



## **Chapter 5**

# **CEQA Mandated Analysis**

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(b) and (c) require that the significant unavoidable impacts of the project, as well as any significant irreversible environmental changes that would result from project implementation, be addressed in the Environmental Impact Report (EIR). Additionally, CEQA Guidelines Section 15126.2(e) requires that an EIR evaluate the “growth-inducing” effects of a project. The following paragraphs discuss these mandated topics associated with implementation of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan, herein after referred to as the project. The analysis area covers the entire city of Moreno Valley (City) and sphere of influence, which are collectively referred to as the Planning Area. Within the analysis, Concept Areas refers to those areas where the GPU proposes land use changes as shown on Figure 3-1.

### **5.1 Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented**

In accordance with CEQA Guidelines Section 15126.2 (b) any significant unavoidable impacts of a project, including those impacts that can be mitigated but not reduced to below a level of significance despite the applicant’s willingness to implement all feasible mitigation measures, must be identified in the EIR. Implementation of the project would result in significant, unavoidable impacts associated with the following issues: agriculture and forestry resources (important farmland and indirect conversion), air quality (construction emissions of criteria pollutants), biological resources (sensitive species, sensitive riparian habitats, and jurisdictional wetlands and waters), cultural and tribal cultural resources (historic resources, archaeological resources, human remains, and tribal cultural resources), noise (increases in ambient noise associated with traffic and construction), and

transportation (vehicle miles traveled). Chapter 4.0 of this EIR provides more detail about the nature and extent of these impacts related to implementation of the project.

These impacts would remain significant and unavoidable as a result of the project. A Statement of Overriding Considerations, consistent with CEQA Guidelines Section 15093, will be prepared, for certification with the Final EIR, identifying specific economic, legal, social, technological, or other benefits of the project which allow approval of the project to outweigh the unavoidable impacts.

## **5.2 Significant Irreversible Environmental Changes Which Would Result if the Project is Implemented**

In accordance with CEQA Guidelines Section 15126.2(c):

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 improvements which provide 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.

Non-renewable resources generally include agricultural land; biological, archaeological, and paleontological resources; mineral deposits; water bodies; and some energy sources. The project has been designed to minimize impacts to sensitive biological resources by primarily focusing future development and redevelopment within the proposed Concept Areas. These areas consist of clusters of vacant and underutilized land within the city limit that would avoid the majority of sensitive habitat that is located within the eastern and southeastern portion of the Planning Area. Focusing development and redevelopment within these areas that consist primarily of developed and/or disturbed land would minimize adverse impacts to sensitive species. Similarly, the Concept Areas avoid the majority of the identified historic and potentially eligible historic resources, as well as the majority of the archaeological sensitive complexes. Nonetheless, impacts to biological and cultural resources were found to remain significant and unavoidable, because it cannot be known at the program level of analysis with certainty that impacts to sensitive species could be fully avoided or be fully mitigated. (see Sections 4.4 and 4.5 of this EIR). Additionally, implementation of the project would result in the permanent loss of 15 acres of land designated Prime Farmland, as well as the additional loss of farmland due to indirect conversion of agricultural land through urbanization (see Section 4.2). Therefore, future development consistent with the project could result in the permanent loss of biological, cultural, and agricultural resources.

There exists some potential for paleontological resources to be present within the Planning Area, primarily within portions of the sphere of influence that have been identified as having

a high potential for paleontological resources. However, implementation of mitigation measure PAL-1 would reduce impacts associated with future grading and development to a level less than significant (see Section 4.7). As described in Section 4.10, implementation of the project would result in less than significant impacts to water bodies (drainage and water quality). The Planning Area does not support any mineral extraction activities, and the small amount of land designated as MRZ-2 in the southeastern portion of the sphere of influence is not located within any of the proposed Concept Areas. Therefore, impacts related to mineral resources would be less than significant.

With regard to energy resources, actions related to future development would result in an irretrievable commitment of nonrenewable resources, including as energy supplies and construction materials, such as lumber, steel, and aggregate. Non-renewable energy resources (coal, natural gas, oil) would be used in construction, heating, and refrigeration of food and water, transportation, lighting, and other associated energy needs. (Energy impacts are further discussed in Section 4.6 of this EIR).

