22.0
REQUIRED CEQA ANALYSES

22.1 CUMULATIVE IMPACTS

The CEQA Guidelines require that an EIR contain an analysis of cumulative impacts to which the project might contribute. An EIR must discuss the "cumulative impact" of a project when its incremental effect would be cumulatively considerable. CEQA Guidelines §15355 defines cumulative impacts as:

> "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."

CEQA Guidelines §15130(a)(1) states that 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."

CEQA Guidelines §15130(b) states that the discussion of cumulative impacts:

> "shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone."

By requiring an evaluation of cumulative impacts, CEQA attempts to minimize the possibility that an EIR will overlook large-scale environmental impacts by only focusing on the effects of a single project. Further, CEQA Guidelines §15130(b)(3) state:

> "Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used."

CEQA Guidelines §15130(b)(5) requires that the cumulative impacts analysis:

> "examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects,"

CEQA Guidelines §15130(b)(1)) requires that one of two methods of establishing a future baseline be used:

> "A. A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
>
> B. A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency."

The CEQA Guidelines §15130(b)(1)(B)(2) definition of probable future projects includes:

> "projects included in an adopted capital improvements program, General Plan, Regional Transportation Plan, or other similar plan or included in a summary of projections of projects (or development areas designated) in General Plans or similar plans, and those projects anticipated as a later phase of a previously approved project (e.g., a subdivision)."

Considering the proposed 2035 San Benito General Plan (2035 General Plan) is a countywide planning document, this cumulative analysis combines impacts from implementation of the project in addition to development in adjacent counties and cities using a projections-based approach.

CEQA Guidelines §15065(c) states that a mandatory finding of significance is required if the project would make a cumulatively considerable contribution to a cumulative impact. The importance of a project's contribution must be viewed in the context of the cumulative effect. Case law has held that even a small contribution may be cumulatively considerable if the cumulative effect is particularly acute.

In summary, to be consistent with the requirements of CEQA, an assessment of cumulative effects must contain the following elements:

- The geographic scope of the expected cumulative effects;
- A list of past, present, and probable future projects, or an adopted projection of projects, that contribute to cumulative effects;
- A summary of expected cumulative effects; and
- A reasonable analysis of the cumulative effects of the cited projects.

Following is a discussion of these required elements.

22.1.1 Definition of Geographic Scope of Cumulative Impacts Analysis

In general, the geographic scope for this cumulative impacts analysis includes San Benito County, the incorporated cities within San Benito County, and the adjacent counties. Cities in adjacent counties were not included since none are immediately adjacent to San Benito County. Listed below are the cities and counties used in this analysis, along with the year of their adopted general plan. Some cumulative issue areas have a larger geographic scope, including air quality and watershed-level hydrologic effects. For each cumulative environmental issue area discussed, the issue-specific cumulative geography is identified.

City General Plans – Within San Benito County

- **City of Hollister General Plan (2005).** The City's General Plan, adopted in December 2005, identifies growth as a major factor in the loss of agricultural land. As a result, the General Plan reduced the size of the city's planning area.
- **City of San Juan Bautista General Plan (1998).** The City of San Juan Bautista adopted its General Plan in September 1998. San Juan Bautista's planning area includes the city, the 2,000 acre sphere of influence, and an additional 1,000 acres of farmland in the unincorporated county, for a total of 3,000 acres. The planning area boundary extends to San Justo Road on the north, Lucy Brown Road on the east, the mouth of San Juan Canyon on the south, and Nyland Ranch on the west.

Counties Outside Of San Benito County

- **Santa Clara County General Plan (1994).** Santa Clara County borders San Benito County on the north. The border between the two counties roughly follows the Pajaro River then becomes a straight line south of the Pacheco Pass through the Diablo Mountain Range.

Santa Clara County's 1994 General Plan covers the planning period from 1995 to 2010. The General Plan emphasizes compact development within existing urban areas as the preferred method to accommodate future growth in the county. Santa Clara County is a fast-growing county due to its location near the San Francisco Bay Area.

- **Santa Cruz County General Plan (1994).** Santa Cruz County is located to the north and west of San Benito County. The border roughly follows the Pajaro River and State Route 129. The A.R. Wilson Rock Quarry in San Benito County, adjacent to the Pajaro River, is the major employer and industrial use in this area. The General Plan created an urban/rural boundary that limits urban development to four incorporated cities: Scotts Valley, Santa Cruz, Capitola, and Watsonville; and the unincorporated areas of Live Oak, Soquel, Aptos, and Freedom.

- **Monterey County General Plan (2010).** Monterey County is located west of San Benito County. The two counties share a border through the Coast and Gabilan Mountain ranges. The community of Aromas straddles the San Benito and Monterey County border. It sits less than a mile away from Santa Cruz County and about two miles from Santa Clara County. Monterey County adopted its updated General Plan in October 2010. The General Plan is intended to guide land use within the county through the year 2030.

- **Merced County General Plan (2013).** Merced County is located to the northeast of San Benito County. The border between the two counties runs southeast through the Diablo Mountain Range. Given the remoteness and rugged terrain of this area, there are no major communities near the Merced and San Benito County border. The General Plan is intended to guide land use within the county through the year 2030.

- **Fresno County General Plan (2000).** Fresno County is located to the southeast of San Benito County. The two counties share a border along the Diablo Mountain Range. Fresno County continues to be one of the leading agricultural producing counties in the nation. It recently experienced a large increase in population and development, especially in its 15 incorporated cities. The General Plan was last updated in October 2000. The 2020 Fresno County General Plan was designed to accommodate an additional 1,113,790 residents by the year 2020.

Future land use and growth projections are based on information provided in the general plans for the counties and cities in the region. While buildout years for the counties and cities included vary, the growth identified in the planning documents represents maximum planned growth that can be accommodated in the region. Table 22-1 outlines the geographic scope of the 2035 General Plan cumulative impacts analysis.

Table 22-1 Analysis Area for Cumulative Effects

Jurisdiction	General Plan Timeframe	General Plan Buildout Population	General Plan EIR-Identified Significant Environmental Effects
City of Hollister	2005-2023	55,192	Population and employment growth inducement; intersection levels of service; roadway capacity; exposure to seismic hazards; farmland conversion.
City of San Juan Bautista	1998-2015	3,000	Farmland conversion, net increase in criteria air pollutant emissions; degradation of visual resources; exposure to seismic hazards
Santa Clara County	1995-2010	1,800,000	Farmland conversion; cumulative traffic congestion; substantial damage and loss of life from earthquakes; cumulative school capacity; impacts to parks; cumulative loss or disruption of cultural resources.
Santa Cruz County	1994-2004[2]	--	--
Monterey County	2010-2030	602,731	Farmland conversion; cumulative loss of farmland; lack of water supply; demand for water infrastructure; demand on groundwater resources; saltwater intrusion from groundwater demand; urban development within flood hazard areas; impedance or redirection of flood flows; dam or levee failure; cumulative groundwater quality; cumulative water supply project effects; traffic congestion on county and regional roadways; inadequate emergency access; cumulative traffic congestion; cumulative inadequate emergency access; net increase in criteria air pollutant emissions; cumulative air quality; loss or disruption of special status species and sensitive habitats; cumulative biological resources; demand for solid waste facilities; cumulative wildfire hazards; adverse aesthetic effects; growth inducement; cumulative effects to climate change.

Jurisdiction	General Plan Timeframe	General Plan Buildout Population	General Plan EIR-Identified Significant Environmental Effects
Merced County	2013-2030	238,209	Farmland conversion; increase in criteria air pollutant emissions; adverse effects on special status species and sensitive habitats; adverse effect on wetlands, riparian habitat, and other sensitive natural communities; increase in greenhouse gas emissions; deplete groundwater supplies and interfere with groundwater recharge; increase in noise levels; traffic congestion on local roads and state highways; interfere with the water supply of existing users; cumulative effects to agricultural resources; cumulative effects to air quality; cumulative biological resources; cumulative effects to climate change; cumulative effects to hydrology and water quality; cumulative effects to noise; cumulative effects to transportation; cumulative effects to utilities and service systems; irreversible environmental changes.
Fresno County	2000-2020	1,113,790	Farmland conversion; reduction in agricultural production; cancellation of Williamson Act Contracts; traffic; transit; bicycle facilities; wastewater treatment facilities; storm drainage facilities; flooding; police protection; fire protection; emergency response services; park and recreation facilities; library services; public services; unidentified cultural resources; water supply; groundwater; water quality; biological resources; mineral resources; air quality; hazardous materials; noise; and visual quality.

Sources: General Plan EIRs for all cities and counties listed; various dates as set forth in table.

Notes: [1]Located within San Benito County.
[2]Santa Cruz County General Plan EIR was unavailable at RDEIR publication.

