

5.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the *California Environmental Quality Act (CEQA) Guidelines* states that an Environmental Impact Report (EIR) must include a discussion of the following topics:

- growth-inducing effects of the proposed project
- significant environmental effects which cannot be avoided if the proposed project is implemented
- significant irreversible environmental changes which would be involved in the proposed project should it be implemented; and

In addition, Section 15128 of the *State CEQA Guidelines* requires a brief statement of the reasons that various possible effects of a project have been determined not to be significant and, therefore, are not discussed in detail in the EIR. This PEIR analyzed all potential effects of the project as described in Appendix G of the *State CEQA Guidelines*, therefore, there is no listing of effects determined not to be significant.

5.1 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROJECT THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

An EIR must identify significant impacts associated with a proposed agency action that could not be mitigated to a less than significant level. Many of the impacts that are determined to be significant and unavoidable could be mitigated to less than significant at the project level. However, this PEIR evaluates impacts at a programmatic level, and detailed site plans and project descriptions are not available. Therefore, without the ability to evaluate each project that could occur as a result of the Plan, these impacts were determined to be significant and unavoidable.

Table ES-5, Summary of Project Impacts, Mitigation Measures, and Residual Impacts, which is contained in the **Executive Summary** of this PEIR, and **Sections 3.1** through **3.21** of this PEIR provide a comprehensive identification of the environmental effects of the SCAG's proposed Connect SoCal Plan, including the level of significance both before and after mitigation.

Section 15126.2(c) of the *CEQA Guidelines* requires that an EIR (including a PEIR) describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Implementation of the Plan would result in significant and unavoidable project-related and/or cumulative impacts in the following areas:

- **Aesthetics:** Implementation of transportation projects contained in the Plan and development projects anticipated to occur under the Plan may result in the conversion of open space or vacant lands to new uses. Areas potentially affected include designated open space visible from USFS, Caltrans, county, and city designated scenic vistas. The Plan would also have the potential to impact rock outcroppings or other scenic elements such as historic resources within eligible state scenic highways. Many of the transportation projects and the HQTAs are in areas with designated scenic resources including historic buildings and scenic rock outcroppings. Therefore, there is potential for the Plan to affect these resources. Implementation of transportation projects contained in the Plan and development anticipated to occur under the Plan has the potential to degrade the visual character of project sites, constituting a significant impact. Implementation of transportation projects contained in the Plan and development anticipated to occur under the Plan has the potential to create new substantial sources of light or glare, constituting a significant impact.
- **Agriculture and Forestry Resources:** Implementation of transportation projects as well as growth anticipated under the Plan would have the potential to convert the following to non-agricultural use: Prime Farmland, Farmland of Statewide Importance, Unique Farmland and Farmland of Local Importance. Implementation of the transportation projects and growth anticipated under the Plan would have the potential to conflict with land managed pursuant to Williamson Act contracts constituting a significant impact. Implementation of the transportation projects and anticipated growth under the Plan has the potential to conflict with existing zoning for forest land, timberland, or timberland zoned Timberland Production. Implementation of transportation projects and anticipated growth under the Plan would result in significant impacts with regards to the loss of forest land or conversion of forest land to non-forest use. Implementation of transportation projects and anticipated growth under the Plan would result in significant impacts with regards to the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.
- **Air Quality:** At the regional level, criteria pollutant emissions would be mostly reduced compared to existing conditions and the region would meet air quality standards. In 2045, when compared to existing conditions, on-road mobile-source PM_{2.5} would increase in Imperial, Riverside, and San Bernardino Counties and mobile-source PM₁₀ would increase in Imperial, Orange, Riverside, and San Bernardino Counties due to increasing traffic. On-road mobile-source particulate matter emissions would remain the same or decrease from existing conditions in the other counties. Within the SCAB (which is likely indicative of the region as a whole), SCAQMD indicates that total pollutant emissions are being reduced through at least 2031, except for small increases in SO_x and PM_{2.5}. Individual project emissions may result in significant construction and/or operational emissions as compared to thresholds of significance identified by each air district which would result in a

cumulative impact. Over the lifetime of the Plan numerous transportation projects and land use development projects would be implemented. The construction of these projects could expose sensitive receptors to substantial pollutant concentrations.

