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## **6.0 OTHER SECTIONS REQUIRED BY CEQA**

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## 6.0 OTHER SECTIONS REQUIRED BY CEQA

This chapter discusses the long-term implications of the proposed project as required by CEQA. The topics discussed include significant irreversible environmental changes/irretrievable commitment of resources, growth-inducing impacts and significant and unavoidable environmental effects.

### 6.1 IRREVERSIBLE ENVIRONMENTAL CHANGES

#### CEQA REQUIREMENT

Public Resources Code Section 21100(b)(2)(B) requires an Environmental Impact Report to include a detailed statement setting forth any significant effects on the environment that would be irreversible if a proposed project is implemented. Examples of irreversible environmental changes, as set forth in CEQA Guidelines Section 15126.2(c), include the following:

- The proposed project would involve a large commitment of nonrenewable resources such that removal or nonuse thereafter is unlikely;
- The primary and secondary impacts of a proposed project would generally commit future generations to similar uses (e.g. a highway providing access to a previously inaccessible area); or
- The proposed project involves uses in which irreversible damage could result from any potential environmental accidents associated with the proposed project.

A proposed project would result in significant irreversible effects if it is determined that key resources would be degraded or destroyed to the extent that there is little possibility of restoring them. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified (CEQA Guidelines Section 15126.2(c)).

#### ANALYSIS

The development of the project would result in the alteration of site topography, which while relatively minor, would represent a permanent change, since it would be infeasible to return the site to its existing topography. The construction of the other proposed uses, including the residential areas, the Neighborhood Commercial center and mixed uses, the school, park and recreational facilities, and other proposed improvements would also be permanent changes. In addition, while not entailing an unusually large commitment of resources, the project would include the consumption of non-renewable building materials and energy resources during the construction phase, and the ongoing consumption of energy for lighting, air conditioning, space and water heating, and travel to and from the site during the life of the project. However, the consumption of such resources is typical of these types of developments and would be reduced to the extent feasible by the implementation of a number of sustainable building and design features proposed by the project, as set forth in Article 5 of the Specific Plan. While these changes would be permanent, the project would include the production of a mix of housing types to serve the needs of a range of households, the creation of some employment opportunities at the Neighborhood Commercial center and potential mixed uses, as well as the contribution of various community amenities in the form of park and recreational facilities and a potential new school.

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### 6.2 GROWTH INDUCING IMPACTS

#### CEQA REQUIREMENT

Public Resources Code Section 21100(b)(5) and CEQA Guidelines Section 15126(d) require that the growth-inducing impacts of a project be addressed in the EIR. It must discuss the ways in which the project may directly or indirectly foster economic or population growth or additional housing in the surrounding environment, remove obstacles to growth, tax existing community services facilities, or encourage or facilitate other activities that cause significant environmental effects, either individually or cumulatively (CEQA Guidelines Section 15126.2(d)). Direct growth-inducing impacts result when the development associated with a project directly induces population growth or the construction of additional developments within the same geographic area. The analysis of potential growth-inducing impacts includes a determination of whether a project would remove physical obstacles to population growth. This often occurs with the extension of infrastructure facilities that can provide services to new development. In addition to direct growth-inducing impacts, an EIR must also discuss growth-inducing effects that will result only indirectly from the project. Indirect growth-inducing impacts result from projects that serve as catalysts for future unrelated development in an area. Development of public institutions, such as colleges, and the introduction of employment opportunities within the same geographic area, are examples of projects that may result in growth-inducing impacts.

An EIR's discussion of growth-inducing effects should not assume that growth is necessarily beneficial, detrimental, or of little significance to the environment (CEQA Guidelines Section 15126.2(d)). An EIR is required to discuss the ways in which the proposed project could foster growth (CEQA Guidelines Section 15126.2(d)(2)). It is not required to forecast and mitigate development described as induced growth.

