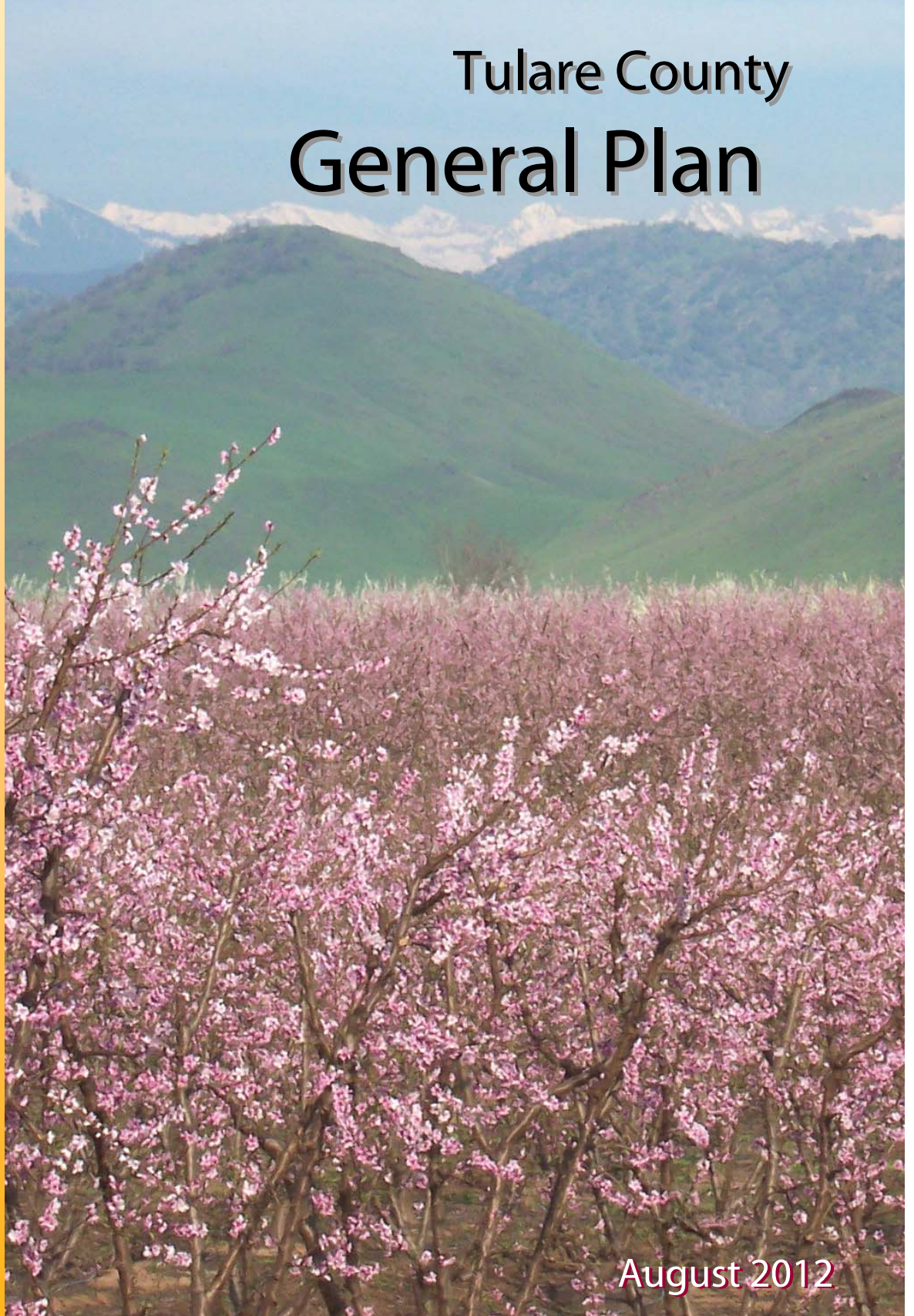




Tulare County General Plan Update

CEQA Findings and Statement of Overriding Considerations

Tulare County General Plan



August 2012

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TULARE COUNTY GP 2030 UPDATE

CEQA Findings and Statement of Overriding Considerations

Introduction

The project consists of an update to the Tulare County General Plan (also referred to as the General Plan 2030 Update, the “proposed project” in the FEIR, the GPU, the updated general plan, or the General Plan update). The General Plan 2030 Update updates and reorganizes the County’s general plan policies and documents as described in Section B, below. The General Plan update will serve as a “blueprint” for growth; that is, it establishes the general pattern of land use and adopts goals and policies to guide the County in future land use decision-making for the unincorporated area of the County. The goals and policies established by the General Plan address a range of related topics, including, but not limited to Land Use, Water Resources, Air Quality, Flooding, Public Safety (i.e., wildfire hazards, law enforcement, fire service, etc.), Open Space and Conservation, and Traffic (See RDEIR Section 2.0, “Project Description”, for further details).

Tulare County is the lead agency as defined in the California Environmental Quality Act (CEQA). (Public Resource Code §21067).

The “Final Recirculated Draft EIR” for the GPU, also referred to as the “Final EIR” (FEIR) or “Final Environmental Impact Report” for the Tulare County General Plan 2030 Update (GPU) and the Climate Action Plan (SCH#2006041162) evaluates the environmental effects associated with implementation of the General Plan 2030 Update and the Climate Action Plan. The FEIR serves as an informational document for public agency decision-makers and the general public regarding the environmental effects of the General Plan 2030 Update and identifies feasible mitigation measures (referred to as “Required Additional Mitigating Policies and Implementation Measures”) and alternatives that would reduce or eliminate significant impacts of the proposed project.

The FEIR is the primary reference document for the development and implementation of a mitigation monitoring plan for the proposed project. Environmental impacts cannot always be mitigated to a level that is considered less than significant. In accordance with the CEQA Guidelines (Cal. Code Regs., tit. 14, section 15000 et seq.), if a lead agency approves a project that has significant impacts that are not substantially mitigated (i.e., significant unavoidable impacts), the agency shall state in writing the specific reasons for approving the project based on the final CEQA documents and any other information in the public record for the project. (CEQA Guidelines, section 15093, subd. (b).) This is called a “statement of overriding considerations”. (CEQA Guidelines, Section 15093.) (RDEIR, page 1-9)

The FEIR consists of the following contents:

- Executive Summary;
- Chapter 1, “Introduction and Readers’ Guide”;
- Chapter 2, “Minor Revisions to the Recirculated Draft EIR,” contains minor changes and edits to the text of the RDEIR made in response to the comments (including revisions made after the release of the uncertified FEIR in September 2011);
- Chapter 3, “Comments on the Recirculated Draft EIR,” includes a copy of each of the comment letters received during the review period from March 25, 2010 to May 27, 2010. The individual comment letter numbers correspond to those responses provided in Chapter 5;
- Chapter 4, “Master Responses,” is comprised of general responses that address similar comments received regarding certain specified subject areas;
- Chapter 5, “Responses to Comments on the Recirculated Draft EIR,” contains the written responses to the individual comments received during the public review period for the RDEIR along with written responses to those comments; and
- The Recirculated Draft EIR dated February 2010. Revisions contained in the chapters above preempt language contained in the Recirculated Draft EIR.

This document includes the CEQA Findings, consistent with CEQA Guidelines Section 150901, and includes the Statement of Overriding Considerations, consistent with CEQA Guidelines Section 15093.

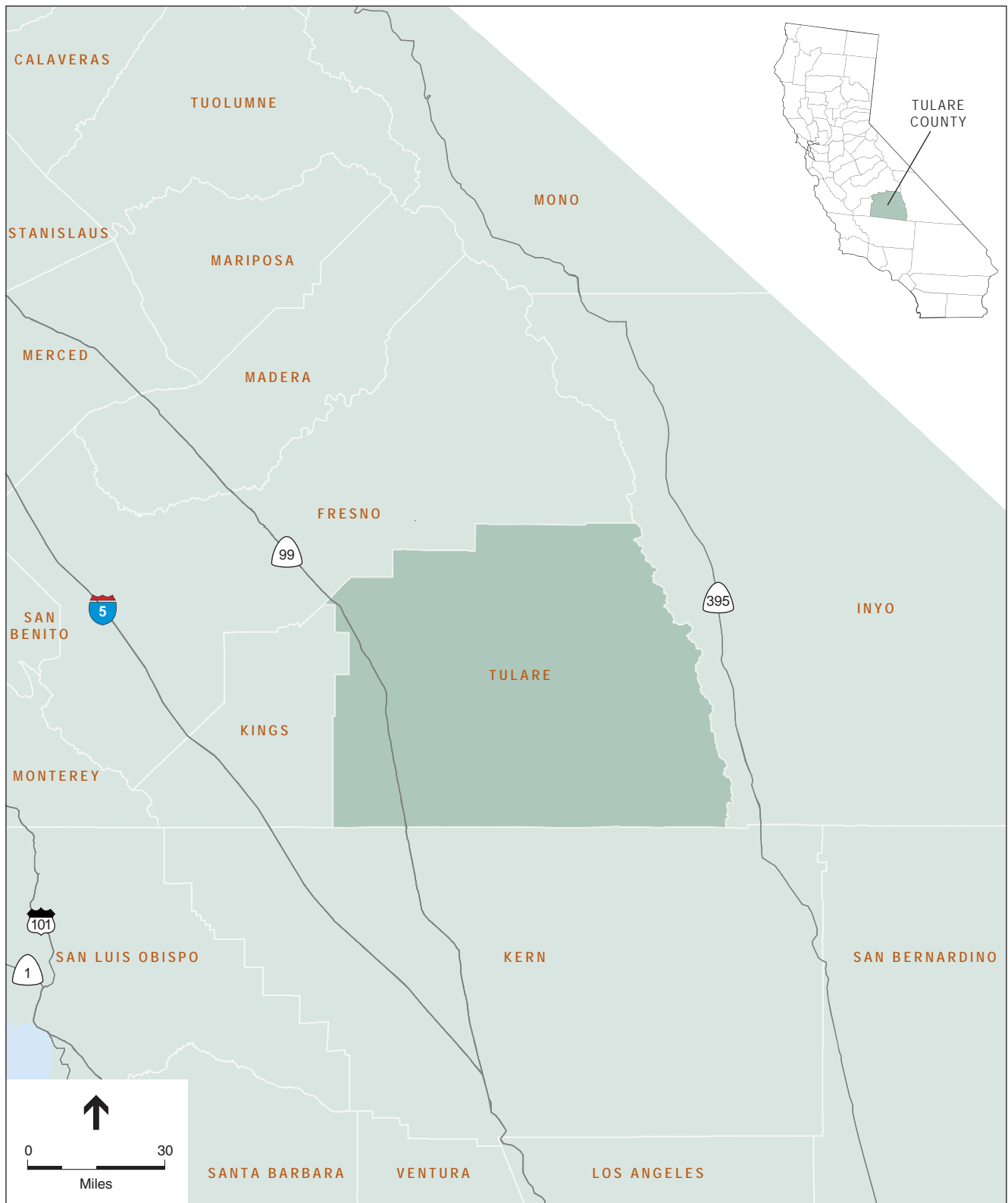
Project Description Summary

Project Setting and County Boundaries

Tulare County is located in a geographically diverse region with the peaks of the Sierra Nevada framing its eastern region, a foothill region west of the mountains, transitioning to the western portion of the County which includes the San Joaquin Valley floor, which is very fertile and extensively cultivated. The County is connected regionally via State Route 99 (SR 99), which is the primary north-south highway in the County. State highways 63 (north/south), 65 (north/south), 190 (east/west), and 198 (east/west) serve to connect the various cities, communities and regions within the County.