- **Biological Resources:** Implementation of transportation projects identified in the Plan and development projects anticipated to occur under the Plan would affect biological resources. Direct impacts that could occur during construction of some projects include direct loss of sensitive plant and/or wildlife species resulting from injury, death, or disturbance of these species. Direct impacts may also occur through direct habitat loss and fragmentation during construction, displacement of sensitive species due to construction noise or during operation, accidental introduction of non-native plants by construction equipment or during maintenance and general operation, introduction of new lighting sources, and dust and noise during construction and operation. Implementation of transportation projects identified in the Plan and development projects anticipated to occur under the Plan would have a substantial adverse effect on riparian habitats and other sensitive natural communities. Implementation of transportation projects identified in the Plan and development projects anticipated to occur under the Plan would have a substantial adverse effect on wetlands. Implementation of transportation projects identified in the Plan and development projects anticipated to occur under the Plan would interfere substantially with the movement of native resident or migratory fish, or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites directly, as a result of habitat conversion to accommodate transportation projects and growth under the Plan, or indirectly through interruption of movement or migratory corridors caused by construction and operation of infrastructure for transportation projects and adjacent projects that may result from improved transportation access. Implementation of transportation projects as well as land use and transportation strategies identified in the Plan have the potential to conflict with local policies and ordinances related to biological resources. Implementation of transportation projects identified in the Plan and development projects anticipated to occur under the Plan would have a potential to result in conflicts with the provisions of applicable adopted HCPs and NCCPs because some planned major transportation projects and development projects may occur in or adjacent to lands protected under these plans, constituting a significant impact.
- **Cultural Resources:** The Plan has the potential to effect historical resources in the SCAG region, including sites listed in the NRHP. Transportation projects and anticipated growth under the Plan have the potential to cause a substantial adverse change in the significance of archaeological resources in the SCAG Region, pursuant to *CEQA Guidelines* Section 15064.5, constituting a significant impact. The Plan includes transportation projects that have the potential to disturb human remains

interred outside of formal cemeteries or those interred in Native American sacred sites, constituting a significant impact.

- **Geology and Soils:** Implementation of transportation projects included in the Plan as well as growth under the Plan, particularly projects involving large-scale ground disturbance during construction such as grade separation projects, mixed flow lane projects, and rail projects may result in significant impacts from soil erosion or the loss of topsoil. The potential direct impacts on paleontological resources related to implementation of transportation projects and development projects anticipated to occur under the Plan, could result in substantial alteration or removal of a significant paleontological resource from construction activities, and is considered significant.
- **Greenhouse Gas Emissions:** Implementation of the Plan could conflict with CARB's 2017 Scoping Plan or any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs. Furthermore, while GHG emissions are anticipated to decrease compared to existing conditions, they are not anticipated to be reduced sufficiently to meet the targets established for California.
- **Hazards and Hazardous Materials:** Implementation of the Plan would increase the risk of significant hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials as well as through reasonably foreseeable upset conditions. Transportation projects and land use strategies included in the Plan may increase the risk of emitting hazardous materials within one-quarter mile of a school. Furthermore, the Plan may cause transportation projects and development to be located on sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The Plan would not in itself result in a safety hazard; however, increased population growth that would occur by 2045 would result in increased air traffic in major commercial airports in Southern California which could result in significant safety impacts. The Plan would result in significant impacts in regards to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan.
- **Hydrology and Water Quality:** Grading, excavation, and other construction activities associated with implementation of transportation projects and development projects anticipated to occur under the Plan, could impact water quality due to erosion resulting from exposed soils that may be transported in stormwater runoff. Given that most of the groundwater basins in the Plan area are already in a state of overdraft, future development may result in a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted). Implementation of transportation projects as well as anticipated development under the

Plan would occur within watersheds that have impaired water bodies. Many of the impaired water bodies are located near a freeway, transit, or rail projects included in the Plan. Several projects may impact water bodies by placing fill material within a stream channel. The Plan has the potential to change existing drainage patterns. Transportation projects such as lane widening projects, new highways, as well as bridges/tunnels, and transportation facilities projects that could cross existing creeks, water crossings, rivers or be expanded into wetland areas may impact water bodies by placing fill material within a stream channel. the Plan has the potential to alter existing drainage patterns. Implementation of the Plan's transportation projects as well as land use strategies may increase impervious surfaces, which in turn could increase urban runoff if not regulated, resulting in the transport of greater volumes of polluted water into storm drain systems. With regard to flooding, implementation of transportation projects and development projects anticipated to occur under the Plan built in low-lying areas or in proximity to waterways and/or dam inundation zones may be subject to flood hazards. An increase in impervious surfaces would increase water runoff and potentially affect groundwater recharge rates and water quality in the basins. Therefore, the Plan may conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan and mitigation measures are required.

