
1.0 INTRODUCTION

This Draft Environmental Impact Report (DEIR) has been prepared by the County of San Benito, as lead agency pursuant to applicable provisions in accordance with the California Environmental Quality Act (CEQA) and its implementing guidelines, the CEQA Guidelines. The purpose of the EIR is to evaluate the potential environmental effects associated with the development of the Santana Ranch Specific Plan project (hereinafter "proposed project"), a residential mixed use development project on a 292-acre site ("Plan Area"). The Plan Area is located east of the intersections of Fairview Road with Hillcrest Road and Sunnyslope Road, within an unincorporated area of San Benito County immediately adjacent to the City of Hollister. The proposed project includes a maximum of 1,092 dwelling units, approximately 65,000 square feet of neighborhood commercial space, potential mixed uses within the Residential Multiple (RM-SR) areas, an elementary school site upon which it is anticipated an elementary school would ultimately be built to serve up to 700 students, 18.2 acres of park space as well as additional park and recreational facilities, and related on- and off-site project infrastructure. In addition to the Plan Area, additional property will be evaluated in this EIR as part of the project being studied. First, an approximate 26-acre area immediately adjacent to the northeast corner of the Plan Area ("WWTP site") is included in this environmental review because the applicant proposes to potentially develop this area as a wastewater treatment plant and related irrigation areas to serve the project in the event the City of Hollister's Domestic Wastewater Treatment Plant is not able to provide wastewater capacity for the project. Second, the parcels of land located on the east side of Fairview Road immediately adjacent to the Plan Area consisting of the existing CDF Fire Station (approximately 5 acres) ("CDF site") and the existing LESSALT water treatment plant (approximately 1.7 acres) ("LESSALT site") are being included because the applicant proposes that these parcels, along with portions of the Plan Area, be annexed into Sunnyslope County Water District. For purposes of this EIR, the 292-acre Plan Area, the 26-acre WWTP site, the 5-acre CDF site, and the 1.7-acre LESSALT site shall be referred to collectively as the "project site."

This chapter summarizes the purpose and intended uses of the EIR, the requirements for environmental review that are mandated under federal, state and local law, and the scope and organization of the EIR.

1.1 BACKGROUND AND PURPOSE

The County of San Benito, hereinafter the "County," has prepared this EIR to provide the decision makers, as well as the public, responsible agencies, and trustee agencies with information about the potential environmental effects of the proposed project. As described in CEQA Guidelines Section 15121(a), an EIR is a public informational document that assesses potential environmental effects of the proposed project and identifies feasible mitigation measures and alternatives to the proposed project that could reduce or avoid adverse environmental impacts. Public agencies are charged with the duty to consider and minimize environmental impacts of proposed development where feasible, and have an obligation to balance a variety of public objectives, including environmental, economic and social factors.

1.2 TYPE OF DOCUMENT

CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR has been prepared as a project level EIR pursuant to CEQA Guidelines Section 15161. A project EIR focuses on the changes in the environment that would result from development of the project, including construction and operation of the project. The EIR examines environmental impacts of the project as compared to the existing environment in the vicinity of the project from both a local and regional perspective, on the basis of maximum use and intensity scenarios for the aforementioned topic areas, as identified within the Specific Plan.

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1.3 INTENDED USES OF THIS EIR

This EIR has been prepared in accordance with CEQA and is consistent with the most recent edition of the CEQA Guidelines. This document will be used by San Benito County and any other responsible or reviewing agencies to identify and evaluate significant environmental impacts of developing the project. This analysis is based on the potential effects of the proposed project, as measured against the existing condition of the site and its surroundings. **Chapter 2.0, Project Description**, contains a detailed Project Description. Discretionary actions that would be required as part of the project evaluated in this EIR are listed under subheading **2.7, Requested Actions and Required Approvals**.

1.4 ENVIRONMENTAL REVIEW PROCESS

The California Environmental Quality Act and the County of San Benito encourage public participation in the planning and environmental review processes. Opportunities will be provided for the public to present comments and concerns regarding the project and this environmental review document through a 45-day CEQA public review and comment period, as well as at public hearings or meetings before the County of San Benito Planning Commission and Board of Supervisors.