22.1.2 Analysis of Cumulative Effects

The following presents an assessment of the cumulative effects of implementing the proposed 2035 General Plan.

Aesthetics/Visual Resources

The geography for cumulative effects to visual resources is San Benito County. Potential individual aesthetic impacts from implementation of the 2035 General Plan are described in Chapter 5 of this RDEIR. No significant adverse effects were identified following implementation of 2035 General Plan goals and policies as amended by mitigation set forth in this RDEIR. Future growth in unincorporated San Benito County and development in cities within the County would result in the intensification of existing urban and other uses, as well as the conversion of open space to urban land uses. Collectively, these activities could degrade the existing visual character and quality of scenic resources.

Cumulative development within existing cities in the County, new urban communities (as identified as Study Areas), and elsewhere within the County would be subject to design review, and would require new development to appear similar or complementary to existing rural or low intensity land uses, thereby lessening visual impacts to a certain extent.

Particularly in agricultural areas with scattered development, there will be an incremental change in the visual character of the area. In addition, light pollution has the potential to become an issue of increasing concern in the county as new development contributes additional outdoor lighting installed for safety and other reasons. Future development in all jurisdictions will be subject to the California Building Code standards that would help reduce potential impacts associated with light and glare, and development within the unincorporated County would be subject to its Dark Skies ordinance; and the 2035 General Plan which contains numerous policies that would serve as self-mitigation. Furthermore, it is anticipated that development throughout the County, as well as the project at hand, would be required to mitigate for any identified impacts related to nighttime light pollution related to new sources of lighting and spillover light and glare, especially with respect to sensitive uses related to astronomical observatories, glow effects could occur in previously dark areas.

Although for the above reasons, impacts associated with aesthetic and visual resources would be reduced and partially offset, the project's contribution from implementation of the 2035 General Plan to the significant cumulative loss of aesthetic quality is expected to be cumulatively considerable. No measures in addition to proposed 2035 General Plan policies and mitigation identified in this RDEIR are available and within the jurisdiction of San Benito County to reduce the magnitude of this impact to a less than significance level.

Agricultural Resources

The environmental impact analysis presented in Chapter 6 of this RDEIR identified the following significant and unavoidable impacts for agricultural resources:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agriculture use.
- Conflict with existing zoning for agricultural use, or the provisions of Williamson Act contracts.
- Involve other land use changes that would result in conversion of farmland to non-agricultural uses.

Development under the 2035 General Plan in San Benito County, in cities within the county, and in surrounding counties would contribute to cumulative agricultural impacts. While the 2035 General Plan includes goals and policies designed to protect, to the extent feasible, the majority of farmlands of concern, specifically under the agricultural land use designations and via the Land Use Element goals and policies, the 2035 General Plan would allow for the conversion of farmlands to non-agricultural use to accommodate future residential growth, new employment, commercial development, roadway improvements, energy development, and other developed uses.

Although the 2035 General Plan goals and policies described in Chapter 6 would reduce and partially offset San Benito County's contribution to these impacts, the contribution from implementation of the 2035 General Plan to the significant cumulative loss of agricultural resources is expected to be cumulatively considerable. No measures in addition to proposed 2035 General Plan policies and mitigation identified in this RDEIR are available and within the jurisdiction of San Benito County to reduce the magnitude of this impact. Because the decisions of adjacent municipalities and counties regarding conversion of agricultural land are outside the control of San Benito County, this cumulative impact would be considered significant and unavoidable.

Air Quality

The geography for cumulative effects to air quality is the North Central Coast Air Basin, which includes Monterey, Santa Cruz, and San Benito Counties. Potential impacts to air quality from implementation of the 2035 General Plan are described in Chapter 7 of this RDEIR. No significant adverse effects under the thresholds established by the MBUAPCD were identified following implementation of 2035 General Plan goals and policies. However, the 2035 General

Plan growth forecasts would not be consistent with the assumptions used in drafting regional air quality plans, and implementation of the 2035 General Plan could not induce emissions above MBUAPCD thresholds. Buildout of the 2035 General Plan would generate operational emissions from on-road vehicles, agricultural sources, and area sources. However, the 2035 General Plan buildout would not violate any air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase of a criteria pollutant for which the region is non-attainment. As noted in the Air Quality chapter, the 2035 General Plan's contribution to regionally significant cumulative impacts related to air quality could be cumulatively significant.

Biological Resources

The geography for cumulative effects to biological resources is the Central California region. Potential effects to biological resources from implementation of the 2035 General Plan are described in Chapter 8 of this RDEIR. While the 2035 General Plan goals and policies as amended by mitigation set forth in this RDEIR would reduce impacts to biological resources, the environmental impact analysis presented in Chapter 8 of this RDEIR identified the following significant and unavoidable impacts to biological resources:

- Substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- Loss or destruction of riparian or other sensitive natural habitats and the wildlife and plants that depend on those habitats.
- Conflicts with local policies or ordinances protecting biological resources, such as tree preservation policies or ordinances.

Expected cumulative impacts due to the development under the 2035 General Plan and in the cumulative impact area are expected to be similar in type to those discussed in Chapter 8 of the RDEIR. Because of the potentially greater land area that may be converted and unavailable to native species and their habitats (as well as fragmentation issue), the magnitude of the cumulative impact is expected to be greater than for San Benito County alone. Species and habitats potentially affected are also expected to be similar. Although 2035 General Plan goals and policies described in Chapter 8 would reduce and partially offset San Benito County's contribution to these impacts, the potential impacts to habitat and protected species throughout the Central California region is expected to be cumulatively considerable. Therefore, the 2035 General Plan would make cumulatively considerable contributions to these significant cumulative impacts.

Cultural Resources

The geography for cumulative effects to cultural resources is San Benito County. Potential effects to cultural resources from implementation of the 2035 General Plan are described in Chapter 9 of this RDEIR. No significant adverse effects were identified following implementation of 2035 General Plan goals and policies as amended by mitigation set forth in this RDEIR. As described in Chapter 9, implementation of the proposed 2035 General Plan would lead to development and the construction of infrastructure that could lead to substantial adverse changes in the significance of historical resources within the unincorporated county, and could cause a substantial adverse change in archaeological and paleontological resources, unique geological features, the disturbance of human remains, or the degradation of traditional resource properties. Implementation of 2035 General Plan goals and policies and mitigation measures set forth in this RDEIR would reduce the potential that new development and related infrastructure projects within the unincorporated portion of San Benito County would substantially damage or permanently destroy significant known or unknown historic and cultural resources.

Impacts to cultural resources can be somewhat isolated incidents that are project-specific, and generally do not contribute to a cumulative condition. However, while projects in the county and other municipalities would require mitigation that would avoid or minimize potentially significant impacts to historic and cultural resources as required by state law, there would be an overall progressive loss of resources.

No measures in addition to proposed 2035 General Plan policies and mitigation identified in this RDEIR are available and within the jurisdiction of San Benito County to reduce the magnitude of this impact. The 2035 General Plan would make a cumulatively considerable contribution to this cumulative effect.

Geological Resources

The geography for cumulative effects from geologic hazards is San Benito County. Potential geologic hazards effects from implementation of the 2035 General Plan are described in Chapter 10 of this RDEIR. No potentially significant adverse effects were identified following implementation of 2035 General Plan goals and policies. Geologic conditions are highly localized. Because the geological resource effects of the 2035 General Plan would be less than significant, implementation of the plan would not make a cumulatively considerable contribution to this less-than-significant cumulative effect.

Global Climate Change

Climate change is considered a global cumulative issue due to the nature of associated environmental changes. Chapter 11 of this RDEIR describes the 2035 General Plan contribution to global climate change, and is accordingly an analysis of the project's contribution to this cumulative impact. The State of California has adopted plans to reduce statewide greenhouse gas emissions in an effort to reduce the state's proportional share of such emissions and the adverse effects of global warming. Implementation of the goals and policies included in the 2035 General Plan would reduce San Benito County's contribution to regional and global greenhouse gas emissions compared to business as usual (BAU) conditions but would still be significant and unavoidable. Because the climate change effects of the 2035 General Plan would be significant and unavoidable, implementation of the plan would make a cumulatively considerable contribution to this significant cumulative effect.

Hazards

The geography for cumulative effects from hazards is San Benito County. Potential effects from hazards as a result of implementation of the 2035 General Plan are described in Chapter 12 of this RDEIR. No significant adverse effects were identified following implementation of 2035 General Plan goals and policies as amended by mitigation set forth in this RDEIR. Even though development resulting from implementation of the 2035 General Plan would result in increased traffic and congestion on roadways that would increase the response times for emergency vehicles within the County, and in adjacent areas on roadways that serve San Benito County traffic, all future development and redevelopment would be required to comply with state building and fire codes. The proposed 2035 General Plan policies and mitigation identified in this RDEIR would result in continued emergency access that would meet the response time goals of service providers.