Tulare County consistently ranks amongst the top two leading agricultural-producing counties in the U.S., sharing this recognition with its larger neighbor to the north, Fresno County. In addition to agricultural production, the County’s economic base also includes agricultural packing and shipping operations. Small and medium sized manufacturing plants are located in the Valley part of the county and are increasing in number.

The County of Tulare is bordered by Fresno County to the north and Kern County to the south. Kings County is located on the west side of Tulare County while Inyo County borders the County to the east (see **Figure 1**). The crest of the Sierra Nevada mountain range forms the boundary with Inyo County. The northern border of Tulare County is an irregular line that passes just south of the Cities



SOURCE: DeLorme Street Atlas USA, 2001; and ESA, 2012

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Figure 1
Regional Locator

of Kingsburg and Reedley and State Highway 180. The southern border is a consistent east-west trending line, comprising the south standard parallel south of Mount Diablo, located north of the City of Delano in Kern County. The western border generally trends north-south in a straight-line north and south just east of the Cities of Corcoran and Hanford in Kings County.

Summary of the General Plan 2030 Update¹

Tulare County General Plan 2030 Update is the product of an update process that would add a variety of important new goals and policies to existing components of the County's General Plan. In addition, some obsolete policies of the General Plan will be deleted by this update process. In many cases, those obsolete policies will be replaced by new provisions. Further, a Work Plan, consisting of implementation measures, is proposed. Implementation measures in the Work Plan will be prioritized by the County, and adjusted over time to remain consistent with, and effectively implement, the General Plan 2030 Update as adopted.

The General Plan 2030 Update consists of a comprehensive update of Tulare County's existing General Plan. The historic three tier structure will remain, formalized as three "Parts." The key General Plan Update policy document includes Part I: the Goals and Policies Report and Part II: Area Plans. Part III consists of individual, existing Community, sub-area and other localized plans. The current adopted plans in Part III will not be changed as part of this update, except that the Planning Framework (Part 1, Chapter 2) of the General Plan Update modifies the Urban Development Boundaries for Dinuba (revised by this update to include the Dinuba Golf Course) and Pixley (revised by this update to include Harmon Field). The General Plan 2030 Update is generally described in detail in Section 2.0 "Project Description" of the RDEIR, and in Chapter 1 of the FEIR. These Findings have been provided for the adoption of the "Proposed Project" draft of the General Plan 2030 Update, including additional revisions which have been incorporated into the General Plan 2030 Update since the "February 2010" draft, including but not limited to the "Required Additional Mitigating Policies and Implementation Measures" identified in the FEIR. These revisions are outlined in further detail in the Resolution for the adoption of the General Plan 2030 Update.

Project Objectives

Although the proposed project was developed to meet several fairly broad objectives (i.e., the requirements of State law, etc.) the General Plan Update was also developed through an extensive public outreach process to reflect the specific policy needs of Tulare County. To help determine what these specific policy needs are, the Tulare County Board of Supervisors considered input received from the many community workshops, the Tulare County General Plan Update Technical Advisory Committee, and the Planning Commission, on the fundamental values that would guide the preparation of the General Plan Update. As a result of this input, the following five value statements were identified:

¹ This summary of the General Plan 2030 Update is only intended to provide a brief overview of the General Plan 2030 Update. The Resolution on the General Plan 2030 Update controls the contents of the approval.

- The beauty of the County and the health and safety of its residents will be protected and enhanced.
- The County will create and facilitate opportunities to improve the lives of all County residents.
- The County will protect its agricultural economy while diversifying employment opportunities.
- Every community will have the opportunity to prosper from economic growth.
- Growth will pay its own way providing sustainable, high quality infrastructure and services.

From these value statements, four framework concepts were developed for the General Plan.

- **Concept 1: Agriculture.** One of the most identified assets in Tulare County is the rich agricultural land on the Valley floor and in the foothills. The General Plan identifies agriculture not only as an economic asset to the County but also as a cultural, scenic, and environmental element to be protected and to insure that the utilization of these resources may continue to economically succeed.
- **Concept 2: Land Use.** Tulare County has a number of unincorporated communities and may plan for and establish new communities that will grow and develop while natural resource lands (agriculture, mineral extraction, and open space) will be preserved and permitted to expand. It is anticipated that much of the projected population growth will require a range of housing choices, neighborhood support services, and employment producing uses that are centrally located in cities and unincorporated communities. The County will also utilize its goals and policies to guide the conversion of agricultural and natural resource lands to urban uses.
- **Concept 3: Scenic Landscapes.** The scenic landscapes in Tulare County will continue to be one of its most visible assets. The Tulare County General Plan emphasizes the enhancement and preservation of these resources as critical to the future of the County. The County will continue to assess the recreational, tourism, quality of life, and economic benefits that scenic landscapes provide and implement programs that preserve and use this resource to the fullest extent.
- **Concept 4: Natural and Cultural Resources.** As Tulare County develops its unincorporated communities and plans for new self-sustaining communities, the County will ensure that development occurs in a manner that limits impacts to natural and cultural resources through the implementation of its Goals and Policies through proper site planning and design techniques.

From these framework concepts several guiding principles were identified, which set the foundation for the various goals, policies, and implementation measures that comprise the various elements of the General Plan Update. These guiding principles also serve as the objectives of the proposed project.

Overall, the objectives of the proposed project are to amend and update the policies of the General Plan to achieve the following:

- Provide opportunities for small unincorporated communities to grow or improve quality of life and their economic viability and to provide the framework for planning new self-sustaining communities;

- Promote reinvestment in existing unincorporated communities in a way that enhances the quality of life and their economic viability in these locations;
- Protect the County's important agricultural resources and scenic natural lands from urban encroachment through the implementation of goals and policies of the General Plan;
- Strictly limit rural residential development in important agricultural areas outside of unincorporated communities' Urban Development Boundaries (UDBs) and cities' County Adopted City Urban Area Boundaries (CACUABs) and County Adopted City Urban Development Boundaries (CACUDBs) (i.e., avoid sprawl);
- Allow existing and outdated agricultural facilities in rural areas to be retrofitted and used for new agricultural related businesses (including value added processing facilities and uses) subject to specified criteria; and
- Enhance planning coordination and cooperation with the agencies and organizations with land management responsibilities in and adjacent to Tulare County.

Procedural Compliance with CEQA

Environmental Review and Public Participation

The original Draft EIR was circulated for public review and comment for an extended period over 90 days (January 14, 2008 through April 15, 2008). The County published a Recirculated Draft Environmental Impact Report (RDEIR) on or about March 25, 2010 and a FEIR on or about August 30, 2011 in compliance with CEQA. The FEIR has been prepared for the County in accordance with CEQA and the CEQA Guidelines. As allowed for in CEQA Guidelines § 15084(d) (2), the County retained a consultant to assist with the preparation of the environmental documents. The County, as the lead agency, has directed preparation of the EIR, reviewed all material prepared by the consultant, and such material reflects the County's independent judgment. The key milestones associated with the preparation of the EIR are summarized below. In addition, an extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the EIR and to solicit comment on the results of the environmental analysis presented in the Recirculated Draft EIR. In general, the preparation of the EIR included the following key steps and public notification efforts:

- The 2006 Notice of Preparation (NOP). The County formally initiated the environmental process with circulation of an NOP, which was sent to responsible agencies and interested individuals for a 30-day review period from April 25, 2006 to May 29, 2006. While an initial study was not included as part of the NOP, the NOP identified the likely potential environmental impacts that should be studied in the EIR. A public scoping meeting was held on May 1, 2006. The NOP and a summary of the comments received during the 30-day review period are provided in the FEIR (RDEIR, Appendix A).
- The 2008 Draft EIR. In January 2008, the County published the Tulare County General Plan 2030 Update Draft Environmental Impact Report (DEIR). The 2008 DEIR assessed the environmental implications of implementing the proposed project. The 2008 DEIR was circulated for public review and comment for an extended period of over 90 days (January 14, 2008 through April 15, 2008) to allow for maximum public involvement and input. A copy of the Notice of Completion (including extensions, published January 14, 2008), requesting public comment, is attached to the FEIR (RDEIR, Appendix A).

During the public review period for the 2008 Draft EIR, the County accepted approximately 90 written communications (over 770 pages of written communication with more than 800 pages of attachments) from agencies, organizations and individuals with comments on the general plan update and original DEIR.

In its role as the lead agency, the County has directed the recirculation of the DEIR for the proposed project (RDEIR). Consideration of the various comments received on the DEIR, as well as continued research and documentation in the areas of air quality and climate change regulation resulted in the County's decision to update a number of sections of the RDEIR, as well as the 2010 Background Report. Consequently, comments on the previous DEIR released in January 2008, although a part of the administrative record, do not require a written response in the Final Environmental Impact Report (FEIR). New comments must be submitted for the RDEIR. The County, as provided in CEQA Guidelines, section 15088.5(f)(1), will not respond to individual comments received on the January 2008 Draft EIR but will respond to any new comments received on this February 2010 RDEIR as part of the FEIR to be considered by the Planning Commission and Board of Supervisors.

- The 2010 Recirculated Draft EIR ("RDEIR"). The County reviewed and considered all comments received during the 2008 comment period, made several revisions to the proposed project (i.e., revised the General Plan 2030), and recirculated the DEIR. The 2010 RDEIR was circulated for public review and comment for a period of 60 days (March 25, 2010 through May 27, 2010) to continue to allow for maximum public involvement and input.
- The 2010 proposed FEIR. A total of 40 comment letters were received on the RDEIR during the public review period from March 25, 2010 to May 27, 2010, with an additional four (4) letters received after the official completion of the public review period. Altogether, the County received 44 letters containing approximately 2,300 comments, with approximately 1,570 pages of materials. Letters received from government and local agencies accounted for 4 percent of the total comments received. Letters received from individuals and organizations comprised 96 percent of the total comments received. County published a FEIR on or about August 30, 2011, which included: a list of persons, organizations, and public agencies commenting on the RDEIR; the County's written responses to all significant environmental points raised in the comments; changes to the text of the RDEIR made in response to comments; and other revisions and clarifications,
- 2010 Planning Commission recommendations. The FEIR and the Project were reviewed by the Planning Commission in duly noticed public hearing(s) held on August 30, 2011, October 19, 2011, and December 7, 2011. On December 7, the Planning Commission adopted resolutions containing its written recommendations to the Board of Supervisors to certify the proposed FEIR (Planning Commission Resolution No.8636) and to adopt the Project as modified in: the FEIR, the revisions recommended by Staff in the Public Policy Comment Matrix (Attachment 3A) BOS Agenda Item Attachment E Item 7, the Tulare County 2030 General Plan Update Summary of Changes (Attachment 3B) BOS Agenda Item Attachment E Item 8, the General Plan 2030 Update Correctory Table (Attachment 3C) BOS Agenda Item Attachment E Item 9 and the Addendum to Attachment 3C titled "Addendum to Attachment 3C General Plan City Section PF – 4 BOS Agenda Item Attachment E Item 10."

