CHAPTER 6 Other CEQA Considerations

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the Environmental Impact Report (EIR) must also identify (1) significant environmental effects of the proposed project, (2) significant environmental effects that cannot be avoided if the proposed project is implemented, (3) significant irreversible environmental changes that would result from implementation of the proposed project, (4) growth-inducing impacts of the proposed project, (5) mitigation measures proposed to minimize significant effects, and (6) alternatives to the proposed project.

6.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Long-term cumulative development under the Transit Zoning Code (SD 84A and SD 84B) would result in the following significant and unavoidable project-related impacts:

Aesthetics

- Implementation of the proposed project could result in a substantial increase in shade/shadows over sensitive uses.

Air Quality

- Short-term construction impacts resulting from peak daily emissions of PM_{10}, CO, VOC, and NO_X
- Operational impacts resulting from peak daily emissions of PM_{10}, CO, VOC, and NO_X
- A cumulatively considerable net increase of criteria pollutants for which the proposed project region is in nonattainment under an applicable federal or State ambient air quality standard resulting from construction and operation

Cultural Resources

- Development under the Transit Zoning Code could cause a substantial adverse change in the significance of an historic resource pursuant to Section 15064.5 of the CEQA Guidelines.

Global Climate Change

- Long-term development under the Transit Zoning Code may cause conflict with adopted plans, policies, or regulations adopted for the purpose of reducing greenhouse gas emissions

- Long-term cumulative development under the Transit Zoning Code will have a direct or indirect effect on the environment through the emission of greenhouse gases.

Noise

- Short-term construction impacts resulting from groundborne vibration or groundborne noise levels
- Long-term operational impacts of the operation of Southern California Regional Rail Authority rail line would expose nearby sensitive receptors to noise levels in excess of the City's acceptable noise standards.

Transportation/ Traffic

- Long-term cumulative development under the Transit Zoning Code will cause an impact related to insufficient roadway capacity that could be mitigated. However, since the impacted area is outside of the jurisdiction of the City, there is no guarantee that the improvements will be made and impacts would therefore be significant.

6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(c) 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.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses
- The project would involve a large commitment of nonrenewable resources
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy)

Long-term cumulative development under the Transit Zoning code would result in the continued commitment of the City of Santa Ana to mixed-use development, thereby precluding any other uses for the lifespan of the project. As discussed previously, the City of Santa Ana General Plan identifies a long-term plan for the Transit Zoning Code (SD 84A and SD 84B) area, as an area which possesses opportunities for transitioning in the future. Although any proposed development would further the

City's commitment of a portion of the Transit Zoning Code (SD 84A and SD 84B) area for mixed use land use purposes for future generations, the proposed Code does not represent a change in commitment from existing and planned uses for the Transit Zoning Code (SD 84A and SD 84B) area. Further, the Transit Zoning Code area is comprised almost exclusively of infill sites and would not represent conversion of previously undeveloped land to developed uses.

Resources that will be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources. In addition, construction activities related to the proposed project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment.

With respect to operational activities, compliance with all applicable building codes, as well as project mitigation measures or project requirements, would ensure that all natural resources are conserved or recycled to the maximum extent 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 site's reliance upon nonrenewable natural resources; however, even with implementation of conservation measures, consumption of natural resources would generally increase with long-term cumulative development under the Transit Zoning Code.

In addition, a long-term increase in the demand for electrical resources would occur. However, the proposed project would not involve a wasteful or unjustifiable use of energy or other resources, and energy conservation efforts could also occur with new construction. In addition, new development associated with the proposed project will be constructed and operated in accordance with specifications contained in Title 24 of the CCR. Therefore, the use of energy for development throughout the project area would occur in an efficient manner.

6.3 GROWTH-INDUCING IMPACTS

As required by the CEQA Guidelines, an EIR must include a discussion of the ways in which the proposed project could directly or indirectly foster economic development or population growth, or the construction of additional housing and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2(d)). Growth can be induced in a number of ways, including the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of removal of obstacles to growth relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval. Under CEQA, induced growth is not considered necessarily beneficial, detrimental, or of little significance to the environment.

In general, a project may foster spatial, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area)

- The project results in the urbanization of land in a remote location (leapfrog development)
- The project establishes a precedent-setting action (e.g., a change in zoning or general plan amendment approval)
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.)

If a project meets any one of these criteria, it may be considered growth inducing. Generally, growth-inducing projects are either located in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways, or encourage premature or unplanned growth.

To comply with CEQA, an EIR must discuss the ways in which the proposed project could promote economic or population growth in the vicinity of the project and how that growth will, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2(d)). Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth is considered a significant impact only if it affects (directly or indirectly) the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth, in some other way, significantly affects the environment.