Apart from transportation issues, hazardous materials and other public health and safety issues are generally site-specific, and would not be significantly affected by other development in the region. Implementation of the proposed 2035 General Plan goals and policies, in combination with state and federal regulations designed to reduce the effects of the routine use, transport, and disposal of hazardous materials, would minimize potential public health and environmental hazards. Because the effects from hazards of the 2035 General Plan would be less than significant, implementation of the plan would not make a cumulatively considerable contribution to this less-than-significant cumulative effect.

Hydrology and Water Use

The geography for cumulative effects to hydrology includes the Pajaro River and the Silver Creek watersheds. The environmental impact analysis is presented in Chapter 13 of this RDEIR. No

significant adverse effects were identified following implementation of 2035 General Plan goals and policies as amended by mitigation set forth in this RDEIR. Future growth in the region, including cities and surrounding counties, would lead to urban development, including construction of buildings and paving that interfere with groundwater recharge. However, even after period of drought historically, groundwater levels have recovered in the Gilroy-Hollister groundwater basin. Further, the 2035 General Plan identifies a number of actions to be taken by the County that protect recharge directly and indirectly. Therefore, the 2035 General Plan would make a less-than-significant contribution to this potentially significant cumulative groundwater recharge impact.

Implementation of the 2035 General Plan and development in the region may alter local drainage and runoff; however, these impacts are generally localized and would not affect the larger watershed. Increased urbanization and associated traffic would result in additional impacts to water quality due to contaminated runoff, which could have a regional impact. Compliance with Regional Water Quality Control Board regulations, such as applicable NPDES permits and associated best management practices, would minimize discharge of contaminated surface water as a result of development in cities and counties. However, existing regulations would not completely eliminate contributions from new development under the 2035 General Plan and cumulative development in the region. Therefore, the 2035 General Plan would make a cumulatively considerable contribution to this significant cumulative water quality impact.

Implementation of 2035 General Plan policies and actions, as amended by mitigation set forth in this RDEIR, would reduce potential impacts related to flooding as a result of dam failure.

Although the 2035 General Plan goals, policies, and mitigation measures would minimize the risks to people and property from flooding as a result of dam failure and seismic activity in the region, because several of the dams within and around San Benito are owned and operated by other agencies, the 2035 General Plan and development in the region would result in development in levee and dam inundation areas, and the 2035 General Plan would make a cumulatively considerable contribution to this significant cumulative flood impact.

No measures in addition to proposed 2035 General Plan policies and mitigation identified in this RDEIR are available and within the jurisdiction of San Benito County to reduce the magnitude of these impacts.

Land Use

The geography for cumulative effects to land use is San Benito County. Potential land use compatibility effects from implementation of the 2035 General Plan are described in Chapter 14 of this RDEIR. No potentially significant adverse effects were identified following implementation of 2035 General Plan goals and policies as amended by mitigation set forth in

this RDEIR. Buildout of the 2035 General Plan and the development projected for the County's incorporated cities and the surrounding counties would result in substantial land use changes on the regional level. However, the proposed 2035 General Plan was designed specifically to achieve and promote consistency with the applicable plans, policies, and regulations of other governmental agencies that have jurisdiction over land use decisions in neighboring cities and counties. Therefore, the 2035 General Plan would make a less than cumulatively considerable contribution to this potentially cumulative land use compatibility impact.

Noise

The geography for cumulative effects to the noise environment is the San Benito County region, including incorporated and unincorporated areas of San Benito County and surrounding counties. The environmental impact analysis presented in Chapter 15 of this RDEIR identified the following potentially significant and unavoidable impact due to noise:

- Noise level increases at the locations of proposed noise sensitive developments caused by development consistent with the 2035 General Plan.
- Permanent noise increases from vehicular traffic resulting from development under the 2035 General Plan.

The protection of sensitive uses from adverse levels of noise is a major focus of the 2035 General Plan. Despite the implementation of noise abatement measures included in the 2035 General Plan and in this RDEIR, it is infeasible to ensure that existing sensitive uses would not be exposed to future noise levels exceeding the County's noise standards or those of adjacent affected jurisdictions, or significantly exceeding the levels such uses are exposed to today. While noise impacts are generally experienced locally, increased traffic from implementation of the 2035 General Plan would contribute to a significant increase in traffic noise levels on roadway segments throughout the region. No measures in addition to proposed 2035 General Plan policies and mitigation identified in this RDEIR are available and within the jurisdiction of San Benito County to reduce the magnitude of this impact. The 2035 General Plan would make a cumulatively considerable contribution to this significant cumulative effect.

Population and Housing

The geographic scope for cumulative effects to population and housing is the San Benito County region, including incorporated and unincorporated areas of San Benito County and surrounding counties. The environmental impact analysis presented in Chapter 16 of this RDEIR identified the following potentially significant and unavoidable impact to population and housing:

- Induce substantial population growth either directly, by proposing new homes and businesses, or indirectly, through extension of roads and other infrastructure.

The purpose of the 2035 General Plan is to provide a framework to guide land use development and conservation within the unincorporated portion of San Benito County. The 2035 General Plan contains numerous goals and policies to promote responsible development and an orderly and sustainable growth framework, to direct development to core urban areas where services and infrastructure are in place, and to balance job opportunities with recent housing opportunities.

However, the 2035 General Plan could accommodate developed land uses outside of areas designated for urban development, and could be considered growth-inducing. When viewed with the more substantial growth projected to occur in the cities and the surrounding counties, the 2035 General Plan's incremental effects on growth and population would make a cumulatively considerable contribution to this cumulative effect. No measures in addition to proposed 2035 General Plan policies and mitigation identified in this RDEIR are available and within the jurisdiction of San Benito County to reduce the magnitude of this impact.

Public Services

The geographic scope for cumulative effects to public services is San Benito County. Potential public service effects from implementation of the 2035 General Plan are described in Chapter 17 of this RDEIR. No potentially significant adverse effects were identified following implementation of 2035 General Plan goals and policies. While growth under buildout conditions of the 2035 General Plan would result in increases in demand for public services, implementation of the 2035 General Plan goals and policies would ensure the provision of appropriately timed and sized services to serve new urban development concurrent with growth and to minimize environmental impacts associated with the siting of new or expanded facilities. Because the public services effects of the 2035 General Plan would be less than significant, implementation of the plan would not make a cumulatively considerable contribution to this less-than-significant cumulative effect.

Recreation

The geographic scope for cumulative effects to recreation resources is San Benito County. Potential effects to recreation resources from implementation of the 2035 General Plan are described in Chapter 18 of this RDEIR. No potentially significant adverse effects were identified following implementation of 2035 General Plan goals and policies. The proposed 2035 General Plan contains goals and policies to adequately maintain existing facilities, fund the development of new park facilities to serve new residents and visitors, and reduce impacts associated with the construction and expansion of recreational facilities. Because the effects to recreation resources

with implementation of the 2035 General Plan would be less than significant, implementation of the plan would not make a cumulatively considerable contribution to this less-than-significant cumulative effect.

Transportation

The geography for cumulative effects to transportation and circulation is the San Benito County region, including incorporated and unincorporated areas of San Benito County and surrounding counties. The environmental impact analysis presented in Chapter 19 of this RDEIR identified the following potentially significant and unavoidable impact due to transportation and circulation issues in San Benito County:

- Substantial increase in vehicular traffic on state freeways and highways.
- Substantial increase in vehicular traffic on local roadway segments.
- Substantial increase in vehicular traffic at key intersections.

Implementation of the proposed 2035 General Plan would lead to additional traffic on roads and state highways in San Benito County and the region, and resulting traffic operations would exceed Level of Service standards. The cost of both the construction of improvements needed by the year 2035 and the preservation of rights of way needed to accommodate buildout improvements is beyond the control of San Benito County alone, and would require the combined efforts of all agencies, including the County, AMBAG, Caltrans, and adjacent counties and cities. There is no guarantee that other jurisdictions will elect to participate in the cost of identified improvements.

Because improvements may not be installed, this impact would remain significant and unavoidable. No measures in addition to proposed 2035 General Plan policies and mitigation identified in this RDEIR are available and within the jurisdiction of San Benito County to reduce the magnitude of this cumulative impact. Therefore, the County's contribution to regional cumulative impacts related to traffic would be cumulatively significant.

Utilities and Service Systems

The geography for cumulative effects to utilities and service systems is the San Benito County region, including incorporated and unincorporated areas of San Benito County and surrounding counties. Potential effects to utilities and service systems from implementation of the 2035 General Plan are described in Chapter 20 of this RDEIR. No potentially significant adverse effects were identified following implementation of 2035 General Plan goals and policies. Buildout of the 2035 General Plan and the development projected for the county's incorporated cities and the surrounding counties would result in an increase in demand on utilities and service systems.