The review and certification process for the EIR will involve the following procedural steps:

NOTICE OF PREPARATION

In accordance with Public Resources Code Section 21100, 21151 and Sections 15064(a)(1) and (f)(1) of the CEQA Guidelines, the County of San Benito determined that an EIR would be necessary for the project since it is not exempt from CEQA review and it may cause a significant effect on the environment; therefore, no initial study was prepared. In accordance with Section 15082(a) of the CEQA Guidelines, the County circulated a Revised Notice of Preparation (NOP) of an EIR on November 23, 2009, which provided a description of the project, its location and the project's probable environmental effects. The NOP is included as **Appendix A** of this EIR. The NOP was circulated to the public, local, state and federal agencies, and other interested parties as required under the law to solicit comments on the proposed project and the scope of the environmental review. Comments raised in response to the NOP were considered during preparation of this Draft EIR and are also included in **Appendix A**.

DRAFT EIR

The EIR contains a description of the project, description of the environmental setting, and identification of the project's significant environmental effects, including direct, indirect and long-term effects. The EIR also briefly sets forth the reasons that possible significant environmental impacts were found to be insignificant and therefore not discussed in detail in the EIR. The EIR also includes a discussion and analysis of significant cumulative impacts, as well as an identification and description of any feasible measures that can be implemented to reduce or avoid each potentially significant environmental effect of the project. The EIR also describes a reasonable range of alternatives to the project that could feasibly attain the project's basic objectives while reducing or avoiding any of its significant impacts, as well as an examination of any growth-inducing impacts. Upon completion and publication of the EIR, the County filed a Notice of Completion (NOC) with the State Office of Planning and Research, in accordance with Section 15085 of the CEQA Guidelines. This began the 45-day public review period (Public Resources Code, Section 21161) for the EIR.

PUBLIC NOTICE/PUBLIC REVIEW

Concurrent with the NOC, the County provided public notice of the availability of the DEIR for public review in accordance with CEQA Guidelines Section 15087(a), and invited comment from the general public, Responsible Agencies, Trustee Agencies, and other organizations and interested parties. As discussed above, the DEIR public review and comment period is 45 days. Although no public hearings on the DEIR are required by CEQA, the County will hold a Planning Commission public review meeting during the 45-day review period at which time public comment on the EIR will be accepted both in written form and orally. Notice of the time and location of the hearing will be published prior to the Planning Commission meeting in accordance with applicable noticing provisions.

All comments or questions regarding the Draft EIR should be addressed to:

Lisette Knight, Senior Planner
COUNTY OF SAN BENITO
3224 Southside Road
Hollister CA 95023
Phone: 831-637-5313

RESPONSE TO COMMENTS/FINAL EIR

Following the public review and comment period for the DEIR, a Final EIR (FEIR) will be prepared. The County will evaluate the comments received on the DEIR during the 45-day comment period and will prepare written responses for inclusion in the FEIR as required under CEQA. These responses will describe the disposition of any significant environmental issues raised by the commenters. The County Board of Supervisors will review and consider the FEIR prior to its decision to approve, revise or reject the proposed project.

CERTIFICATION OF THE EIR

If the County finds that: (1) the FEIR is "adequate and complete"; (2) it reflects the County's independent judgment and analysis; and (3) it was presented to the Board of Supervisors, which reviewed and considered the information in the FEIR, the County will certify the FEIR.

PROJECT CONSIDERATION

Upon review, consideration and certification of the FEIR, the County will decide whether to approve the project. A decision to approve the project would be accompanied by written findings in accordance with CEQA Guidelines Section 15091 and, if applicable, Section 15093 (Statement of Overriding Considerations).

MITIGATION MONITORING

The County of San Benito must also adopt a Mitigation Monitoring and Reporting Program for mitigation measures that have been incorporated into or imposed upon the project to reduce or avoid significant effects on the environment (Public Resources Code Section 21081.6(a)). This program will be designed to ensure compliance with these measures during project implementation. The specific reporting or monitoring program required by CEQA is not required to be included in the EIR. Throughout the EIR, however, mitigation measures have been clearly identified and presented in a language that will facilitate establishment of a monitoring and

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reporting program. Any mitigation measures adopted by the County as part of the certified FEIR will be considered as conditions for approval of the project and will be included in the Mitigation Monitoring and Reporting Program to ensure and verify compliance.