Record of Proceedings

For the purposes of CEQA, and these findings, the administrative record for the proposed project consists of those items listed in Public Resources Code section 21167.6, subdivision (e). The record of proceedings for the Board's decision on the proposed project consists of the following documents, at a minimum:

- The General Plan Background Report (revised in 2010);
- The NOP (April 2006) and all other public notices issued by the County in conjunction with the proposed project;
- The Draft Environmental Impact Report for the Tulare County General Plan 2030 Update and Technical Appendices (January 2008);
- All comments submitted by agencies or members of the public during the extended 90-day comment period on the DEIR (January 14, 2008 through April 15, 2008);
- All comments and correspondence submitted to the County with respect to the proposed project, in addition to timely comments on the DEIR;
- The Recirculated Draft Environmental Impact Report for the Tulare County General Plan 2030 Update and Technical Appendices (March 2010);
- All comments submitted by agencies or members of the public during the extended 60-day comment period on the RDEIR (March 25, 2010 through May 27, 2010);
- The Final Environmental Impact Report for the Tulare County General Plan 2030 Update, including comments received on the RDEIR and responses to those comments (September 2011);
- The mitigation monitoring plan for the proposed project;
- All findings and resolutions adopted by the Board in connection with the Tulare County General Plan 2030 Update, and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the proposed project prepared by the County, consultants to the County, or responsible or trustee agencies with respect to the County's compliance with the requirements of CEQA and with respect to the County's action on the Tulare County General Plan 2030 Update;
- All documents submitted to the County (including the Planning Commission and Board of Supervisors) by other public agencies or members of the public in connection with the Tulare County General Plan 2030 Update, up through the close of the public hearing on the FEIR (December, 2011);
- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by the County in connection with the Tulare County General Plan 2030 Update;
- Any documentary or other evidence submitted to the County at such information sessions, public meetings and public hearings;
- All resolutions adopted by the County regarding the Tulare County General Plan 2030 Update, and all staff reports, analyses, and summaries related to the adoption of those resolutions;
- Matters of common knowledge to the County, including, but not limited to Federal, State, and local laws and regulations;

- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

The official custodian of the record is the County of Tulare Resource Management Agency. The documents and other materials, which constitute the record of proceedings for the County's approval of this project, are located at the County of Tulare Resource Management Agency office located at 5961 S. Mooney Blvd, Visalia, CA 93277.

Mitigation Monitoring and Reporting Programs

A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the proposed project, and has been approved by the Board of Supervisors by the same resolution that has adopted these findings. (See Pub. Resources Code, § 21081.6, subd. (a)(1); CEQA Guidelines, § 15097.) The County will use the MMRP to track compliance with the proposed project mitigation measures. The MMRP has been published as a stand-alone document.

Environmental Impacts and Findings

CEQA Requirements

Public Resources Code section 21002 provides that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. The required procedures are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. In the event that specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof. (Public Resources Code §21002.)

The requirements set forth in Public Resources Code section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code section 21081, subd. (a); CEQA Guidelines, section 15091, subd. (a).)

The EIR included a detailed analysis of impacts in multiple environmental disciplines, analyzing the proposed project and alternatives, including a No Project Alternative. The EIR discloses the environmental impacts expected to result from the construction and operation of the proposed project. Where possible, mitigation measures were identified to avoid or minimize significant environmental effects. The mitigation measures identified in the EIR are measures proposed by the lead agency, responsible or trustee agencies or other persons that were not included in the proposed project but could reasonably be expected to reduce adverse impacts if required as conditions of approving the proposed project, as required by CEQA Guidelines § 15126.4(a)(1)(A). Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." CEQA Guidelines section 15364 adds another factor: "legal"

considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors "Goleta II"*) (1990) 52 Cal.3d 553, 565.)

The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417.) "[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (Id.; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) Alternatives and mitigation measures may also be determined to be infeasible if they do not "fully satisfy the objectives associated with a proposed project" or are "undesirable from a policy standpoint." (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, sections 15093, 15043, subd. (b); see also Pub. Resources Code, section 21081, subd. (b).)

The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Goleta II*, 52 Cal.3d at p. 576.)

These findings set forth the evidentiary and policy basis for the Board of Supervisors' decision to approve the proposed project in a manner consistent with the requirements of CEQA.

Pursuant to Public Resources Code § 21081 and CEQA Guidelines §15091, no public agency shall approve or carry out a project for which a FEIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

The County has made one or more of these specific written findings regarding each significant impact associated with the proposed project. Those findings are presented below in **Table 1**, along with a presentation of facts in support of the findings.

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Land Use and Aesthetics				
Impact 3.1-1: The proposed project could divide the physical arrangement of an established community.	Less-than-Significant	<p>Although this impact is considered <i>less-than-significant</i>, the following revised existing policies are recommended to ensure that this impact remains <i>less-than-significant</i>:</p> <ul style="list-style-type: none"> • PFS-1.7 Coordination with Service Providers. The County shall work with special districts, community service districts, public utility districts, mutual water companies, private water purveyors, sanitary districts, and sewer maintenance districts to provide adequate public facilities and to plan/coordinate, as appropriate, future utility corridors in an effort to minimize future land use conflicts. • LU-7.12 Historic Buildings and Areas. The County shall seek to encourage preservation of buildings and areas with special and recognized historic, architectural, or aesthetic value. New development should respect architecturally and historically significant buildings and areas. Landscaping, original roadways, sidewalks, and other public realm features of historic buildings or neighborhoods shall be restored or repaired where ever feasible. 	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that changes or alterations are recommended and are incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as revised policies PFS-1.7 and LU-7.12 are feasible and are adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.1, the primary purpose of the updated general plan is to ensure that future development follows a consistent and orderly pattern that does not physically divide the arrangement of an established community. As development occurs, it would be required to be consistent with the goals and policies of the proposed updated general plan. The proposed updated general plan policies will ensure compliance with the proposed general plan and provide for the implementation of measures to protect existing neighborhoods (in particular those with historic building and/or areas) and to ensure that development is consistent with existing development patterns. (RDEIR pages 3.1-18 through 3.1-21) Although no mitigation is required for this less than significant impact, proposed revisions to policies PFS-1.7 and LU-7.12 will further ensure that land use impacts associated with the division of existing established communities will be less-than-significant.</p> <p>Reference: RDEIR pages 3.1-20 through 3.1-21. For additional discussion regarding the project's impacts to land use, see RDEIR Section 3.1.</p>	Less-than-Significant
Impact 3.1-2: The proposed project could conflict with other applicable adopted land use plans.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.1, the project as proposed ensures consistency with other applicable regional plans governing land uses in Tulare County. Additionally, the project ensures that existing and future land uses function without imposing a nuisance, hazard, or unhealthy condition upon adjacent uses. The proposed updated general plan policies will ensure consistency with other applicable adopted land use plans (such as the Comprehensive Airport Land Use Plan, etc.). (RDEIR pages 3.1-22 through 3.1-24)</p> <p>Implementation of proposed updated general plan policies described in the RDEIR (pages 3.1-23 through 3.1-24) will reduce potential land use impacts associated with land use conflicts with applicable adopted land use plans to a less-than-significant level. Because this impact is less</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			than significant, no additional mitigation measures are required. Reference: For additional discussion regarding the project's impacts to land use, see RDEIR Section 3.1.	
Impact 3.1-3: The proposed project would substantially degrade the existing visual character or quality of scenic resources or vistas.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.1 of the RDEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that reduce or avoid this impact. These mitigating policies and implementation measures address Scenic Landscapes, Environmental Resources Management, Public Facilities and Services, Land Use, Transportation and Circulation, Corridor Framework, and Foothills Growth Management. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • protect and feature existing scenic qualities of the County; • preserve and enhance the character and scale of the County's communities, hamlets and rural areas; • provide guidance on the development of infrastructure that minimizes impacts to the existing scenic qualities of the County; • protect scenic views for travelers along County roads and highways; • provide protection to scenic resources and roadways within the various planning areas <p>No additional, feasible mitigation measures identified.</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.1, new development resulting from population growth associated with the Project will result in changes to existing views within all portions of the County's planning areas (e.g. communities, hamlets, rural areas.). A majority of the changes will be focused in the unincorporated communities of the Rural Valley Lands Plan geographical area. The Project will alter the existing open space views of surrounding visible areas and contrast with the surrounding open space/agricultural environment at the edge of these new development areas. Implementation of proposed updated general plan policies would help preserve the existing visual character or quality of future development sites and their surroundings. More specifically, updated general plan policies and implementation measure are designed to:</p> <ul style="list-style-type: none"> • protect the visibility of the night sky in communities; • improve the visual quality of the County by maintaining or enhancing existing scenic resource conditions; • develop guidelines to improve future development projects, or create capital improvements which improve community aesthetics; • preserve the existing historic character of the County's communities, hamlets and rural areas; • encourage the development of new structures and infrastructure that build on natural landscapes and features of the existing setting; • encourage the County to implement a variety of measures designed to preserve historic resources, including abatement programs for dilapidated buildings, adaptive reuse of historic structures and continued coordination with local preservation groups to improve 	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>building facades and other features;</p> <ul style="list-style-type: none"> • protect scenic views for travelers along County roadways; • provide guidance for development of infrastructure that minimizes impacts to existing scenic landscapes; • continue maintenance of a designated system of County Scenic Routes and State Scenic Highways; • protect the “gateway highways to the Sequoias; • maintain rural-agricultural character; • protect the scenic qualities of local roadways; • minimize impacts to scenic resources within the foothills; • ensure hilltop development is designed to preserve the existing skyline and scenic panorama of the foothills; • required the County to prepare design guidelines for County Scenic Routes in the Rural Valley Land Plan areas; require the County to work with the Three Rivers and Springville communities to prepare the “Sequoia Gateway Guidelines” for future community plan updates. <p>Even with implementation of these policies, new development along the periphery of the County’s existing communities, hamlets, or rural areas will substantially degrade the existing visual character or quality of the site and its surroundings through the introduction of developed uses within areas currently used for open space/agricultural activities. No additional feasible mitigation is currently available. Consequently, this impact remains a significant unavoidable impact.</p> <p>Reference: For additional discussion regarding the project’s significant and unavoidable impacts to visual resources, see RDEIR, Section 3.1.</p>	
Impact 3.1-4: The proposed project would substantially degrade the quality of scenic corridors or views from scenic roadways.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.1 of the RDEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that reduce or avoid this impact. The mitigating policies and implementation measures address Scenic Landscapes, Environmental Resources Management, Land Use, Transportation and Circulation, Corridor Framework, and Foothills Growth Management. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • protect and feature existing scenic qualities of 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.1, new development resulting from population growth anticipated under</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>the County;</p> <ul style="list-style-type: none"> • preserve and enhance the character and scale of the County's communities, hamlets and rural areas; • provide guidance on the development of infrastructure that minimizes impacts to the existing scenic qualities of the County; • protect scenic views for travelers along County roads and highways; • provide protection to scenic resources and roadways within the various planning areas <p>No additional, feasible mitigation measures identified.</p>	<p>the Project will result in permanent changes to existing scenic views throughout all County planning areas, in particularly along roadways associated with development in the Corridor Framework Plan area. New development will alter existing open space views of surrounding visible areas and contrast with the surrounding open space/agricultural environment at the edge of these new development areas. Implementation of proposed updated general plan policies will help protect scenic views for travelers along County roadways, guide infrastructure development to minimize impacts to existing scenic landscapes and preserve the existing visual character or quality of future development sites (including scenic corridors and roadways). More specifically, updated general plan policies and implementation measure are designed to:</p> <ul style="list-style-type: none"> • protect scenic views for travelers along County roadways; • provide guidance for infrastructure development that minimizes impacts to existing scenic landscapes; • continue maintenance of a designated system of County Scenic Routes and State Scenic Highways; • protect "gateway highways" (SR190 and SF198) to the Sequoias; • limit or provide guidance on the types of billboards, advertising or development that can be placed along County Scenic Routes and State Scenic Highways. <p>However, new development resulting from population growth under the Project will still result in permanent changes to existing scenic views throughout all County planning areas and will substantially degrade the existing visual character or quality of scenic corridors through the introduction of developed uses. No additional feasible mitigation is currently available to reduce this impact to a less than significant level. Consequently, this impact remains a significant unavoidable impact.</p> <p>Reference: For additional discussion regarding the project's significant and unavoidable impacts to visual resources (including scenic corridors and roadways), see RDEIR, Section 3.1.</p>	

