

CHAPTER 5 Other CEQA Considerations

5.1 INTRODUCTION

This chapter presents the evaluation of types of environmental impacts required by CEQA that are not covered within the other chapters of this EIR. In particular, 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. As part of this analysis, the EIR must also identify (1) significant environmental effects of the proposed project; (2) significant environmental effects which cannot be avoided if the proposed project is implemented; (3) significant irreversible environmental changes which would be involved in the proposed project should it be implemented; (4) growth-inducing impacts of the proposed project; (5) the mitigation measures proposed to minimize the significant effects; and (6) alternatives to the proposed project.

5.2 GROWTH-INDUCING IMPACTS

As required by the CEQA Guidelines, an EIR must include a discussion of the ways in which the proposed project could directly or indirectly foster economic development or population growth, or the construction of additional housing and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[d]). Growth can be induced in a number of ways, including the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of removal of obstacles to growth relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval. Under CEQA, a determination whether induced growth is beneficial or detrimental is not necessarily made, but rather an analysis of the impacts of such growth must be analyzed. Induced growth is considered a significant impact only if it affects (directly or indirectly) the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth, in some other way, significantly affects the environment.

In general, a project may foster spatial, economic or population growth in a geographic area if it meets any one of the criteria identified below:

- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area)
- The project results in the urbanization of land in a remote location (leapfrog development)
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.)
- The project establishes a precedent-setting action (e.g., a change in zoning or general plan amendment approval)

If a project meets any one of these criteria, it may be considered growth inducing. Generally, growth-inducing projects are either located in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure, such as sewer and water facilities or roadways, or encourage premature

or unplanned growth. The discussion of the removal of obstacles to growth relates directly to the removal of infrastructure limitations (typically through the provision of additional capacity or supply), or the reduction or elimination of regulatory constraints on growth that could result in growth unforeseen at the time of project approval. A physical obstacle to growth can involve the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

5.2.1 Removal of Obstacles to Growth

The General Plan Update encourages the reuse and intensification of previously developed areas of the City rather than the extension of urban development into undeveloped areas of the City. Development under the General Plan Update is programmed for areas of the City that are developed and are served by an extensive network of electricity, water, sewer, storm drain, roadways, and other infrastructure sized to accommodate or allow for existing and planned growth. Only minor connections would be needed to accommodate new development. As no new major roads or highways have been proposed to provide new access to the City, the General Plan Update would not be removing an impediment to growth. The General Plan Update would not facilitate development in any undeveloped areas where development could not already occur under the current General Plan or existing Specific Plans. Instead, the General Plan Update focuses on infill development and increasing density on existing uses within identified Study Areas. Therefore, the General Plan Update would not result in the removal of obstacles to growth that would result in growth-inducing development.

5.2.2 Population Growth

As discussed in Section 4.13 (Population/Housing), SCAG projections anticipate the City's population will increase to 135,389 residents by 2035, an increase of 13,487 persons compared to 2005 (from 2005 SCAG data). Section 4.13 goes on to state that, under full build-out of the General Plan Update, the City's 2035 population is expected to increase to 183,596 persons. This would result in 50,565 more people living within the City of Simi Valley by 2035 than under the governing SCAG plan. These projected increases in population would occur due to the focus on infill development within the General Plan Update and previously approved Specific Plans. While the General Plan Update proposes additional population beyond SCAG 2030 forecasts, SCAG updates its projections on a regular basis to account for actions such as a General Plan Update in its member jurisdictions. Therefore, the General Plan Update is accommodating for continued growth expected in the region, and is not necessarily inducing said growth.

Furthermore, the potential growth in the City under the General Plan Update consists of infill development, development within existing Specific Plan areas, and intensification of existing uses within the City, and would not result in the urbanization of land in a remote location. Developed areas of the City are served by an extensive network of electricity, water, sewer, storm drain, roadways, and other infrastructure sized to accommodate or allow for existing and planned growth. As no new major roads or highways have been proposed to provide new access to the City, the General Plan Update would not be removing an impediment to growth. Instead, proposed development under the General Plan Update

would serve to accommodate growth that will imminently occur in the Southern California region, as captured by SCAG projections in previous and future updates of their RTP. Therefore, the General Plan Update would not be growth inducing or set new precedent for growth, but rather would adequately plan for expected growth.

5.2.3 Employment Growth

Implementation of the General Plan Update would generate some short-term employment opportunities during construction activities of any future development under the General Plan Update. Given the ample supply of construction workers in the regional work force of Southern California, the labor pool from which workers would be drawn, the proposed project would not be considered growth inducing from a short-term employment perspective.

Implementation of the General Plan Update would result in permanent employment opportunities at business developments created by development anticipated under the General Plan Update. These potential full-time and part-time positions are anticipated to be filled by the local labor force. The jobs associated with the new land use zones in the Study Areas could be the types that attract new residents to the area. However, Simi Valley is a primarily residential community, and has an existing employment base from which to pull employees. The economic expansion that would occur in association with these future developments is accounted for in the General Plan Update and anticipated by the City, and is not considered growth inducing.

5.2.4 Precedent Setting Actions

It is the specific purpose of the General Plan Update to preserve the community of Simi Valley and accommodate for its orderly development. Therefore, by its nature, the General Plan Update is designed to reduce the potential for uncontrolled growth and associated environmental impacts.

