As mentioned previously throughout this Draft Environmental Impact Report (Draft EIR), this document is being prepared in compliance with the California Environmental Quality Act (CEQA), including the State CEQA Guidelines. The CEQA Guidelines state that "[u]ses 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."¹ Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with a project. Irretrievable commitments of resources should be evaluated to ensure that such current consumption is justified. Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of Project implementation that cannot be avoided.

Implementation of the proposed Section 31 Specific Plan Project ("Specific Plan Project" or "Project") would irreversibly commit approximately 618 acres of the vacant and undeveloped Project Site for residential, commercial retail, resort, and open space/recreational uses. The irreversible environmental changes of this urbanization include incremental degradation of the regional air quality, additional noise created by traffic generated by future inhabitants of the Project Site, incremental demands for public services and utilities, and changes to the visual environment that will not likely be reversed. Significant unavoidable adverse environmental effects associated with degradation of air quality and ambient noise will result from development, despite implementation of all feasible mitigation measures, conditions of approval, project design features, and local, State, and federal regulations.

Primary impacts will result from the consumption of nonrenewable resources during construction and operation of the Project. Nonrenewable resources such as sand, gravel, and steel, and renewable resources such as lumber, will be consumed during Project construction. Energy, fossil fuels, oils, and natural gas will be irreversibly committed during construction. These same resources are used for vehicles and heating/cooling equipment during operations. The continued use of these resources associated with Project operations represents a long-term obligation. The energy consumed in developing and maintaining the site for urban use may be considered a permanent investment.

Construction of the Project would consume limited amounts of certain types of lumber; other raw materials in steel; metals such as copper and lead; aggregate materials used in concrete and asphalt such as sand and stone; water, petrochemical construction materials such as plastic; petroleum-based construction materials; and other similar slowly renewable or nonrenewable resources. Additionally, fossil fuels for construction vehicles and equipment would be consumed. In terms of Project operations, the

¹ California Public Resources Code, Title 14, Division 6, Chapter 3, California Environmental Quality Act Guidelines, Section 15126(c).

following slowly renewable and nonrenewable resources would be required: natural gas and electricity, petroleum-based fuels, fossil fuels, and water. The California Administrative Code regulates the amount of energy consumed by new development for heating, cooling, ventilation, and lighting purposes. Nevertheless, the consumption of such resources would represent a long-term commitment of those resources.²

The commitment of resources required for the construction and operation of the Project would limit the availability of such resources for future generations or for other uses during the life of the Project. However, continued use of such resources is consistent with the anticipated growth and planned changes on the Project Site and within the general vicinity.

The Project would also result in an increased commitment of certain public services to the proposed land uses, including the provision of police, fire, and emergency medical services, school services, water supply services, wastewater treatment services, and solid waste disposal. However, as indicated in the respective sections of this Draft EIR, impacts associated with these public services would be less than significant.

In addition, the Project would result in a long-term, irreversible change in the visual character of the Project Site. The nonurbanized character of the site would be transformed into residential/commercial development. Night lighting in the Project vicinity would incrementally increase as a result of the proposed development.

Project implementation will cause the average daily trips (ADT) to increase substantially when combined with ambient growth in the vicinity. The increased number of vehicles will contribute to the degradation of air quality. The Project air quality analysis indicates that impacts to air quality are significant, even after mitigation.

A secondary impact that results from increased traffic is an increase in ambient noise levels. Currently, the area surrounding the Project is developed with relatively medium to high ambient noise levels, with some existing street segments higher than 70 dB(A). Once the Project conducts roadway improvements and introduces Project traffic on those roads, the noise levels will increase, including along roadway segments next to existing sensitive receptors. Implementation of the Project, together with ambient growth and other cumulative projects in the vicinity, would incrementally increase areawide noise levels. However, while noise levels will remain higher permanently, they can be mitigated to less than significant levels.

The Project's contribution to State, national, and global greenhouse gases (GHG) emission inventories and the resultant effect on global climate change is evaluated on a cumulative basis. Secondary impacts result from fuel consumption in the form of air pollution, which both degrades air quality in general and

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² California Administrative Code, Title 24.

contributes to the formation of GHGs that cumulatively affect global warming. Human activities associated with industrial/manufacturing, utilities, transportation, residential, and agricultural sectors contribute to GHG emissions. While the Project would minimize the generation of GHG emissions to the greatest extent feasible, GHG emissions and global climate change remain a significant cumulative issue. Therefore, the Project's contribution to GHG emissions would be cumulatively considerable.