

CHAPTER 6. OTHER CEQA CONSIDERATIONS

This chapter discusses other potential environmental effects for which the California Environmental Quality Act (CEQA) requires analysis, in addition to the specific issue areas evaluated in Chapter 4, *Environmental Impacts Analysis*. These additional effects include the potential for the Dana Reserve Specific Plan (DRSP; project) to result in growth-inducing impacts, the irreversible commitment of resources, and significant unavoidable environmental effects.

6.1 GROWTH-INDUCING IMPACTS

State CEQA Guidelines Section 15126.2(e) requires that an Environmental Impact Report (EIR) provide a discussion of the growth-inducing impacts of the proposed project. Growth-inducing impacts could be caused by projects that foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth-inducing impacts also can be caused by removing obstacles to population growth, such as an expansion of a wastewater treatment plant, and can result from population increases that require the construction of new community services facilities.

In general terms, a project may induce spatial, economic, or population growth in a geographic area if it meets any of these four criteria:

1. Removal of an impediment to growth (e.g., establishment of an essential public service or the provisions of new access to an area);
2. Economic expansion or growth (e.g., changes in revenue base, employment expansion);
3. Establishment of a precedent-setting action (e.g., an innovation, a change in zoning or general plan amendment approval); or
4. Development or encroachment in an isolated area or one adjacent to open space (being different from an “infill” type of project).

Should a project meet any one of the above-listed criteria, it can be considered growth inducing. The impacts of the proposed project are evaluated below with regard to these four criteria.

6.1.1 Removal of an Impediment to Growth

The project would require modification of the Nipomo Urban Reserve Line (URL) to include the Specific Plan Area and annexation into the Nipomo Community Services District (NCSD) service area to facilitate the NCSD’s provision of water and wastewater services within the Specific Plan Area. In addition, buildout of the Specific Plan Area would require a number of off-site water and wastewater system improvements to the existing NCSD service systems, which would increase the service capacity of those systems to accommodate project-related growth and other planned growth into the future.

While the project would result in the establishment of extended and expanded water and wastewater system infrastructure, the project site is located within the NCSD Sphere of Influence (SOI; NCSD 2018). An SOI identifies a plan for the probable future physical boundary and service area of a local agency or municipality; therefore, the project site’s inclusion in the SOI indicates plans for service extensions to this area. In addition, the project site is currently bordered by the existing NCSD service area to the southeast and southwest, and, while not adjacent to the site, the NCSD service area also includes areas west and north of the Specific Plan Area.

Water and wastewater services do not currently serve as a direct constraint on development in the Nipomo area. Therefore, extension of NCSD infrastructure to the project site would not remove an impediment to

future unplanned growth in the project vicinity or provide an essential public service that could induce additional population growth. Expansion of existing NCSO infrastructure capacity would be designed to serve existing NCSO customers, the population induced by the project, and future planned population growth within the NCSO service area. Therefore, annexation of the Specific Plan Area into the NCSO service area and implementation of associated water and wastewater system improvements would not have a substantial growth-inducing effect on surrounding land uses beyond the project's direct population growth discussed in Section 4.14, *Population and Housing*, of this EIR.

The Specific Plan Area is currently accessible via Cherokee Place, Hetrick Avenue, Pomeroy Road, and Cory Way. Therefore, implementation of the DRSP would not establish new access to an area.

6.1.2 Economic Expansion or Growth

Build-out of the Specific Plan Area is estimated to result in the construction of 1,441 new housing units (including accessory dwelling units [ADUs] and junior accessory dwelling units [JADUs]), generation of 273 new full-time equivalent jobs, and short-term construction employment opportunities. Based on information provided in the *South County Area Plan* and the *2019 Regional Housing Needs Allocation Plan* (see Table 4.14-8 in Section 4.14, *Population and Housing*; San Luis Obispo Council of Governments [SLOCOG] 2019a), the community of Nipomo is a housing-rich community, with a majority of local workers commuting to other localities for work. Therefore, new employment opportunities would be anticipated to be primarily filled by current residents within the community of Nipomo and/or future residents associated with the project and would not induce significant population growth within Nipomo.

The project would allow for the future development of an educational facility, such as a community college campus, within the Specific Plan Area. While most jobs generated by this use would be anticipated to be filled by the local labor pool and future residents associated with the project, post-secondary education facilities could also result in an increase in college-age students seeking housing in Nipomo or the nearby surrounding areas. Based on the quantity and range of housing types proposed within the Specific Plan Area, including a dedicated neighborhood for affordable housing, a portion of enrolled students would be anticipated to be housed within the project site. In addition, it is assumed that a portion of enrolled students would already reside within the community of Nipomo or nearby surrounding areas. Together, it is anticipated that the majority of enrolled students and employees would be existing residents within the project vicinity or be housed within the Specific Plan Area. Therefore, the establishment of a new education facility would not be anticipated to result in a substantial increase in population within the community of Nipomo or immediately surrounding areas; however, it could encourage a limited amount of growth as a result of the provision of jobs/uses that are not currently present in the immediate project vicinity.

6.1.3 Establishment of a Precedent-Setting Action

The project would include establishment of new land use designations within the Specific Plan Area to allow for increased density of development as well as allow for the development of commercial uses, such as a hotel and educational facilities. Establishment of new higher-density residential development, recreational amenities, education facilities, and commercial uses within the Specific Plan Area may increase the attractiveness of surrounding rural residential land for future residential development at similarly higher densities, including construction of ADUs and/or subdivisions and future commercial development. Development of high-density uses within the Specific Plan Area would also influence the baseline for future development density and visual character of surrounding areas, which may make the demand for future higher-density development in the project vicinity increase, compared to existing

conditions. Therefore, implementation of the project could establish a precedent setting action, and impacts would be *significant and unavoidable*.