However, the primary policy direction of the 2035 General Plan to ensure an adequate water supply is to pursue a collaborative approach with the various water agencies in assessing and managing long-term supply through integrated planning and conjunctive use of surface water, groundwater and recycled water sources and increased conservation. Similarly, existing and planned groundwater recharge programs in the county, coupled with the policies contained within the 2035 General Plan, would substantially reduce impacts to groundwater supplies. Further, 2035 General Plan policies require that new development be served by adequate services, including water and wastewater treatment facilities, stormwater drainage facilities, and solid waste disposal. Therefore, the 2035 General Plan would make a less than cumulatively considerable contribution to this potentially cumulative impact to utilities and service systems.

22.2 GROWTH INDUCEMENT AND SECONDARY EFFECTS

CEQA Guidelines §15126.2(d) requires that an EIR identify any growth-inducing impacts that may result from a project. The CEQA Guidelines define a growth-inducing impact as:

> "…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… It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

Induced growth as defined in this section of CEQA includes the direct employment, population, or housing growth of a project as well as the secondary or indirect growth accompanying direct growth. For example, new employees from commercial development and new population from residential development represent direct growth, and induce additional economic activity in a given area from the increase in aggregate spending generated as purchases of goods and services. New employment also adds to the demand for local housing, although since all persons employed in a given community will not necessarily live in that community, this housing demand increase will tend to be less than the increase in employment. A project can induce growth by lowering or removing infrastructure barriers to growth, improving transportation access to an area, introducing a new use into an area, or by creating an amenity such as tourist-oriented facilities that attract new population or economic activity.

For an evaluation of the potential of the 2035 General Plan to result in growth inducement, see Impact POP-1 in Chapter 16, *Population and Housing*, of this RDEIR. The potential impact of growth inducement was determined to be significant and unavoidable.

Because this RDEIR programmatically evaluates the potential environmental effects of induced growth from implementation of the 2035 General Plan countywide in Chapters 5 – 22, no additional evaluation would be necessary.

22.3 Energy

State CEQA Guidelines Appendix F describes the types of information and analyses related to energy conservation to be included in an EIR. Energy conservation is described in terms of decreased per capita energy consumption, decreased reliance on natural gas and oil, and increased reliance on renewable energy sources. To assure that energy implications are considered in project decisions, EIRs must include a discussion of the potentially significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.

22.3.1 Environmental Setting

The environmental and regulatory setting of San Benito County with respect to energy use is described in detail in the Natural Resources section of the General Plan Background Report (San Benito County 2010b). That document is incorporated into this RDEIR by reference as though fully set forth herein. The Background Report is available for download from the General Plan Update website at: http://sanbenitogpu.com/docs.html.

Copies of the Background Report may also be viewed during standard business hours (8:00 a.m. to 12:00 p.m. and 1:00 p.m. to 5:00 p.m.), Monday through Thursday, at the San Benito County Planning and Building Department, 2301 Technology Parkway, Hollister, CA 95023-9174. County offices are closed to the public on Fridays.

The Background Report's discussion of the energy/electricity setting describes the level of electric services provided in San Benito County, in addition to energy reports from the California Energy Commission (CEC), the Energy Information Administration (EIA), and California Department of Conservation (DOC). The energy/electricity setting discussion in the Background Report includes the following information:

Energy Sources

Pacific Gas and Electric (PG&E), one of the five largest utilities in the state, is the only purveyor of electricity and natural gas in the county. PG&E has been actively involved in supporting several renewable energy projects within the County, such as photovoltaic (PV) solar power plant development, as a way to meet increasing energy demands within the region and the State's Renewable Portfolio Standard (RPS). The county receives energy from power generating

facilities located outside of San Benito County, including: thermal power plants using natural gas, coal, fuel oil, and tires as fuel; wind turbines; hydroelectric facilities; biomass plants; and an increasing number of solar panels on individual homes and businesses. Although a large-scale solar energy generation facility has been proposed in San Benito County, as of 2013, there are no renewable energy production facilities currently operating within the county.

PG&E also has three major transmission lines running west to east across the County to substations in Fresno and Merced Counties. Because population growth is a key driver for increasing residential and commercial energy demands and for water pumping and other services, and because San Benito County population and energy demand is forecast to grow through 2035, energy demands in the County will increase. In order to avoid the need to construct new, large-scale electricity generation facilities, both the state and regional energy purveyors have focused on reducing the growth in demand through energy conservation and efficiency over the past decade. As a result, there has been an increasing investment in a range of energy efficiency and conservation programs.

22.3.2 Regulatory Setting

The Background Report's discussion of energy/electricity regulatory setting includes the following federal, state, and regional regulations:

- **Federal Energy Regulatory Commission (FERC)**. The FERC is an independent agency that regulates the interstate transmission of electricity, natural gas, and oil. FERC reviews proposals to build liquefied natural gas terminals and interstate natural gas pipelines; it also licenses hydropower projects. Licensing of hydroelectric under the authority of FERC includes input from state and federal energy, environmental protection, fish and wildlife, and water quality agencies. The Systems Assessment and Facilities Siting Division of the CEC provides coordination to ensure that needed energy facilities are authorized in an expeditious, safe, and environmentally acceptable manner.

- **California Energy Commission (CEC).** CEC is California's primary energy policy and planning agency. Created by the California Legislature in 1974, CEC has five major responsibilities: 1) forecasting future energy needs and keeping historical energy data; 2) licensing thermal power plants 50 megawatts or larger; 3) promoting energy efficiency through appliance and building standards; 4) developing energy technologies and supporting renewable energy; and 5) planning for and directing state response to energy emergencies. Under the requirements of the California Public Resources Code, CEC, in conjunction with the DOC's Division of Oil, Gas, and Geothermal Resources, is required to assess electricity and natural gas resources on an annual basis or as necessary.

- **California Public Utilities Commission (CPUC)**. The CPUC is a state agency created by constitutional amendment to regulate privately owned telecommunications, electric, natural gas, water, railroad, rail transit, passenger transportation, and in-state moving companies. The CPUC is responsible for assuring California utility customers have safe, reliable utility services at reasonable rates while protecting utility customers from fraud. The CPUC regulates the planning and approval for the physical construction of electric generation, transmission, or distribution facilities; and local distribution pipelines of natural gas (CPUC Decision 95-08-038). The CPUC regulatory program is grounded in the philosophy that cost-effective energy efficiency is the state's first line of defense against power shortages. This strategy is supported through $2 billion in energy efficiency funding for 2006-2008. The CPUC's Renewables Portfolio Standard program requires an annual increase in renewable generation by the utilities equivalent to at least one percent of sales, with an aggregate goal of 20 percent by 2010.

- **Independent System Operator (ISO)**. Power is delivered from generating facilities over the utilities' transmission lines and distribution wires. The ISO, whose governing board is appointed by the Governor and who is regulated by FERC, manages most of California's transmission system. The ISO's primary function is to balance electricity supply with demand and maintain adequate reserves to meet the needs of California homes and businesses. The California Electricity Oversight Board monitors and reports on the activities of the ISO.

- **Title 24.** Title 24, California Building Standards, contains the energy efficiency standards related to residential and nonresidential buildings. Title 24 standards are based, in part, on a state mandate to reduce California's energy demand.

- **Energy Action Plan (2003).** In 2003 California adopted an energy action plan that focuses on energy efficiency as the primary way in which the state would meet its future energy needs.

- **Energy Efficiency Act of 2006 (AB 2021).** This bill encourages all investor-owned and municipal utilities to aggressively invest in all achievable, cost-effective energy efficiency programs in their service territories. The results of this bill are expected to reduce forecasted electricity demand by 10 percent over ten years from 2006 through 2016, offsetting the projected need to build 11 new major power plants.

- **Renewables Portfolio Standard (RPS) (CA Public Utilities Code §399.11 et seq., and Public Resources Code §25740 et seq.).** Effective January 1, 2003, the California Legislature mandated an increase in the percentage of renewable retail electricity sales by publicly regulated electrical utilities by at least one percent per year, to reach at least 20 percent by the end of 2010 and 33 percent by the end of 2020.

- **Executive Order S-06-06.** This Executive Order calls out the benefits and potential of bioenergy in helping meet the future needs of the state for clean, renewable power, fuels, and hydrogen. By 2010 it calls for the production of 20 percent of biofuels in California, an increase of this amount to 40 percent by 2020, and to 75 percent by 2050. It also aims to produce 20 percent of the renewable electricity generated from biomass resources within the state by 2010.

- **Executive Order S-14-08.** This Executive Order established the goal of reaching 33 percent of renewable retail electricity sales by publicly related electrical utilities by 2020. It was signed to streamline the renewable energy project approval process and to increase the state's RPS.

