

4.0 OTHER CEQA ISSUES

This chapter presents the evaluation of additional environmental impacts analyses required by CEQA that are not covered within the other chapters of this EIR, including significant unavoidable environmental effects of the Project, irreversible environmental changes, growth inducing impacts (including removal of obstacles to growth), and resource areas that are found not to be significant. Section 15126 of the 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. Accordingly, in addition to the analysis provided in Chapter 3, *Environmental Impact Analysis and Mitigation Measures*, this EIR must identify growth inducing impacts and significant irreversible environmental changes that would potentially result from implementation of the Project.

4.1 IRREVERSIBLE ENVIRONMENTAL IMPACTS

CEQA Guidelines, Section 15126.2(d) requires evaluation of irretrievable commitments of resources to assure that such consumption is justified. This includes use of nonrenewable resources, the commitment of future generations to similar uses, and irreversible damage that can result from environmental accidents associated with the Project.

The Project would facilitate the construction of new buildings and paved surfaces, involving consumption of building materials and energy, some of which are nonrenewable or locally limited natural resources (e.g., fossil fuels and wood). Non-renewable resources utilized for the Project could no longer be utilized for other purposes. Consumption of building materials and energy is associated with any development in the region, and these commitments of resources are not unique or unusual to the Project. The Project would represent an incremental commitment to long-term use of non-renewable resources, particularly gasoline for increased automobile use and oil, coal, and natural gas for power generation (see also, Section 3.14, *Utilities and Energy Conservation*). Although not unique to the Project, the automobile-oriented nature of the Project would result in it being a larger energy consuming development, particularly for gasoline, than most current projects in the City (see also, Section 3.0.3, *Cumulative Impacts Analysis* for discussion of cumulative projects). In addition, as discussed in Section 3.3, *Air Quality and Greenhouse Gas Emissions*, use of each of these forms of non-renewable energy would contribute to the generation of GHGs with an incremental contribution to global climate change. To help alleviate impacts to non-renewable resources, the Project would meet or exceed the requirements of the California Building Code (CBC) and California Title 24 in effect at the time of construction, and would comply with the City's green building certification system

and City Conservation and Open Space Element (COSE) Policy 5.5.7, which outlines energy efficiency and green building certifications in new development. Proposed sustainable site design and development practices would include water conservation measures, efficient appliances, and energy conscious heating and cooling systems to offset new energy demand. Moreover, the Project is proposed to include native and non-invasive drought tolerant plant materials to conserve water. These sustainable building features could reduce new energy demand and the consumption of water and non-renewable fossil fuels. Consumption of these resources would occur with any development in the region and are not unique to the Project.

As described in Section 3.2, *Agricultural Resources*, implementation of the Project would irreversibly commit approximately 47.6 acres of prime (if irrigated) soils designated as Farmland of Local Potential by the California Department of Conservation to residential and other development. The Project would commit future generations to similar uses within the Specific Plan area. The irretrievable commitment of this site for these uses is mitigated through compliance with City LUE Policies 1.8.1, *Open Space Protection*, and 1.9.2, *Prime Agricultural Land*, which require permanent protection of offsite agricultural lands of equal area and quality to be put into an agricultural conservation easement via mitigation measure MM AG-1.

The Project would not be expected to result in environmental accidents or upsets that have the potential to cause irreversible damage to the natural or human environment; however, the potential for wildfire is exacerbated by the Project (see also, Section 3.7, *Hazards, Hazardous Materials, and Wildfires*). While recovery from wildfire damage involves rebuilding and restoration of damaged areas, which would ultimately correct the effect on the natural and human environment, there is a possibility that wildfire may result in the permanent loss of structures or natural features (e.g., sensitive habitats and species, heritage and other mature trees), which would be potentially irreversible. The commitment of these resources for Project development has been planned for and would achieve implementation of the City's General Plan.

4.2 GROWTH-INDUCING IMPACTS

Section 15126.2(e) of the CEQA Guidelines requires a discussion of how the Project could foster economic or population growth, or the construction of additional housing (either directly or indirectly) in the surrounding environment. Induced growth is distinguished from the direct economic, population, or housing growth of a project. Induced growth is any growth that results from new development that would not have taken place in the

absence of the project and that exceeds planned growth. CEQA Guidelines also state that growth in any area should not be assumed to be necessarily beneficial, detrimental, or of little significance to the environment.

Growth-inducing impacts are caused by those characteristics of a project that tend to foster or encourage population and/or economic growth. The Project could result in five types of growth-inducing impacts: 1) the creation of short- and long-term employment opportunities which draw newcomers to the region and increase economic growth; 2) increase in residential population from development of new residential development; 3) the generation of new commercial and tourist accommodations to entice people to the area; 4) expansion of utilities and infrastructure; and 5) removal of an obstacle to future development.

