

## CHAPTER 5 Other CEQA Considerations

Section 15126 of the CEQA Guidelines requires that all aspects of a project 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 that cannot be avoided if the proposed project is implemented (addressed below in Section 5.2); (2) significant irreversible environmental changes that would result from implementation of the proposed project (addressed below in Section 5.3); and (4) growth-inducing impacts of the proposed project (addressed below in Section 5.4). In addition, this chapter will discuss the environmental effects not found to be significant (addressed below in Section 5.1).

### 5.1 EFFECTS FOUND NOT SIGNIFICANT

The following was found not to be significant and therefore was not analyzed further in this EIR:

#### 1. Agriculture and Forestry Resources

Potential impacts to agriculture resources were determined not to be significant, because the City is a developed urban area and does not contain farmland or forest lands within the proposed SGCP area. According to the California Department of Conservation Farmland Mapping and Monitoring Program, South Glendale is designated as developed land. The closest Prime Farmland, Unique Farmland or Farmland of Statewide Importance is located approximately 12 miles west of the proposed SGCP boundary. Furthermore, no Williamson Act contract lands or forest lands are located with or adjacent to the proposed SGCP area. Therefore, the effects of the proposed project were found not significant, as no impacts on agricultural and forestry resources would occur.

### 5.2 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Table 2-1 (Summary of Environmental Impacts and Mitigation Measures) in Chapter 2 (Summary) and Sections 4.1 through 4.16 in Chapter 4 (Environmental Analysis) of this EIR provide a comprehensive identification of the proposed project's environmental effects, including the level of significance both before and after mitigation. In summary, implementation of the proposed SGCP would result in the following significant and unavoidable project-related and/or cumulative impacts:

#### ■ Aesthetics

- **Impact 4.1-3**—Implementation of the proposed project would substantially degrade the existing visual character or quality of the site and its surroundings.
- **Impact 4.1-4**—Implementation of the proposed project would result in new sources of increased shade.

■ **Air Quality**

- **Impact 4.2-1**—Implementation of the proposed project would conflict with or obstruct implementation of the applicable air quality plan.
- **Impact 4.2-2**—Implementation of the proposed project would violate an air quality standard or contribute substantially to an existing or projected air quality violation.
- **Impact 4.2-3**—Implementation of the proposed project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).
- **Impact 4.2-4**—Implementation of the proposed project would expose sensitive receptors to substantial pollutant concentrations.

■ **Greenhouse Gas Emissions**

- **Impact 4.6-1**—Implementation of the proposed project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Additionally, the proposed project would conflict with an applicable plan policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses.

■ **Population and Housing**

- **Impact 4.12-2**—Implementation of the proposed project would induce substantial population growth in an area, either directly or indirectly.

■ **Public Services**

- **Impact 4.13-3**—Implementation of the proposed project would increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand.
- **Impact 4.13-4**—Implementation of the proposed project would increase the demand for police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand.

■ **Recreation**

- **Impact 4.14-1**—Implementation of the proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- **Impact 4.14-2**—Implementation of the proposed project would include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

■ **Transportation/Traffic**

- **Impact 4.15-5**—Implementation of the proposed project would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

### 5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. 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. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.”*

Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Resources that will be permanently and continually consumed due to implementation of the proposed project include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient or wasteful use of resources. In addition, construction activities related to the proposed project would result in the irreversible commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment.

With respect to operational activities, compliance with all applicable building codes, as well as project mitigation measures, would ensure that all natural resources are conserved or recycled to the maximum extent feasible. It is also possible that new technologies or systems will emerge, or will be more cost-effective or user friendly, that will further reduce reliance upon nonrenewable natural resources; however, even with implementation of conservation measures, consumption of natural resources would generally increase with implementation of the proposed project.

In addition, a long-term increase in the demand for electrical and natural gas resources would occur. However, the proposed project would not involve a wasteful or unjustifiable use of energy or other resources, and energy conservation efforts could also occur with new construction. New development associated with the proposed project will be constructed and operated in accordance with specifications contained in CCR Title 24; therefore, the use of energy on site would occur in an efficient manner.

In summary, implementation of the proposed project would result in the irretrievable commitment of limited, slowly renewable and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses during buildout of the proposed SGCP. However, continued use of such resources would be nominal. Therefore, although irreversible

changes would result from implementation of the proposed project, such changes would not be considered significant.