1.5 SCOPE AND ORGANIZATION

Sections 15122 through 15132 of the CEQA Guidelines identify the content requirements for Draft and Final EIRs. As set forth more fully therein, an EIR must include: a project description and a description of the environmental setting. In addition, the EIR must include consideration and discussion of environmental impacts, including significant impacts; feasible mitigation measures proposed to minimize significant impacts; a range of reasonable alternatives; significant irreversible environmental changes; growth-inducing impacts; and cumulative impacts.

The consideration and discussion of the environmental issues addressed in the EIR were the result of the preparation of environmental documentation and supporting technical reports in connection with the project, as well as comments provided by public agencies and the public in response to the Notice of Preparation. Based upon technical reports, other relevant documentation, NOP comments, agency consultation and review of the project application, the County has determined the scope for this EIR. This EIR is organized in the following manner:

CHAPTER 5 - EXECUTIVE SUMMARY

This chapter summarizes the characteristics of the proposed project and provides a concise summary matrix of each of the project's significant environmental impacts with proposed mitigation measures and project alternatives; areas of controversy known to the County including issues raised by agencies and the public; and issues to be resolved including the choice among alternatives and whether and how to mitigate the significant effects.

CHAPTER 1.0 - INTRODUCTION

This chapter provides an introduction and overview describing the intended use of the EIR, the environmental review and certification process, and the scope and organization of the EIR.

CHAPTER 2.0 - PROJECT DESCRIPTION

This chapter provides a detailed description of the proposed project, including an overview of the project, its regional location, project characteristics, the project's relationship to existing planning documents, project objectives, and requested actions and required approvals.

CHAPTER 3.0 - ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

This chapter contains an analysis of environmental topic areas to be addressed, as identified below. Each subsection contains a description of the existing setting of the project area, identifies project-related impacts and recommends feasible mitigation measures as required.

The following major environmental topics shall be addressed in this chapter:

- **3.1 Aesthetics and Visual Resources:** The potential change in character as measured against the existing setting and visual conditions of the project area, including any unique or character-defining visual resources, is discussed in this section of the EIR. Project visibility, scale, additional light and glare, and community character are considered relative to the

existing rural, residential, limited orchard and hay farming agricultural land uses existing on-site and in the context of the applicable regulatory setting. Views of the project site as seen from various roadways in the vicinity are discussed within this section of the EIR as part of the analysis. Potential aesthetic and visual impacts that could result from the proposed project are evaluated, and feasible mitigation measures addressing these impacts are identified as warranted.

- **3.2 Agricultural Resources:** This section describes the project site's characteristics, including its existing agricultural resources, as well as the surrounding uses. This section also evaluates, within the applicable regulatory setting, the potentially significant impacts of the conversion of farmland, conflicts with Williamson Act contracts or existing zoning, and other changes that could result in conversion of adjacent farmland. This examination is based on the *San Benito County General Plan*, the *San Benito County Important Farmland* map (2008) and the *Soil Survey of San Benito County* (1988)
- **3.3 Air Quality:** This section describes the existing environmental setting and evaluates local and regional air quality impacts associated with project implementation, including short-term impacts from grading and construction, long-term operational emissions from mobile and stationary sources and exposure to toxic air contaminants such as particulate exhaust emissions from diesel-fueled engines, as well as an analysis of the project's potential cumulative impact on greenhouse gas emissions. This section also contains recommended measures to mitigate the identified impacts to the extent feasible. This analysis is based on an air quality assessment prepared for the County by AMBIENT Air Quality & Noise Consulting, and using information from the Monterey Bay Unified Air Pollution Control District (MBUAPCD), their respective air management plans and CEQA guidance documents.
- **3.4 Biological Resources:** Potential impacts of the project on biological resources in the affected areas are analyzed in this section. In particular, this section evaluates the project's potentially significant impacts on special-status species and their habitat as well as wildlife corridors, and recommends measures to mitigate to the extent feasible any identified significant impacts. This analysis is based on a review of the project description as well as data collected from field surveys, available literature from federal, state and local agencies, and a PMC peer review of the biological technical reports by H.T. Harvey & Associates, including a biotic assessment (2007a), results of species-specific surveys (2007b), two wetland delineations (2007c; 2008a), and a biological assessment for U.S. Fish and Wildlife Service (USFWS; 2008b). PMC biologists also conducted reconnaissance-level surveys of the project site in July 2009 and March 2010. Although all the technical reports are discussed in the environmental setting, the impact analysis relies primarily on peer-reviewed biological resource information obtained through recent surveys and the reports completed by H.T. Harvey in 2007 and 2008, all of which are included as **Appendix D**.
- **3.5 Cultural Resources:** This section considers and evaluates the potential impacts of the proposed project on cultural and paleontological resources. Cultural resources include historic buildings and structures, historic districts, historic sites, prehistoric and historic archaeological sites, and other prehistoric and historic objects and artifacts. Paleontological resources include fossil remains, as well as fossil localities and formations, which have produced fossil material in other nearby areas. This EIR utilizes technical information and analyses from previous studies, including reports prepared by *Archaeological Resource Management* (1995) and *Basin Research Associates* (1997), which are hereby incorporated by reference. Current archaeological and historical investigations for the project site were