- 1) As discussed in Section 3.11, *Population and Housing*, the Project would construct 174 multi-family housing units and 404 independent and 51 assisted living units and provide approximately 332 full-time equivalent jobs, in addition to short-term construction employment. Most of the Project's labor force is expected to come from the local labor pool; however, some workers may come from outside areas. Therefore, there would be a minor increase in economic growth which would be further minimized by the fact that new jobs created by the Project would may be absorbed by existing residents or future residents of the City and Project.
- 2) The Project would result in the construction of up to 578 new units-would result in a residential population growth of approximately 1,231 persons. However, Based on the Applicant's current deposit list, approximately 300 persons proposing to reside at Villaggio once constructed are current City residents that would move from and vacate their existing house (RRM Design Group 2019). Though future residents of the Project are likely to be existing residents of the City, the action of moving to the Project and vacating their homes has the potential to attract new residents to the City from outside the existing population. Given this circumstance and the fact that the origin of future residents of the Project cannot reliably be forecasted, the Project is estimated to result in a residential population growth of approximately 1,231 persons, as discussed in detail in Section 3.11, *Population & Housing*. However, construction of 174 housing units within Madonna From Ranch would help alleviate the City's increased housing demand, and the construction of 404 units within Villaggio would fulfill a specialized housing need and is thus not considered growth-inducing as it would not foster the need for future

- construction of additional housing. Population growth within the City is directly related to the increase in available housing supply, and the City's LUE Policy 1.11.2 limits the City-wide increase in housing units to one percent annually, excluding affordable housing (refer to Impact PH-1 in Section 3.11, *Population and Housing*). Therefore, population growth in the City is already controlled through General Plan policies that limit residential growth rates; the Project would be subject to these residential growth rate limits.
- 3) The Project would attract visitor populations to the area, including overnight visitors associated with the proposed 70,000-sf hotel. A new hotel development could attract tourists and travelers to the area and generate additional revenue for local businesses. Visitors may also come to Villaggio to stay with relatives. Associated increases in visitors could potentially result in increased traffic and use of public facilities and services and has the potential to incrementally induce growth in the City.
 - 4) As discussed in Section 2.4.4, *Utilities and Services*, the Project includes the construction of water supply and wastewater collection systems for the Project site that would tie into City systems. Further, the Project would allow for the extension of roadways into the site, including two commercial collectors, as well as roadway and intersection improvements on LOVR. The extension of roadways and improvements would improve access and circulation within the immediate vicinity of the site and would enable a future extension of Commercial Collector B to connect to Irish Hills Plaza. Extension of utilities and roadways within the site would not facilitate additional development along the hillside, particularly of the undeveloped 7.39-acre parcel zoned retail commercial (C-R) and located north of the Project site and adjacent to the Irish Hills Plaza. There is limited opportunity for additional future development due to the expansion of utilities and services in the Project area, as most undeveloped land surrounding the Project site is within open space easements.
 - 5) There is an undeveloped parcel in the immediate vicinity of the Project site, which could experience development in the future due to the removal of an obstacle to development brought about by the Project. A portion of the 7.39-acre parcel north of the Project site is below the 150-foot elevation line and currently subject to City LUE Policy 6.4.7, Hillside Planning Areas, which prohibits development above the 150-foot elevation within the Irish Hills Planning Area. The Project would amend

Policy 6.4.7 to allow for development over the 150-foot elevation. This could open the door for other future development in the Irish Hills area, specifically for the 7.39-acre parcel. However, all other adjacent lands surrounding the Project site are already developed (e.g. hotels along Calle Joaquin), constrained by steep slopes and existing development (Mountainbrook Church), or protected as open space lands within the Irish Hills Natural Reserve by a 2010 conservation easement owned by the Land Conservancy of San Luis Obispo; thus, these lands would not be affected by the amendment to Policy 6.4.7.

4.3 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines state that the EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR (Section 15128). After standard regulatory conditions and/or mitigation measures are applied, several resource areas were found to be below the level of significance, as identified in the Initial Study Checklist (Appendix A). Effects found not to be significant and a brief explanation as to why is included below.

4.3.1 Forestry Resources

No known forestry resources are associated with the Project site; therefore, *no impact* to forestry resources would result from the Project.

4.4 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines, Section 15126.2(c) requires a description of any significant unavoidable impacts resulting from implementation of a project, including impacts that cannot be mitigated to below a level of significance. The Project was evaluated with respect to specific resource areas to determine whether implementation would result in significant adverse impacts. A detailed discussion of each of the impacts can be found in Chapter 3, *Environmental Impact Analysis and Mitigation Measures*.

Specific significance thresholds were defined for each potential impact associated with each resource area. Based on the environmental impact assessment presented in Chapter 3, *Environmental Impact Analysis and Mitigation Measures*, of this EIR, the resource areas of aesthetics and visual resources, air quality and GHGs, cultural and tribal resources, hazards/hazardous materials and wildfire, land use and planning, noise, and transportation

would result in significant impacts even after mitigation is applied to reduce the level of impact.

Under CEQA Guidelines Section 15065, when an EIR demonstrates that implementation of a proposed project will cause significant and unavoidable impacts, the agency must issue a Statement of Overriding Considerations before approving the project. A Statement of Overriding Considerations is a report of the lead agency's findings regarding the merits of approving a proposed project despite its significant environmental impacts and reflects the balancing of competing public objectives. Therefore, the City will be required to adopt a Statement of Overriding Considerations to address the significant impacts identified above and discussed in detail in Chapter 3, *Environmental Impact Analysis and Mitigation Measures*. In this instance, the City may weigh the long-term benefits of the Project, such as fostering additional regional housing opportunities, including senior housing, against potentially adverse impacts created by the Project. To facilitate consideration of these issues, this EIR discloses potential impacts and provides a range of Project alternatives that could more fully alleviate environmental concerns. In addition, Section 3.9, *Land Use and Planning*, provides an overview of the City's policy context, which provides information on how the Project meets several important City policy objectives and where it may raise concerns over consistency with other City policies. All this information should be reviewed when considering this Project.