## 5.4 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that this section discuss the ways in which the proposed project could foster economic, population or housing growth, either directly or indirectly, in the surrounding environment. Also, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. Although growth inducement itself is not considered an environmental effect, it could potentially lead to environmental effects.

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

- Removal of an impediment to growth (e.g., establishment of an essential public service and provision of new access to an area);
- Fostering of economic expansion or growth (e.g., changes in revenue base and employment expansion);
- Fostering of population growth (e.g., construction of additional housing), either directly or indirectly;
- Establishment of a precedent-setting action (e.g., an innovation, a change in zoning and general plan amendment approval); or
- Development of or encroachment on an isolated or adjacent area of open space (being distinct from an in-fill project).

Should a project meet any one of the above-listed criteria, it may be considered growth inducing. The potential growth-inducing impacts associated with implementation of the proposed project are evaluated below against these criteria. It is important to note that the CEQA Guidelines (Section 15145) do not require that an EIR predict (or speculate) specifically where such growth would occur, in what form it would occur, or when it would occur. The answers to such questions require speculation, which CEQA discourages.

### 5.4.1 Impacts of Induced Growth

Potential growth inducement impacts of the proposed SGCP are addressed in Section 4.12 (Population and Housing) of this EIR under Project Impacts and Mitigation 4.12.3. As stated in Section 4.12.3, although implementation of the proposed SGCP does not involve direct development, it allows for an increase of up to 10,337 new dwelling units in the proposed SGCP area. This growth exceeds SCAGs forecasted growth of 8,700 dwelling units for the entire City. An increase of 10,337 dwelling units would result in a population increase of approximately 27,910 people within the proposed SGCP area. SCAG projects an increase in population of 20,800 residents within the City by 2040; therefore, the growth associated with the proposed SGCP exceeds the projected growth for the entire City by 7,110 people.

Implementation of the proposed SGCP would result in a population increase of 20,925 beyond the existing Glendale General Plan for the proposed SGCP area.

In terms of employees, the proposed SGCP would lead to an additional 11,236 employees (57,747 in total), which is a 24.2 percent increase on the number of employees (as of 2015) in the proposed SGCP area. It is estimated that without the project, the number of employees in the proposed SGCP area would be 54,651, which is a 17.5 percent increase on the number of employees (as of 2015) in the proposed SGCP area.

While the additional population allowed under the proposed SGCP would exceed SCAG's projections, one of the proposed project's main objectives (see Project Description Section 3.2, Objective 12 of this EIR) is to meet or exceed the RHNA allocation. Section 4.8 of the Glendale General Plan Housing Element identifies a need for 2,017 dwelling units over the period 2014-2021. The policies listed in the Housing Element promote the development of housing for all income levels and seek to accommodate growth based on community needs (refer to Section 4.12.2, Regulatory Framework). In addition to the Housing Element, the Glendale Long Range Planning Public Input Findings (2006) identified "retention, new development, and rehabilitation of affordable housing" as its highest priority within the housing topic area. Increasing population growth and new residential development within the City has thus been a priority for a considerable amount of time.

The proposed SGCP in conjunction with the DSP aims to ensure responsible growth in the Downtown area and provide incentives for a range of housing developments near transportation hubs, services, and recreation facilities. The increase in dwelling units and subsequent population increase within the City is aligned with the vision for South Glendale, and the proposed development seeks to enable the projected growth in the proposed SGCP area. Implementation of the proposed SGCP would enable better connections between lower income housing and transportation and service areas, and consequently facilitate better connections with employment centers.

The proposed project would also include an amendment to the Glendale General Plan to incorporate the proposed SGCP and slight modification to the DSP boundaries, and an amendment to Zoning Ordinance and Zoning Map to apply zoning consistent with the proposed SGCP; some or all of which could be approved concurrently with the proposed SGCP at the discretion of the City Council. This would allow for the increase in population and dwelling units to be consistent with all local planning documents within the City. The proposed SGCP would thus guide future growth and include a framework for land use and development to prevent unanticipated or inappropriate population growth within the proposed SGCP area.

The impact associated with induced population growth is partly reduced due to the City's role in approving discretionary projects. However, this is a programmatic analysis and impacts are addressed under the assumed buildout year of 2040. Therefore, inducement of population growth, economic expansion, and a change in zoning and general plan amendment approval (three of the criteria listed above) anticipated under the proposed project would constitute a significant and unavoidable impact.

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