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6.0 LONG-TERM IMPLICATIONS OF THE PROJECT

6.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2 (c) of the Guidelines for the California Environmental Quality Act (CEQA) require that an Environmental Impact Report (EIR) consider and discuss significant irreversible changes that would be caused by implementation of the proposed project. The CEQA Guidelines specify that the use of nonrenewable resources during the initial and continued phases of the project should be discussed because a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary and secondary impacts (such as a highway improvement that provides access to a previously inaccessible area) should also be discussed because such changes generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with the project and should be discussed.

The proposed Shipyard Sediment Remediation Project (proposed project) is the dredging of sediment adjacent to shipyards in the San Diego Bay; the dewatering, solidification of the dredged material (onshore or on a barge); the potential treatment of decanted water (anticipated disposal to the sanitary sewer system); and the transport of the removed material to an appropriate landfill for disposal. The study area for the sediment removal project is located along the eastern shore of central San Diego Bay, extending approximately from the Sampson Street Extension on the northwest to Chollas Creek on the southeast, and from the shoreline out to the San Diego Bay main shipping channel to the west.

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) stipulated that several agencies and/or parties caused or permitted the discharge of waste to the Shipyard Sediment Site that has resulted in the accumulation of waste in the marine sediment. The contaminated marine sediment has caused conditions of contamination or nuisance in San Diego Bay that adversely affect aquatic life, aquatic-dependent wildlife, human health, and San Diego Bay beneficial uses.

The purpose of the project is to implement a Tentative Cleanup and Abatement Order (CAO) issued by the San Diego Water Board. The Tentative CAO established alternative cleanup levels for the project that are the lowest technologically and economically achievable levels as required under California Code of Regulations (CCR) Title 23 section 2550.4(e).

The proposed project would not change the existing or allowed uses in San Diego Bay, but at a minimum, cleanup levels must fully support beneficial uses. The proposed project would not irreversibly commit or change allowed uses in the San Diego Bay as the bay has already

been committed to various uses in the existing condition including its function as a shipping channel and various beneficial uses.¹

Similarly, implementation of the proposed project would not irreversibly commit the use of the staging sites as these sites have already been committed to urban use, including maritime industrial and parking lot use, in the existing setting. Although the exact area required for sediment management will be determined during the final design phase, it is estimated that 2 to 2.5 acres would be required. The staging area will require site preparation. The site will be graded and compacted (if necessary), and a sealing liner will be put in place if needed to prevent infiltration. An asphalt pad will then be constructed. The drying area will be surrounded by K-rails and sealed with foam and impervious fabric to form a confined area. Once the proposed project is completed, it is anticipated that the staging area would be returned to use as a parking area.

Once the dredge materials have been dried and tested, they will be loaded onto trucks for disposal at an approved landfill. For purposes of this project, it is assumed that 85 percent of the material will be transported from the staging area to Otay Landfill, which is approximately 15 miles southeast of the Shipyard Sediment Site. Although the sediment is not known to be classified as California hazardous material, it will be tested upon removal and prior to disposal. It is assumed for the purposes of this Program EIR (PEIR) that up to 15 percent of the material will require transport to a hazardous waste facility (a Class I facility), which will most likely be the Kettleman Hills Landfill in Kings County, California, near Bakersfield. Therefore the proposed project would result in the utilization of limited landfill capacity for waste disposal. It is important to note that the Kettleman Hills Landfill and the Otay Landfill are permitted landfills that are intended to serve the waste disposal needs of the County of San Diego.

Implementation of the project would result in a commitment of limited, slowly renewable, and nonrenewable resources. Such resources may include certain types aggregate materials used in concrete and asphalt such as sand and stone; water; petrochemical construction materials such as plastic; and petroleum-based construction materials. In addition, fossil fuels used by construction equipment would also be consumed. More specifically fuel would be required to operate barges and dredging equipment as well as trucks utilized to haul dredged material to landfills. Project construction will also result in an increased commitment of public maintenance services such as the treatment of decanted water via the sanitary sewer system during project implementation.

¹ The long-term beneficial uses of San Diego Bay include: Industrial Service Supply (IND); Navigation (NAV); Contact Water Recreation (REC-1); Non-contact Water Recreation (REC-2); Commercial and Sport Fishing (COMM); Preservation of Biological Habitats of Special Significance (BIOL); Estuarine Habitat (EST); Wildlife Habitat (WILD); Rare, Threatened, or Endangered Species (RARE); Marine Habitat (MAR); Migration of Aquatic Organisms (MIGR); Spawning, Reproduction, and/or Early Development (SPWN); and Shellfish Harvesting (SHELL).

The commitment of limited, slowly renewable, and nonrenewable resources required for implementation of the proposed project would limit the availability of these resources for future generations. However, the use of such resources would be temporary, the project would not substantially limit the availability of these resource during project implementation, and the proposed project would not commit future generations to the long-term use of these resources (i.e., it would cease upon project implementation).

