6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE CAUSED BY THE PROPOSED PLAN SHOULD IT BE IMPLEMENTED

INTRODUCTION

Section 15126.2(d) of the State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by a 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 following occurs:

- 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 would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; and
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Determining whether the proposed Plan may result in significant irreversible effects requires a determination of whether a project will require a large commitment of such nonrenewable resources. The Plan Area includes the Neighborhood Area (NA) and the Resource/Conservation Area (RCA). The Plan would allow the development of the NA with a compact pattern of new neighborhoods and limit development in the RCA to promote the preservation of open space and natural habitat in this foothill area.

The NA has been disturbed by the development of flood control facilities and mining and contains a closed aggregate mine but also contains natural habitat and additional sand and gravel deposits considered to have regional value. The proposed Plan would allow the permanent commitment of the NA to urban development, which would result in the loss of biological resources in this portion of the Plan area and

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access to the sand and gravel deposits present in this portion of the Plan Area. While mitigation is identified for the impacts of the Plan on biological resources present in the NA, the Plan would result in permanent impacts to these resources. In addition, while the presence of existing residential neighborhoods on the east, south, and west of the NA would be a constraint to any further mining in the NA, the Plan would result in the loss of access to the mineral resources present in this portion of the Plan Area.

Construction and long-term operation of the proposed Plan would require the commitment and reduction of nonrenewable and/or slowly renewable resources, including petroleum fuels and natural gas (for vehicle emissions, construction, lighting, heating, and cooling of structures) as well as lumber, sand/gravel, steel, copper, lead, and other metals (for use in building and roadway construction and utility infrastructure). Other resources that are slow to renew and/or recover would also be impacted by project implementation; these include air quality (through the combustion of fossil fuels and production of greenhouse gases) and water supply (through the increased potable water demands for drinking, cleaning, landscaping, and general maintenance needs).

An increased commitment of public services (e.g., police, fire, school, sewer, and water services) would also be required. Project development is an irreversible commitment of the land, energy resources, and public services. After the 50- to 75-year structural lifespan of the buildings is reached, it is improbable that the site would revert to permanently undeveloped conditions due to the large capital investment that will already have been committed.

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