addressed in technical appendices to the EIR and in the EIR itself. This EIR is a project-level document that evaluates the potential environmental impacts of the Proposed Project (i.e., Specific Plan, General Plan Amendments, Rezone, Tentative Map, and other land use approvals). This EIR evaluates all elements of the Proposed Project, including the construction (short-term) and operational (long-term) impacts associated with its development. Accordingly, although this EIR covers a portion of the same geographic area as the Otay Ranch PEIR, this EIR is a Project-level analysis based on more recent technical studies.

Existing on-site natural resources would be removed as part of the Proposed Project. Implementation of the Proposed Project would result in permanent, direct impacts to approximately ~~689.7~~708.6 acres of vegetation communities within Village 14 and Planning Areas 16/19. A total of ~~45.2~~32.2 acres of off-site permanent impacts and 53.2 acres of off-site temporary direct impacts to lands owned by the California Department of Fish and Wildlife, City of Chula Vista and City of San Diego Water Utilities Department and on a County of San Diego road easement would result from Proposed Project road grading. Most of the indirect impacts to vegetation communities and special-status plants can also affect special-status wildlife. Although irreversible, these impacts would be mitigated by measures outlined in Section 2.4, Biological Resources, of this EIR.

The Proposed Project would also preclude future extraction of mineral resources, as more fully explained in Section 3.1.4, Mineral Resources. As analyzed herein, these impacts were determined to be less than significant based on the feasibility of mining these resources.

Implementation of the Proposed Project would consume non-renewable resources. This consumption would occur during the construction phase of the Proposed Project and would continue throughout its operational lifetime. The Proposed Project would require a commitment of resources that would include building materials, fuel and operational materials and resources, and fuel for the transportation of goods and people to and from the Project Area.

Construction of the Proposed Project would require consumption of resources that are not renewable or that may renew so slowly as to be considered non-renewable. These resources would include 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.

3.1.10 Significant Irreversible Environmental Changes Resultant from Project Implementation

The resources that would be committed during operation of the Proposed Project would include water, and fossil fuels for electricity, natural gas, and transportation. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Proposed Project, and the existing, finite supplies of these natural resources would be incrementally reduced. However, the Proposed Project includes an Energy Conservation Plan that identifies design features to reduce the consumption of non-renewable energy resources. The three main categories identified in the Energy Conservation Plan where reductions in energy use may occur are land use and community design, building siting and construction techniques, and transit facilities and alternative transportation modes (see Appendix 3.1.9 of this EIR). Additionally, a Water Conservation Plan was prepared (Appendix 3.1.2-3) for the Proposed Project, which will require mandatory water reduction measures for residential and non-residential land uses.

The Proposed Project would involve an unquantifiable, but limited, use of potentially hazardous materials typical of residential, office, and commercial uses, including cleaning solvents and fertilizers and/or pesticides for landscaping. These materials would be contained, stored, and used on site in accordance with manufacturer instructions and applicable standards and regulations. Compliance with regulations would serve to protect against a significant and irreversible environmental change that could result from the accidental release of hazardous materials.

The Project Area had historically been used for agricultural purposes. Development within the Project Area would contribute to the incremental and cumulative loss of agricultural lands (~~Farmland of Local Importance~~coastal-dependent crops). This would be an irreversible consequence of converting the Project Area to residential, mixed-use retail/commercial, park, and public land uses. However, the Project Area has been planned as part of the Otay Ranch GDP/SRP to provide single-family residences and a Village Core containing commercial uses, parks (both neighborhood and regional), community-purpose facilities, a potential elementary school site, and potential transit stops. No additional loss of agricultural land would occur beyond what was analyzed and planned for in the Otay Ranch GDP/SRP. Pursuant to mitigation measure M-AG-1 (see Section 2.2, Agricultural Resources), an Agricultural Plan has been prepared as part of the Proposed Project's Specific Plan (RH Consulting 2018).

In summary, construction and operation of the Proposed Project would result in the irretrievable commitment of non-renewable resources, which would limit the availability of these particular resources for future generations or for other uses during the life of the Proposed Project. However, the Proposed Project includes requirements for energy and water conservation so that use of those resources would be of a relatively small scale compared to similar development without such requirements. Additionally, the Proposed Project would accommodate growth forecasted for the Otay Ranch area, as discussed in Section 3.1.5, Population and Housing. The loss of such resources would not be highly accelerated when compared to existing conditions and

growth projections for San Diego County. The Proposed Project's irretrievable commitments of resources have been evaluated and, based on that evaluation, the County of San Diego has determined that the Proposed Project's consumption of those resources is justified (14 CCR 15126.2(c)). Therefore, although irretrievable commitments of resources would result from the Proposed Project, such changes would be **less than significant**.