- **Executive Order S-21-09.** Executive Order S-21-09 increases California's RPS to 33 percent by 2020, which was first established by EO S-14-08. It allows the Air Resources Board and other agencies such as the CPUC and CEC to ensure that regulations are adopted that consider approaches that achieve AB 32 and S-14-08.

- **Senate Bill 375 (2008).** SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation in an effort to reduce energy consumption. SB 375 requires metropolitan planning organizations (MPO) to adopt a sustainable communities strategy or alternative planning strategy, which will prescribe land use allocation in that MPO's regional transportation plan.

- **Senate Bill X1-2 (2011).** Signed into law April 12, 2011, SB X1-2 increases California's electricity utility RPS from 20 percent by 2010 to 33 percent (of total retail sales) by 2020, and extends the RPS to public utilities.

22.3.3 Environmental Effects

The impact analysis evaluates whether buildout under the 2035 General Plan project could result in significant energy efficiency impacts.

Significance Criteria

In accordance with CEQA, this analysis considers impacts to be significant if implementation of a proposed action would directly or indirectly result in inefficient, wasteful, and unnecessary consumption of energy.

Environmental Impacts

The following discussion examines the potential impacts of implementing the proposed 2035 General Plan based on the impact threshold criteria described above.

Impact ENER-1: Inefficient, wasteful, or unnecessary consumption of energy with 2035 General Plan buildout.

Level of Significance: Less than significant, no mitigation required.

Buildout of the 2035 General Plan would increase energy consumption in San Benito County. However, policies contained within the 2035 General Plan would promote smart energy use and efficiency and would reduce adverse environmental impacts associated with increased energy consumption to less-than-significant levels. Energy use is increasing in San Benito County, and while buildout of the 2035 General Plan would generate additional demand for energy supplies and energy supply services, 2035 General Plan goals and policies would encourage energy efficiency and reduce potential energy use (see Table 22-2).

Table 22-2 2035 General Plan Policies that Promote Energy Efficiency and Energy Use Reduction

Policy	How the Policy Avoids or Reduces Impact
Land Use Element	
LU-1.1: Countywide Development The County shall focus future development in areas around cities where infrastructure and public services are available, within existing unincorporated communities, and within a limited number of new communities, provided they meet the requirements of goal section LU-7.	Focuses and encourages development in areas of existing infrastructure and public services. Reduces vehicle miles traveled (VMT) and associated energy use.
LU-1.2: Sustainable Development Patterns The County shall promote compact, clustered development patterns that use land efficiently; reduce pollution and the expenditure of energy and other resources; and facilitate walking, bicycling, and transit use.	Encourages sustainable development patterns that reduce energy use and encourage walking, bicycling, and transit use. Reduces VMT and associated energy use.

Policy	How the Policy Avoids or Reduces Impact
LU-1.5: Infill Development The County shall encourage infill development on vacant and underutilized parcels within Hollister and City of San Juan Bautista's city limits and unincorporated communities in order to maximize the use of land within existing urban areas, minimize the conversion of productive agricultural land and open spaces, and minimize environmental impacts associated with new development.	Encourages infill development that reduces VMT while preserving agricultural land. Reduces VMT and associated energy use.
LU-2.1: Sustainable Building Practices The County shall promote, and where appropriate, require sustainable building practices that incorporate a "whole system" approach to designing and constructing buildings that consume less energy, water, and other resources; facilitate natural ventilation; use daylight efficiently; and are healthy, safe, comfortable, and durable.	Encourages whole system sustainable building practices. Reduces the consumption of natural gas and electricity from new and existing structures.
LU-2.2: Sustainable Building Practices The County shall encourage sustainable building practices that go beyond the minimum requirements of the Title 24 CalGreen Code (i.e., Tier 1 or Tier 2 measures) and to design new buildings to achieve a green building standard such as Leadership in Energy and Environmental Design (LEED).	Encourages energy efficient buildings that go beyond code requirements. Reduces the consumption of natural gas and electricity from new and existing structures.
LU-2.3: Energy Conservation Standards for New Construction The County shall cooperate with the local building industry, utilities, and air district to promote enhanced energy conservation standards for new construction.	Encourages cooperation with other agencies and industry regarding energy standards in new construction. Reduces consumption of natural gas and electricity from new and existing structures.
LU-2.4: Solar Access The County shall encourage new residential subdivisions and new commercial, office, industrial, and public buildings to be oriented and landscaped to enhance natural lighting and solar access in order to maximize energy efficiency.	Encourages solar orientation for new buildings. Increases energy efficiency, thereby reducing energy consumption.

Policy	How the Policy Avoids or Reduces Impact
LU-2.5: Energy Retrofits The County shall promote the retrofitting of existing buildings with new and innovative energy and water efficiency technologies and encourage structures being renovated to be built to a green building standard such as Leadership in Energy and Environmental Design (LEED).	Encourages energy efficiency retrofits to existing buildings. Reduces the consumption of natural gas and electricity from new and existing structures.
LU-2.6: Green Building Standard The County shall require all new County buildings be constructed to green building standards, such as Leadership in Energy and Environmental Design (LEED), and all existing County buildings to be retrofitted with energy efficient technologies.	Requires county buildings to be built to green building standards. Reduces the consumption of natural gas and electricity from new structures.
LU-2.7: Sustainable Location Factor The County shall encourage new development in locations that provide connectivity between existing transportation facilities to increase efficiency, reduce congestion, and improve safety.	Encourages new development in locations that provide connectivity between transportation facilities. Reduces VMT and associated energy use.
LU-3.3: Increased Agricultural Sustainability and Energy Efficiency The County shall encourage and support farms, vineyards, and ranches that seek to implement programs that increase the sustainability of resources, conserve energy, and protect water and soil in order to bolster the local food economy, increase the viability of diverse family farms and improve the opportunities for farm workers.	Encourages sustainable agricultural practices. Reduces energy consumption from agricultural operations.
LU-4.2: Urban Residential Development The County shall ensure new urban residential development (e.g., greater than two units per acre) occurs in areas that have, or can provide, adequate public facilities and services to support such uses, and are near major transportation networks, transit and/or bicycle corridors, pedestrian paths and trails, and employment centers.	Encourages residential development to be located near transportation networks and employment centers. Reduces VMT and associated energy use.

Policy	How the Policy Avoids or Reduces Impact
LU-4.4: Multi-Family Residential The County shall require multi-family housing to be located within walkable mixed-use neighborhoods that include uses such as employment centers, shopping districts, civic uses, and other forms of residential development, and have good automobile access and are near transit, if possible.	Encourages multi-family residential development to be located within walkable mixed-use neighborhoods and employment centers. Reduces VMT and associated energy use.
LU-4.5: Innovative Site Planning and Residential Design The County shall encourage new residential developments to use innovative site planning and features that increase the design quality, and efficiency, and water conservation of structures and landscapes while protecting the surrounding environment.	Encourages residential development that conserves water. Reduces water use and associated energy use.
LU-5.1: New Regional Commercial Centers The County shall encourage new regional commercial centers to be located at or near existing or future highway interchanges and major intersections and along existing or future transit, bicycle, and pedestrian and trail corridors, and include transit, bicycle, and pedestrian facilities.	Encourages regional commercial centers to be located near highway interchanges and transportation infrastructure. Reduces VMT to/from commercial centers and offices and associated energy use.
LU-5.3: New Neighborhood Commercial The County shall allow new neighborhood commercial uses so long as they are located within reasonable distance of a community, are centrally located to serve an unincorporated community that is lacking neighborhood commercial services, or where the need for expanded neighborhood commercial services can be demonstrated. The County shall ensure neighborhood commercial uses connect to surrounding residences along transit corridors and bicycle and pedestrian paths and include appropriate transit, bicycle, and pedestrian facilities.	Limits new neighborhood commercial to locations near residences. Reduces VMT to/from commercial centers and offices and associated energy use.