- **Land Use:** Physical division of an established community could occur as a result of real or perceived barriers to pedestrians, bicyclists, and motorists. Short-term construction related impacts could result from disturbances due to construction equipment; these impacts are discussed under other impact categories (e.g., Noise, Aesthetics, and Air Quality). Long-term impacts could result from the completion of new or expanded roadways or transit facilities in existing communities. , since the Plan's planning horizon year is beyond the timeline of many of the most recent general plans, implementation of the Plan's transportation projects and land use strategies could potentially result in changes in the land use patterns in the region that may facilitate land use changes in some areas. Therefore, there is potential for inconsistencies with general plans as well as regional conservation plans.
- **Mineral Resources:** Transportation projects contained in the Plan and development projects anticipated to occur under the Plan would require substantial amounts of aggregate resources for construction purposes, constituting a significant impact. Transportation projects contained in the Plan and development projects anticipated to occur under the Plan have the potential to impact availability of mineral resources if they are constructed in mineral resource zones.
- **Noise:** Implementation of transportation projects and development projects anticipated to occur under the Plan would likely result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other

agencies, constituting a significant impact. Implementation of the transportation projects and the construction of land use development projects anticipated to occur under the Plan would generate varying levels of vibration and groundborne noise. Implementation of transportation projects and development anticipated to occur under the Plan may result in exposure of persons to or generation of significant noise levels from aircrafts and other airport activity (including ground transportation) constituting a significant impact.

- **Population and Housing:** Due to the Plan's land use strategies that focus on compact development, there is potential to induce growth in some areas of the region although overall the Plan accommodates anticipated growth rather than inducing growth. The construction of transportation projects that require expansion of existing or designation of new ROWs have the potential to result in the displacement of existing people and housing, necessitating the construction of replacement housing, thereby constituting a potentially significant impact.
- **Public Services:** Implementation of Connect SoCal could affect the need for construction of new or physically altered fire protection and emergency response facilities in order to maintain acceptable service ratios. Although the location and size of such facilities is not yet known, impacts could occur, requiring the consideration of mitigation measures. The Plan could contribute to the need for construction of new or physically altered police facilities in order to maintain acceptable service ratios. The Plan could contribute to substantial adverse physical impacts associated with the construction and subsequent operation of new or physically altered school facilities in order to maintain acceptable service ratios. The Plan could contribute to substantial adverse physical impacts associated with the construction of library facilities in order to maintain acceptable service ratios.
- **Parks and Recreation:** Transportation projects and growth under the Plan would have the potential to increase use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration would occur, constituting a potentially significant impact.. Implementation of the Plan would result in additional linear recreation facilities, including a regional greenway network, a regional bikeway network, and local bikeway networks, the construction of which might have an adverse physical effect on the environment.
- **Transportation and Traffic:** The Plan could conflict with or be inconsistent with *CEQA Guidelines* section 15064.3(b). The Plan also has the potential to result in inadequate emergency access, or to substantially impair an adopted emergency response plan.
- **Tribal Cultural Resources:** Transportation projects and anticipated growth under the Plan have the potential to cause a substantial adverse change in the significance of tribal cultural resources in the

SCAG region, defined in Public Resources Code section 21074, as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe.

- Utilities and Service Systems:** Many of the transportation projects within the Plan have the potential to generate a substantial amount of solid waste during construction through grading and excavation activities, as well as debris resulting from removal of structures, due to the volume of solid waste debris expected to be generated with implementation of the Plan and lack of identified landfill capacity, impacts would be significant. Implementation of some transportation projects and anticipated growth under the Plan would involve construction of new storm water drainage facilities and may require construction of new or expanded wastewater treatment facilities. Implementation of the Plan could result in a determination by one or more of the wastewater treatment providers in the region that there is inadequate capacity to serve the future population demand in addition to the provider's existing commitments, resulting in a significant impact. Implementation of the Plan, could require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. The Plan could result in insufficient water supplies from existing entitlements and resources resulting in significant impacts.
- Wildfire:** Transportation projects and anticipated development projects may be located in wildfire-prone areas which could potentially exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from wildfires or the uncontrolled spread of wildfires, particularly those populations living down wind of the fire. Development may continue to occur in urban/wildlands interface areas which would necessitate infrastructure such as power poles that could result in wildfire risk. Due to the anticipated increased consumption of greenfields under the Plan, development may continue to occur in urban/wildlands interface areas which would result in significant risks for people and structures

All other environmental impacts (project-specific and cumulative) are either less than significant or can be mitigated to a less than significant level.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the *State CEQA Guidelines* states that an EIR must include a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Specifically, Section 15126.2(d) 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

For purposes of this analysis, the Plan would result in significant irreversible environmental changes if it:

- involves a large commitment of nonrenewable resources that would commit future generations;
- results in irreversible damage from environmental accidents; or
- irretrievable commitments of nonrenewable resources to justify current consumption.

