
6 Other CEQA Considerations

This chapter includes the following other considerations that are required in an environmental impact report (EIR):

- Growth inducement (Section 6.1)
- Significant irreversible environmental effects (Section 6.2)
- Significant unavoidable environmental impacts (Section 6.3)

6.1 Growth Inducement

Section 15126.2(e) of the California Environmental Quality Act (CEQA) Guidelines mandates that the growth-inducing nature of the proposed Pacifica Project (project or proposed project) be discussed. This CEQA Guideline states the growth-inducing analysis is intended to address the potential for a project to “foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” Further, the CEQA Appendix G Checklist (Population and Housing) also mandates that a CEQA document speak to a proposed project’s likelihood to induce substantial population growth in an area, either directly (e.g., by proposing new homes or businesses) or indirectly (e.g., through extension of roads or other infrastructure).

A project may be distinguished as either facilitating planned growth or inducing unplanned growth. Facilitating growth is relating to the establishment of direct employment, population, or housing growth that would occur within a project site. Inducing growth is related to lowering or removing barriers to growth or by creating an amenity or facility that attracts new population/economic activity. This section contains a discussion of the growth-inducing factors related to the proposed project as defined under CEQA Guidelines Section 15126.2(e). A project is defined as growth inducing when it directly or indirectly does any of the following:

1. Fosters population growth
2. Fosters economic growth
3. Includes the construction of additional housing in the surrounding environment
4. Removes obstacles to population growth
5. Taxes existing community service facilities, requiring construction of new facilities that could cause significant environmental effects
6. Encourages or facilitates other activities that could significantly affect the environments, either individually or cumulatively

Pursuant to CEQA Guidelines Section 15126.2(e), it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

As discussed in Section 4.12, Population and Housing, the proposed project would directly facilitate growth through development of 164 residential units, which would introduce new residents or relocate residents within the area. The project’s service population is based on the City of Oceanside (City) Housing Element, which estimates an average household size of 2.86 persons per dwelling unit (City of Oceanside 2021). The project’s service population, defined as the number of residents, is approximately 469 people. Construction of the proposed project would generate an economic stimulus from activities such as the use of building materials, employment of

construction workers, and the introduction of new or relocated consumer demand in the area. The proposed project would not introduce a population beyond what is planned for the City and the region.

The most recent Regional Housing Needs Assessment from the San Diego Association of Governments (SANDAG) stated that the City needs to build 5,443 units from 2021 through 2029 (SANDAG 2020). The City has a projected deficit of 1,268 very-low income units, 718 low-income units, 883 moderate income units, and 2,574 above-moderate income units (SANDAG 2020). The project is expected to bring 164 units to market in 2024/2026, all of which would be within SANDAG's growth projection for housing during the 6th Cycle planning horizon (i.e., April 2021–April 2029). Therefore, the project would not conflict with SANDAG's regional growth forecast for the City. Although the project would directly lead to additional growth within the City, and the increase in population growth at the project site was not accounted for in the City's Housing Element or General Plan, the increase in units would be within SANDAG's growth projection and would not conflict with the regional growth forecast for the City.

The project would not lead to indirect growth, as the project would not provide for additional infrastructure improvements that would allow for additional unplanned growth in the area. The project does not remove obstacles to growth by extending infrastructure to new areas, nor would it result in significant adverse environmental impacts beyond those analyzed in this EIR due to the expansion of infrastructure such as water supply facilities, wastewater treatment plants, roads, or freeways. The project would include utility improvements; however, these upgrades would only be to the proposed project connection points and would only be upgraded to serve the project. Refer to Section 4.12 of this EIR for a full discussion of potential growth-inducing impacts.

6.2 Significant Irreversible Effects

CEQA Guidelines Section 15126.2(d) requires that an EIR identify any significant irreversible environmental changes associated with a proposed project. That section describes irreversible effects as:

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. (See Public Resources Code section 21100.1 and Title 14, California Code of Regulations, section 15127 for limitations to applicability of this requirement.)

Per Section 15127, irreversible changes are only required to be addressed in EIRs when connected with the adoption or amendment of a local plan, policy, or ordinance; adoption by a local agency formation commission of a resolution making determinations; or when the project is subject to National Environmental Policy Act and requires an environmental impact statement. This project does not involve any of those activities, and as such this analysis is not required and is appropriately not provided herein.

6.3 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, including those impacts that can be mitigated but not reduced to a less-than-significant level. Chapter 5, Effects Found Not To Be Significant, analyzes and discusses the CEQA topic areas where the project will not have

a significant impact. Chapter 4, Environmental Analysis, of this EIR describes the potential environmental impacts of the proposed project and recommends mitigation measures to reduce impacts, where feasible. As discussed in this EIR, implementation of the proposed project would result in potentially significant impacts to air quality, biological resources, cultural resources, geology and soils, transportation, and tribal cultural resources before mitigation. These impacts would be reduced to below a level of significance through mitigation. Implementation of the proposed project would not result in any significant and unavoidable impacts.

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