

5. Other CEQA Considerations

5.1 Significant Unavoidable Adverse Impacts

CEQA Guidelines §15126.2(b) requires that EIRs include a description of all significant impacts, including those that can be mitigated but not reduced to a level of insignificance.

The environmental effects of the proposed project are discussed in Section 4 – Environmental Setting, Impacts, and Mitigation Measures. The project-level analysis in Section 4 addresses whether implementation of the project would result in a significant adverse impact in any of 13 specific environmental issue areas. Significance thresholds were defined for each issue area addressed in Section 4. When potentially significant impacts were identified, mitigation measures were developed that could reduce impacts to below the respective significance threshold(s), provided that such mitigation could feasibly be accomplished. Based on the project-level analysis prepared for this document, most environmental impacts can be reduced to a less than significant level. The proposed DTSP Update will provide potential development opportunities over a 20-year period. The following significant and unavoidable project-related and/or cumulative impacts could result in relation to future development:

- Air Quality – The proposed project will result in significant unavoidable adverse impacts for air quality in the short term when construction activities will create NO_x emissions that exceed the SCAQMD thresholds, even after mitigation is applied. Analysis also shows that ROG and PM₁₀ emissions will continue to exceed the SCAQMD thresholds and will be considered significant and unavoidable cumulative impacts in the long term.
- Cultural Resources – Mitigation for cultural resources would require a qualified professional to conduct site-specific historical resource investigations for future developments within the project area that would demolish or otherwise physically affect buildings or structures 45 years old or older or affect their historic setting. Nonetheless, development within the DTSP area could result in demolition or removal of significant historical resources, which would result in a significant impact. While implementation of site-specific mitigation measures, such as written and photographic documentation of significant historical resources, would reduce the magnitude of this impact, the impact would remain significant due to the physical demolition of the property. Consequently, impacts on historical resources are considered potentially significant and unavoidable.
- Noise – Groundborne vibration and noise can be a potential significant impact during construction. Pile driving has been identified as the type of activity that would likely cause significant impacts. Since it is unknown at this time if potential future individual projects may include pile driving, the construction-related temporary increases in ambient noise levels (e.g., pile driving) would represent a significant unavoidable adverse impact.

- Public Services – The proposed DTSP Update site boundaries cover 336 acres and would include potential development opportunities over a 20-year period. As such, it is not possible at this time to specify the exact location, size, or timing of future development (which may occur under the proposed DTSP) that may contribute to an eventual increase in calls to the HBFD. Therefore, it is currently unknown which potential future needs for staff and/or facilities and equipment may be required (if needed) in relation to individual development projects. Because additional fire personnel, facilities, and/or equipment may be needed in relation to future development proposals per the DTSP Update, and it is unknown as to where or how these additions may be provided, impacts relative to fire protection will be significant and unavoidable.
- Utilities and Service Systems – Water usage will increase as a result of implementation of the development allowed under the proposed DTSP Update. While the update project itself and its adoption will not create significant and unavoidable impacts per se, each development project proposed as a result of adoption of the DTSP Update will need to be vetted with utility providers to ensure that adequate water supplies are available to support proposed development.

In regard to avoiding or mitigating an environmental effect, this EIR evaluates all potential physical environmental impacts that may occur as a result of implementation of the project and provides mitigation for those identified environmental effects. The recommended mitigation measures are key factors in reducing potential environmental impacts to the environment to a less than significant level. Based on the foregoing environmental analysis contained in this EIR, all other impacts can be reduced to a less than significant level through mitigation measures.

5.2 Effects Not Found To Be Significant

Section 4 of this Draft Program EIR analyzes the impacts of the proposed project with respect to the specific environmental issue areas. As discussed in Section 4, most environmental impacts can be reduced to less than significant levels with implementation of recommended mitigation measures for most topical areas addressed in this EIR. Therefore, most environmental impacts associated with the implementation of the proposed project will be mitigated to a less than significant level as also described in Section 5.1 – Significant Unavoidable Adverse Impacts above.

Mitigation measures are provided for the following topical areas: Aesthetics, Air Quality, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Public Services, Recreation, Transportation/Parking, and Utilities & Service Systems. A summary of the potential impacts associated with the proposed DTSP Update and the recommended mitigation measures are presented in the Executive Summary Matrix (Section 2.5, beginning on page 2-5 of this EIR). The mitigation measures presented in the topical areas of Air Quality, Cultural Resources, and Geology/Soils are primarily for environmental impacts related to short-term construction activities. Topical areas that have mitigation measures identified to address project impacts (long term) after construction and during project design or operations include: Aesthetics,

Hydrology and Water Quality, Noise, Public Services, Transportation/Parking, Recreation, and Utilities & Service Systems.

