2.~~12~~11 Significant Irreversible Environmental Changes Resultant from 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 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 GPA, as well as LAFCO determinations regarding annexation to the San Diego County Sanitation District, which would provide 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 239-acre 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 predominately vacant land, with sensitive habitat (as well as agriculture/orchard), to urbanized uses (paved roadways and graded lots with buildings and landscaping) would represent an irreversible loss of existing biological, visual, and agricultural resources on approximately ~~164.9~~159.9 acres on-site, with ~~92~~ 90 acres being biological habitat, including sensitive vegetation communities, special status wildlife species, and jurisdictional wetlands. These impacts are considered permanent and the losses are considered irreversible. Only the lots that are kept in undisturbed condition would be considered to not constitute an irreversible change to biological resources (~~28.2~~ 31.2 acres).

The Proposed Project would result in a loss of ~~13.0~~13.1 acres of agricultural resources that encompass Prime Farmland or Farmland of Statewide Importance candidate soils, and thus would substantially impair the ongoing viability of the site for agricultural use. These impacts are considered permanent and the losses are considered irreversible. The Project design includes a ~~36.5~~35.4-acre on-site agricultural easement that would retain the associated existing avocado orchard and continue this operation (and potentially other uses such as vineyards and additional orchards including citrus, pomegranates, nuts, and olives) in perpetuity.

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 presently unknown paleontological and cultural resources that may be buried could be irreversibly changed if they were inadvertently disturbed, though data recovery for study would be accomplished. The changes in topography and overall conversion of the Project area from rural to developed uses also would result in irreversible aesthetic changes. Likewise, the imposition of urban activities into the existing undeveloped area would irreversibly change the noise and transportation environment, and modification of drainage patterns would irreversibly change on-site hydrology.

The Project site has been classified by the California Department of Conservation – Division of Mines and Geology as an area of "Potential Mineral Resource Significance (MRZ-3). However, the Project site is adjacent to existing and proposed residential areas which would be incompatible with future extraction of mineral resources on the Project site. Therefore, implementation of the Project would not result in the loss of availability of a known mineral

resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

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.