6.0 OTHER MANDATORY DISCUSSION AREAS

This chapter addresses the issues of effects found not to be significant, growth inducement, significant effects which cannot be avoided if the proposed project is implemented, and significant irreversible environmental changes.

6.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

Based upon initial environmental review, the City has determined that the project would not have the potential to cause significant impacts associated with the following issue areas:

- Agriculture and Forestry Resources;
- Energy;
- Mineral Resources;
- Population and Housing; and
- Wildfire

6.1.1 Agriculture and Forestry Resources

The project site is developed and contains an RV resort. No active agricultural operations are present on the site or in the project vicinity. Based on farmland mapping prepared by the California Department of Conservation (CDC) California Important Farmland Finder, the project site and surrounding areas are not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. According to the California Important Farmland Finder, the project site and surrounding areas are classified as Urban and Built-Up Land (CDC 2016). Therefore, implementation of the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

The Williamson Act is only applicable to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland, or at least 40 acres of land not designated as Prime Farmland. The Williamson Act is designed to prevent the premature and unnecessary conversion of open space lands and agricultural areas to urban uses. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land for use as agricultural or related open space. The project site is approximately 12 acres in size and is not classified as Prime Farmland. As stated above, the project site and surrounding areas are classified as Urban and Built-Up Land, where the Williamson Act does not enforce development restrictions. Therefore, the project site is not subject to a Williamson Act Contract. Based on the above considerations, the project is not anticipated to have impacts relative to the conversion of farmland to non-agricultural uses because no such uses exist within the project site or vicinity.

No forestland occurs within the project area or immediate vicinity that would conflict with implementation of the proposed project. Therefore, implementation of the proposed project would not result in the loss or conversion of farmland or forestland. No impacts to agricultural or forestry resources would occur.

6.1.2 Energy

6.1.2.1 Construction-related Energy Use

Energy used for construction would primarily consist of fuels in the form of diesel and gasoline. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction and would include the transportation of construction materials and construction worker commutes. Heavy-duty construction equipment associated with construction activities, haul trucks involved in the removal or construction and demolition materials, and smaller support equipment (such as lighting) would consume petroleum-based fuel. Construction workers would travel to and from the project site throughout the duration of construction, presumably in gasoline-powered vehicles.

While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. The petroleum consumed during project construction would also be typical of similar construction projects and would not require the use of new petroleum resources beyond what are typically consumed in California. Based on these considerations, construction of the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Additionally, the project would be built and operated in accordance with existing, applicable regulations, which include, but are not limited to, the California Green Building Standards Code and CARB regulations. Construction equipment and operation equipment would be maintained to allow for continuous energy-efficient operations. The project would therefore not conflict with the City's CAP, and impacts associated with construction-related energy use would be less than significant.

6.1.2.2 Operation-related Energy Use

Electricity, natural gas, water demand, and wastewater generation, as well as anticipated VMT associated with the existing land use and operation of the project, were calculated in CalEEMod, using CalEEMod defaults and features such as project size and location. Table 6-1, *Estimated Annual Energy Consumption at Buildout (Operational)*, summarizes this information and converts the values to British thermal units (BTU) for energy comparison purposes. The existing annual energy consumption associated with the current RV resort was deducted from the energy consumption estimated for the project to yield the net energy use resulting from implementation of the proposed project. As shown in Table 6-1, the project would result in a net increase in annual energy consumption of approximately 107,241 BTU.