#### ANALYSIS

##### **Precedent for Further Development**

The approval of the proposed project would not represent a new commitment of rural lands for urban development. This site has been planned for urban uses in principle by the County Board of Supervisors since 1989, with the adoption of Resolution No. 89-92, which designated this site in the County's General Plan (as part of a larger 558-acre area) as an 'Area of Special Study.' This area was deemed appropriate for development because it was generally not constrained by the existence of natural resources or environmental hazards, and viewed as an opportunity for higher density development so long as the projects were proposed as part of a comprehensive plan for public services and resource conservation. As stated in the General Plan, Land Use Element, Land Use Plan, the Area of Special Study designation "applies to areas of the County where a combination of the following criteria apply: 1) More concentrated development than is presently allowed may be desirable provided a comprehensive plan for public services and resource conservation is integrated in order of priority into a specific plan, community plan, or area plan; 2) As a result of prior, piecemeal subdivisions, a plan for integrated development and coordination of governmental services and/or community facilities is desirable; 3) The County has identified the area as a potential area for commercial, industrial, and/or residential development." Therefore, approval of the project would not represent the first decision in favor of extending urban development into this non-urbanized area, and thus would not induce further outward urban expansion beyond this special study area by way of setting a precedent for such outward growth.

### **Precedent for Suburban-Density Development in the Unincorporated County**

The approval of the proposed project would not represent the first time that suburban-density development has been approved in the unincorporated area of San Benito County. Several previous projects, including but not limited to Ridgemark Golf Course, Cielo Vista Estates, Oak Creek, Quail Hollow, Riverside Estates and Ashford Highland, were approved by the County and developed within the past twenty to thirty years. Therefore, the approval of the project would not represent the first suburban-density project in San Benito County, and as such would not induce growth by way of setting a precedent for similar development in the unincorporated area of the County.

### **Growth Induced by Increased Infrastructure Capacities**

The infrastructure required for the development of the project would be sized to accommodate buildout of the project only. In the event that the potential wastewater treatment facility is ultimately built, it would be sized to serve only the project, being able to treat an average of 0.32 mgd, which is the estimated wastewater generation for the project. Similarly, water mains within the project boundaries would be sized to serve the project only. Providing municipal water to lands east of the project site would also be prevented because the eastern limits of San Benito County Water District Zone 6 (the distribution zone San Felipe water) and the Sunnyslope County Water District are coterminous with the eastern project boundary. New sewer mains will be required to be installed within Fairview Road, in order to connect the project site to the City of Hollister Domestic Water Treatment Plant. The project proposes to size these mains to accommodate only the project's waste requirements. Therefore, because the project is not currently proposing to oversize the required sewer lines, no growth beyond that already anticipated will be induced by the new sewer lines.

### **Removal of Obstacles to Growth**

Roadway and intersection improvements associated with the project will provide additional capacity of these facilities, thus accommodating additional growth in the area. The majority of the project's proposed roadway and intersection improvements, however, have been previously anticipated in the City of Hollister and County General Plans, and have been included to accommodate the growth anticipated by these plans. The project will therefore not remove potential obstacles to growth that have not already been anticipated by the City of Hollister and San Benito County General Plans.

Sunnyslope and Hillcrest Roads would be extended easterly into the project site, but would be constructed as major collector streets only as far as Orchard Park Road, beyond which they would become minor collector streets. Thus, these streets would not have sufficient capacity to accommodate traffic from any additional development to the east of the project site. The internal north-south collector street (Park Center Drive) has been designed to allow roadway extensions off-site to the north and south; however, those adjacent off-site areas are also within the 'Area of Special Study' and therefore have already been identified by the County as areas of potential urban development.

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### **Stimulus for Economic Growth**

The Neighborhood Commercial center and potential mixed uses permitted in the RM-SR area would likely stimulate some economic growth through direct employment, as well as indirect growth through demand for goods and services. This could contribute to incremental secondary effects such as increased hiring by suppliers. However, given the relatively minor amount of economic activity that would result from the project, the indirect impacts from this minor increment of economic growth would not be significant.

The residential component of the project would not induce direct economic growth since it would not create new permanent employment opportunities, as compared with industrial or commercial development. Residential development is generally considered a product rather than a cause of economic growth. However, during the construction phase, temporary jobs would be created and others supported in the purchase of materials. The residential component would also have a minor secondary economic effect resulting from the consumer demand for goods and services by project residents.

### **Population and Housing Growth**

To the extent that employees of businesses at the on-site Neighborhood Commercial center or within any mixed uses in the RM-SR areas would not already live within easy commuting range of the project site, they could be induced to move into the area, thus creating a slight increase in housing demand in the area. However, this minor increase in potential housing demand would not be significant given the relatively minor amount of additional employment opportunities.