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Impact 3.1-5: The proposed project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the County	Significant and Unavoidable	<p>As discussed in more detail in Section 3.1 of the RDEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that reduce or avoid this impact. The mitigating policies and implementation measures address Scenic Landscapes, Environmental Resources Management, Land Use, Transportation and Circulation, Corridor Framework, and Foothills Growth Management. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> protect and feature existing scenic qualities of the County; preserve and enhance the character and scale of the County's communities, hamlets and rural areas; provide guidance on the development of infrastructure that minimizes impacts to the existing scenic qualities of the County; protect scenic views for travelers along County roads and highways; provide protection to scenic resources and roadways within the various planning areas <p>The EIR also identified required additional mitigating policies to address this impact:</p> <ul style="list-style-type: none"> LU-7.18 Lighting. The County shall continue to improve and maintain lighting in park and recreation facilities to prevent nuisance light and glare spillage on adjoining residential areas. LU-7.19 Minimize Lighting Impacts. The County shall ensure that lighting in residential areas and along County roadways shall be designed to prevent artificial lighting from reflecting into adjacent natural or open space areas unless required for public safety. <p>No additional, feasible mitigation measures identified.</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.1, new development resulting from population growth anticipated as part of the General Plan Update will increase the amount of light and glare within urban development boundary areas associated with the development of urban uses, such as additional parking lots, building lights, and streetlights within areas that currently have no light or minimal amounts of light and glare. Implementation of updated general plan policies will help to minimize impacts resulting from a new source of substantial light or glare which would adversely affect day or nighttime views. More specifically, these policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> screen some land uses and maintain visual accessibility to ensure new development maintains existing views of natural areas; protect the visibility of the night sky in communities; limit the use of billboards, advertising or development that would introduce forms of nuisance lighting along State Scenic Highways, County Scenic Routes, or other area that currently have limited amounts of existing development <p>However, even with these policies and implementation measures, new development will result in substantial new sources of light and glare within areas currently used for a variety of open space/agricultural activities.</p> <p>The EIR identifies new policies LU-7.18 "Lighting" and LU-7.19 "Minimize Lighting Impacts") as required additional mitigation. Policy LU-7.18 requires the County to continue to improve and maintain lighting in park and recreation facilities to prevent nuisance light and glare spillage on adjoining residential areas. Policy LU-7.19 requires the County to ensure that lighting in residential areas and along County roadways be designed to prevent artificial lighting from spilling into adjacent natural or open space areas unless required for public safety. No additional feasible mitigation is currently available to reduce this impact to a less than</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>significant level. Consequently, this impact remains a significant unavoidable impact.</p> <p>Reference: For additional discussion regarding the project's significant and unavoidable impacts to visual resources (including scenic corridors and roadways), see RDEIR, Section 3.1.</p>	
Cumulative Impacts	Cumulatively considerable	<p>As discussed in more detail in Section 3.1 of the RDEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that reduce or avoid impacts to Land Use and Aesthetics. The mitigating policies and implementation measures address Land Use, Air Quality, Transportation and Circulation, Environmental Resource Management, the Planning Framework, the Corridor Framework, Foothills Growth Management, Scenic Landscapes, Agriculture, Water Resources, Health and Safety, and Public Facilities and Services.</p> <p>The EIR also identifies additional mitigation measures (i.e., new policies) LU-7.12, LU-7.18, LU-7.19 and. PFS-1.7</p> <ul style="list-style-type: none"> • LU-7.12 Historic Buildings and Areas. The County shall seek to encourage preservation of buildings and areas with special and recognized historic, architectural, or aesthetic value. New development should respect architecturally and historically significant buildings and areas. Landscaping, original roadways, sidewalks, and other public realm features of historic buildings or neighborhoods shall be restored or repaired where ever feasible. • LU-7.18 Lighting. The County shall continue to improve and maintain lighting in park and recreation facilities to prevent nuisance light and glare spillage on adjoining residential areas. • LU-7.19 Minimize Lighting Impacts. The County shall ensure that lighting in residential areas and along County roadways shall be designed to prevent artificial lighting from 	<p>Finding: The Board finds that changes or alterations have been incorporated into the Project which mitigates the project's cumulatively considerable contribution to significant cumulative impacts on the environment from Land Use and Aesthetics impacts. Specifically, the mitigation measures adopted as new policies LU-7.12, LU-7.18, LU-7.19 and PFS-1.7, are feasible and are adopted to mitigate significant effects of the GPU on Land Use and Aesthetics. However, even with implementation of these measures, the project's contribution to a significant cumulative impact remains <i>cumulatively considerable</i>.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Sections 3.1 and 5.3, growth associated with implementation of the GPU, along with development within the County will result in changes to the visual character of the County from a more agricultural/rural setting to one that is more characterized by suburban or urban uses (i.e., streets, homes and neighborhood shopping centers, with increased light and glare sources.)</p> <p>Despite the proposed policies and actions more fully described in section 3.1, and implementation of adopted state and County regulations that enhance the County's current community character and preserve open space, development permitted under the proposed project will result in a significant impact to the existing visual identity and character of the County due to the amount of growth allowed under the GPU.</p> <p>Development associated with regional growth will result in a substantial change to the visual character the surrounding area of the County. Continual urbanization of existing agriculture and open space land has the potential to permanently alter the character of the area. State and local regulations, such as the State Scenic Highway guidelines mitigation some potential impacts along scenic corridors by preserving views and open space land. However, development under the proposed project, combined with overall growth trends in the surrounding counties and cities, including cities within Tulare County, will transform the region from an agricultural/rural character to a more suburban setting. This is a significant cumulative impact and the growth allowed under the GPU represents a considerably cumulative contribution. As discussed in Section 3.1, no additional feasible mitigation measures are currently</p>	Cumulatively Considerable.

