6.0 OTHER CEQA CONSIDERATIONS

6.1 SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(c) of the *State CEQA Guidelines* requires that an Environmental Impact Report (EIR) describe any significant impacts that cannot be avoided. Specifically, Section 15126.2(c) states that an EIR shall:

> "Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described."

The Executive Summary of this document (Chapter 1.0) contains a detailed summary that identifies the proposed Project's environmental impacts as compared to existing conditions, proposed mitigation measures, and the level of significance of any impacts after mitigation. The following is a summary of the impacts that are considered significant, adverse, and unavoidable after all mitigation is applied. These impacts are also described in detail in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures.

6.1.1 Agricultural Resources

The conversion of 119.2 acres (ac) of Important Farmland (Unique Farmland as designated by the California Department of Conservation [DOC] Farmland Mapping and Monitoring Program [FMMP]) to a non-agricultural use would be potentially significant. As described in Section 4.2.9 of this Draft EIR, mitigation was considered to reduce the impact of the conversion of 119.2 ac of Important Farmland to non-agricultural uses. However, the mitigation measures were not considered feasible; therefore, impacts pertaining to the conversion of Important Farmland to a non-agricultural use from implementation of the proposed Project would be significant and unavoidable.

6.1.2 Greenhouse Gas Emissions

The proposed Project would exceed the applicable South Coast Air Quality Management District (SCAQMD) Service Population greenhouse gas (GHG) thresholds for 2025 and 2030. Thus, Project-related emissions would have a potentially significant impact related to the generation of GHG emissions.

No feasible mitigation measures exist that would reduce GHG emissions to levels that are less than significant. More than 73 percent of all mobile-source emissions in 2025 and 66 percent of all mobile-source emissions in 2030 (by weight) would be generated by the proposed Project's mobile sources (traffic). Neither the Project Applicant/Developer nor the City of Lake Forest (City) can substantively or materially affect reductions in Project mobile-source emissions beyond the regulatory requirements and project design features included as part of the proposed Project. Additionally, even if mitigation were applied to reduce all other sources of GHG emissions to the maximum extent possible, the proposed Project's mobile-source emissions alone would still exceed

the threshold of significance. Therefore, impacts related to the generation of GHG emissions would remain significant and unavoidable.

6.1.3 Conflict with Greenhouse Gas Emissions Reduction Plans, Policies, and Regulations

Although the Project would not conflict with any of the 2017 Scoping Plan elements, as discussed above, it would exceed the applicable Service Population GHG thresholds and consequently has the potential to result in a cumulatively considerable impact with respect to GHG emissions. This would result in a significant and unavoidable impact related to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As discussed previously, there is no available mitigation to substantially lessen or reduce this significant impact to less than significant. Therefore, impacts related to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions would remain significant and unavoidable.

6.2 ENERGY IMPACTS

According to Section 15126.2(b) of the *State CEQA Guidelines*, "[i]f analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use."

As described in Section 4.6, Energy, of this Draft EIR, the proposed Project would not result in significant impacts related to energy use. Therefore, no mitigation is required.

6.3 GROWTH-INDUCING IMPACTS

Sections 15126(d) and 15126.2(e) of the *State CEQA Guidelines* require that an EIR analyze growth-inducing impacts and discuss the ways in which a proposed project could foster economic or population growth or construction of additional housing, either directly or indirectly, in the surrounding environment. This section examines ways in which the proposed Project could foster economic or population growth, or the construction of additional housing either directly or indirectly in the surrounding environment. *State CEQA Guidelines* Section 15126.2(d) also requires a discussion of the characteristics of projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. To address these issues, potential growth-inducing effects were examined through analysis of the following questions:

- Would the project remove obstacles to, or otherwise foster, population growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development)?

- Would the project foster economic growth?

- Would approval of the project involve some characteristic that may encourage and facilitate other activities that could significantly affect the environment?

Growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment (*State CEQA Guidelines*, Section 15126.2(e)). This issue is presented to provide additional information on ways in which the proposed Project could contribute to significant changes in the environment beyond the direct consequences of developing the proposed land uses as described in earlier sections of this Draft EIR.

6.3.1 Removal of Obstacles to, or Otherwise Foster, Population Growth

The area surrounding the Project site is already highly urbanized and developed with a mix of residential, hotel, business park, regional park/open space, commercial, and light industrial land uses, so limited population growth is feasible within the vicinity of the Project site. In any event, the proposed Project would not remove impediments to population growth in the area surrounding the Project site. While the proposed Project may require water, sewer, electricity, and natural gas lines on site and in the immediate vicinity of the Project site, such improvements would be intended primarily to meet Project-related demand and would not necessitate substantial utility infrastructure improvements. In addition, all roadway improvements planned with respect to the proposed Project are intended to provide for better circulation flows within the Project site and the immediate Project vicinity, and would not foster off-site population growth.

The construction of the proposed Project would generate a substantial number of construction-related jobs. However, the proposed Project would not promote construction workers relocating their places of residence as a direct consequence of working on the proposed Project. The work requirements of most construction projects are highly specialized so construction workers remain at a job site only for the limited time in which their specific skills are needed to complete a particular phase of the construction process. In addition, as described in Section 4.13, Population and Housing, the supply of general construction labor in the region has been stable over recent years and is 13 percent above Orange County's 10-year average, suggesting a well-functioning construction job market and available regional labor pool. Therefore, given the availability of construction workers, the proposed Project would not induce material population growth from a short-term employment perspective.