Table 6-1
ESTIMATED NET ANNUAL ENERGY CONSUMPTION AT BUILDOUT (OPERATIONAL)

Source	Quantity	BTU
Existing Land Use Operations		
Electricity	699,753 (kWh)	2,388
Natural Gas	2,979,497 (kBtu)	2,979
Water/Wastewater	162,372 (kWh)	554
Transportation	93,731 (gallons)	12,192
	Total Existing Annual Energy Consumption	**18,113**
Project Operations		
Electricity	6,984,030 (kWh)	23,831
Natural Gas	7,090,760 (kBtu)	7,091
Water/Wastewater	1,010,199 (kWh)	3,447
Transportation	699,204 (gallons)	90,985
	Total Proposed Annual Energy Consumption	**125,354**
	Net Total Annual Energy Consumption (Project minus Existing)	**107,241**

Source: HELIX 2020b
kWh= kilowatt hours; kBTU= kilo-British thermal units; BTU = British thermal units

While the project would increase the consumption of energy related to electricity, natural gas, water, and wastewater, the increase is consistent with the energy projections for the state and the region. The project would also include the following sustainable design features, which would also help to ensure the project's gas/water/wastewater energy usage is not excessive or wasteful:

- Native and drought-tolerant landscape materials and plant species to reduce water usage;
- Low-flow sprinkler heads, drip irrigation, and automatic weather-sensitive controllers in irrigation systems to reduce water usage;
- Light-colored stone pavers to reduce heat absorption;
- Provision of electric vehicle charging stations; and
- Energy-conserving lighting to reduce electricity consumption.

As shown in Table 6-1, transportation is the greatest source of energy consumption. Energy is used for transportation in the form of fuel for vehicular trips. While the project would increase the consumption of gasoline and diesel proportionately with projected population growth, the increase is consistent overall with the energy projections for the state and the region. The project also would incorporate a number of project design features and assumptions that would lower vehicular traffic trips, and therefore energy consumption rates related to private vehicular transportation to help ensure the project's transportation-related energy usage is not excessive or wasteful:

- Increased transit accessibility and within a TPA;
- Provision of electrical vehicle charging stations; and

- Provision of a pedestrian and bicycle facilities links on-site uses and connect to existing or planned bicycle and pedestrian facilities contiguous with the project site.

Additionally, operation of the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The California Energy Code Building Energy Efficiency Standards include provisions applicable to all buildings, residential and nonresidential, which are mandatory requirements for efficiency and design. The project would be consistent with the requirements of Title 24 through implementation of energy-reduction measures, such as energy efficient lighting and appliances. As described in Section 4.8 of this EIR, the project would be consistent with applicable energy conservation goals and policies within the General Plan. Therefore, impacts related to operation-related energy use would be less than significant.

6.1.3 Mineral Resources

According to the Conservation and Sustainability Element of the City's General Plan, the City is not identified as having significant mineral resources (City 2012a). Approximately 98 percent of the City's land area has been developed with residential and commercial land uses. The project site is currently developed as an RV resort; no existing or past mineral extraction facilities are located on the project site or in the immediate vicinity. Additionally, the project area is not known as a locally important mineral resource recovery site and is not delineated on any plan for mineral resource recovery uses. The site has not been associated with mineral mining, and therefore, no impacts to the loss of a known mineral resource or locally important mineral resource recovery site would occur.

6.1.4 Population and Housing

The project site is currently developed with an RV resort containing 174 full-hookup RV spaces that would be removed with implementation of the project. However, the RV resort serves a combination of short-term and extended stay visitors, so implementation of the project would not displace a significant number of people or eliminate a large number of housing units. Additionally, the RVs are mobile in nature and would be able to move to another location. Furthermore, the project proposes the construction of housing, so there would not be a net loss in housing.

The proposed project entails a master development plan for a phased TOD consisting of multi-family residential and resident-serving commercial uses. In total, an estimated 850 to 950 residential units would be constructed at buildout. There is a recognized housing shortage both in San Diego County and statewide that is contributing toward rising rents and housing costs. According to the 2010 Census, the City's population increased approximately four percent in the ten years since the 2000 Census. Additionally, according to SANDAG's 2050 Regional Growth Forecast, the City is anticipated to experience a 38-percent increase in population between 2008 and 2050 (SANDAG 2011). The City's population continues to grow and there is a need of new housing units to accommodate the growth in the City's population. Therefore, the additional 850 to 950 residential units proposed by the project would help to meet the existing and anticipated need for additional housing in La Mesa. The additional housing would likely be used to meet existing population growth and would not be expected to influence an increase in population growth in the region.