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>reflecting into adjacent natural or open space areas unless required for public safety.</p> <ul style="list-style-type: none"> • PFS-1.7 Coordination with Service Providers. The County shall work with special districts, community service districts, public utility districts, mutual water companies, private water purveyors, sanitary districts, and sewer maintenance districts to provide adequate public facilities and to plan/coordinate, as appropriate, future utility corridors in an effort to minimize future land use conflicts. <p>No additional, feasible mitigation measures identified.</p>	<p>available to further reduce impacts to Land Use and Aesthetics.</p> <p>The proposed project does, however, provide direction for growth and development within the county, ensuring orderly development consistent with economic, social and environmental needs and directs the County to coordinate growth and development so that it does not conflict with other applicable plans and regulations. The project does not make a cumulatively considerable contribution to Land Use Impacts.</p> <p>Reference: For additional discussion regarding the Project's cumulative contribution to significant, cumulative land use and aesthetic impacts, see RDEIR Sections 3.1 and 5.3.</p>	
Traffic and Circulation				
Impact 3.2-1: The proposed project would result in a substantial increase in vehicular traffic.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.2 of the RDEIR, the GPU includes, as part of the Project, mitigating policies that reduce or avoid this impact. The mitigating policies address Transportation and Circulation and Land Use. These policies are designed to:</p> <ul style="list-style-type: none"> • minimize transportation impacts through establishment of design and LOS standards for a variety of circulation, traffic, transit, and non-motorized transportation modes; • integrate land use and circulation concepts during early planning and design phases of County-wide development to minimize land use conflicts <p>No additional, feasible mitigation measures identified.</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.2, the Project will result in additional County-wide residential and non-residential land use developments which will contribute to additional vehicle use on local and regional streets and highways within all of the County's individual planning areas. The updated general plan addresses its traffic effects through a combination of policies and the physical improvements identified in the Transportation and Circulation Element of the updated general plan. (RDEIR, pages 3.2-16 through 3.2-32) Despite the policies identified in the updated general plan, deterioration in the traffic LOS as compared to current conditions is unavoidable mostly due to city growth not directly controlled by this plan. The physical improvements require cooperation and funding from a variety of entities inside and outside the County, so implementation of these improvements cannot be guaranteed solely through the County's actions. Additionally, the proposed circulation improvements (identify on page 3.2-24 of the RDEIR) are within the responsibility and jurisdiction of other public agencies and not specifically with the agency making the finding. Such</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>improvements can and should be adopted by such other agency. No additional feasible mitigation is currently available. Consequently, this impact remains a significant unavoidable impact.</p> <p>Reference: For additional discussion regarding the project's significant and unavoidable impacts to transportation and circulation issues, see RDEIR, Section 3.2.</p>	
Impact 3.2-2: The proposed project could result in substantial changes in accessibility to County-area railroad terminals and cargo transfer points.	Significant	<p>As discussed in more detail in Section 3.2 of the RDEIR, the GPU includes, as part of the Project, mitigating policies that reduce or avoid this impact. The mitigating policies address Transportation and Circulation and Land Use. These policies are designed to:</p> <ul style="list-style-type: none"> minimize transportation impacts through the establishment of design and LOS standards for a variety of circulation, traffic, transit, and non-motorized transportation modes; integrate land use and circulation concepts during early planning and design phases of Countywide development to minimize land use conflicts. <p>The EIR also identifies an additional mitigation measures required to address this impact:</p> <ul style="list-style-type: none"> TC-2.7 Rail Facilities and Existing Development. The County will work with the California Public Utilities Commission (CPUC) to ensure that new railroad rights-of-way, yards, or stations adjacent to existing residential or commercial areas are screened or buffered to reduce noise, air, and visual impacts. Similarly, the County should coordinate with the CPUC and railroad service providers to address railroad safety issues as part of all future new development that affects local rail lines. Specific measures to be considered and incorporated into the design of future projects affecting rail lines include, but are not limited to, the installation of grade separations, warning signage, traffic signaling improvements, vehicle parking prohibitions, installation of pedestrian specific warning 	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as new policy TC-2.7 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.2, additional population growth in the County and the State is expected to increase demand for freight movement through the County. Accessibility to railroad terminals and cargo transfer points could be affected by population growth and land use changes, resulting from development under the updated general plan. Rail transportation activities near existing and proposed railroad facilities within the Corridor Framework and Rural Valley Lands geographic areas could be affected. The updated general plan will ensure that a variety of measures are implemented to minimize rail transportation impacts. These policies establish standards to for a variety of transportation modes; require continued County coordination with TCAG and the High Speed Rail Commission; require the County to encourage Amtrak to add passenger service; protect important railroad right-of-way for future rail expansion activities, and provide for early design phase integration of land use and circulation concepts to minimize land use conflicts.</p> <p>The EIR also identifies new Policy TC-2.7 as required, additional mitigation. Policy TC-2.7 directs the County to work with the CPUC to screen residential or commercial areas from noise, air and visual impacts associated with railroads, thus minimizing land use conflicts that could impede accessibility to railroad terminals and cargo transfer points.</p> <p>For these reasons, implementation of proposed updated general plan policies (RDEIR page 3.2-33) along with adoption of the new policy (Policy TC-2.7 "Rail Facilities and Existing Development") as required mitigation, will reduce potential impacts to railroad and cargo transfer accessibility to a less than significant level.</p> <p>Reference: For additional discussion regarding the project's impacts to transportation and circulation issues see RDEIR Section 3.2.</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		devices, and the construction of pull out lanes for buses and vehicles		
Impact 3.2-3: The proposed project could result in a substantial increase in Countywide aviation usage at local facilities.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation.</p> <p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: The updated general plan will ensure that a variety of measures are implemented to address impacts to Countywide aviation facilities and support continued enhancement and development of the Countywide airport system. Consequently, with implementation of the updated general plan policies and implementation measures (RDEIR page 3.2-35) aviation impacts associated with the proposed project are considered less than significant.</p> <p>Reference: For additional discussion regarding the project's impacts to transportation and circulation issues see RDEIR Section 3.2.</p>	Less-than-Significant
Impact 3.2-4: The proposed project could result in a substantial increase in public transit usage.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: The updated general plan will ensure that a variety of measures are implemented to address impacts to public transit facilities and to continue supporting enhancement and development of the County's public transit system are implemented. Consequently with implementation of the updated general plan policies and implementation measures (RDEIR page 3.2-36) transit system impacts associated with the proposed project are considered less than significant.</p> <p>Reference: For additional discussion regarding the project's impacts to transportation and circulation issues see RDEIR Section 3.2.</p>	Less-than-Significant
Impact 3.2-5: The proposed project could result in a substantial increase in bicycle and pedestrian activity.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: The updated general plan will ensure that a variety of policies designed to minimize impacts to bicycle and pedestrian facilities and to support the expansion and development of additional trail facilities are implemented. Consequently with implementation of the updated general plan policies and implementation measures (RDEIR page 3.2-38) bicycle and pedestrian-related impacts associated with the proposed project are considered less than significant.</p> <p>Reference: For additional discussion regarding the project's impacts to transportation and circulation issues see RDEIR Section 3.2.</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Cumulative Impact	Cumulatively Considerable	<p>As discussed in more detail in Section 3.2 of the RDEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that serve to reduce or avoid Transportation and Circulation impacts, including policies and implementation measures addressing Transportation and Circulation and Land Use.</p> <p>The EIR also identifies an additional mitigation measures (i.e., new policy) TC-2.7.</p> <ul style="list-style-type: none"> TC-2.7 Rail Facilities and Existing Development. The County will work with the California Public Utilities Commission (CPUC) to ensure that new railroad rights-of-way, yards, or stations adjacent to existing residential or commercial areas are screened or buffered to reduce noise, air, and visual impacts. Similarly, the County should coordinate with the CPUC and railroad service providers to address railroad safety issues as part of all future new development that affects local rail lines. Specific measures to be considered and incorporated into the design of future projects affecting rail lines include, but are not limited to, the installation of grade separations, warning signage, traffic signaling improvements, vehicle parking prohibitions, installation of pedestrian specific warning devices, and the construction of pull out lanes for buses and vehicles 	<p>Finding: The Board finds that changes or alterations have been incorporated into the Project which mitigates the project's cumulatively considerable contribution to significant cumulative impacts on the environment from Transportation and Circulation impacts. Specifically, the mitigation measure adopted as new Policy TC-2.7 is feasible and is adopted to mitigate significant effects of the GPU on related transportation and circulation. However, even with implementation of this measure, the project's contribution to a significant cumulative impact remains cumulatively considerable. Other changes or alterations are within the responsibility and jurisdiction of other public agencies and have been, or can and should be, adopted by that other agency (including the California Department of Transportation, Tulare County Association of Governments, cites, etc.)</p> <p>Rationale for Finding: Cumulative traffic and transportation impacts of the GPU are more fully described in Section 3.2 of the RDEIR.</p> <p>The EIR identifies additional, required mitigation for transportation and circulation impacts. Policy TC-2.7, as modified in the Final EIR, directs the County to coordinate with the CPUC and railroad service providers to address railroad safety issues as part of all future new development that affects local rail lines. Specific measures to be considered and incorporated into the design of future projects affecting rail lines include, but are not limited to the examples listed in TC-2.7. This measure would reduce impacts to transportation and circulation related to railway safety.</p> <p>As discussed in Sections 3.2 and 5.3 of the RDEIR, and in the FEIR, physical improvements identified in the proposed project would require cooperation and funding from a variety of entities outside the County. Therefore implementation of improvements that would reduce impacts to transportation and circulation cannot be guaranteed solely through County's actions. For these reasons, cumulative impacts to transportation and circulation are considered significant and unavoidable. The project's contribution is cumulatively considerable.</p> <p>Reference: For additional discussion regarding the Project's cumulative contribution to significant, cumulative traffic and circulation impacts, see RDEIR Sections 3.2 and 5.3.</p>	Cumulatively Considerable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Air Quality				
Impact 3.3-1: The proposed project could expose a variety of sensitive land uses to construction-related air quality emissions.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.3, the updated general plan will ensure that a variety of policies designed to minimize construction-related air quality impacts are implemented. In addition, a number of regulations and standards exist that target construction-related air quality pollutants. Consequently with implementation of the updated general plan policies and implementation measures (RDEIR page 3.3-19) construction-related air quality impacts associated with the proposed project are considered less than significant.</p> <p>Reference: For additional discussion regarding the project's impacts to air quality issues see RDEIR Section 3.3.</p>	Less-than-Significant
Impact 3.3-2: The proposed project would result in a cumulatively considerable net increase of criteria air pollutants that result in a violation of an air quality standard.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.3 of the RDEIR, the GPU includes, as part of the Project, mitigating policies and implementation measures that reduce or avoid this impact. The mitigating policies address Air Quality, Land Use, and Environmental Resources Management. These policies are designed to:</p> <ul style="list-style-type: none"> • improve air quality through a regional approach and interagency cooperation; • improve air quality by reducing air emissions related to transportation; • improve air quality and minimize impacts to human health and the County's economy through smart land use planning and design; • implement the best available controls and monitoring to regulate air emissions; • encourage economic and social growth while retaining quality of life standards; • encourage energy conservation in new and developing (future) developments. <p>No additional, feasible mitigation measures identified</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains <i>significant and unavoidable</i>.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.3, the updated general plan addresses air quality impacts through a variety of policies and implementation measures. (RDEIR page 3.3-22) Future, project-specific compliance with SJVAPCD regulations and permitting will also help to reduce air quality emissions associated with individual projects. Compliance with SJVAPCD Regulation VIII (Fugitive Dust Prohibitions), and Rule 4550 (Conservation Management Practices) will help to reduce project PM10 emissions. SJVAPCD Rule 9510 will reduce project related NOx and PM10 emissions during project construction and operation. Compliance with Rule 9410 (Employer Based Trip Reduction) will reduce vehicle-related emissions from new and existing large employers. Rule 2201 (New and Modified Stationary Source Review) requires new and modified facilities to implement best available control technology (BACT) to reduce criteria pollutant emissions and to offset emissions that exceed thresholds contained in the rule. New and existing dairies and feedlots are subject to Rule 4570 (Confined Animal Facilities) that will reduce ROG emissions. Also, the</p>	Significant and Unavoidable

