



## 7.0 OTHER CEQA CONSIDERATIONS

### 7.1 GROWTH-INDUCING IMPACTS

*CEQA Guidelines* Section 15126(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.” The *CEQA Guidelines* also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. This section analyzes potential growth-inducing impacts, based on the criteria outlined below, as suggested in the *CEQA Guidelines*. In general terms, a project may foster spatial, economic, or population growth in a geographic area, if it meets any 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 or employment-generating land uses), 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 proposed project’s potential growth-inducing impacts are evaluated below against these criteria.

It is noted that the *CEQA Guidelines* require an EIR to “discuss the ways” a project could be growth-inducing and to “discuss the characteristics of some projects that may encourage...activities that could significantly affect the environment.” However, the *CEQA Guidelines* 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; refer to *CEQA Guidelines* Section 15145, Speculation.

### IMPACT ANALYSIS

The project proposes to amend a Specific Plan to allow for the development of a new mix of uses within the project site.

#### Removal of an Impediment to Growth

The new land uses anticipated by the proposed project would occur as infill development on a currently developed property. The proposed project does not involve development that would



establish a new essential public service or utility/service system. The proposed amended Specific Plan area is already served by essential public services (i.e., fire and police protection, parks and recreational facilities, schools, and solid waste disposal); an extensive network of utility/service systems (i.e., water, wastewater, electricity, and natural gas); and other infrastructure necessary to accommodate or allow the existing conditions and planned growth. The existing public services and utility/service systems can be readily upgraded and/or extended into the Specific Plan area. The increased demands for public services and utility/service systems would not significantly reduce or impair any existing or future levels of services, either locally or regionally, as concluded in Sections 5.10 through 5.17. Project implementation would not require substantial development of unplanned or unforeseen public services and utility/service systems. Therefore, project implementation would not remove an impediment to growth/foster spatial growth through establishment of an essential public service or expansion to a new area.

Although project implementation would facilitate the installation and construction of transportation improvements necessary to carry out the Specific Plan, as discussed in detail in Section 5.4, Traffic, these improvements would not provide new access to an area since access is already provided by an existing roadway network. Therefore, project implementation would not remove an impediment to growth/foster spatial growth through the provision of new access to an area.

### **Economic Expansion/Growth**

The proposed project would increase the existing housing inventory in Duarte by 1,400 units and add 100,000 square feet (sf) of office space and 12,500 sf of restaurant/retail space, resulting in a potential population growth of 4,625 (4,242 residents and 383 employees). As discussed in Section 5.3, the proposed project could increase the City's existing population by approximately 19.3 percent over existing conditions. The projected population growth is anticipated to increase sales and property taxes, with resultant increases in the City's revenue base. The projected growth in non-residential floor area and employment would foster economic expansion and increase the City's revenue base through increases the City's business license tax, utility user taxes, property taxes, and sales taxes. Therefore, the proposed project is considered growth inducing with respect to economic expansion.

### **Population, Housing, and Employment Growth**

Section 5.3, Population and Housing, identifies the existing population, housing, and employment for the County of Los Angeles (County) and City of Duarte (City), and provides an analysis of potential housing and population impacts that may result from project implementation.

A project could induce population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). The proposed project's employment growth could result in population growth within the City, as the potential exists that future employees (and their families) would choose to relocate to the City. As concluded in Section 5.3, project implementation could increase the City's population by 4,625 (4,242 residents and 383 employees), or approximately 19.3 percent over existing conditions.



Additional population associated with new residential development within the Specific Plan area has been considered in the *General Plan*. The proposed project is intended to meet the Regional Housing Needs Assessment (RHNA) allocation for Duarte and the goals of the *2014-2021 Housing Element* by providing up to 1,400 dwelling units, some of which would be affordable housing. In addition, as concluded in *Sections 5.10* through *Section 5.17*, existing public services and utility/service systems can be readily upgraded and/or extended into the Specific Plan area to serve the increased population. Project implementation would not require substantial development of unplanned or unforeseen public services and utility/service systems. Individual development projects would be reviewed on a project-by-project basis to determine if existing services and utilities are sufficient or if new and/or upgraded facilities are necessary to serve the development. The increased demands for public services and utility/service systems would not significantly reduce or impair any existing or future levels of services, either locally or regionally. Further, development within the Specific Plan area is anticipated to occur over multiple years based on market demand, which would allow for development of necessary services and infrastructure to serve the anticipated growth. Therefore, impacts would be less than significant.

In addition, and as indicated in *Table 5.3-8*, implementation of the proposed project would increase local employment by approximately 3.61 percent over existing conditions. This employment growth would result in population growth within the City, as the potential exists that future employees (and their families) would choose to relocate to the City. However, estimating the number of these future employees who would choose to relocate to Duarte would be highly speculative since many factors influence personal housing location decisions. Based on the City's vacancy rate of 3.0 percent, 220 dwelling units are available (vacant), as of May 2019. New employees in the Specific Plan area could utilize these vacant dwelling units. However, most new employees are assumed to occupy new residences generated by the project. Therefore, impacts would be less than significant.

Potential growth inducing impacts are also assessed based on a project's consistency with regional growth forecasts. SCAG is the responsible agency for developing and adopting regional growth forecasts for Los Angeles County governments, among others. SCAG provides forecasts through 2040 (SCAG 2016).

As also discussed in Section 5.3, Population and Housing, implementation of the proposed project, along with other City projects that have been approved, would exceed the growth assumptions contained in the 2016-2040 RTP/SCS. As such, the proposed Specific Plan would result in growth in the City that is inconsistent with the underlying assumptions used to develop strategies in the RTP/SCS.