5.3 Significant Irreversible Environmental Effects

CEQA Guidelines §15126.2(c) requires that an EIR evaluate significant irreversible environmental changes that would be caused by the project. An impact would be considered significant if any of the following occurs as a result of the project:

1. 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 non-use thereafter unlikely;
2. Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area) generally commit future generations to similar uses;
3. Irreversible damage that could result from environmental accidents associated with the project;
4. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The DTSP Update would provide for future development opportunities over a 20-period that would involve the commitment of some resources, particularly the labor and materials required for construction of the buildings. This commitment of energy, personnel, and building materials would be commensurate with that of other projects of similar magnitude, and none of these commodities are in short supply. Manpower would be committed for the construction of buildings and public facilities necessary to support the new development. Ongoing maintenance and operations of the uses (retail, restaurant, office, hotel, cultural arts facilities, and residential) would entail a further commitment of energy resources such as natural gas, electricity, and water resources.

As indicated, future development of the project will increase the demand for water resources. During a normal year, Huntington Beach uses approximately 35,000 acre feet (afy) of water, but multiple dry years could put demand closer to 37,000 afy. To maintain reliability, it is necessary to be able to meet multiple dry year demand. Recently adopted conservation measures influence the water demand factors used. Recent events related to court decisions on endangered species protection in the Sacramento-San Joaquin River Delta and persistent drought in California and the Southwest are forcing reductions in water available through traditional importation sources, increasing conservation requirements across Southern California and the City. In an effort to comply with statewide water goals and reduce water usage by 20% by the year 2020, the City is recommending conditions of approval that could reduce residential demand by as much as 35%. Recommended conditions of approval for redevelopment projects within the DTSP area should aid in reduction of overall water usage. Those conditions of approval are incorporated into mitigation measures as part of this EIR. Conversion of existing buildings and public areas to comply with the same conservation measures can further assist in meeting the 20% reduction goal.

The project will represent a permanent commitment of the DTSP area to potential future development; however, no important natural resources will be significantly impacted as a result of the project. Based on the existing condition of the DTSP area (previously developed with existing uses with a few scattered vacant parcels) and surrounded by other uses such as residential, beaches, and roads, the proposed project does result in significant irreversible environmental damage. Future individual projects will be required to adhere to the City's General Plan, applicable code requirements, and the DTSP Update. Additionally, the incorporation of mitigation measures further reduces potential environmental impacts associated with the implementation of the DTSP Update project. Long-term impacts associated with the implementation of the DTSP Update would result due to an increase in air pollutants (short-term construction and long-term vehicular emissions), traffic, and noise.

In summary, implementation of the proposed project would involve the following irreversible environmental changes to existing on-site natural resources: commitment of energy and water resources as a result of the operation and maintenance of potential future development that would be permitted under the DTSP Update; and the alteration of properties within the DTSP area.

5.4 Growth Inducing Impacts

CEQA Guidelines §15126.2(d) requires that an EIR address the growth-inducing impacts of a proposed project. A project is defined as growth inducing when it:

- fosters economic growth, population growth, or construction of additional housing, either directly or indirectly, in the surrounding environment;
- removes obstacles to population growth;
- results in further taxes to existing community service facilities; and/or
- encourages or facilitates other activities that could significantly affect the environment, either individually or cumulatively.

The proposed DTSP Update would allow for additional development opportunities within the DTSP boundaries. The maximum development potential includes retail (213,467 square feet), restaurant (93,332 square feet), office (92,784 square feet), cultural facilities (30,000 square feet), residential (648 units), and hotel (235 rooms).

The total projected maximum development potential associated with the proposed DTSP Update could potentially occur over 20 years. This maximum build-out does not take into account unique constraints on individual parcels. Also, build-out will occur over time in response to market demand, and thus it is unknown when complete build-out will occur. Infrastructure and public services (e.g., sewer, water, gas, electricity, drainage, police, fire) within the DTSP already exist within the DTSP area; however, expansion of facilities and services would be needed depending on the project type, location, and size. The DTSP Update would also contribute to the population growth of the City.