Introduction to Growth Inducement Issues Growth can be induced in a number of ways, including the direct construction of new homes and businesses, the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of the removal of obstacles to growth relates directly to the removal of infrastructure limitations (typically through the provision of additional capacity or supply), or the reduction or elimination of regulatory constraints on growth that could result in growth unforeseen at the time of project approval.

Elimination of Obstacles to Growth The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

According to SCAG Population Growth Projections for 2010–2035, a population increase of 15,930 residents is projected for Santa Ana, representing an annual average growth of 0.2 percent or approximately 637 residents per year. The SCAG Regional Comprehensive Plan (RCP) which serves as a framework to guide local land use decision-making as it relates to regional growth and the City of Santa Ana General Plan will be used in order to provide long-term guidance and policies for maintain and improving the quality of life in, and the resources of, the community.

6.3.1 Economic Effects

Under a full build-out, full industrial-conversion scenario development under the Transit Zoning Code (SD 84A and SD 84B) could displace approximately 460 employees. Although a net decrease in

employees would occur as a result of long-term development scenario, full implementation of the Metro East Mixed Use Overlay Zone project, located just to the east of the project area, would result in the addition of 2,343 jobs and therefore, no substantial job loss would occur for the Santa Ana area. The City is projecting an employment growth of approximately 13,394 employees between 2005 and 2015, or 0.3 percent or 535 employees per year.

As noted in Section 4.9 (Population and Housing), the increase in population associated with the proposed residential units would result in a total population increase estimated at 12,225 people.

The combination of land uses on the proposed project would function to increase retail and commercial sales and activities within the City, as well as enhance the economic viability of the area. The creation of new commercial activities and enhancement of existing commercial facilities would contribute to the economic vitality of the City, which would enable the continued provision of high quality services and programs for residents and businesses and would provide positive contributions to the City's municipal revenue stream.

The positive revenue stream may result in the creation of indirect and induced jobs. Indirect jobs are those that would be created when the future owners and/or managers of the retail-commercial uses purchase goods and services from businesses in the region, and induced jobs are those that are created when wage incomes of those employed in direct and indirect jobs are spent on the purchase of goods and services in the region. The City's economic impacts are primarily the result of purchases of goods and services as well as payment of taxes and salaries, which affects the regional economy of the City and County, and on a more indirect basis, California. Therefore, the positive revenue stream and the resulting increased economic viability of the project site could result in indirect growth-inducing impacts.

Increased Demand on Secondary Markets Development (residential or employment-generating uses) typically generates a secondary or indirect demand for other goods and services. The secondary or economic change can be quantified by an economic multiplier, which is an economic term used to describe interrelationships among various sectors of the economy. One aspect of the multiplier effect is the potential catalytic force a project can have on satellite or follow-up development because it creates a demand or market to be served (e.g., neighborhood commercial development around residential development).

Increased Pressure on Land Use Intensification Unforeseen future development can be spurred by the construction of certain projects that have the effect of creating unique and currently unmet market demands, or by creating economic incentive for future projects by substantially increasing surrounding property values. These types of impacts are most often identified for projects developed in areas that are currently lacking a full spectrum of economic activity. For example, newly developing office areas may be lacking in a full range of support commercial uses; this support commercial demand can cause increased pressure for rezones or general plan amendments aimed at providing adequate land to accommodate businesses seeking to serve the unmet demand.

6.3.2 Growth-Inducing Effects of the Proposed Project

■ Remove an Impediment to Growth/Precedent-Setting Action

The proposed Transit Zoning Code (SD 84A and SD 84B) provides detailed development and design standards that will improve the pedestrian streetscape and encourage transit-supportive development opportunities. The proposed Code also allows for more intense mixed-use development than currently exists in the project area. The proposed project would also make efficient use of the existing infrastructure.

The proposed project includes a General Plan Amendment and a zone change (via the proposed Transit Zoning Code [SD 84A and SD 84B]) to a more mixed-use zoning designation. The proposed designations would be generally consistent with the nature of on-site and surrounding development. Implementation of the amendments would allow for continued use of industrial development, while also permitting mixed-use development to promote increased land use compatibility with surrounding uses and a more transit-supportive environment. However, due to the lack of an existing mixed-use land use and/or zoning designation within the City, the project would be considered growth inducing as a result of removing an impediment to growth or establishing a precedent-setting action.

6.4 MITIGATION MEASURES PROPOSED TO MINIMIZE SIGNIFICANT EFFECTS OF THE PROPOSED PROJECT

Table 1-1 (Summary of Environmental Impacts and Mitigation Measures), which is contained in Chapter 1 (Summary of Environmental Impacts and Mitigation Measures) of this EIR, provides a comprehensive identification of the proposed project's environmental effects and proposed mitigation measures.

6.5 ALTERNATIVES TO THE TRANSIT ZONING CODE (SD 84A AND SD 84B)

Alternatives to the proposed project are presented in Chapter 5 (Alternatives) of this EIR.