5 CEQA-Required Conclusions

This section summarizes significant, unavoidable, irreversible, growth-inducing, and cumulative impacts as required by California Environmental Quality Act (CEQA) Guidelines. Significant and unavoidable adverse impacts of the proposed General Plan are described in more detail in Chapter 3.

5.1 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACTS

According to CEQA Guidelines 15126(b), this EIR must discuss any significant environmental impacts that cannot be avoided under full implementation of the proposed General Plan. Also, this EIR must discuss why the Plan is being proposed, notwithstanding such impacts. The proposed policies of the General Plan summarized in Chapter 3 would avoid or eliminate most of the potentially significant impacts. However, significant impacts are expected in the areas of agricultural land conversion, special status species and their habitats, and air quality, and there are no feasible mitigation options available to reduce these impacts to levels that are less than significant. These impacts are discussed fully in Chapter 3 and summarized below.

AGRICULTURAL LAND CONVERSION

Approximately 2,522 acres of Farmland of Statewide Importance would be converted to urban uses as a result of full buildout of the proposed General Plan. Substantial amounts of Prime Farmland (193 acres) and Farmland of Local Importance (61 acres) would also be converted. All told, 2,023 of these converted acres are in Williamson Act contracts (agricultural preserves). Though the proposed General Plan provides policies to minimize the extent of growth/sprawl associated with future development, this agricultural land conversion is considered a significant and unavoidable impact.

SPECIAL STATUS SPECIES AND HABITATS

With buildout of the proposed General Plan, development of urban uses will impact known special status species in the Planning Area as it converts or encroaches on their habitats.. The additional noise, light, glare, stormwater runoff, and general human activity associated with population growth elsewhere in Lemoore has the potential to reduce the suitability and attractiveness off nearby wildlife environments for habitat uses. The substantial agricultural land conversion to urban uses and resulting impact on species and habitats constitutes a significant and unavoidable impact.

AIR QUALITY

Over the long term, the full implementation of the proposed General Plan would result in an increase in criteria pollutant emissions primarily due to related motor vehicle trips. Stationary sources and diesel-fueled mobile sources would also generate emissions of toxic air contaminants including diesel particulate matter that could pose a health risk. Overall, implementation of the proposed General Plan would result in a cumulatively considerable net increase of criteria pollutants which would exceed the annual SJVAPCD thresholds for NO_X and ROG. The Plan commits the City to support federal and State efforts to reduce emissions through its policies for reduced automobile use, energy conservation in new buildings and energy management in public

buildings, public infrastructures (e.g. street lighting) and publicly-owned vehicles. These policies intend that the proposed General Plan would not interfere with the SJVAPCD's efforts to achieve and maintain air quality standards through regional incentives and regulatory programs it has established or is planning to put in place. However, since the full scope and effectiveness of General Plan policy measures is not fully known, and the air quality problems in the Valley are regional in nature, this impact is considered significant and unavoidable.

The proposed General Plan is being offered despite these significant unavoidable impacts because the City is in need of an updated land use plan that can thoughtfully and creatively accommodate projected population growth, as well as provide for jobs and economic development over the next 23 years. The current General Plan is no longer practical for Lemoore because stronger growth management is necessary. Plus, the current Plan neither provides for a balance of jobs and housing nor offers adequate, concrete policies to control the character of new neighborhoods, promote walkability, and minimize the impacts of growth. The proposed General Plan seeks to achieve these goals through growth management tools and policies that give priority to density, connectivity, jobs-housing balance, and preserving prime agricultural land and ecological areas. The significant impacts related to the proposed General Plan would not be considerably different under any other likely growth scenario for Lemoore that accommodates already planned and approved residential and non-residential development proposed for the city.

Impacts associated with increased greenhouse gas (GHG) emissions from vehicles and electricity, analyzed in detail in Section 3.13, are also discussed as cumulative impacts under Section 5.4. They are not included in the "Significant and Unavoidable" air quality emissions discussion above because there are currently no State criteria for determining the significance of impacts related to global climate change.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

This EIR must also examine significant irreversible changes to the environment caused by full implementation of the proposed General Plan. More specifically, CEQA Guidelines require the EIR to consider whether "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" (CEQA Guidelines section 15126.2(c)). "Non-renewable resources" in this instance refers to the physical features of the natural environment in Lemoore, such as land, air, waterways, etc. These irreversible changes may not be covered directly or explicitly by an impact statement in the EIR, but rather are conclusions made from the sum of impacts discussed in the EIR as a whole.

OPEN SPACE

Development under the proposed General Plan would result in the permanent conversion of 2,800 acres of agricultural open space to urban uses. This conversion has a wide array of impacts, ranging from habitat modifications to visual disruptions to new noise sources and hydrology constraints. Overall, this represents a significant and irreversible environmental change.

ENERGY USE

New development under the proposed General Plan would result in the commitment of existing and planned sources of energy which would be necessary for the construction and daily use of new buildings and for transportation associated with new population. Residential and non-residential development uses electricity, natural gas, and petroleum products for power, lighting, heating, cooling, and other indoor and outdoor services, while cars and trucks use both oil and gasoline. Use of these types of energy for new development—even in the decreased quantities per capita associated with full implementation of proposed Plan policies and compliance with stricter State regulations—would result in overall increased use of nonrenewable energy resources. This represents a potentially significant and irreversible environmental change.