Policy	How the Policy Avoids or Reduces Impact
LU-5.6: Mixed-Use Development The County shall encourage both vertical and horizontal mixed-use development within community centers and near or along transportation and transit corridors, bicycle paths, and pedestrian and trail routes as a means of providing efficient land use, housing, and transportation options for county residents. The County shall ensure that mixed use developments include appropriate transit, bicycle, and pedestrian facilities.	Encourages mixed-use development. Reduces VMT to/from commercial centers and offices and associated energy use.
LU-6.2: Employment Center Access Where appropriate, the County shall encourage new employment centers and industrial developments near existing or future highway interchanges and major intersections and along existing or future transit, bicycle, and pedestrian and trail corridors, and include transit, bicycle, and pedestrian facilities. The County shall ensure that industrial uses and employment center developments include appropriate transit, bicycle, and pedestrian facilities.	Encourages new employment centers and industry to locate near transportation infrastructure. These policies would encourage alternative modes of transportation, reduce VMT associated with employment centers and industry, and reduce associated energy use.
LU-6.4: Sustainable Technologies The County shall encourage all employment and industrial projects to incorporate sustainable technologies including energy and water efficient practices.	Encourages energy and water efficiency practices in employment centers and industrial projects, reducing water and energy usage.
LU-8.5: Sustainable New Communities The County shall encourage New Communities to be planned and designed to reflect the spirit and intent of sustainable growth strategies, such as providing: a. easy access to transit and bicycle networks; b. a balance between jobs and housing; walkable streets with shade trees and sidewalks; c. good internal connectivity and good connectivity to the community at large; d. a reduced parking footprint; a transportation demand management program; e. institutions such as schools within walking distance from residences;	Encourages that communities be designed to reflect the intent of sustainable growth strategies. Community environmental and sustainable design requirements would reduce energy use.

Policy	How the Policy Avoids or Reduces Impact
f. distinct, compact, walkable neighborhoods, each with a recognizable center; g. habitat avoidance and conservation plans; and h. restoration of resources such as riparian corridors and permanent preservation of open space.	
Economic Development Element	
ED-5.6: Safe and Convenient Tourist Travel The County, in coordination with Council of San Benito County Governments (SBCOG), should enhance tourists' ability to travel safely and conveniently to different destinations throughout the county. This should include developing strategies to ensure tourists travel safely on rural roads and to promote an integrated, multi-modal transportation system that includes bike rental services, pedestrian connections, and hiking, biking and riding trails.	Requires tourism enhancements to encourage multi-model travel. Reduces VMT and associated energy use.
ED-6.1: Workforce Education and Training Promotion The County shall support programs that educate the local workforce on: conventional, productive, sustainable, and organic agriculture concepts, including water conservation strategies; emerging high-tech industries; and alternative energy production.	Provides program support for water conservation and alternative energy production. Support for green technology sectors and sustainable agriculture reduces energy use.
Circulation Element	
C-1.1: Intermodal Connectivity The County shall ensure that, whenever possible, roadway, highway, public transit systems, and pedestrian and bicycle trails are interconnected with other modes of transportation.	Ensures interconnections of travel options. These policies encourage a more efficient circulation system that will reduce energy use.
C-1.2: Complete Streets To promote a road and street network that accommodates cars without requiring car- dependence, the County shall plan for use of roadways by all vehicle types and users, including automobiles, trucks, alternative energy vehicles, agricultural equipment, transit, bicyclists, and pedestrians, when constructing or modifying roadways. Additionally, the County shall plan its road and street network	Promotes complete streets program that discourages car dependence. Encourages a more efficient circulation system that will reduce energy use.

Policy	How the Policy Avoids or Reduces Impact
to reflect a context- sensitive approach to the design of thoroughfare assemblies, where the allocation of right-of-way and the facilities provided are based on the intended character, whether urban or rural, of a particular location (urban context). Roads and streets within communities shall be designed to support and encourage walkability as a response to their context, whereas roads in open areas of the County shall be designed primarily for vehicular circulation. As such, thoroughfares that serve both open areas and communities in the County shall change as the surrounding urban context varies. This includes: a. Encouraging thoroughfare designs that are context sensitive, such as those recommended in Designing Walkable Urban Thoroughfares: A Context Sensitive Approach by the Institute of Transportation Engineers (ITE); b. Supporting urban design principles that promote walkability within communities to include: i. A mix and variety of land uses designed to be relatively compact and in proximity to one another; ii. Buildings that are oriented toward streets, with appropriately narrow setbacks and functional entries directly fronting onto sidewalks; iii. Pedestrian-scaled architecture, landscape, and thoroughfares designed to provide engaging sidewalk views and comfort to pedestrians traveling at slow speeds; and iv. Circulation networks that provide an interconnected system of streets and open spaces with relatively small block lengths; c. Creating multi-modal street connections in order to establish a comprehensive, integrated, and connected transportation network; d. Incorporating pedestrian and bicycle facilities, where appropriate and feasible, that promote safety and maximize access; e. Planting street trees adjacent to curbs and between the	

Policy	How the Policy Avoids or Reduces Impact
street and sidewalk to provide a buffer between the pedestrian and the automobile, where appropriate; f. Incorporating traffic calming devices such as roundabouts, bulb-outs at intersections, and traffic tables; and g. Coordinating with other agencies and cities to ensure connections are made between jurisdictions.	
C-1.10: Street Network Plans The County shall require project applicants to prepare a street network plan for any subdivision proposal located near existing, approved, or proposed development (county or city). The plan shall illustrate how adjoining properties will inter-connect over the long-term and how the plan will improve pedestrian and bicycle connectivity. The plan shall include an interim access plan and a long-term plan that consolidates vehicular access onto arterials/collectors (via street network design, or some other method).	Encourages complete street interconnections between distinct subdivisions. Encourages bicycle and pedestrian travel, reducing VMT and associated energy use.
C-2.1: Bicycle, Pedestrian and Equestrian Systems The County shall encourage complete, safe, and interconnected bicycle, pedestrian, and equestrian systems that serve both commuter travel and recreational use, and provide access to major destinations in the county.	Encourages interconnected bicycle and pedestrian systems. Encourages the use of alternative modes of transportation (bicycling, walking) and would reduce VMT and associated energy use.
C-2.2: Pedestrian and Bike Path Construction The County shall plan, design, and construct pedestrian routes and bikeways consistent with the County Bikeway and Pedestrian Master Plan or its succeeding plan. Priority shall be given to bicycle commuting routes, routes to schools, bike lanes on all new streets classified as arterials or collectors, and bike lanes on or adjacent to existing heavily traveled roads.	Encourages interconnected bicycle and pedestrian systems. Encourages the use of alternative modes of transportation (bicycling, walking) and would reduce VMT and associated energy use.
C-2.8: Sidewalks in Subdivisions The County shall require project applicants to provide sidewalks or other safe and convenient accommodations for pedestrians (e.g., shared-space streets) on all new roads or modifications to existing roads in accordance with County roadway design standards.	Encourages pedestrian amenities. Encourages walking over driving, which would reduce VMT and associated energy use.

Policy	How the Policy Avoids or Reduces Impact
C-3.12: Commuter Rail in Hollister The County shall support efforts to extend Caltrain service from Gilroy to Hollister to link San Benito County to San Jose and San Francisco.	Supports use of train travel rather than automobile travel. Encourages the use of public transit and would reduce VMT and associated energy use.
C-4.2: Ridesharing Promotion The County shall support SBCOG programs that promote the use of ridesharing, vanpooling, and carpooling to decrease vehicle trips on road systems in the county.	Supports ridesharing and carpooling programs. Encourages less single occupant travel, which will reduce VMT and associated energy use.
C-4.3: Employer Incentives The County shall encourage employers to provide transit subsidies, bicycle facilities, alternative work schedules, ridesharing, telecommuting, employee education, and preferential parking for carpools/vanpools.	Encourages employers to support policies that promote ridesharing and multiple occupancy commutes to reduce emissions per passenger. Also encourages alternative transportation that will reduce VMT and associated energy use.
C-4.4: San Benito County Employee Incentive Programs As a major employer, San Benito County shall demonstrate leadership in the implementation of programs encouraging the use of alternative modes of transportation by its employees. Example programs may include: ▪ Preferential carpool parking and other ridesharing incentives; ▪ Flexible working hours or telecommuting where consistent with job duties and customer service needs; ▪ Secure bicycle parking; and ▪ Incentives for using transit, such as discounted passes or tokens.	Encourages San Benito County to demonstrate leadership regarding support of policies to discourage single occupant commuters. Encourages alternative transportation that will reduce VMT and associated energy use.
Public Facilities and Services Element	
PFS-1.3: Efficient Infrastructure and Facilities The County shall update and replace public facilities and infrastructure with technologies that improve energy efficiency and conserve water, when feasible.	Requires that County facilities implement energy efficiency improvements. Reduces energy use.