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conducted by PMC in April, 2008 to identify any potentially changed conditions and to verify results of previous studies.

- **3.6 Geology and Soils:** This section of the EIR provides a discussion of the geologic, seismic and soil conditions at the proposed project site. The potential impacts of the proposed project related to existing geologic, seismic and soil conditions are evaluated and feasible mitigation measures are proposed where applicable. PMC's analysis is based on the technical information contained within the *Geotechnical Investigation and Geologic Feasibility Evaluation Update (2007)* prepared for the project. This report is contained in **Appendix E** of this EIR.
- **3.7 Hazards and Hazardous Materials:** This section of the EIR discusses the potential presence of hazardous materials and conditions within the project site and analyzes the potential risk of these conditions in proximity to existing and proposed development and human activities. PMC's analysis is based on the technical information contained within the *Phase I Environmental Site Assessment and Limited Phase II Soil Testing report (ESA)* prepared for the project site by Earth Systems Pacific (ESP) in August 2009, and the *Natural Gas Pipeline Risk Analysis* prepared for the project by Kleinfelder, Inc., included as **Appendix F** to this EIR. The purpose of the ESA is to evaluate the potential presence of soil or groundwater contamination related to any past use, handling, storage, or disposal of hazardous materials or petroleum products on or near the project site.
- **3.8 Surface Water Hydrology and Water Quality:** This section discusses surface hydrology and water quality relative to the San Benito County area and the project site. Changes in water quality, drainage patterns, and erosion are analyzed. PMC's analysis is based on the technical information contained within the *Engineering Report for Development of Santana Ranch*, prepared by the engineering firm of RJA, October 2008, included as **Appendix G**, as well as flood mapping information provided by San Benito County.
- **3.9 Land Use and Planning:** This section of the EIR describes the existing land uses of the project site, characterizes surrounding land uses and evaluates the consistency of the project with relevant provisions of the *San Benito County General Plan* and other applicable County plans or policy documents. The discussion of potential impacts focuses on compatibility of the proposed project with adopted land use plans and policies and with surrounding land uses. This analysis is based on the General Plan, the *San Benito County Code* (including the County's *Zoning Ordinance*), and additional information provided by San Benito County.
- **3.10 Noise:** This section includes a summary of applicable regulations, a description of existing ambient noise conditions, and an analysis of potential noise impacts of the proposed project. Feasible mitigation measures are recommended, as necessary, to reduce significant noise impacts. The noise analysis is based on a noise impact assessment prepared on behalf of the County by AMBIENT Air Quality & Noise Consulting, included as **Appendix ___**.
- **3.11 Public Services and Facilities:** This section of the EIR addresses existing public services and facilities within unincorporated San Benito County and evaluates the potential environmental impacts associated with any physical expansion or alteration to public service facilities caused by implementation of the proposed project. Services examined for potential impacts include law enforcement, fire protection, schools, parks and recreation, and solid waste. This analysis is primarily based on information contained in the *County of San Benito General Plan* and personal and written communication with the San Benito County Sheriff's Department, San Benito County Fire Department, Hollister School District, San

Benito High School District, Integrated Waste Management, and San Benito County Planning and Building Department.