Based on the preceding analysis, no adverse population and housing impacts would be associated with the project. In fact, the proposed addition of housing would help the City accommodate the increasing population.

6.1.5 Wildfire

The project site is located in a region of the County that experiences warm wet winters and hot dry summers with occasional droughts. According to the Safety Element of the City's General Plan, wildland fires occur in rural areas where development interfaces with undeveloped areas. Although the City is an urban community, wildland fires are present in the remaining pockets of undeveloped open area including, the open space portions of Eastridge, and Mount Helix (City 2012a). The project site is developed, but there is a small strip of undeveloped open space directly south of the site (i.e., Alvarado Creek banks and channel). However, the undeveloped open space is small and isolated, so it does not present significant risks of wildland fire to the project site.

The City of La Mesa acknowledges and reinforces the County of San Diego's Multi-jurisdictional Hazard Mitigation Plan, which identifies risks and ways to minimize damage caused by natural and humanmade disasters. The project would be included in this plan because the project site is located within the city limits. The project site is accessed via Alvarado Road. During construction, heavy construction-related vehicles could interfere with emergency response to the site or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). However, delays would be both minor and temporary. Additionally, operation of the proposed project would involve minimal and infrequent traffic in and out of the project site and would not result in interference with emergency response access. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Additionally, implementation of the project would not exacerbate wildfire risks or require the installation or maintenance or associated infrastructure that may exacerbate fire risk. The project does involve several public improvements, including frontage road improvements to Alvarado Road (including new sidewalk, curb and gutter, streetlights, a pedestrian bridge, and a pedestrian connection to the trolley station), relocation of existing utility lines, sewer system upgrades, and improvements to Alvarado Creek. However, such improvements would not cause wildfire risks at the project site to substantially increase from existing conditions. Therefore, impacts related to wildfire would be less than significant.

6.2 GROWTH INDUCEMENT

CEQA Guidelines Section 15126.2(e) requires that EIRs include an evaluation of potential growth inducement impacts to "Discuss the 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." This can include projects which remove obstacles to population growth, such as through the provision of expanded public utility capacity that may allow additional construction in the associated service area (e.g., the major expansion of a wastewater treatment plant). The referenced CEQA Guidelines section also notes that "It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

6.2.1 Short-term Effects

During the project construction phase, demand for various construction trade skills and labor would increase. It is anticipated that this demand would be met by the local labor force and would not require importation of a substantial number of workers that could cause an increased demand for temporary or permanent housing in this area.

6.2.2 Long-term Effects

As discussed in Section 6.1.4, *Population and Housing*, the City's population continues to grow and there is a need of new housing units to accommodate the anticipated growth. Similarly, the population of the region has been increasing at twice the rate of the production of new housing in the region, and the City is behind in the production of its Regional Housing Needs Allocation (RHNA) allocation for 2010 – 2020 of 1,722 new units. Consistent with an urbanized, largely built-out community, La Mesa has experienced relatively little housing growth since 1990. The housing stock in the City grew from 24,154 units in 1990 to 26,167 units in 2010, or an eight percent increase over 20 years (City 2012a). Based on the SANDAG Series 13 Growth Forecast (SANDAG 2013b), the housing stock in La Mesa only slightly increased by 2020, which creates a shortfall in the RHNA allocation.

The proposed development of up to 950 multi-family residential units would provide much needed housing within the City to respond to the existing housing shortage in La Mesa, as well as in San Diego County and statewide, consistent with the City's RHNA. The project would not directly or indirectly increase population growth in the region. No significant pressure on local housing supply or demand is expected from development of the project. Proposed residential development would accommodate growth and demand that is already occurring within the region. The project site is currently developed with a RV resort and is surrounded by existing development and infrastructure. The project would not require the extension or expansion of roadways, public services, utilities, or infrastructure into areas currently without service. As a result, development of the project would not remove any physical barriers to growth. Therefore, growth inducement would not be significant as a result of the project.