TABLE 1
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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>County will continue to ensure that a variety of PM10, PM2.5, and related ROG reducing measures are implemented under all future development projects to minimize air quality impacts through project specific CEQA mitigation measures and permit conditions. However, total air quality emissions associated with buildout of the proposed project would still exceed SJVAPCD thresholds for NOx, ROG and PM10. No additional feasible mitigation is currently available to reduce this impact to a less than significant level. As a result, the impact remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's significant and unavoidable impacts to air quality issues, see RDEIR, Section 3.3.</p>	
Impact 3.3-3: The proposed project could conflict with or obstruct implementation of an applicable air quality plan.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.3 of the RDEIR, the GPU includes, as part of the Project, mitigating policies that reduce or avoid this impact. The mitigating policies address Air Quality and Land Use.</p> <p>No additional, feasible mitigation measures identified.</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.3, growth in population vehicle use and other source categories will occur at historically robust rates. Although this Similar to Impact 3.3-2, the updated general plan addresses air quality impacts through a variety of policies and implementation measures. (RDEIR page 3.3-22) Future, project-specific compliance with SJVAPCD regulations and permitting will also help to reduce air quality emissions associated with individual projects. However, increased vehicle use and emissions from other source categories and population growth will make it more difficult to attain the 8-hour ozone standard by SJVAPCD's 2023 attainment date. The SJVAPCD's ozone attainment plan relies on unidentified future measures that require technological advances to achieve attainment. Because SJVAPCD is still developing future regulatory efforts, and because of the amount of the Project may come into conflict with, or obstruct implementation of an applicable air quality plan, No feasible mitigation is currently available to reduce this impact to less than significant. As a result, the impact remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's significant and unavoidable impacts to air quality issues, see RDEIR, Section 3.3.</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Impact 3.3-4: The proposed project could expose sensitive receptors to substantial pollutant concentrations that could affect public health.	Significant and Unavoidable	As discussed in more detail in Section 3.3 of the RDEIR, the GPU includes, as part of the Project, a number of mitigating that serve to reduce or avoid this impact. The mitigating policies address Air Quality and Land Use. No additional, feasible mitigation measures identified	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.3, development resulting from the Project could place sensitive land uses near local intersections or roadways associated with air pollutant emissions that exceed State or federal ambient air quality standards within all of the County's individual planning areas. Similarly, existing sensitive land uses near local roadways could be exposed to air pollutant emissions that exceed State or federal ambient air quality standards. In addition, Toxic Air Contaminant (TAC) emissions could be released from various construction and operations (e.g. dairy) associated with the Project. The updated general plan will implement a variety of policies and implementation measures designed to address air quality issues (RDEIR pages 3.3-25 – 3.3-27; see also pages 3.3-1 through 3.3-24). The County will also continue to discourage the siting of industrial or dairy/feedlot uses near sensitive land uses. Additionally, CEQA review for individual projects will provide project-specific data and require feasible mitigation for this impact. However, even with implementation of the above mentioned policies and regulations, and compliance with applicable SJVAPCD Rules and regulations, sensitive receptors such as children, seniors, and acutely ill and chronically ill persons may be exposed to substantial pollutant concentrations from new or increased emissions from a variety of sources including traffic, construction, dairy or feedlot operations, industrial processes, etc. associated with implementation of the updated general plan. No additional feasible mitigation is currently available to reduce this impact to a less than significant level. This is a significant and unavoidable air quality impact.</p> <p>Reference: For additional discussion regarding the project's significant and unavoidable impacts to air quality issues, see RDEIR, Section 3.3.</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Impact 3.3-5: The proposed project could create objectionable odors affecting a substantial number of people.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.3, the updated general plan will implement a number of policies designed to address nuisance issues (including odor concerns) associated with the inappropriate siting of sensitive land uses near other incompatible uses, including Policies AQ-3.1 through AQ-3.6, LU-1.1 through LU- 1.4, and LU-1.8. Additionally, compliance with SJVAPCD regulations on dairy and feedlot operations would also help to reduce this potential impact. These policies and regulations are specifically designed to address air quality and odor impacts at new or expanded existing dairy and feedlot facilities. Consequently, this impact is considered <i>less-than-significant</i>. No additional mitigation measures are required.</p> <p>Reference: For additional discussion regarding the project's impacts to air quality issues see RDEIR Section 3.3.</p>	Less-than-Significant
Cumulative Impacts	Cumulatively Considerable	As discussed in more detail in Section 3.3 of the RDEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that serve to reduce or avoid Air Quality impacts, including policies and implementation measures addressing Air Quality, Land Use, Environmental Resources Management,	<p>Finding: The Board finds that changes or alterations have been incorporated into the Project which mitigates the project's cumulatively considerable contribution to significant cumulative impacts on the environment related to Air Quality, but not to a level that is less than cumulatively considerable. No additional feasible mitigation measures are available to reduce the project's contribution to less than cumulatively considerable. Consequently, this impact remains <i>cumulatively considerable</i>.</p> <p>Rationale for Finding: As discussed more fully in Section 3.2 of the RDEIR, Tulare County is located within the San Joaquin Valley Air Pollution Control District (SJVAPCD). Emissions from mobile sources, dairy and feedlot operations, and natural gas combustion from stationary sources will exceed SJVAPCD thresholds for ROG and PM10, increasing the potential to expose people to pollutant concentrations that exceed health based standards described in Table 3.3-1 in the RDEIR. Industrial and commercial processes emissions allowed under the project could be of a hazardous nature. SJVAPCD Rules direct the County to take specific steps to reduce air quality impacts resulting from net increases in criteria pollutants, and GPU policies addressing Air Quality, Land Use and Environmental Resource Management employ integrated strategies to reduce air quality impacts, including, but not limited to, compact growth, infill development, landscaping, energy conservation and efficiency measures, renewable energy, implementation of best available controls for monitoring and regulating</p>	Cumulatively Considerable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>air emission. Despite the number and variety of policies and strategies incorporated in the GPU, total air quality emissions associated with buildout under the GPU will exceed SJVACPD thresholds for NOx, ROG and PM10.</p> <p>Because the SJVACPD is still developing future regulatory efforts, and analysis assumes that population growth, vehicle use and other source categories will occur at historically robust rates, there is uncertainty as to whether growth accommodated by the project will conflict with or obstruct applicable attainment plans.</p> <p>The GPU also incorporates a variety of policies to minimize sensitive receptor exposure to Toxic Air Contaminants (TACs), including policies to avoid inappropriate siting of sensitive land uses near other incompatible uses, and requiring individual projects to the extent feasible, to mitigate significant or potentially significant air quality impacts. However, the success of such measures is subject to technological and economic uncertainty.</p> <p>No additional feasible mitigation is currently available.</p> <p>For these reasons, the project's contribution to significant cumulative impacts to air quality will be cumulatively considerable.</p> <p>Reference: For additional discussion regarding the Project's cumulative contribution to significant, cumulative air quality impacts, see RDEIR Sections 3.3 and 5.3.</p>	
Energy and Global Climate Change				
Impact 3.4-1: The proposed project could result in the wasteful, inefficient, or unnecessary consumption of energy by residential, commercial, industrial, or public uses associated with increased demand due to anticipated population growth in the County.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be less-than-significant prior to mitigation.</p> <p>Rationale for Finding: As discussed in more detail in RDEIR Section 3.4, the updated general plan will implement a number of policies (including Land Use, Air Quality, Health and Safety, Foothill Growth Management, Transportation and Circulation, Planning Framework, Public Facilities and Services) designed to minimize wasteful, inefficient, or unnecessary consumption of energy (RDEIR pages 3.4-27 and 3.4-28). These policies and implementation measures will:</p> <ul style="list-style-type: none"> minimize vehicle miles traveled through support of future development patterns that increase the use of alternative forms of transportation and non-motorized transportation; minimize vehicle miles traveled through mixed use, infill, redevelopment and higher density development 	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<ul style="list-style-type: none"> • promote the continued use and expansion of bicycle and pedestrian facilities; • Direct development to existing urban areas and encourage efficient use of existing public services and utilities <p>In particular, the Transportation and Circulation (TC) and Air Quality (AQ) Elements include policies that support the use of public transit over personal vehicle use through funding mechanisms or transit planning efforts (see Policies TC-1.6, TC-1.18, TC-3.7, TC-4.2, TC-4.3, TC-4.7, and AQ Implementation Measure #8). A number of policies support the design of pedestrian and bicycle facilities in future development subsequent to the updated general plan (see Policies LU-7.3, TC- 5.1, TC-5.2, TC-5.3, TC-5.4, TC-5.6, TC-5.7, TC-5.9, AQ-3.3, HS-9.1, HS-9.2 and HS Implementation Measure #24 and TC Implementation Measures #21– #28).</p> <p>Land Use, Air Quality and Planning Framework policies support the creation of mixed use, infill, high density developments, and direct development to within cities, unincorporated communities and hamlets where public services and facilities, infrastructure. Utilities and services, employment centers and other amenities are available. For these reasons, this impact is considered less than significant; no additional mitigation measures are required.</p> <p>Reference: For additional discussion regarding the project's energy and global climate change impacts, see RDEIR, Section 3.4.</p>	
Impact 3.4-2: The proposed project could result in the wasteful, inefficient, or unnecessary consumption of energy in the construction and operation of new buildings.	Less-than-Significant	<p>Although this impact is considered <i>less-than-significant</i>, the following new policies are recommended to ensure that this impact remains <i>less-than-significant</i>:</p> <ul style="list-style-type: none"> • ERM-4.7 Reduce Energy Use in County Facilities. Continue to integrate energy efficiency and conservation into all County functions. • ERM-4.8 Energy Efficiency Standards. The County shall encourage renovations and new development to incorporate energy efficiency and conservation measures that exceed State Title 24 standards. When feasible, the County shall offer incentives for use of energy reduction measures such as expedited permit processing, reduced fees, and technical assistance. 	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that several new policies are recommended and are incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as new policies ERM-4.7 and ERM-4.8 are feasible and are adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: As discussed in more detail in RDEIR Section 3.4, the updated general plan will ensure that a variety of policies and implementation measures are implemented. Although no mitigation is required for this less than significant impact, new Policies ERM-4.7 "Reduce Energy Use in County Facilities" and ERM-4.8 "Energy Efficiency Standards") will further ensure that construction and operation of new buildings will not result in inefficient or unnecessary energy consumption. (RDEIR page 3.4-30.) Policy ERM-4.8 requires the County, when feasible, to provide additional energy use reduction measures/incentives and to include energy reduction measures into the</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>design of new buildings and the retrofitting of existing buildings. Policy ERM-4.8 requires the County to continue to integrate energy efficiency into all County functions. Consequently, with implementation of the updated general plan policies and implementation measures impacts associated with the proposed project are considered less than significant.</p> <p>Reference: For additional discussion regarding the project's energy and global climate change impacts see RDEIR Section 3.4.</p>	
<p>Impact 3.4-3: The proposed project would potentially conflict with the State goal of reducing greenhouse gas emissions in California to 1990 levels by 2020, as set forth by the timetable established in AB 32, California Global Warming Solutions Act of 2006.</p>	Significant and Unavoidable	<p>As discussed in more detail in Section 3.4 of the RDEIR, the GPU includes, as part of the Project, a number of policies and implementation measures that implement or support measures recommended by the Office of the Attorney General that reduce or avoid this impact. The mitigating policies address Air Quality, Land Use, Environmental Resources Management, Public Facilities and Services, Water Resources, Agricultural Resources, Foothill Growth Management, Health and Safety, Planning Framework, Transportation and Circulation.</p> <p>The EIR also identifies additional mitigation measures (i.e., revised, existing policy (Policy AQ-1.7, Policy AQ-1.8, Policy AQ-1.9, AQ Implementation Measure #16, , AQ Implementation Measure #17) required to address this impact:</p> <ul style="list-style-type: none"> • AQ-1.7 Support Statewide Climate Change Solutions. The County shall monitor and support the efforts of Cal/EPA, CARB and the SJVAPCD, under AB 32 (Health and Safety Code §38501 et seq.), to develop a recommended list of emission reduction strategies. As appropriate, the County will evaluate each new project under the updated General Plan to determine its consistency with the emission reduction strategies. • AQ-1.8 Greenhouse Gas Emissions Reduction Plan/Climate Action Plan. The County will develop a Greenhouse Gas Emissions Reduction Plan (Plan) that identifies greenhouse gas emissions within the County as well as ways to reduce those emissions. 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project (specifically, revised, existing policies AQ-1.7, AQ-1.8, AQ-1.9, AQ, Implementation Measure #16, and AQ Implementation Measure #17) which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in more detail in RDEIR Section 3.4, the incremental increase in CO₂ emissions will exceed the lower reporting limit for major sources. Compared to the overall State reduction goal, the incremental increase in GHG emissions resulting from the Project is substantial and could conflict with the State's ability to meet the reduction goals in AB 32. The updated general plan will implement a variety of policies designed to address air quality/greenhouse gas emission/climate change issues and comply with AB 32 and other Statewide greenhouse gas emission reduction requirements. More specifically, the updated general plan includes policies and implementation measures designed to minimize GHG emissions by reducing emissions from mobile and stationary sources and supporting energy efficiency and conservation measures. RDEIR Table 3.4-5 lists measures recommended by the Office of the Attorney General to address global warming and the corresponding policies and implementation measures included as part of the project.</p> <p>In addition to the policies and implementation measures provided in the RDEIR (RDEIR, pages 3.4-33 through 3.4-38), the EIR identifies revised Policy AQ-1.7 "Support Statewide Climate Change Solutions", new Policies AQ-1.8 "Greenhouse Gas Emissions Reduction Plan", AQ-1.9 "Support Off-Site Measures to Reduce Greenhouse Gas Emissions", and</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>The Plan will incorporate the requirements adopted by the California Air Resources Board specific to this issue. In addition, the County will work with the Tulare County Association of Governments and other applicable agencies to include the following key items in the regional planning efforts.</p> <ul style="list-style-type: none"> o Inventory all known, or reasonably discoverable, sources of greenhouse gases in the County, o Inventory the greenhouse gas emissions in the most current year available, and those projected for year 2020, and o Set a target for the reduction of emissions attributable to the County's discretionary land use decisions and its own internal government operations. <ul style="list-style-type: none"> • AQ-1.9 Support Off-Site Measures to Reduce Greenhouse Gas Emissions. The County will support and encourage the use of off-site measures or the purchase of carbon offsets to reduce greenhouse gas emissions. • AQ Implementation Measure #16. The County shall develop and maintain a climate action plan. The climate action plan shall include the following elements: an emissions inventory, emission reduction targets, applicable greenhouse gas control measures, and monitoring and reporting plan. • AQ Implementation Measure #17. The County may inspect County facilities to evaluate energy use, the effectiveness of water conservation measures, production of GHGs, use of recycled and renewable products and indoor air quality to develop recommendations for performance improvement or mitigation. The County shall update the audit periodically and review progress towards implementation of its recommendations. 	<p>new Air Quality Implementation Measures #16 and #17 as required, additional mitigation. Policy AG-1.7 requires to County to monitor and support efforts to develop a recommended list of emission reduction strategies, and evaluate new projects for consistency with emission reduction strategies. Policy AQ-1.8 directs the County to develop a GHG emission reduction plan, incorporating the requirements adopted by the California Air Resources Board, and to work with the Tulare County Association of Governments and other agencies to include inventory efforts in regional planning efforts and target setting for the County's discretionary land use decisions. Policy AQ-1.9 directs the County to support and encourage off-site measures or carbon offset purchases to deduce GHG emissions. AQ Implementation Measure #16 requires the County to develop and maintain a climate action plan. . AQ Implementation Measure #17 allows the County to inspect County facilities to evaluate energy use, the effectiveness of water conservation measures, GHG emissions, use of recycled and renewable products and indoor air quality to develop recommendations for performance improvement or mitigation and requires periodic audit updates and progress review. However, even with implementation of the above mentioned policies and implementation measures, and required, additional mitigation, implementation of the updated general plan will still result in a significant and unavoidable climate change impact. No additional feasible mitigation measures are currently available to reduce this impact to a less than significant level. This impact, therefore, remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's energy and global climate change impacts, see RDEIR, Section 3.4, Master Response #10 (pages 4-38 through 4-48) of the FEIR, and the Climate Action Plan.</p>	