- **3.12 Parks and Recreation:** This section of the EIR addresses existing parks and recreational facilities within the County of San Benito, as well as planned park facilities within the Santana Ranch project. The potential impacts of the project related to existing park and recreational facilities, as well as any impacts resulting from the use of proposed facilities within the project, are evaluated and feasible mitigation measures are included where applicable. PMC's analysis is based on information supplied by the San Benito County Planning Department and the City of Hollister, other technical documents, and on information contained within the Santana Ranch Specific Plan.
- **3.13 Traffic and Circulation:** This section of the EIR examines potential traffic and circulation impacts resulting from the proposed project based on the traffic impact analysis for the project prepared by Hexagon Transportation Consultants, dated August 8, 2008, as supplemented on March 3, 2010. This analysis was prepared on behalf of the project applicant, in consultation with the County of San Benito Public Works Department and Planning Department. The analysis was peer reviewed on behalf of the County by the traffic engineering firm of Hatch Mott MacDonald (formerly Higgins Associates) on September 26, 2008. The traffic impact analysis and peer review documentation are attached as **Appendix H** of this EIR.
- **3.14 Wet and Dry Utilities:** This section of the EIR addresses existing utility and infrastructure systems within the County of San Benito and the City of Hollister that will serve the proposed Santana Ranch project. The analysis discusses the ability of existing or planned systems to accommodate the proposed project in terms of distribution and supply and identifies potential environmental impacts that could result from the need for new or expanded systems. PMC's analysis is based primarily on information provided by the County of San Benito and local service providers, as well as information contained within the San Benito County General Plan, City of Hollister *General Plan*, the *Engineering Report for Development of Santana Ranch* prepared for the project by RJA and technical information (including a Water Supply Assessment) provided by Tully & Young, Inc., attached as **Appendix J**. This section also includes a discussion of projected energy usage of the project, with an emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy, pursuant to Appendix F of the CEQA Guidelines.

CHAPTER 4.0 – ALTERNATIVES TO THE PROJECT

CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to a project, which could feasibly attain the basic objectives of the project and avoid and/or lessen the environmental effects of the project. This EIR's alternatives analysis compares the proposed project and the selected alternatives. These alternatives are discussed in **Chapter 4.0, Alternatives to the Project**, and include:

- **Alternative 1 – No Project/No Build:** The “No Project/No Build Alternative” assumes that if the project is not approved, no further development of the project site would occur. This alternative would result in the continued use of all areas of the project site as described in the environmental setting of **Section 3.9, Land Use Planning**, which consists of: agricultural uses including cultivated hayfields and the continued cultivation of the 23-acre walnut orchard; and the existing residential uses in connection with the two on-site residences. This alternative also assumes that the beneficial attributes of the project, including the implementation of

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numerous sustainable design, siting and building features; reservation of an elementary school site; and the development of over 18 acres of parks and recreational facilities, as well as roadside trails, landscaped parkways, naturally designed detention basins and a Class I trail and sidewalks within landscaped corridors along the collector streets and Fairview Road, would not be constructed. This alternative would avoid each of the impacts identified in this EIR, which are listed within the Impact Summary Table.