6.2 GROWTH-INDUCING IMPACTS

Sections 15126(d) and 15126.2(d) of the State CEQA Guidelines require that an EIR analyze growth-inducing impacts and state that an EIR should discuss the ways in which the project could foster economic or population growth or construction of additional housing, either directly or indirectly, in the surrounding environment. It should be noted that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment (CEQA Guidelines section 15126.2(d)).

Employment demand generated by new commercial and industrial development and new population generated by new residential development represent direct forms of growth. A project may indirectly induce growth by removing barriers to growth, or by creating a condition that attracts additional population or new economic activity.

The extent to which the new jobs created by a project are filled by existing residents is a factor that reduces the growth-inducing effects of the project. Jobs created by the proposed project would be limited to short-term design, engineering, and construction-related jobs and jobs associated with the operation of barges, dredging equipment, treatment of sediment removed from the bay, and transportation of the sediment to area landfills. These jobs would be temporary, lasting until the proposed project is completed.

The County of San Diego has a civilian labor force of approximately 1,551,000 with approximately 151,500 people unemployed.¹ The unemployment rate in San Diego County (County) was 9.8 percent in April 2011. This compares with an unadjusted unemployment rate of 11.7 percent in California and 8.7 percent for the nation during the same period. This suggests an available local and regional labor pool to serve the short-term employment opportunities offered by the proposed project. Because of the general availability of local and regional labor resources and the current unemployment rates in the County, there would be an opportunity to hire local employees to fill the proposed project's employment needs. It is unlikely that a substantial number of employees would need to be relocated from outside the region. Therefore, implementation of the proposed project would not induce substantial

¹ Employment Development Department. 2011. San Diego-Carlsbad-San Marcos Metropolitan Division (San Diego County). May 20, 2011. [http://www.calmis.ca.gov/file/lfmonth/sand\\$pds.pdf](http://www.calmis.ca.gov/file/lfmonth/sand$pds.pdf). Accessed May 2011.

population growth and is unlikely to result in a permanent increase in population within the San Diego region. Given the fact that the project would result in a relatively small number of additional employment opportunities and that it is likely that those positions would be filled by current, local residents, the project would also not result in the need for the construction of additional housing units. Overall, the project is not anticipated to induce migration to the area and, consequently, would have little effect on local population size. As such, the potential for population growth or construction of additional housing as a result of project implementation is negligible.

In addition, the proposed project is not anticipated to contribute substantially to economic growth in the region. As previously stated, the proposed project would not change or augment allowed uses in the San Diego Bay as the bay has already been committed to various uses in the existing condition including its function as a shipping channel. While persons employed during project implementation may seek shopping, entertainment, auto maintenance, and other economic opportunities in the surrounding area, the overall impact of such demand would be minimal in comparison to the overall economy of San Diego County. Further, such demand would cease upon project completion. Therefore, the proposed project is not anticipated to substantially contribute to long-term economic growth in the region.

Finally, the proposed project is not anticipated to remove any existing obstacles to growth. San Diego Bay is located along the shoreline of an urbanized area and proposed staging areas are surrounded by a variety of urban uses. Implementation of the proposed project would not require infrastructure improvements except for those necessary to connect to existing utilities (e.g., drains connecting to sanitary sewers). Therefore, the proposed project is not considered to be growth inducing with respect to utilities and service systems. Similarly, the proposed project would not require improvements to local roadways or intersections. Trucks hauling sediment to waste disposal facilities will utilize existing roadways and designated haul routes. Therefore, the proposed project is not considered to be growth inducing with respect to roadways. The proposed project would not induce growth in the County of San Diego or removal obstacles to growth in the region.

6.3 SIGNIFICANT EFFECTS THAT CANNOT BE AVOIDED

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. The Executive Summary of this document contains a detailed summary table that identifies the project's environmental impacts, proposed mitigation measures, and the level of significance of those impacts after mitigation. The following is a summary of the impacts that are considered significant adverse and unavoidable after all mitigation is applied. These impacts are also described in detail in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures.

6.3.1 Air Quality

The proposed Shipyard Sediment Remediation Project would result in significant unavoidable construction-related adverse air quality impacts of oxides of nitrogen (NO_x) (which is a precursor to ozone [O₃]) emissions, even after the implementation of feasible standard conditions and mitigation measures. While the adherence to San Diego Air Pollution Control District (APCD) rules and regulations and identified mitigation measures would reduce this impact, it would remain significant and adverse because the City daily threshold for NO_x would be exceeded. There are no other feasible mitigation measures that are available to offset this significant impact.

Construction activities for the Shipyard Sediment Remediation Project would also contribute to construction-related adverse cumulative air quality impacts because the San Diego Air Basin (SDAB) is presently in nonattainment for O₃, and the proposed project, in conjunction with other planned projects, would contribute to the existing nonattainment status for O₃. Therefore, the cumulative construction air quality impacts of the proposed project would remain significant.

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