6.1.4 Development or Encroachment into an Isolated Area

The project site is located adjacent to the existing Nipomo URL and within the NCSO's SOI. The project site is generally surrounded by existing suburban residential neighborhoods to the southeast and southwest, rural residential development to the north and northwest, and U.S. Highway 101 (US 101) to the east. As stated above, the Specific Plan Area has existing access on all sides of the property, with the exception of the northeastern side of the property which is located adjacent to US 101. The project site is easily accessible from within the unincorporated community of Nipomo and construction of housing units associated with the DRSP would help alleviate the heightened housing demand within the county and would not foster the need for future construction of additional housing.

Therefore, implementation of the project would not result in development or encroachment into an isolated area, and impacts would be *significant and unavoidable*.

GI Impact 1 (Class I)
The project would result in substantial growth inducement associated with the proposed project's population as well as the potential to induce additional spatial, economic, or population growth in a geographic area.
Mitigation Measures
<i>No feasible mitigation has been identified.</i>
Residual Impacts
<i>Potential impacts associated with substantial growth inducement would be significant and unavoidable (Class I).</i>

6.2 IRREVERSIBLE COMMITMENT OF RESOURCES

State CEQA Guidelines Section 15126.2(d) states that use of nonrenewable resources during the initial and continued phases of a proposed project may be irreversible if a large commitment of these resources makes their removal, indirect removal, or use thereafter unlikely. This section of the EIR evaluates whether the project would result in the irretrievable commitment of resources or would cause irreversible changes in the environment.

The project would allow for the future development of residential and commercial uses within the currently undeveloped project site, the construction of which would irreversibly commit construction materials and non-renewable energy resources (e.g., fossil fuels, wood, etc.). Nonrenewable resources utilized during construction for the development within the Specific Plan Area would no longer be utilized for other purposes. Consumption of building materials and energy is associated with all development projects in the region, and these commitments of resources are not unique or unusual to the project. Construction of residential and commercial structures would be subject to the California Building Code (CBC), which regulates the method of use, properties, performance, and types of building materials used in construction. Construction equipment would be subject to state and local fuel efficiency standards and idling restrictions.

The buildout of the project would also result in an incremental contribution to the long-term consumption of energy resources associated with the establishment of residential and commercial uses within the

Specific Plan Area. Future residential development would be serviced by the Pacific Gas and Electric Company (PG&E), which supplies 25% of its energy mix from renewable resources, 45% from nuclear energy, 28% from large hydrological energy sources, and 2% from nuclear gas (PG&E 2020). The Southern California Gas Company (SoCalGas) is the primary provider of natural gas for urban and rural communities within San Luis Obispo County. SoCalGas has committed to replacing 20% of its traditional natural gas supply with renewable natural gas by 2030 (Sempra 2019). The project would meet or exceed the requirements of the CBC and California Title 24 in effect at the time of construction. Compliance with these standards would include implementation of water conservation measures, energy- and water-efficient appliances, and energy-efficient heating and cooling systems. These sustainable building features would reduce new energy demand and the consumption of water and nonrenewable fossil fuels to a level consistent with or better than other development within the project vicinity. Therefore, the commitment of these resources for project development has been planned for and impacts associated with commitment of resources would be *less than significant*.

6.3 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS

State CEQA Guidelines Section 15126.2(c) requires that EIRs provide a discussion of significant impacts that cannot be mitigated to a level of insignificance without imposing an alternative design, their implications, and the reasons why the project is proposed, notwithstanding their effect. The project's potential impacts on the environment were evaluated with respect to specific resource areas in Chapter 4, *Environmental Impacts Analysis*. Based on the analysis provided in Chapter 4, the project would have significant unavoidable residual impacts associated with air quality (Section 4.3, *Air Quality*), biological resources (Section 4.4, *Biological Resources*), greenhouse gas (GHG) emissions (Section 4.8, *Greenhouse Gas Emissions*), land use and planning (Section 4.11, *Land Use and Planning*), population and housing (Section 4.14, *Population and Housing*), and transportation (Section 4.18, *Transportation*).

In accordance with State CEQA Guidelines Section 15093, if an EIR demonstrates that implementation of a proposed project would cause significant and unavoidable impacts, the lead agency must issue a Statement of Overriding Considerations before approving the project to provide the specific reasons to support its action. Therefore, the County of San Luis Obispo (County), as the lead agency, will be required to adopt a Statement of Overriding Considerations to address the significant impacts identified above and discussed in detail in Chapter 4, *Environmental Impacts Analysis*, prior to approval of the project. For the purposes of this document, the County may determine the long-term benefits of the project, such as fostering additional regional housing opportunities, including affordable housing, providing substantial overriding considerations for approving the project despite the identified adverse environmental impacts that would result from implementation of the project. To facilitate consideration of this determination, this EIR includes an evaluation of potential impacts and identifies a range of project alternatives that could reduce and/or fully negate adverse environmental effects. In addition, Section 4.11, *Land Use and Planning*, provides a detailed analysis of the project's consistency with applicable local policies and objectives. Each of these resources may be used in consideration of the significant unavoidable effects that would result from the project.