CONSTRUCTION-RELATED IMPACTS

Significant and irreversible environmental changes could also occur during the course of constructing development projects made possible by the proposed General Plan. Beyond the energy and fuel impacts of construction described separately above, new construction would also result in water consumption and the consumption of building materials, many of which are still made from non-renewable resources. Water and building material use represent potentially significant and irreversible environmental changes.

5.3 GROWTH INDUCING IMPACTS

This EIR must examine the growth-inducing impacts of the proposed General Plan. More specifically, CEQA Guidelines require that the 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" (CEQA Guidelines section 15126.2(d)). This analysis must also consider the removal of obstacles to population growth, such as improvements to the regional transportation system.

PROJECTING GROWTH

Growth-inducing impacts over an extended time period are difficult to assess with precision, since future economic and population trends may be influenced by unforeseeable events, such as natural disasters and business and development cycles. Moreover, long term changes in economic and population growth are often regional in scope; they are not influenced solely by changes or politics within Lemoore. Business trends are influenced by economic conditions throughout the State and the country, as well as around the world. Despite these limitations on the analysis, it is still possible to assess some general potential growth-inducing impacts of the proposed General Plan.

Based on the current development projects and average buildout densities for new residential land uses, the Plan accommodates approximately 8,440 new housing units – 6,970 from proposed Plan buildout and 1,470 from current development projects. This would result in a doubling of Lemoore's existing population from 23,390 to 48,250, an annual growth rate of 3.1 percent. This population estimate is consistent with the historical average annual growth rate of 3.2 percent from 1980 to 2005. Population increase in Lemoore will be driven primarily by regional economic growth and migration. The Business, Technology, and Industrial Reserve Area was made a part of this planning process so that the City could incorporate it systematically into patterns of growth

and development. While it offers additional employment area in excess of immediate needs, the proposed General Plan time horizon is distant enough to warrant consideration of the future use of this land. Policies within the proposed Plan prevent the premature development of this reserve area and encourage infill within the rest of the UGB first. Overall, the proposed General Plan is likely to accommodate growth rather than stimulate new growth.

JOBS/HOUSING BALANCE

Lemoore has fewer jobs in the City than there are employed residents, a ratio of 0.55 jobs per employed resident, meaning that many people currently commute to jobs outside the City. The proposed General Plan accommodates an additional 16,520 jobs at full buildout, in an attempt to support a better jobs-housing balance. Achieving this number of new jobs would require an average annual growth rate of 6.4 percent per year for 23 years. Under those conditions, the jobs/employed residents ratio is expected to reach 1.03 by 2030, meaning that for each employed resident there is just over one job available in the City, a much better ratio to achieve public transit ridership, walking and bicycle commuting goals that are inherent in the proposed General Plan Community Design and Circulation elements. The extensive provision of employment-related land uses may induce growth by encouraging people to move to Lemoore for these jobs, while providing opportunities for existing residents to work closer to home.

5.4 CUMULATIVE IMPACTS

CEQA requires that this EIR examine cumulative impacts. As discussed in CEQA Guidelines section 15130(a)(1), a cumulative impact "consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." The analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall "reflect the severity of the impacts and their likelihood of occurrence" (CEQA Guidelines section 15130(b)).

In order to assess cumulative impacts, the EIR must analyze either a list of past, present, and probable future projects or a summary of projections contained in an adopted general plan or related planning document. The Bibliography contains a comprehensive list of documents utilized for the purposes of analysis for this EIR, including documents relating existing conditions and future projections pertinent to each EIR issue area.

It is important to note that the proposed General Plan is essentially a set of projects, representing the cumulative development scenario for the reasonably foreseeable future in the Planning Area, which includes the City of Lemoore and surrounding areas that would be affected by the proposed General Plan. Therefore, the analysis presented in Chapter 3 also represents to some extent a cumulative analysis of the Planning Area over the General Plan time horizon to 2030.

For future discretionary projects requiring mitigation measures that go beyond what is required by existing regulations and the proposed General Plan, site-specific measures will be identified to reduce significant project–level impacts to less than significant. The project's incremental impacts may remain significant and unavoidable where no feasible mitigation measures exist. Regardless, the degree of future impacts and the applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project, and for each impact area, at this program level of analysis. Therefore, this EIR concludes that where proposed policies

provide adequate mitigation for future conditions that are attributable to the proposed General Plan as a program-level document, the cumulative impacts may be considered reduced to less than significant. Likewise, if policies are not sufficient to reduce the impact, the impact remains significant and unavoidable. The significance related to future project-specific impacts must be evaluated in future project-specific EIRs.

WATER RESOURCES AND QUALITY

An increase in development resulting from implementation of the proposed General Plan along with similar countywide growth would create additional demand for safe drinking water as the City's population increases. Regional development would also increase the amount of impervious surfaces potentially resulting in greater flood hazards, erosion and potential impacts to water quality. As discussed in Sections 3.3 and 3.6, existing regulations and proposed General Plan policies would reduce the cumulative risks to hydrology and water quality associated with increasing development within the City to a less-than-significant level.