In summary, the project would not result in significant growth inducement by way of setting a precedent for similar projects, by creating excess infrastructure capacities, by stimulating significant economic growth, or by generating significant unmet demand for housing.

## **6.3 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS**

Public Resources Code Section 21100(b)(2)(A) requires an EIR to include a detailed statement setting forth any significant effects on the environment that cannot be avoided if a project is implemented. Significant effects that cannot be mitigated must be described as well as effects that can be mitigated but not reduced to a level of insignificance (CEQA Guidelines Section 15126.2(b)). If significant unavoidable impacts cannot be reduced or avoided without changing the design of the project, the EIR must describe the reasons the project is being proposed despite the significant unavoidable impacts (CEQA Guidelines Section 15126.2(b)). Section 15093(a) of the CEQA Guidelines allows the decision-making agency to determine if the benefits of a proposed project outweigh the significant unavoidable adverse environmental impacts of implementing the proposed project. San Benito County can approve a proposed project with significant unavoidable adverse impacts if it prepares a "Statement of Overriding Considerations" setting forth the specific reasons for making such a judgment. The Statement of Overriding Considerations is a statement of San Benito County's views on the ultimate balancing of the merits of approving a project despite its environmental impacts. The Statement of Overriding Considerations must be in writing and state specific reasons supporting the County's action based on the Final EIR and other substantial evidence in the record. Substantial evidence includes facts, reasonable assumptions predicated upon facts and expert opinions supported by facts. Substantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment.

Based upon the environmental analysis provided in **Chapter 3.0**, most of the potential impacts associated with the proposed project can be avoided or reduced to a less than significant level through the imposition of mitigation measures that would be implemented in conjunction with the proposed project. However, the project would result in **significant unavoidable impacts** with regard to air quality and traffic.

### EMISSIONS OF CRITERIA AIR POLLUTANTS

With mitigation, maximum daily project-generated emissions would be reduced to approximately 174 lbs/day of ROG, 212 lbs/day NO<sub>x</sub>, 1,052 lbs/day of CO, 1 lbs/day SO<sub>x</sub>, and 179 lbs/day of PM<sub>10</sub>. Project-generated emissions would be reduced, but would still be anticipated to exceed MBUAPCD significance thresholds for ROG, NO<sub>x</sub>, and PM<sub>10</sub>. As a result, this impact would be considered **significant and unavoidable**. Please see **Section 3.3, Air Quality**, for complete discussion on this impact.

### TRAFFIC

A number of roadway intersections within the Hollister area will be impacted by the proposed project. Most of these intersections will be improved using traffic impact fees collected from the project by the County, or by funds collected through the establishment of benefit areas for the intersection improvements not included in the TIF. Because improvements to these intersections may not be implemented in time to mitigate the immediate project impacts to these intersections, however, project impacts must be considered to be **significant and unavoidable**. Please see **Section 3.13, Traffic and Circulation**, for complete discussion on this impact.

## 6.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

A significant effect on the environment is generally defined as a substantial or potentially substantial adverse change in the physical environment (CEQA Guidelines Section 15382). The term "environment" means the physical conditions, both natural and man-made, that exist within the area that will be affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise and objects of historic or aesthetic significance; the area involved shall be the area in which significant effects would occur either directly or indirectly as a result of the proposed project (CEQA Guidelines Section 15360).

Detailed analyses and discussion of environmental topics found to be significant are provided within **Chapter 3.0** of this EIR. Listed below are those environmental effects that were determined not to be significant and therefore not discussed in detail in the EIR (Pub. Res. Code Section 21100(c); CEQA Guidelines Section 15128). This determination is based on the scope of prior environmental documentation for this site, standards of significance contained within the CEQA Guidelines and the Notice of Preparation process for the proposed project. The completed NOP and responses from the public and affected agencies and organizations are included in the Technical Appendices.

### MINERAL RESOURCES

Mineral resource impacts are considered significant if the proposed project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or of a locally important mineral resource recovery site delineated on a local General Plan, Specific Plan or other land use plan. According to the *San Benito County General Plan*, there are no significant mineral resources or mining operations

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within the project site. Since there is no evidence of any mineral resources on the project site, and therefore implementation of the proposed project would not result in the loss of access to, or availability of, a known mineral resource that would be of value to the county, region or the state, this topic was not evaluated further.