- **Alternative 2 – No Project/No General Plan Amendment:** The “No Project/No General Plan Amendment Alternative” assumes that the project site would be developed with estate homes on five-acre minimum lots, as permitted under the project site’s current County ‘Rural’ General Plan and zoning designations. For the 292-acre Plan Area, this density would allow for approximately 44 dwelling units based on an assumed 219 net acres for development. These lots would not be comprehensively planned in accordance with a specific plan and may be sold individually, with each buyer contracting separately to build custom homes. This alternative also assumes that the beneficial attributes of the project, including the implementation of numerous sustainable design, siting and building features; the reservation of an elementary school site; and the development of over 18 acres of parks and recreational facilities, as well as roadside trails, landscaped parkways, naturally designed detention basins and a Class I Trail and sidewalks within landscaped corridors along the collector streets and Fairview Road; would not be constructed. The potential impacts of this alternative are discussed, relative to the impacts associated with the proposed project.
- **Alternative 3 – Lower Density Alternative:** This alternative would reduce the density and intensity of development of the project by approximately one-third, and would consist of 519 single-family dwellings, 213 multi-family dwellings, and 43,550 square feet of Neighborhood Commercial uses. No mixed uses would be built under this alternative. It is assumed that the project site would be comprehensively planned in accordance with an adopted specific plan, and that the proposed uses would be served by either the City of Hollister Domestic Wastewater Treatment Plant or an on-site treatment plant, similar to the proposed project. Under this alternative, it is assumed that the beneficial attributes of the project, including the implementation of numerous sustainable design, siting and building features; the reservation of an elementary school site (assuming a 700-student school); and the development of parks and recreational facilities, as well as roadside trails, landscaped parkways, naturally designed detention basins and a Class I trail and sidewalks within landscaped corridors along the collector streets and Fairview Road, would be constructed, albeit on a reduced scale commensurate to the reduced density and intensity of development. The impacts that would result from the Lower Density Alternative are discussed, relative to the impacts associated with the proposed project.
- **Alternative 4 – Rural Residential Alternative:** This alternative assumes the project site would be developed consistent with the County’s “Rural Residential” zoning designation, which permits development of one single-family unit per 1/2 acre, so long as water and sewer services are available. Accordingly, under this alternative, a total of 438 single-family homes would be developed on the project site (assuming 219 net acres). It is assumed that the project site would not be comprehensively planned in accordance with an adopted specific plan, but that the proposed uses would be served by either the City of Hollister Domestic Wastewater Treatment Plant or an on-site treatment plant, similar to that described by the proposed project. In addition, under this alternative, the required park and recreational facilities, along with other necessary infrastructure and improvements, would be built. However, it is assumed that other beneficial attributes of the project, including the implementation of numerous sustainable design, siting and building features; the reservation of an elementary school site; extensive additional informal park and recreational facilities

(i.e., roadside trails, landscaped parkways, naturally designed detention basins and a Class I trail and sidewalks within landscaped corridors along the collector streets and Fairview Road); would not be constructed. The impacts that would result from the Rural Residential Alternative are discussed, relative to the impacts associated with the proposed project.

CHAPTER 5.0 – CUMULATIVE IMPACT SUMMARY

This section evaluates the cumulative impacts generated by a list of past, present and reasonably foreseeable probable future projects in proximity to the project, as identified by the County of San Benito and City of Hollister, along with various technical analyses taken from the various analyses within **Chapter 3.0** of this EIR and appendices. Cumulative impacts expected from the project are the result of combining the potential effects of the project with other cumulative development identified by the County of San Benito, as listed in Table 5.1, as well as that anticipated by growth within the *San Benito County General Plan*.

SECTION 6.0 - OTHER SECTIONS REQUIRED BY CEQA

This section contains required discussions and analyses of various topical issues mandated by CEQA Guidelines Section 15126.2, including: significant and unavoidable environmental effects; growth inducing impacts; irreversible environmental changes and effects found not to be significant.

CHAPTER 7.0 - REPORT PREPARERS AND REFERENCES

The purpose of this chapter is to provide a list of all authors and agencies that assisted in the preparation of the report by name, title, and company or agency affiliation. It also itemizes supporting and reference data used in the preparation of the Draft EIR and lists all governmental agencies, organizations, and other individuals consulted in preparing the Draft EIR.

APPENDICES (VOLUME 2)

This section includes all notices and other procedural documents pertinent to the EIR, as well as all technical reports and other documents as appropriate, which have been prepared in connection with or are otherwise relevant to the analysis contained in this EIR.

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1.6 IMPACT TERMINOLOGY

This Draft EIR uses the following terminology to describe environmental effects of the proposed project:

- **Standards of Significance:** A set of criteria used by the lead agency to determine at what level, or "threshold", an impact would be considered significant. Significance criteria used in this EIR include the CEQA Guidelines and Statutes; factual or scientific information; regulatory and performance standards of local, state, and federal agencies, including the County's adopted CEQA procedures.
- **Less Than Significant Impact:** A less than significant impact would cause no substantial change in the environment and no mitigation is required.
- **Potentially Significant Impact:** A potentially significant impact may cause a substantial adverse change in the physical conditions of the environment. Significant impacts are identified by the evaluation of project effects using specified standards of significance. Feasible mitigation measures and/or project alternatives are identified to reduce project effects to the environment.
- **Significant and Unavoidable Impact:** A significant and unavoidable impact would result in a substantial change in the environment for which no feasible mitigation is available to reduce the impact to a less than significant level, although mitigation may be available to lessen the degree of the impact.
- **Cumulative Impact:** Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.