6.3 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires an EIR to identify significant environmental effects that cannot be avoided if a project is implemented. As discussed in Chapter 4.0, *Environmental Analysis*, implementation of the project would result in significant impacts to Biological Resources, Cultural and Tribal Cultural Resources, Hazards and Hazardous Materials, and Paleontological Resources. Each of these impacts would be reduced to below a level of significance through the identified mitigation. Therefore, the project would not result in any significant unavoidable environmental effects.

6.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126(d) of the State CEQA Guidelines requires an evaluation of significant irreversible environmental changes which would occur should a project be implemented. Irreversible environmental changes typically fall into three categories: (1) primary impacts, such as the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources, and cultural resources); (2) secondary impacts, such as road improvements which provide access to previously inaccessible areas; and (3) environmental accidents potentially associated with the project. Section 15126.2(d) of the State CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of such resources is justified.

6.4.1 Primary Impacts Related to Nonrenewable Resources

Section 15126.2(d) of the CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of such resources is justified.

Implementation of the proposed project would not result in significant irreversible impacts to agricultural land or forestry resources, mineral deposits, and energy resources, as described in Section 6.1. Although the project would impact sensitive biological resources (riparian habitat) and potential jurisdictional areas, mitigation for the impacts would generate a net gain in resource quality by providing for on-site mitigation (as approved by the responsible resource agencies during the permitting process). Water bodies in the project area include Alvarado Creek which bisects the project site and continues downstream to the San Diego River. Implementation of the project would include improvements to Alvarado Creek to control flood and storm water flows within the channel, as well as to enhance the creek as an open space amenity and natural feature. As discussed in Section 5.7, *Hydrology and Water Quality*, the project would comply with applicable regulations and implementation of construction and post-construction BMPs to prevent and/or treat pollutant discharge into receiving waters.

The project would entail the commitment of energy and non-renewable resources, such as energy in the form of electricity, energy derived from fossil fuels, natural gas, construction materials (i.e., concrete, asphalt, sand and gravel, petrochemicals, steel, and lumber and forest products), potable water, and labor during the construction phases. The project features a number of sustainability elements to minimize its consumption of energy and non-renewable resources, as described in Section 6.1.2 and associated impacts would be less than significant. Nevertheless, use of these resources on any level would have an incremental effect on the regional consumption of these commodities, and therefore result in long-term, irretrievable losses of non-renewable resources, such as fuel and energy.

Cultural and paleontological resources could potentially be disturbed during project grading, but would be salvaged, as necessary, and any resources encountered would be recovered in accordance with mitigation, as described in Sections 4.3, *Cultural and Tribal Cultural Resources*, and 4.10, *Paleontological Resources.* Impacts to paleontological and cultural resources would not result in irreversible changes to those resources.

6.4.2 Secondary Impacts Related to Access to Previously Inaccessible Areas

The project would not involve road or highway improvements that would provide access to previously inaccessible areas. The proposed pedestrian and bicycle facilities would increase accessibility and connectivity, but such facilities would not connect areas that are not currently inaccessible. Therefore, implementation of the proposed project would not result in a significant irreversible impact with regard to access to previously inaccessible areas.

6.4.3 Impacts Related to Environmental Accidents

With respect to environmental accidents, and as further discussed in Section 4.6, *Hazards and Hazardous Materials*, of this EIR, potential impacts related to hazardous materials and associated health hazards from implementation of the proposed project would be avoided or reduced to below a level of significance through mandatory conformance with applicable regulatory/industry standards and codes and identified mitigation. The project site is located in a developed area with a generally low potential for wildfire hazards, as described in Section 6.1.5. Further, no major environmental accidents or hazards are anticipated to occur as a result of project implementation, with incorporation of the mitigation discussed in Section 4.6.

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