In summary, implementation of the project would result in an increase in residential, business park, industrial, office, commercial, and civic and institutional uses throughout the Planning Area, particularly within the Concept Areas (see Figure 3-1). Construction and operation associated with implementation of future projects 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. However, the use of such resources would be consistent with local and regional growth forecasts for the area (see Section 4.14). Therefore, although irreversible environmental changes would result from future development, such changes would not be considered significant.

### **5.3 Growth Inducement**

CEQA Guidelines Section 15126.2(d) requires that an EIR:

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. Included in this are projects which would remove obstacles to population growth (for example, a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population might tax existing community services facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can directly or indirectly induce growth. Construction of new housing would directly induce population growth. However, if a project creates substantial new permanent

employment opportunities, it could indirectly induce growth by stimulating the need for additional housing and services to support the new employment demand. It could also indirectly induce growth by removing infrastructure limitations or regulatory constraints on a required public service, such as roads or water service.

### **5.3.1 Population and Housing Growth**

The project does not propose the construction of new housing or other development; rather it provides capacity for future development consistent with state Housing Element Law and regional plans including the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The California Department of Finance is responsible for developing the total statewide housing demand projection. With the state Department of Housing and Community Development, this demand is apportioned to each of the state's regions. SCAG is responsible for allocating the region's projected new housing demand in each of its member jurisdictions through the Regional Housing Needs Assessment (RHNA) process (see Chapter 3.0, Project Description). The allocation takes into account factors such as market demand for housing, employment opportunities, the availability of suitable sites and public facilities, commuting patterns, type and tenure of housing need, and others. Therefore, the 2021 GPU portion of the project contains policies and implementation programs that would provide for housing development consistent with the City's share of the regional housing need as identified in the RHNA.

As described in Section 4.14, buildout of the project would result in development of approximately 22,052 new homes, which is greater than the RHNA allocation assigned to the city of 13,627 new homes. This exceedance of the RHNA allocation would provide a buffer in all income categories to ensure the city can navigate the no net loss provisions of the state Housing Element law and have continued ability to meet the RHNA by income group throughout the planning period.

Section 4.14 also documented that buildout of the project would result in approximately 72,737 households in 2040, which would be fewer than the 2040 SCAG household projection of 73,000. Similarly, the project's projected population size of 252,179 would be less than the 2040 SCAG projection of 256,600. This difference in population is due to the greater share of multi-family units that would likely result under buildout of the project compared to buildout of the existing 2006 General Plan, as multi-family units typically have a lower household population. Therefore, the project would accommodate projected future housing needs in the Planning Area and would not induce population growth.

Furthermore, the project has been designed to primarily focus future development and redevelopment within Concept Areas that consist of vacant or underutilized land along major transit corridors.

### **5.3.2 Removal of an Impediment to Growth**

The project does not propose the construction or expansion of new housing, services, or other infrastructure development; rather it provides for future development consistent with state

Housing Element Law. The project has been designed to primarily focus future development and redevelopment within Concept Areas that consist of vacant or underutilized land along major transit corridors. Future development outside of the Concept Areas would occur in areas that are already served by infrastructure and would not require extensions into unserved portions of the Planning Area. Therefore, future infrastructure development would occur within areas that are already served by essential roads, utilities, and public services, and the project would not remove an impediment to growth.

### **5.3.3 Foster Economic or Employment Growth**

The project does not propose or provide direct development rights to new major retail, commercial or employment centers that would encourage substantial economic or employment growth. Rather, it provides capacity for future development consistent with regional plans including SCAG 2016 RTP/SCS. The project would slightly increase the number of jobs to 83,246 compared to the SCAG 2040 growth projection of 83,200. However, this slight increase in approximately 46 jobs would have a negligible effect on future growth that would be offset by the decrease in population and households compared to SCAG 2040 growth projections described in Section 5.3.1 above. Therefore, future economic and employment growth associated with the project would not induce growth.

## **5.4 Conclusion**

Overall, the project would not be growth inducing as it would serve to accommodate projected growth as required by state law. The project would not remove an impediment to growth, nor does it propose to develop, or permit the encroachment into an isolated area adjacent to open space, or foster economic and employment expansion. As discussed above, the project would accommodate projected population growth and would not be considered growth inducing because it would provide housing capacity for projected population growth. The opportunities to provide housing would be consistent with the city's need to establish a resilient housing base for the community and comply with state law.