Policy	How the Policy Avoids or Reduces Impact
PFS-2.1: Efficient Operations The County shall maintain facilities and service standards and conduct operations in a manner that meets community needs in an efficient manner, conserves resources, and reduces the County's contribution to greenhouse gas emissions.	Requires that the County operate its facilities in an energy efficient manner, reducing energy use.
PFS-2.4: Monitoring Efficiency and Conservation The County shall monitor and regularly report on its progress in implementing energy efficiency, water conservation, and waste reduction measures and in meeting its greenhouse gas reduction targets and goals for County facilities and activities.	Requires that the County monitor progress in energy efficiency, water conservation, and waste conservation, promoting the reduction of energy use.
PFS-2.5: Sustainability Retrofits The County shall increase energy efficiency in older County buildings through energy efficiency and retrofits (e.g., compact florescent light bulbs, motion-activated lighting, computerized HVAC systems), renewable energy generation (e.g., photovoltaic cells), and water conservation retrofits (e.g., low flow toilets and sinks, drip irrigation, water reuse).	Requires energy efficiency improvements in older buildings. Ensures that older buildings attain energy retrofits, reducing energy use.
PFS-2.6: Sustainable New Buildings In building new facilities and buildings, the County shall achieve a high standard (e.g., equivalent to LEED® certification) of energy efficiency and water conservation and employ renewable energy technologies.	Requires that new County buildings are energy efficient, conserve water, and use renewable energy, thereby reducing energy use.
PFS-2.7: New Fleet and Equipment Purchases The County shall purchase lower-emission and/or electric vehicles and energy efficient equipment when purchasing new fleet vehicles and maintenance/construction equipment.	Requires that the County purchase energy efficient vehicles in their fleets thereby reducing energy use.
PFS-2.8: Energy and Fuel Sources The County shall use available clean energy and fuel sources to operate its buildings, vehicles, and maintenance/construction equipment.	Requires that the County use clean energy sources to operate facilities.
PFS-2.9: Fleet Operations The County shall require County staff to reduce vehicle idling, reduce trips, establish efficient routing, and use public transportation, carpooling, and alternate modes of transportation when available to reduce energy consumption and costs.	Requires County staff to reduce energy consumption associated with travel thereby reducing energy use.

Policy	How the Policy Avoids or Reduces Impact
PFS-2.11: Preference for Reduced-Emission Equipment The County shall give preference to contractors using reduced emission equipment for County construction projects and contracts for services, as well as businesses which practice sustainable operations.	Requires that the County give preference to contractors using reduced emission equipment and encourages contractors to use energy efficient vehicles.
PFS-7.7: Waste-to-Energy Projects The County shall promote technologies, including biomass and biofuels, that use solid waste as an alternative energy source. The County shall support efforts to develop and install waste-to-energy projects in appropriate locations.	Promotes use of biomass and biofuels from solid waste for energy use.
Natural and Cultural Resources Element	
NCR-4.8: Water Education The County shall encourage water districts to provide public education to encourage existing homeowners to adopt water conservation practices for landscaping and interior plumbing.	Promotes education regarding water conservation practices. Supports efficient water use, which will reduce energy expenditures to develop, transport, or treat water.
NCR-4.10: Water Efficient Landscape Ordinance The County shall develop, maintain, and implement a Water Efficient Landscape Ordinance, consistent with the Model Water Efficient Landscape Ordinance prepared by the California Department of Water Resources, to require greater use of regionally native drought-tolerant vegetation, limitations on the amount of turf in residential development, and other measures as appropriate.	Encourages landscaping that minimizes water use. Supports efficient water use, which will reduce energy expenditures to develop, transport, or treat water.
NCR-4.11: Reclaimed Water The County shall require the use of reclaimed water irrigation systems in new development wherever possible.	Supports the use of recycled water for new development. Supports efficient water use, which will reduce energy expenditures to develop, transport, or treat water.
NCR-4.12: Rainwater Catchment The County shall encourage homeowners to install roof catchment systems and use rainwater for non-potable uses in order to reduce the need for groundwater.	Supports the use of rainwater catchment systems to reduce groundwater use. Supports efficient water use to reduce energy expenditures to develop, transport, or treat water.

Policy	How the Policy Avoids or Reduces Impact
NCR-6.1: Local Renewable Energy The County shall strive to increase the supply of locally-produced, renewable energy (e.g., solar, wind, geothermal, and biomass) in order to promote energy independence and efficiency.	Promotes renewable energy sources. Reduces demand for fossil fuel- generated electricity.
NCR-6.8: Remove Barriers to Renewable Energy The County shall remove or otherwise address barriers to renewable energy production in the county (e.g., solar, wind, biomass).	Requires removal of barriers to renewable energy production. Encourages renewable energy.
Health and Safety Element	
HS-5.7: Greenhouse Gas Emission Reductions The County shall promote greenhouse gas emission reductions by supporting carbon efficient farming methods (e.g., methane capture systems, no-till farming, crop rotation, cover cropping); supporting the installation of renewable energy technologies; and protecting grasslands, open space, oak woodlands, riparian forest and farm-lands from conversion to urban uses.	Promotes GHG reductions in agriculture, renewable energy, and preservation of areas that sequester carbon.

Source: San Benito County 2012, 2014; EMC Planning Group 2014; URS 2012; Planning Partners 2012.

Implementation of the above 2035 General Plan policies would require the efficient use of fuel and energy by: reducing vehicle use and vehicle miles traveled (VMT); encouraging energy conservation, efficiency, and green design in new construction and existing buildings; reducing the consumption of fossil fuels by encouraging alternative transportation; and by promoting the utilization of alternative energy sources. Further discussion of measures for reducing the county's VMT (and associated fuel consumption) and for reducing the county's overall GHG emissions can be found in Chapter 19, Transportation and Circulation and Chapter 11, Global Climate Change.

Appendix D of this EIR includes estimated activity and consumption data for GHG emission sources, including: transportation; area sources; energy use; solid waste; and agriculture emissions. This data also shows increased energy efficiency as a result of 2035 General Plan policies. Even though VMT per day would increase in unincorporated areas of the county at 2035 buildout conditions (see Table 2 of Appendix D), based on reductions from the Low Carbon Fuels Standard (LCFS), the Pavley Rule, and the Sustainable Communities goals, transportation emissions of GHGs were reduced by 33 percent in 2035 as compared to 2035 Business as Usual (BAU) conditions (see Table 6, Appendix D).

Appendix D also includes energy use estimates under buildout conditions, and with acquisition of renewable resources for power supply and 2035 General Plan policies, the associated decrease in GHG emissions from electricity use (Table 9, Appendix D). By 2035, mitigated electricity consumption is assumed to be reduced by 10,955 metric tons CO_2e. Similarly, Appendix D also shows reduced emissions from agricultural activities as a result of decreased water use (and related energy use) associated with more efficient water application technology. In conclusion, the implementation of the 2035 General Plan would incorporate goals and policies designed to result in measurable anticipated energy and fuel savings, and the County's policies would not result in inefficient, wasteful, and unnecessary use of energy. Therefore, buildout of the 2035 General Plan would have a less-than-significant impact associated with the inefficient use of fuel or energy.

22.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

The following potentially significant effects were found not to be significant or less than significant after mitigation as evaluated in this RDEIR:

- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within State scenic corridors.
- Substantially degrade the existing visual character or quality of scenic resources or vistas.
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the county.
- Conflict with existing zoning of forest land or timberland zoned Timberland Production; result in the loss of forest land or conversion of forest land to non-forest use; or cause other changes in the existing environment which, due to their location or nature, could result in the conversion of forest land to non-forest uses.
- Conflict with or obstruct implementation of the applicable Air Quality Plan.
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
- Expose sensitive receptors to substantial pollutant concentrations.

- Create objectionable odors affecting a substantial number of people.
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means.
- Interfere substantially with the movement of any native resident, or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policies or ordinances.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan.
- Cause a substantial adverse change in the significance of a historical resource.
- Cause a substantial adverse change in the significance of an archaeological resource, directly or indirectly destroy a unique paleontological resource or site, or unique geological feature, or disturb any human remains, including those interred outside of formal cemeteries.
- Result in the degradation or loss of traditional cultural resource properties where Native American customs and traditions are practiced.
- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving: (1) rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, (2) strong seismic ground shaking or seismic-related ground failure including liquefaction, (3) landslides.
- Locate development or structures on a geological unit that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or locate development on expansive soils that may create substantial risks to life.
- Result in substantial soil erosion or topsoil loss from heightened exposure to wind or water erosion, or result in a substantial loss of valuable mineral resources within the county.
- Allow the use of septic tanks or alternative wastewater disposal systems in unfit soils that are incapable of adequately supporting their use, and where sewers are not available for the disposal of wastewater.

- Generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment.
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.
- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through accident conditions involving the release of hazardous materials into the environment.
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or located within the vicinity of a private airstrip, would result in a safety hazard for people residing or working in the project area.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.
- Violate water quality standards or waste discharge requirements .
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the groundwater table level.
- Substantially alter existing drainage patterns within the county, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.
- Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.
- Substantially degrade groundwater quality.