The anticipated growth under the General Plan Update would consist of primarily infill development and intensification of existing uses within the City as well as implementation of previously approved Specific Plan areas, and would not result in the urbanization of land in a remote location. New development in the City would serve to accommodate the growth anticipated in the Southern California region, as captured by SCAG projections in previous and future updates of their RTPs. A general plan is a regulatory document that plans for future growth and guides this identified development. As such, the General Plan Update would accommodate for future growth and would reduce the potential for uncontrolled growth. This process (and subsequent document) is in direct contrast to future, unanticipated actions such as General Plan amendments or changes to the zoning of individual properties on a piece-meal basis. Therefore, by accommodating growth that is already projected by SCAG, the General Plan Update would not be growth inducing or to be precedent setting.

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the 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.

The implementation of the General Plan Update would entail the commitment of energy and human resources for the associated changes. Resources will also be committed for the construction of future development that occurs under the General Plan Update.

Ongoing operation of developments under the General Plan Update would entail a further commitment of energy resources in the form of petroleum products (diesel fuel and gasoline), natural gas, electricity, and water. Long-term impacts would also result from an increase in vehicular traffic, and the associated air pollutant and noise emissions. This commitment of resources would be a long-term obligation in view of the fact that, practically speaking, it is impossible to return the land to its original condition once it has been developed. In summary, implementation of the General Plan Update would involve the following irreversible environmental changes to existing on-site natural resources:

- Commitment of energy and water resources as a result of the construction, operation and maintenance of development allowed under the General Plan Update
- Decrease in ambient air quality and increase in noise

5.4 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. The following significant, unavoidable adverse impacts would result from project implementation.

Air Quality

- Impact 4.3-5** Implementation of the General Plan Update would accommodate growth that exceeds the SCAG projections for the City and would conflict with or obstruct implementation of the Air Quality Management Plan. This is a *significant and unavoidable* impact.
- Impact 4.3-6** Implementation of the General Plan Update would result in operational emissions of PM₁₀ and PM_{2.5} that could contribute substantially to an existing or projected air quality violation. This is a *significant and unavoidable* impact.
- Impact 4.3-7** Implementation of the General Plan Update would result in a cumulatively considerable net increase of criteria pollutants for which the region is in nonattainment under an applicable federal or state ambient air quality standard. This is a *significant and unavoidable* impact.

Transportation/Traffic

Impact 4.16-3 Under Year 2030 conditions, operation of the proposed project would cause an increase in traffic, which is substantial in relation to the forecasted traffic load and capacity of the street system, and some intersections and segments will operate below LOS C. Even with implementation of mitigation measures, this impact is considered *significant and unavoidable*.

Impact 4.13-4 Implementation of the General Plan Update would increase the amount of traffic on CMP highways. It would exceed cumulatively an LOS E standard established by the County CMP Agency for designated roadways and/or highways on SR-118, and therefore would result in a *significant and unavoidable* impact.

5.5 EFFECTS NOT FOUND TO BE SIGNIFICANT

The following impacts were found not to be significant and were therefore not further analyzed in this EIR.

5.5.1 Agricultural Resources

Potential impacts to Agriculture Resources were determined not to be significant. There is no land designated for agricultural purposes within the City and there are no agricultural uses within the City. As such, no farmland would be at risk for conversion and no conflicts would exist with any Williamson Act contracts due to implementation of the General Plan Update. Therefore, impacts to Agricultural Resources were not further analyzed in this EIR.

5.5.2 Biological Resources

Potential impacts to substantial adverse effects to riparian habitat or other natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service were found not to exist within the City. In addition, since the City is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, no effects thereof were determined.

5.5.3 Geology/Soils

The entirety of the City of Simi Valley is served by established wastewater conveyance and treatment services. New land uses allowed under the General Plan Update would connect to existing sewer trunk lines or future expansion of sewer trunk lines. Development under the General Plan Update would not require the use of septic tanks or alternative wastewater systems.

5.5.4 Hazards and Hazardous Materials

Implementation of the General Plan Update would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The County of Ventura and the City of Simi Valley both implement programs to facilitate emergency preparedness. Specifically, the

County of Ventura's Office of Emergency Services (OES) administers the County's disaster preparedness and response program and development of the County's Emergency Response Plan.

5.5.5 Population/Housing

The General Plan Update would allow for infill development and more intense use of land in defined areas. In select locations, land use designations would be amended to allow for re-use of economically underperforming properties and obsolete development. However, existing uses within the City would be allowed to remain. No specific development plans are proposed as part of the General Plan Update. Policies in the General Plan Update apply only to new developments within the City. Accordingly, implementation of the General Plan Update would not require demolition of existing residential units or the displacement of substantial numbers of existing people. The General Plan Update incorporates focused growth and development of residential uses to accommodate the forecasted growth in population and the City's regional fair share housing allocation from SCAG.

5.5.6 Transportation/Traffic

Potential impacts to Transportation and Traffic regarding the General Plan Update conflicting with adopted policies, plans, or programs that support alternative transportation modes was found to have no impact. Various policies set forth in the General Plan Update facilitate the use of other modes of transport besides the automobile.