Upon completion of the proposed Project, the 101 senior affordable housing units and 675 single-family residential units are estimated to generate a total of approximately 2,274 new residents on the Project site. While this direct population growth would increase the demand for neighborhood-serving commercial uses in the area surrounding the Project site, the proposed Project would be located in a built out area of Lake Forest that is already served by neighborhood-serving retail and service uses. Although some local businesses that provide goods and services to nearby residents may hire a small number of additional employees to accommodate the minor increase in clientele associated with the proposed Project, this additional hiring is not expected to induce material population growth because most of these new employees are not expected to change their place of residence.

With regard to Project operation, the proposed school is expected to employ 60 workers. Due to the limited number of jobs induced and the available labor pool within Lake Forest and the region, it is unlikely that the employment offered by the Project would cause people to move or relocate to the

area solely for the purpose of being close to the Project site. Therefore, although the proposed Project would provide employment opportunities, it would not result in substantial indirect growth or create a significant demand for housing in the Project site vicinity.

Therefore, given that the employment opportunities generated by the construction and operation of the proposed Project would be filled by people who would commute to the Project site, the potential population growth associated with Project employees would be minimal.

6.3.2 Foster Economic Growth

The proposed Project would introduce new residents that would invigorate the local economy by spending on goods and services at local businesses. As described in the *Nakase Project Fiscal Impact Analysis* prepared by Stanley R. Hoffman Associates (Appendix N), the proposed Project's residents are projected to spend approximately $28.57 million in retail purchases on an annual basis in Lake Forest. As previously discussed, the construction of the proposed Project would generate a substantial number of construction-related jobs and new employment opportunities in Lake Forest during the construction period. As also discussed, the new school would be expected to employ 60 workers, and these positions would likely be filled by persons already residing in Lake Forest or the region. Therefore, the proposed Project would foster economic growth.

6.3.3 Other Characteristics

The proposed Project involves a General Plan Amendment and Zone Change to establish the Nakase Property Area Plan (Area Plan). The proposed Project includes the development of up to 675 single-family residential units and up to 101 senior affordable rental units on the Project site. Because the Area Plan included as part of the Project would not modify the existing General Plan land use designations or zoning classifications on any off-site properties, the Project would not directly increase the City's population beyond the number of residents who would live in the 776 on-site residential units. While it is conceivable that the Project's approval could attract the interest of new housing developers to Lake Forest who may seek the approval of General Plan Amendments or Zone Changes on other undeveloped or underutilized properties in the City for the purpose of developing new housing, it is highly unlikely given that the City of Lake Forest has very little land that would be able to accommodate new housing development that has not already been designated for housing. Any future growth in the City is likely to occur regardless of whether or not the Project is approved.

6.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the *State CEQA Guidelines* requires that an EIR consider and discuss significant irreversible changes that would be caused by implementation of a proposed project. The *State CEQA Guidelines* specify that the use of nonrenewable resources during the initial and continued phases of a project should be discussed because a large commitment of such resources makes removal or non-use thereafter unlikely. Primary and secondary impacts (e.g., a highway improvement that provides access to a previously inaccessible area) should also be discussed because such changes generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with a project and should be discussed.

The types and level of development associated with the proposed Project would consume limited, slowly renewable, and nonrenewable resources. This consumption would occur during construction of the proposed Project and would continue throughout the operational lifetime of the proposed Project. The development of the proposed Project would require a commitment of resources that would include (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project site.

Construction of the proposed Project would require consumption of resources that are not replenishable or that may renew so slowly as to be considered nonrenewable. These resources would include certain types of lumber and other forest products (e.g., hardwood lumber), aggregate materials used in concrete and asphalt (e.g., sand, gravel, and stone), metals (e.g., steel, copper, and lead), petrochemical construction materials (e.g., plastics), and water. Fossil fuels (e.g., gasoline and oil) would also be consumed in the use of construction vehicles and equipment. Water, which is a limited, slowly renewable resource, would also be consumed during construction of the proposed Project. However, given the temporary nature of construction activities, water consumption during construction would result in a less than significant impact on water supplies. Furthermore, the use of construction vehicles and equipment would require the consumption of nonrenewable fossil fuels such as natural gas and oil. As with other resources consumed during construction, the consumption of nonrenewable fossil fuels for energy use would occur on a temporary basis during construction of the proposed Project.

Operation of the proposed Project would continue to expend similar nonrenewable resources that are currently consumed within Lake Forest and on site. These include energy resources such as electricity, petroleum-based fuels, fossil fuels, and water. Energy resources would be used for heating and cooling buildings, transportation within the Project site, and building lighting. Fossil fuels are primary energy sources for project construction and operation. This existing, finite energy source would thus be incrementally reduced. Under Title 24, Part 6 of the California Code of Regulations (CCR), conservation practices limiting the amount of energy consumed by the proposed Project would be required during operation. Nevertheless, the use of such resources would continue to represent a long-term commitment of essentially nonrenewable resources.

The proposed Project would result in the limited use of potentially hazardous materials contained in typical cleaning agents and pesticides for landscaping on the Project site. Such materials would be used, handled, stored, and disposed of in accordance with applicable government regulations and standards that would serve to protect against a significant and irreversible environmental change resulting from the accidental release of hazardous materials.

In summary, construction and operation of the proposed Project would commit the use of slowly renewable and nonrenewable resources and would limit the availability of these resources on the Project site for future generations or for other uses during the life of the proposed Project. However, the continued use of such resources during operation would be on a relatively small scale and consistent with regional and local urban design and development goals for the area. As a result, the use of nonrenewable resources in this manner would not result in significant irreversible changes to the environment under the proposed Project.

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