- Place housing within a 100-year flood hazard area as mapped on the FEMA Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map; or place within a 100-year flood hazard area structures which would impede or redirect flood flows.
- Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.
- Inundation by seiche, tsunami, or mudflow.
- Physically divide an established community.
- Conflict with any applicable plan, policy, or regulation of a government agency with jurisdiction over land in unincorporated San Benito County that has been adopted for the purpose of avoiding or mitigating an environmental effect.
- Conflict with any applicable habitat conservation plan or natural community conservation plan.
- New noise-producing land uses could expose persons or generate noise levels that would exceed the County's noise thresholds of acceptability established in the current General Plan or Noise Ordinance, or applicable standards of other agencies Expose sensitive uses to construction noise.
- Could expose persons to or could generate excessive groundborne vibration or groundborne noise levels.
- Construction noise could cause a temporary or periodic increase in noise exposure above ambient levels existing without the 2035 General Plan, which could be substantial.
- Development under the 2035 General Plan within the Hollister Municipal Airport or the Frazier Lake Airpark airport land use compatibility plan areas, or a private airstrip could expose people living or working within the plan area to excessive noise levels.
- Displace substantial amounts of population and housing units, necessitating the construction of replacement housing elsewhere.
- Demand additional fire protection and emergency response services in order to maintain acceptable service ratios, response times, or other performance objectives, requiring the construction of new or physically altered governmental facilities, resulting in substantial adverse physical impacts.
- Demand for the construction of new or physically altered police protection and law enforcement facilities, in order to maintain acceptable service ratios, response times or other performance objectives, resulting in substantial adverse physical impacts.

- Demand for the construction of new or physically altered school facilities, in order to maintain acceptable service ratios, response times or other performance objectives, resulting in substantial adverse physical impacts.
- Demand for the construction of new or physically altered libraries, in order to maintain acceptable service ratios, response times or other performance objectives, resulting in substantial adverse physical impacts.
- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.
- Increase demand for air travel or increased development near airports, resulting in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
- Substantially increase hazards due to design features or incompatible uses.
- Result in inadequate emergency access.
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Sufficient water supply resources and entitlements are available to serve the additional development envisioned in the 2035 General Plan.
- Sufficient water supplies are available from existing entitlements and resources to serve the additional development envisioned in the 2035 General Plan, without requiring new or expanded entitlements.
- Substantially deplete groundwater supplies.
- Require or result in the new construction of water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Development under the 2035 General Plan will not exceed the wastewater treatment requirements of the Regional Water Quality Control Board; but may require or result in the construction of new wastewater treatment facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects and could result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

- Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities which could cause significant environmental effects.
- Not be served by a landfill with sufficient permitted capacity to accommodate solid waste disposal needs of growth under the 2035 General Plan; or not comply with federal, state, and local statutes and regulations related to solid waste.
- Inefficient, wasteful, or unnecessary consumption of energy with 2035 General Plan buildout.
- Irreversible Commitment of Resources.
- Potential Environmental Damage from Accidents.
- Cumulative Air Quality impacts.
- Cumulative impacts to Soils and Geological Resources.
- Cumulative Global Climate Change impacts.
- Cumulative Hazards and Hazardous Materials impacts.
- Cumulative impacts to Land Use.
- Cumulative impacts to Public Services.
- Cumulative impacts to Recreation.
- Cumulative Utilities and Service System impacts.

22.5 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS

The significant unavoidable environmental effects of the proposed project are as follows:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agriculture use.
- Conflict with existing zoning for agricultural use, or the provisions of Williamson Act contracts.

- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural uses.

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

- Loss or destruction of riparian or other sensitive natural habitats and the wildlife and plants that depend on those habitats.

- Existing noise levels and future noise levels at the locations of proposed noise sensitive developments allowed for under the 2035 General Plan could expose people to or generate noise levels that exceed the County's noise thresholds of acceptability, established in the current General Plan or Noise Ordinance, or applicable standards of other agencies.

- The anticipated increase in vehicular traffic and other sound-generating activities resulting from development under the 2035 General Plan would result in a permanent increase in ambient noise levels above levels existing without the 2035 General Plan, and in some cases, the increases would be substantial.

- Induce substantial unexpected population growth either directly, by proposing new homes and business, or indirectly, through extension of roads and other infrastructure.

- Substantial increase in vehicular traffic on state freeways and highways would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit, and would conflict with an applicable congestion management program including, but not limited to, level of service standards and travel demand measures, or other standards established by the County's congestion management agency for designated roads or highways. Substantial increase in vehicular traffic on local roadway segments.

- Substantial increase in vehicular traffic on local roadway segments would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit, and would conflict with an

applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County's congestion management agency for designated roads or highways.

- Substantial increase in vehicular traffic on local roadway segments at key intersections would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit, and would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County's congestion management agency for designated roads or highways.
- Cumulative Aesthetics/Visual Resources impacts.
- Cumulative Agricultural Resources impacts.
- Cumulative Biological Resources impacts.
- Cumulative Cultural Resources impacts.
- Cumulative Hydrology and Water Quality impacts.
- Cumulative Noise impacts.
- Cumulative Population and Housing impacts.
- Cumulative Transportation impacts.
- Growth Inducement.
- Irreversible Environmental Changes.

San Benito County is unable to mitigate any of these potentially significant adverse environmental impacts to a less-than-significant level; all of the adverse impacts of the proposed project identified above would remain significant and unavoidable.

22.6 SIGNIFICANT IRREVERSIBLE CHANGES

State CEQA Guidelines §15126.2 requires the evaluation of significant irreversible environmental changes, stating that "uses of nonrenewable resources during the initial and continued phases of a proposed project may be irreversible since a large commitment of these resources makes

removal or nonuse thereafter unlikely." This section of the RDEIR evaluates whether the project would result in the irretrievable commitment of resources, or would cause irreversible changes in the environment. Also, this section identifies any irreversible damage that could result from environmental accidents associated with the proposed project.

22.6.1 Irreversible Commitment of Resources

Implementation of the proposed 2035 General Plan project would result in the construction and operation of urban and other development, and increase the number or amount of scattered rural residential uses, agricultural industrial uses, and surface mining activities. Implementation of the proposed 2035 General Plan would require both direct and indirect expenditures of energy. Indirect energy would be consumed by the use of construction materials for the project (e.g., energy resource exploration, power generation, mining and refining of raw materials into construction materials used, including placement). Direct energy impacts would result from the total fuel consumed in vehicle propulsion (e.g., construction vehicles, heavy equipment, and other vehicles using the facility). Additional energy resource demands would be used for heating and cooling of buildings, transportation of people and goods, as well as lighting and other associated energy needs.

Implementation of the proposed 2035 General Plan would contribute to the incremental depletion of resources, including renewable and non-renewable resources. Resources such as lumber and other forest products are generally considered renewable resources, and would be replenished over the lifetime of the project. For example, lumber supplies are increased as seedlings mature into trees.

Therefore, the development of the project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources over the life of the project.

Non-renewable resources such as natural gas, petroleum products, asphalt, petrochemical construction materials, steel, copper and other metals, and sand and gravel are considered to be commodities that are available in a finite supply. The processes that created these resources occur over a long period of time. Therefore, the replacement of these resources would not occur over the life of the project. To varying degrees, these materials are all readily available, and some materials, such as asphalt or sand and gravel, are abundant. Other commodities, such as metals, natural gas, and petroleum products, are also readily available, but they are finite in supply given the length of time required by the natural process to create them.

The demand for all such resources is expected to increase regardless of whether or not the project is developed. As discussed in the cumulative evaluation and set forth in Table 22-1, urban

development and other organized activities in the Central California region are expected to increase. Therefore, if not consumed by this project, these resources would likely be committed to other projects in the region intended to meet this anticipated growth. The investment of additional resources in the project would be typical of the level of investment normally required for urbanization and development at the scale of San Benito County. Mitigation measures have been included in this RDEIR to reduce and minimize the impact to renewable and non-renewable resources to the extent feasible.

22.6.2 Irreversible Environmental Changes

Irreversible long-term environmental changes associated with the proposed project are evaluated in Chapters 5 to 20 of this RDEIR. These irreversible environmental changes would include the loss of agricultural resources, interference with agricultural activities, an increase in fugitive dust emissions and greenhouse gases, loss or degradation of biological and cultural resources, and increases in traffic and noise levels among other impacts. Policies in the 2035 General Plan and mitigation measures included in this RDEIR have been identified to minimize the effects of the environmental changes associated with the implementation of the 2035 General Plan. However, even with implementation of cited policies and adoption of all mitigation measures, the 2035 General Plan would result in significant and unavoidable impacts to as listed above in Section 22.4, Significant Unavoidable Environmental Effects.

22.6.3 Potential Environmental Damage From Accidents

Potential impacts and irreversible damage that could result from environmental accidents associated with the project have been previously evaluated in Chapter 12, Hazards and Hazardous Materials, of this RDEIR. The 2035 General Plan proposes no uniquely hazardous uses, and its implementation would not be expected to cause environmental accidents that would affect other areas.