5.2.1 Large Commitment of Nonrenewable Resources that would commit future generations

The Plan would result in the irreversible consumption of nonrenewable resources. The irreversible commitment of limited resources is inherent in any development project or, in the case of the Plan, combined transportation and development projects. Resources anticipated to be irreversibly committed over the timespan of the construction activities related to the Plan include, but are not limited to, lumber and other related forest products; sand, gravel, and concrete; petrochemicals; construction materials; steel, copper, lead, and other metals; and water.

Growth and land use changes that would result from implementation of the Plan would likely commit future generations to those uses. Once established, land use patterns can be difficult to change and/or significantly influence without considerable political, social, and economic cost. The development pattern reflected in the Plan represents a commitment of these areas to those uses for the foreseeable future. The Plan emphasizes a compact land use pattern, the result is more efficient use of urban land as well as land at the urban edges or in undeveloped areas of the region. As a secondary result, per capita use of many nonrenewable resources decreases under this Plan. These include: lower per capita use of energy and fuels; less conversion of agricultural, open space, and habitat lands; lower per-capita emissions of air pollutants, including GHGs; resulting in slower climate change effects over time.

However, construction activities related to the proposed project would nevertheless result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment and aggregate supply used in construction.

With respect to operation activities, compliance with all applicable building codes, as well as project mitigation measures or project requirements, would help ensure that natural resources are conserved or recycled as feasible. It is also possible that new technologies or systems will emerge, or will become more cost-effective or user-friendly, that will further reduce the region's reliance upon nonrenewable natural resources; however, even with implementation of conservation measures consumption of natural resources would generally increase with implementation of the Plan.

Furthermore, growth generally results in long-term increase in the demand for electricity and natural gas supplies and distribution. However, the Plan and other federal and state energy efficiency standards will result in lower per-capita demand by encouraging development in urban areas; encouraging energy conservation in new construction and existing buildings; and reducing the infrastructure energy demands by encouraging alternative transportation such as bicycling, walking, and public transit. Furthermore, the Plan will result in lower per-capita VMT through the horizon year.

The region also has multiple nonrenewable resources including agricultural lands, open space, habitat areas, and mineral resources areas that contain aggregate, oil, and natural gas. Increased levels of development outside of already developed areas could result in permanent loss or other adverse impacts to these resource areas.

The Plan would result in the conversion of 41,546 acres of greenfield to urbanized uses, however, this area of potential impact is much smaller that would otherwise occur without regional efforts to encourage more compact growth. By increasing density in urban areas and decreasing the footprint of growth, pressures to convert agricultural and natural lands outside areas planned for growth are decreased.

5.2.2 Irreversible Damage from Environmental Accidents

Any growth in the region includes the potential for irreversible damage from environmental accidents. For example, greater densities expose more people in the same area to unexpected environmental events such as fire, flood, and/or earthquake which could lead to irreversible damage. In addition, irreversible changes to the physical environment could occur from the accidental release of hazardous materials associated with transport on roadways as more hazardous materials are transported through the region and more people are located in closer proximity to hazardous materials threats.

However, this exposure would exist under any growth scenario. Federal and state regulations require the Plan to accommodate expected growth in the region based on market-based forecasts. The SCS minimizes the footprint of that growth. Implementation of the Plan does not, in and of itself, result in greater potential of irreversible damage from an environmental accident.

5.2.3 Irretrievable Commitments of Nonrenewable Resources to Justify Current Consumption

The region has multiple nonrenewable resources including agricultural lands, open space, habitat areas, and mineral resources areas that contain aggregates and natural gas. Increased levels of development outside of already developed areas could result in permanent loss or other adverse impacts to these resource areas. In addition, increased levels of development throughout the region could result in greater use of nonrenewable resources during construction, including nonrenewable aggregates, or increased use of glass, plastic, and other petroleum products.

