

8.0 Significant Unavoidable Environmental Effects/Irreversible Environmental Changes

The environmental review process under both CEQA and NEPA requires a brief discussion of the irreversible impacts or irretrievable commitment of resources associated with a proposed project/action. Specifically, CEQA Guidelines section 15126.2 (b) and (c) require that the significant unavoidable impacts of a proposed project, as well as any significant irreversible environmental changes that would result from project implementation, be addressed in an EIR. Section 40 CFR 1502.16 of CEQA's NEPA Regulations require a discussion of "...any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented."

8.1 Significant Environmental Effects Which Cannot Be Avoided if the Project Is Implemented

Any significant unavoidable impacts of a proposed 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 an EIR.

As evaluated in Section 4.0 of this draft EIR/EIS, there would be no significant unavoidable (i.e., unmitigable) impacts that would result from the proposed action. All potentially significant impacts resulting from project implementation would either be avoided or can be reduced to below a level of significance or adversity with the mitigation measures identified in the Plan and in the MMRP (which will be prepared for the Final EIR/EIS).

Issuance of the Permits and implementation of the proposed Plan or Alternatives 3 and 4 would permanently conserve portions of sensitive biological habitat areas in the San Diego area and would authorize incidental take of Covered Species on approximately 373 acres of habitat. The incidental take of Covered Species, including harm through habitat impacts as defined by federal ESA regulations, within this biological habitat is considered significant. However, mitigation (conservation and management) measures have been outlined in Alternatives 2, 3, and 4 that would reduce impacts to biological and other resources to below a level of significance.

8.2 Irreversible Environmental Changes Which Would Result if the Project Is Implemented

CEQA Guidelines 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 use 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. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.” Similarly, section 40 CFR 1502.16 of the CEQA’s NEPA Regulations require that the discussion of environmental consequences include “...any irreversible or irretrievable commitment of resources which would be involved in the project should it be implemented.”

Nonrenewable resources generally include biological habitat, agricultural land, mineral deposits, water, and some energy sources.

Issuance of the Permits and implementation of the proposed Plan, or one of the alternatives, would authorize incidental take of approximately 373 acres of Covered Species’ habitat. These impacts would occur over the 55-year term of the permit and represent a very small increment of the development and land disturbance which will occur within the Plan Area described in Alternative 2. Mitigation measures have been outlined in the Plan (Alternatives 2, 3, and 4) that would reduce these biological resources impacts to below a level of significance or no adverse effects. However, the incidental take of Covered Species and associated habitat would still comprise a small, but irreversible, environmental change associated with implementation of any alternative.

Relatively minor impacts would also occur to previously disturbed habitats, non-native vegetation communities (e.g., Eucalyptus woodlands), agricultural lands, and potential mineral-bearing lands as a result of the proposed actions or alternatives. These environmental changes would be considered irreversible, but not significant.

In addition, implementation of Water Authority Covered Activities under the Plan or any of the alternatives would involve the irreversible consumption of natural resources and energy. This consumption would occur over the 55-year term of the permit and represents a very small increment of the effects of development and urbanization which will occur within the Plan Area as the result of activities not covered by Alternatives 2, 3, and 4.