TABLE 1
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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Cumulative Impacts	Cumulatively Considerable	<p>As discussed in more detail in Section 3.4 of the RDEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that serve to reduce or avoid Energy and Global Climate Change impacts, including policies and implementation measures addressing Air Quality, Land Use, Public Facilities and Services, Health and Safety, Planning Framework, and the Foothill Growth Management Plan. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • minimize vehicle miles traveled by supporting future development patterns that increase the use of alternative forms of transportation and non-motorized transport and through mixed use, infill, redevelopment and higher density development, • promote the continued use and expansion of bicycle and pedestrian facilities, • conserve existing energy supplies <p>The EIR also identifies additional mitigation measures (i.e., new policies and implementation measures) required to address this impact:</p> <ul style="list-style-type: none"> • ERM-4.7 Reduce Energy Use in County Facilities. Continue to integrate energy efficiency and conservation into all County functions. • ERM-4.8 Energy Efficiency Standards. The County shall encourage renovations and new development to incorporate energy efficiency and conservation measures that exceed State Title 24 standards. When feasible, the County shall offer incentives for use of energy reduction measures such as expedited permit processing, reduced fees, and technical assistance. • AQ-1.7 Support Statewide Climate Change Solutions. The County shall monitor and support the efforts of Cal/EPA, CARB and the SJVAPCD, under AB 32 (Health and Safety Code §38501 et seq.), to develop a 	<p>Finding: The Board finds that changes or alterations have been incorporated into the Project which mitigates the project's cumulatively considerable contribution to significant cumulative impacts on the environment related to Energy and Global Climate Change, but not to a level that is less than cumulatively considerable. No additional feasible mitigation measures are available to reduce the project's contribution to less than cumulatively considerable. Therefore, the Board finds that specific economic, legal, social, technological, or other considerations make it infeasible to reduce the GPU's contribution to this significant cumulative impact to less than cumulatively considerable. Consequently, this impact remains <i>cumulatively considerable</i>.</p> <p>Rationale for Finding: As discussed more fully in RDEIR Sections 3.4 and 5.3, the Project will conflict with the State's goal of reducing GHG emissions in California to 1990 levels by 2030, because the Project will conflict with future plans to achieve GHG reduction goals. The Project plans for growth in the County to occur through 2030; the amount of growth will result in a cumulatively considerable contribution to this significant, cumulative impact.</p> <p>The EIR identifies additional, required mitigation for transportation and circulation impacts. The mitigating effects of Policies ERM-4.7 and ERM-4.8 are described above under Impact 3.4-2; the mitigating effects of Policies AQ-1.7, AQ-1.8 and AQ-1.9, and AQ Implementation Measures #16 and #17 are described above under Impact 3.4-3.</p> <p>However, even with implementation of the above mentioned policies and implementation measures, and required, additional mitigation, implementation of the updated general plan will still result in a cumulatively considerable contribution to climate change. No additional feasible mitigation measures are currently available to reduce this impact to a less than significant level</p> <p>Reference: See discussion in RDEIR Sections 3.2, 3.3, 3.4, 5.3, Master Response #10 (pages 4-38 through 4-48) of the FEIR, and the Climate Action Plan.</p>	Cumulatively Considerable

TABLE 1
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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>recommended list of emission reduction strategies. As appropriate, the County will evaluate each new project under the updated General Plan to determine its consistency with the emission reduction strategies.</p> <ul style="list-style-type: none"> • AQ-1.8 Greenhouse Gas Emissions Reduction Plan/Climate Action Plan. The County will develop a Greenhouse Gas Emissions Reduction Plan (Plan) that identifies greenhouse gas emissions within the County as well as ways to reduce those emissions. The Plan will incorporate the requirements adopted by the California Air Resources Board specific to this issue. In addition, the County will work with the Tulare County Association of Governments and other applicable agencies to include the following key items in the regional planning efforts. <ul style="list-style-type: none"> o Inventory all known, or reasonably discoverable, sources of greenhouse gases in the County, o Inventory the greenhouse gas emissions in the most current year available, and those projected for year 2020, and o Set a target for the reduction of emissions attributable to the County's discretionary land use decisions and its own internal government operations. • AQ-1.9 Support Off-Site Measures to Reduce Greenhouse Gas Emissions. The County will support and encourage the use of off-site measures or the purchase of carbon offsets to reduce greenhouse gas emissions. • AQ Implementation Measure #16. The County shall develop and maintain a climate action plan. The climate action plan shall include the following elements: an emissions inventory, emission reduction targets, applicable greenhouse gas control measures, and monitoring and reporting plan. 		

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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
<ul style="list-style-type: none"> • AQ Implementation Measure #17. The County may inspect County facilities to evaluate energy use, the effectiveness of water conservation measures, production of GHGs, use of recycled and renewable products and indoor air quality to develop recommendations for performance improvement or mitigation. The County shall update the audit periodically and review progress towards implementation of its recommendations. 				
Noise				
Impact 3.5-1: The proposed project could expose a variety of noise-sensitive land uses to construction noise.	Less-than-Significant	<p>Although this impact is considered <i>less-than-significant</i>, the following new policy is recommended to ensure that this impact remains <i>less-than-significant</i>:</p> <ul style="list-style-type: none"> • HS-8.18 Construction Noise. The County shall seek to limit the potential noise impacts of construction activities by limiting construction activities to the hours of 7 am to 7 pm, Monday through Saturday when construction activities are located near sensitive receptors. No construction shall occur on Sundays or national holidays without a permit from the County to minimize noise impacts associated with development near sensitive receptors. 	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that a new policy is recommended and is incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as new policy HS-8.18 is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: CEQA review of individual projects will provide project-specific data and, where possible, identify feasible mitigation to address temporary, construction-related noise impacts. The updated general plan includes Health and Safety policies addressing construction related noise, to provide a quiet environment for Tulare County residents. Although no mitigation is required for this less than significant impact, new Policy HS-8.18 "Construction Noise" will provide additional construction-related noise reduction measures and ensure that impacts remain less than significant.</p> <p>Reference: For additional discussion regarding the project's noise impacts see RDEIR Section 3.5.</p>	Less-than-Significant
Impact 3.5-2: The proposed project could expose a variety of noise-sensitive land uses to traffic noise.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.5 of the RDEIR, the GPU includes, as part of the Project, a number of Health and Safety and Land Use policies that reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> • provide guidance on the analysis, mitigation and monitoring of noise-related impacts; • promote compatible development within areas that minimize impacts (including noise) to 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project (specifically, new policies HS-8.13, HS-8.14, HS-8.15, HS-8.16, HS-8.17, and HS-8.18) which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant,</p>	Significant and Unavoidable

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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>surrounding land uses.</p> <p>The EIR also identifies additional mitigation measures (i.e., new policies) that are required to address this impact:</p> <ul style="list-style-type: none"> HS-8.13 Noise Analysis. The County shall require a detailed noise impact analysis in areas where current or future exterior noise levels from transportation or stationary sources have the potential to exceed the adopted noise policies of the Health and Safety Element, where there is development of new noise sensitive land uses or the development of potential noise generating land uses near existing sensitive land uses. The noise analysis shall be the responsibility of the project applicant and be prepared by a qualified acoustical engineer (i.e., a Registered Professional Engineer in the State of California, etc.). The analysis shall include recommendations and evidence to establish mitigation that will reduce noise exposure to acceptable levels (such as those referenced in Table 10-1 of the Health and Safety Element). HS-8.14 Sound Attenuation Features. The County shall require sound attenuation features such as walls, berming, heavy landscaping, between commercial, industrial, and residential uses to reduce noise and vibration impacts. HS-8.15 Noise Buffering. The County shall require noise buffering or insulation in new development along major streets, highways, and railroad tracks. HS-8.16 State Noise Insulation Standards. The County shall enforce the State Noise Insulation Standards (California Administrative Code, Title 24) and Chapter 35 of the Uniform Building Code. HS-8.17 Coordinate with Caltrans. The County shall work with Caltrans to mitigate noise impacts on sensitive receptors near State 	<p>this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in Section 3.5, noise modeling for the Project indicates that traffic volume increases will not significantly alter the noise environment along a majority of the County's roadway segments. However, some roadway segments in the County's individual planning areas will experience a significant increase in traffic noise and may potentially affect sensitive land uses. The updated general plan will implement a variety of policies designed to address noise and land use compatibility issues, including policies that address analysis and mitigation of future project related noise issues, inappropriate noise levels for sensitive receptors, and land use compatibility with noise-generating land uses. More specifically, updated general plan policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> provide guidance on the analysis and mitigation of future project-related noise issues; identify appropriate noise levels for sensitive receptors, noise compatibility guidelines, and criteria for peak-noise generating land uses; promote compatible development that minimizes nuisance-related impacts, including noise; prevent placement of incompatible noise generating land uses within residential areas. <p>Future CEQA review for individual projects will provide project-specific data and require feasible mitigation for significant noise impacts. However, the ability to mitigate potential noise impacts is contingent upon a variety of factors including the severity of the noise impact and existing land use conditions.</p> <p>The EIR also identifies required, additional mitigation measures (to be incorporated into the updated general plan as new policies). New Policy HS-8.13 "Noise Analysis," requires detailed noise impact analyses to be prepared by a qualified acoustical engineer in areas where current or future exterior noise levels potentially exceed adopted noise policies, to prevent sensitive land uses from noise-generating land uses. New Policy HS-8.14 "Sound Attenuation Features," requires sound attenuation features to be interposed between commercial, industrial and residential uses to reduce noise and vibration impacts. New Policy HS-8.15 "Noise Buffering", requires noise buffering or insulation in new development along major streets, highways and railroad tracks. New Policy HS-8.16 "State Noise Insulation Standards", requires County enforcement of State Noise Insulation Standards. New Policy HS-8.17 "Coordinate with</p>	