While approximately 41,546 acres of undeveloped land would be converted to urban land uses as a result of implementation of the Plan, this area of potential impact is much smaller than would otherwise occur without regional efforts to encourage more compact growth following “smart growth” principles and to direct as much growth as possible to existing developed areas. By increasing the density of development, and decreasing the footprint of growth, pressures to convert agricultural and open space lands outside areas planned for growth are decreased.

New growth generally results in additional demand for electricity, natural gas, and propane supplies and distribution. However, the Plan, and other federal and state efforts, will result in lower per-capita demand by encouraging compact development; encouraging energy conservation in new construction and existing buildings; and reducing the infrastructure energy demands by encouraging alternative transportation such as bicycling, walking, and public transit. Furthermore, the Plan will result in lower per-capita VMT through the horizon year (2045). **Section 3.8, Greenhouse Gas Emissions**, of the PEIR further addresses VMT.

Any growth in the region will result in significant irreversible resource commitments. In evaluating the significance of a project’s irreversible resource commitments, CEQA requires a lead agency to consider whether such commitments are “justified” (*CEQA Guidelines* Section 15126.2(c)). As discussed above, and consistent with the project objectives for the Plan (See **Chapter 2.0, Project Description**), the Plan is designed to minimize irreversible resource commitments, thus maximizing opportunities for future generations. While the Plan will result in irreversible resource commitments, by encouraging higher density, less-consumptive development, as compared to the environmental baseline and forecasted conditions, the commitments are justified and beneficial. Therefore, these commitments are considered less than significant.

5.3 GROWTH-INDUCING IMPACTS

Section 15126.2(e) of the *State CEQA Guidelines* requires that growth inducing impacts of a proposed project be considered. Growth inducing impacts are characteristics of a project that could directly or indirectly create economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth can be induced in a number of ways, including the elimination of obstacles to growth, or by encouraging and/or facilitating other activities that could induce growth. Examples of projects likely to have growth inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or office complexes in areas that are currently only sparsely developed or are undeveloped. In addition, as set forth in the *CEQA Guidelines*, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The *CEQA Guidelines* also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental or of little significance to the environment. Induced growth is considered a significant impact only if it directly or indirectly affects the ability of agencies to provide needed public services or if it can be demonstrated that the potential growth significantly affects the environment, that is, that it would result in construction that would adversely affect the environment.

As discussed in **Section 3.14, Population and Housing**, the Plan includes transportation and land use strategies that guide new population growth within existing urbanized areas, HQTAs, underutilized urban areas, and existing suburban town centers. The Plan would strategically target growth near jobs and transit. However, the improved accessibility from the Plan's transportation projects and strategies could also facilitate population and economic growth in areas of the region that are currently not developed, despite policies designed to limit such development. It should be noted that the Plan would result in an overall increase in total VMT which would be expected due to the large increase in regional population, but the more efficient land use patterns and strategies included in the Plan would result in a decrease in per capita VMT compared to the No Project.

Because several variables influence growth, it is difficult to determine how the Plan alone would affect growth. As described in Chapter 3.0, the Plan would affect each environmental issue area directly through transportation projects and strategies and indirectly through land use and strategies that would create a more compact development pattern than if no Plan were in place. Factors that would potentially induce population growth include roads, highways, freeways, rail, and other transportation improvements that provide access to previously undeveloped areas. HOV projects would not be expected to induce growth as they are adding to an existing freeway instead of creating a new freeway. The availability of adequate water supplies, the availability of sewage treatment facilities, the availability of

developable land, the types and availability of employment opportunities, housing supply and costs, commuting distances, cultural and recreational amenities, climate, and local government growth policies contained in general plans and zoning ordinances would also induce population growth. These are contributing factors to consider when evaluating whether the Plan would, in and of itself, induce population growth, but are not necessarily an indication that the Plan is growth inducing.

As discussed above, total population is expected to remain the same with or without the Plan. Generally, the Plan accommodates growth in a manner substantially consistent with local general plans, regional values and visions, and state and federal laws. The Plan would provide greater access to more of the region than the No Project Alternative due to transportation projects and strategies; however, targeting growth in the HQTAs would limit the geographic spread of growth.. Therefore, in general, the Plan could influence and possibly induce growth into specific parts of the region (including areas that are partially urbanized already) by providing new or expanded access. Overall, the Plan would accommodate and facilitate growth in the region.