The cumulative projects involve various residential and non-residential development that have the potential to result in population growth in Duarte and each of the respective jurisdictions where the cumulative sites are located. The *Duarte General Plan* assumed additional growth within the City, specifically associated with the Duarte Town Center Specific Plan, in addition to the proposed project. Although the development associated with the proposed project would be greater than anticipated by the *General Plan* and exceeds growth projections under the RTP/SCS, development of the Duarte Station Specific Plan Area would not require substantial development of unplanned or unforeseen public services and utility/service systems. As concluded in Section 5.10 through Section 5.17, existing public services and utility/service systems can be readily upgraded and/or extended into the Specific Plan area to serve the increased population. Development within the Specific Plan area is anticipated to occur over



several years based on market demand, which would allow for development of necessary services and infrastructure to serve the anticipated growth. The proposed project is intended to meet the RHNA allocation for Duarte by providing up to 1,400 dwelling units, some of which would be affordable housing. Finally, as stated above, most new employees in the Specific Plan are assumed to occupy new residences generated by the project. Therefore, cumulative impacts associated with new development under the proposed project would be considered less than significant.

Finally, at the regional level, the emphasis has been placed primarily on achieving a balance of employment and housing opportunities within the subregions. This regional concept, referred to as jobs/housing balance, encourages the designation and zoning of sufficient vacant land for residential uses with appropriate standards to ensure adequate housing is available to serve the needs derived from the local employment base. The jobs/housing ratio can be used as the general measure of balance between a community's employment opportunities and the housing needs of its residents. A rate of 1.0 or greater generally indicates that a city provides adequate employment opportunities, potentially allowing its residents to work within the city. A desirable jobs/housing balance improves regional mobility (traffic), reduces vehicle miles traveled, and improves air quality. Conversely, imbalance between a city's jobs and housing increases commutes, with resultant increases in traffic volumes and air emissions, and overall reduces the quality of life.

Duarte's current jobs/housing ratio (2019) is approximately 0.73, indicating employment opportunities for residents to work within the City are not readily available. With project implementation, the City's jobs/housing ratio would be approximately 0.8. Therefore, project implementation would improve the jobs/housing balance within the City, providing increased housing opportunities for residents. Thus, the forecast population and housing growth attributed to the proposed project is not considered significant in a regional context.

### **Precedent-Setting Action**

The proposed project would require a General Plan Amendment (text changes to the Land Use Element relative to the Duarte Station Specific Plan) and adoption of a revised Specific Plan to allow implementation of the proposed revised Specific Plan. However, given that the Specific Plan's proposed land use and development regulations would apply only within the Specific Plan area, the proposed project would not be considered growth inducing with respect to a precedent-setting action.

### **Development or Encroachment of Open Space**

The proposed project is considered an infill development, as the site is currently developed and is surrounded by urbanized uses. Therefore, the proposed project would not be growth-inducing with respect to development or encroachment into an isolated or adjacent area of open space.

Overall, project implementation would not be considered growth inducing as it would not remove an impediment to growth, foster substantial population or housing growth, establish a precedent-setting action, or develop or encroach on an isolated or adjacent area of open space. Although project implementation could cause SCAG's 2040 population and employment forecasts for the City to be exceeded, additional employment-generating uses would provide employment opportunities to residents, resulting in an improved jobs/housing balance within the



City. Therefore, the population and employment growth attributed to the proposed project is considered less than significant in a regional context.

## 7.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

According to *CEQA Guidelines* Sections 15126(c) and 15126.2(c), an EIR is required to address any significant irreversible environmental changes that would occur should the proposed Project be implemented. As stated in *CEQA Guidelines* Section 15126.2(c):

*“[u]ses 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 likely, 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.”*

The proposed project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during the proposed project's construction phase and would continue throughout its operational lifetime. Future development associated with implementation of the proposed project would require a commitment of resources that would include: 1) building materials, 2) fuel and operational materials/resources, and 3) the transportation of goods and people to and from the project site. Future construction associated with implementation of the proposed project would require the consumption of resources that are not replenishable or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: lumber and other forest products, aggregate materials used in concrete and asphalt, metals, and water. Fossil fuels such as gasoline and oil would also be consumed to power construction vehicles and equipment.

The resources that would be committed during full operation of the proposed amended Specific Plan would be similar to those currently consumed within the City of Duarte. These would include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the project, and the existing, finite supplies of these natural resources would be incrementally reduced. Full operation of the proposed Specific Plan would occur in accordance with *Title 24, Part 6 of the California Code of Regulations*, which sets forth conservation practices that would limit the amount of energy consumed by the project. However, the proposed project's energy requirements would, nonetheless, represent a long-term commitment of essentially non-renewable resources.

Limited use of potentially hazardous materials typical of commercial and office uses, including vehicle maintenance materials, could be used and stored on the project site. The use of these materials would be in small quantities and used, handled, stored, and disposed of in accordance with the manufacturer's instructions and applicable government regulations and standards. Compliance with these regulations and standards would serve to protect against significant and irreversible environmental change resulting from the accidental release of hazardous materials.



In addition, demolition activities would comply with regulatory requirements to ensure that asbestos and lead-based paints are not released into the environment. Compliance with such regulations would serve to protect against a significant and irreversible environmental change resulting from the accidental release of hazardous materials.

In summary, development associated with implementation of the proposed project, both construction and operation, 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 the life of the project. However, continued use of such resources would be on a relatively small scale in a regional context. As such, although irreversible environmental changes would result from project implementation, such changes would not be considered significant.