BIOLOGICAL RESOURCES

Development associated with implementation of the proposed General Plan would contribute to the on-going loss of natural and agricultural lands in Kings County, which currently provide habitat for a variety of federal and State listed special status species, as well as other wildlife and plant resources. Development under the proposed General Plan would result in the conversion of existing habitats to urban uses. As more fully described in Section 3.5, policies in the proposed General Plan as well as regional, State and federal regulations are available to mitigate impacts to biological resources at a project-specific level. Development outside of the Planning Area would also be subject to the same regional, State and federal regulations addressing sensitive species. However, since Kings County is projected to continue to urbanize at a steady rate, the loss of open space areas and habitats as a result of the proposed General Plan would contribute considerably to a significant and unavoidable cumulative impact to biological resources.

AIR QUALITY

Cumulative air quality impacts were considered in terms of the land uses provided under the proposed Lemoore General Plan and the traffic projections generated by a cumulative traffic model (see Section 3.2). The traffic model considered growth under the proposed General Plan in conjunction with projected regional growth for Kings County. As more fully described in Section 3.7, due to the existing and projected air quality issues in the San Joaquin Valley Air Basin, the proposed General Plan would contribute considerably to a significant and unavoidable cumulative air quality impact.

WILDFIRES AND HAZARDOUS MATERIALS

The increase in local population and employment under the proposed General Plan would result in the overall increase in hazardous household, commercial and industrial materials. In addition, there would be an increase in population that could be exposed to potential wildland fires. However, City, State, and federal regulations, such as those that control the production, use, and transportation of hazardous materials and waste, will limit the possibility of residents being exposed to large quantities of hazardous materials (in quantities enough to cause bodily harm). Local land use regulations, such as those requiring heavy industrial areas and truck routes to be

located away from residential neighborhoods also serve to reduce contact with hazardous materials. Similarly, land use planning is used to separate incompatible land uses to reduce risks from wildfires, and policies in the General Plan require preparedness training for the Fire Department in fighting potential wildfires. The project's incremental contribution to these impacts will be less than cumulatively considerable.

CULTURAL RESOURCES

As stated in Section 3.11, the City will continue to ensure that a variety of preservation efforts are implemented for all future development projects to minimize impacts to archaeological resources (as defined in Section 15064.5), paleontological resources, or human remains. Under CEQA, however, any "substantial adverse change in the significance of an historical resource" (e.g., the destruction of such a resource) is considered a significant environmental effect as a matter of law. Because the accommodation of future growth also constitutes a likelihood that future development will encounter challenges associated with known and unknown historic resources, the City cannot be sure that cumulative impacts on all such historical resources can be mitigated to less than significant levels. Consequently, the proposed General Plan has the potential to contribute to cumulative impacts to these historic resources. However, similar considerations do not apply to unique archaeological resources or paleontological resources, which can be fully mitigated through data recovery where avoidance or preservation is infeasible or unnecessary (See Section 3.11 for a more detailed discussion). Therefore, implementation of the proposed General Plan would reduce the potential cumulative impact to a less-than-significant level with respect to human remains and archaeological resources that do not qualify as historical resources.

GLOBAL CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS

The impacts of global climate change relate to every facet of human development and environmental management. These impacts are most accurately described as cumulative since almost all decisions related to development and population growth will also contribute incrementally to the increase or decrease of greenhouse gases (GHGs) in the atmosphere. An acceleration of global warming has the potential to cause a number of ecological changes that affect Lemoore. These may include, but are not limited to: decreased air quality; more severe heat; increased wildfires; shifting vegetation; declining forest productivity; decreased spring snowpack in the mountains; water shortages; a potential reduction in hydropower; a loss of winter recreational opportunities; agricultural damage from heat, pests, pathogens, and weeds; and disruptions in estuarine habitats that protect fresh water supply. While this EIR attempts to quantify the proposed General Plan's contribution to GHG emissions, the overall significance of Lemoore's future contribution to global climate change remains unknown without specific criteria by which significance may be measured. To-date, the State has provided no such criteria. Despite a lack of specific criteria, the proposed General Plan includes a broad array of GHG emissions reduction measures, detailed and fully cross-referenced in Section 3.13 of this EIR. These policies are feasible and will support and reinforce initiatives being taken by the State and other public agencies in order to address global warming. The City is committed to a Greenhouse Gas Emissions Reduction Plan and to a policy approach to sustainable development that is integrated into every element of the proposed General Plan.

5.5 IMPACTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires that an EIR provide a brief statement indicating why various possible significant impacts were determined to be not significant and were not discussed in detail. Chapter 3 of this EIR discusses all potential impacts, regardless of their magnitude. A similar level of analysis is provided for impacts found to be less than significant as impacts found to be significant. The significance of an impact is assessed in relation to the criteria provided in each section in Chapter 3. A summary of all impacts is provided in the Executive Summary of this EIR.

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