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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>roadways, by requiring noise buffering or insulation in new construction.</p> <ul style="list-style-type: none"> • HS-8.18 Construction Noise. The County shall seek to limit the potential noise impacts of construction activities by limiting construction activities to the hours of 7 am to 7 pm, Monday through Saturday when construction activities are located near sensitive receptors. No construction shall occur on Sundays or national holidays without a permit from the County to minimize noise impacts associated with development near sensitive receptors. 	<p>Caltrans" requires the County to work with Caltrans to provide noise buffering or insulation to mitigate impacts on sensitive receptors near State roadways. New Policy HS-8.18 "Construction Noise", requires the County to limit construction activities near sensitive receptors to the hours of 7 am to 7 pm Monday through Saturday. Given the uncertainty as to whether future noise impacts can be adequately mitigated for all the individual projects that will be implemented as part (e.g., establishment of setbacks near roadways, etc.) of the proposed project, no additional feasible mitigation is available to reduce this impact to less than significant. This impact therefore remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's noise impacts, see RDEIR, Section 3.5.</p>	
Impact 3.5-3: The proposed project could expose a variety of noise-sensitive land uses to railroad noise.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.5 of the RDEIR, the GPU includes, as part of the Project, a number of Health and Safety and Land Use policies that reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> • provide guidance on the analysis, mitigation and monitoring of noise-related impacts; • promote compatible development within areas that minimize impacts (including noise) to surrounding land uses; • prevent placement of incompatible noise generating land uses within residential areas <p>The EIR also identifies additional mitigation measures (i.e., new policies) that are required to address this impact:</p> <ul style="list-style-type: none"> • HS-8.13 Noise Analysis. The County shall require a detailed noise impact analysis in areas where current or future exterior noise levels from transportation or stationary sources have the potential to exceed the adopted noise policies of the Health and Safety Element, where there is development of new noise sensitive land uses or the development of potential noise generating land uses near existing sensitive land uses. The noise analysis shall be the responsibility of the project 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project (specifically, new policies HS-8.13, HS-8.14, HS-8.15, HS-8.16, HS-8.17, and HS-8.18) which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in Section 3.5, buildout of the proposed project could locate residential land uses in the vicinity of the UPRR (or other railroad) corridor, which could result in the exposure of sensitive receptors to noise levels that exceed County standards for some locations within the Corridor Framework and Rural Valley Lands geographic areas.</p> <p>The updated general plan will implement a variety of policies designed to address noise issues by providing guidance on analysis mitigation and monitoring, and promoting development compatible with surrounding land uses. Policies LU-1.3, LU-5.4, HS-8.1, HS-8.3, and HS-8.4 prevent the placement of incompatible noise-generating land uses within residential areas. CEQA review for future, individual projects with project-specific data and require feasible mitigation to reduce potential significant noise impacts to a less-than-significant level. However, buildout of the proposed project could locate residential land uses in the vicinity of railroad corridors and expose sensitive receptors to noise levels that exceed County standards for some locations. Further, the</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>applicant and be prepared by a qualified acoustical engineer (i.e., a Registered Professional Engineer in the State of California, etc.). The analysis shall include recommendations and evidence to establish mitigation that will reduce noise exposure to acceptable levels (such as those referenced in Table 10-1 of the Health and Safety Element).</p> <ul style="list-style-type: none"> • HS-8.14 Sound Attenuation Features. The County shall require sound attenuation features such as walls, berming, heavy landscaping, between commercial, industrial, and residential uses to reduce noise and vibration impacts. • HS-8.15 Noise Buffering. The County shall require noise buffering or insulation in new development along major streets, highways, and railroad tracks. • HS-8.16 State Noise Insulation Standards. The County shall enforce the State Noise Insulation Standards (California Administrative Code, Title 24) and Chapter 35 of the Uniform Building Code. • HS-8.17 Coordinate with Caltrans. The County shall work with Caltrans to mitigate noise impacts on sensitive receptors near State roadways, by requiring noise buffering or insulation in new construction. • HS-8.18 Construction Noise. The County shall seek to limit the potential noise impacts of construction activities by limiting construction activities to the hours of 7 am to 7 pm, Monday through Saturday when construction activities are located near sensitive receptors No construction shall occur on Sundays or national holidays without a permit from the County to minimize noise impacts associated with development near sensitive receptors. 	<p>ability to mitigate this potential impact is contingent upon a variety of factors including the severity of the noise impact and existing land use conditions.</p> <p>Mitigation measures (to be incorporated into the updated general plan as new policies) are also required. New Policies HS-8.13 "Noise Analysis", HS-8.14 "Sound Attenuation Features", HS-8.15 "Noise Buffering", HS-8.16 "State Noise Insulation Standards", HS-8.17 "Coordinate with Caltrans", and HS-8.18 "Construction Noise", discussed above under Impact 3.5-2, are also applicable to and will reduce this impact.</p> <p>Given the uncertainty as to whether future noise impacts could be adequately mitigated for all the individual projects that will be implemented as part (e.g., establishment of setbacks near railroad crossings, etc.) of the proposed project, no additional feasible mitigation is available to reduce this impact to less than significant. Therefore this impact remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's noise impacts, see RDEIR, Section 3.5.</p>	

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Impact 3.5-4: The proposed project could expose a variety of noise-sensitive land uses to additional stationary noise sources.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.5 of the RDEIR, the GPU includes, as part of the Project, a number of Health and Safety and Land Use policies that serve to reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> provide guidance on the analysis, mitigation and monitoring of noise-related impacts; promote compatible development within areas that minimize impacts (including noise) to surrounding land uses; prevent placement of incompatible noise generating land uses within residential areas <p>The EIR also identifies additional mitigation measures (i.e., new policies) that are required to address this impact:</p> <ul style="list-style-type: none"> HS-8.13 Noise Analysis. The County shall require a detailed noise impact analysis in areas where current or future exterior noise levels from transportation or stationary sources have the potential to exceed the adopted noise policies of the Health and Safety Element, where there is development of new noise sensitive land uses or the development of potential noise generating land uses near existing sensitive land uses. The noise analysis shall be the responsibility of the project applicant and be prepared by a qualified acoustical engineer (i.e., a Registered Professional Engineer in the State of California, etc.). The analysis shall include recommendations and evidence to establish mitigation that will reduce noise exposure to acceptable levels (such as those referenced in Table 10-1 of the Health and Safety Element). HS-8.14 Sound Attenuation Features. The County shall require sound attenuation features such as walls, berming, heavy landscaping, between commercial, industrial, and residential uses to reduce noise and vibration impacts. HS-8.15 Noise Buffering. The County shall 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project (specifically, new policies HS-8.13, HS-8.14, HS-8.15, HS-8.16, HS-8.17, and HS-8.18) which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in Section 3.5, siting of new, industrial development and designated growth areas may increase noise levels in their proximity. Increased noise levels will result from activities such as the continual presence of heavy trucks for distribution of goods and supplies and operation of manufacturing equipment. Areas of land use noise conflict could occur at the orders of industrial areas with other sensitive land uses (e.g., residential areas, schools, etc.). The updated general plan will implement a variety of policies designed to address noise issues. (See also discussion under Impacts 3.5-2 and 3.5-3, above.) In addition, CEQA review for future, individual projects will provide project-specific data and require feasible mitigation to reduce significant noise impacts to a less-than-significant level. However, the ability to mitigate this impact is contingent upon a variety of factors including the severity of the noise impact and existing land use conditions, therefore noise levels may increase in proximity to new industrial development and designated growth areas</p> <p>The EIR identifies required, additional mitigation measures (to be incorporated into the updated general plan as new policies). New Policies HS-8.13 "Noise Analysis", HS-8.14 "Sound Attenuation Features", HS-8.15 "Noise Buffering", HS-8.16 "State Noise Insulation Standards", HS-8.17 "Coordinate with Caltrans", and HS-8.18 "Construction Noise", discussed above under Impact 3.5-2, are also applicable and will reduce this impact, but not to a less than significant level. However, given the uncertainty as to whether future noise impacts can be adequately mitigated for all the individual projects that will be implemented as part of the proposed project, no additional feasible mitigation is available to reduce this impact to less than significant. Therefore this impact remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's noise impacts, see RDEIR, Section 3.5.</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>require noise buffering or insulation in new development along major streets, highways, and railroad tracks.</p> <ul style="list-style-type: none"> • HS-8.16 State Noise Insulation Standards. The County shall enforce the State Noise Insulation Standards (California Administrative Code, Title 24) and Chapter 35 of the Uniform Building Code. • HS-8.17 Coordinate with Caltrans. The County shall work with Caltrans to mitigate noise impacts on sensitive receptors near State roadways, by requiring noise buffering or insulation in new construction. • HS-8.18 Construction Noise. The County shall seek to limit the potential noise impacts of construction activities by limiting construction activities to the hours of 7 am to 7 pm, Monday through Saturday when construction activities are located near sensitive receptors No construction shall occur on Sundays or national holidays without a permit from the County to minimize noise impacts associated with development near sensitive receptors. 		
Impact 3.5-5: The proposed project could expose a variety of noise-sensitive land uses to excessive groundborne vibration or groundborne noise levels.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.5 of the RDEIR, the GPU includes, as part of the Project, a number of Health and Safety and Land Use policies that reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> • provide guidance on the analysis, mitigation and monitoring of noise-related impacts; • identify appropriate noise levels for sensitive receptors and noise compatibility guidelines • promote compatible development within areas that minimize impacts (including noise) to surrounding land uses; • prevent placement of incompatible noise generating land uses within residential areas <p>The EIR also identifies additional mitigation</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project (specifically, new policies HS-8.13, HS-8.14, HS-8.15, HS-8.16, HS-8.17, and HS-8.18) which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in Section 3.5, increased exposure to sources of groundborne vibration could occur through increased residential or employment densities on lands within proximity to noise generating activities (i.e., industrial, airport, etc.) as a result of the Project. Specifically, vibration created through construction and industrial activities or through the operation of motor vehicles and railways could result in potentially significant impacts on local residents.</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>measures (i.e., new policies) that are required to address this impact:</p> <ul style="list-style-type: none"> HS-8.13 Noise Analysis. The County shall require a detailed noise impact analysis in areas where current or future exterior noise levels from transportation or stationary sources have the potential to exceed the adopted noise policies of the Health and Safety Element, where there is development of new noise sensitive land uses or the development of potential noise generating land uses near existing sensitive land uses. The noise analysis shall be the responsibility of the project applicant and be prepared by a qualified acoustical engineer (i.e., a Registered Professional Engineer in the State of California, etc.). The analysis shall include recommendations and evidence to establish mitigation that will reduce noise exposure to acceptable levels (such as those referenced in Table 10-1 of the Health and Safety Element). HS-8.14 Sound Attenuation Features. The County shall require sound attenuation features such as walls, berming, heavy landscaping, between commercial, industrial, and residential uses to reduce noise and vibration impacts. HS-8.15 Noise Buffering. The County shall require noise buffering or insulation in new development along major streets, highways, and railroad tracks. HS-8.16 State Noise Insulation Standards. The County shall enforce the State Noise Insulation Standards (California Administrative Code, Title 24) and Chapter 35 of the Uniform Building Code. HS-8.17 Coordinate with Caltrans. The County shall work with Caltrans to mitigate noise impacts on sensitive receptors near State roadways, by requiring noise buffering or insulation in new construction. 	<p>The updated general plan will implement a variety of policies designed to address noise issues. In addition, CEQA review for future, individual projects will provide project-specific data and require feasible mitigation to reduce significant noise impacts to a less-than-significant level. However, buildout under the updated general plan could potentially expose more people to excess groundborne vibration or noise levels within all of the County's planning areas through increased residential or employment densities on lands within the proximity of noise generating activities and land uses (e.g., industrial uses, airports, railroads, roadways) Further, the ability to mitigate this potential impact is contingent upon a variety of factors including the severity of the noise impact and existing land use conditions.</p> <p>The EIR identifies required, additional mitigation (to be incorporated into the updated general plan as new policies). New Policies HS-8.13 "Noise Analysis", HS-8.14 "Sound Attenuation Features", HS-8.15 "Noise Buffering", HS-8.16 "State Noise Insulation Standards", HS-8.17 "Coordinate with Caltrans", and HS-8.18 "Construction Noise", discussed above under Impact 3.5-2, are also applicable to and will reduce this impact, but not to a less than significant level.</p> <p>Given the uncertainty as to whether future noise impacts could be adequately mitigated for all the individual projects that will be implemented as part of the proposed project, no additional feasible mitigation is available to reduce this impact to less than significant. Therefore this impact remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's noise impacts, see RDEIR, Section 3.5.</p>	

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<ul style="list-style-type: none"> HS-8.18 Construction Noise. The County shall seek to limit the potential noise impacts of construction activities by limiting construction activities to the hours of 7 am to 7 pm, Monday through Saturday when construction activities are located near sensitive receptors. No construction shall occur on Sundays or national holidays without a permit from the County to minimize noise impacts associated with development near sensitive receptors. 		
Impact 3.5-6: The proposed project would be located within an airport land use plan area or within the vicinity of a private airstrip and could expose people residing or working within the project area to excessive noise levels.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.5 of the RDEIR, the GPU includes, as part of the Project, a number of Health and Safety and Land Use policies that serve to reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> promote compatible land use development and patterns that minimize impacts to surrounding land uses (including open space uses); promote development compatible with local airport land use compatibility plans <p>No additional, feasible mitigation measures identified.</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project (specifically, new policies HS-8.13, HS-8.14, HS-8.15, HS-8.16, HS-8.17, and HS-8.18) which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in Section 3.5, the updated general plan will implement a variety of policies designed to address airport noise and land use compatibility issues (RDEIR pages 3.5-35 and 3.5-36). In addition, CEQA review for future, individual projects will provide project-specific data and require feasible mitigation to reduce significant airport-related noise impacts to a less-than-significant level. However, development under the updated general plan could result in new urban development, including new urban land uses in the vicinity of the County's public airports and private airstrips, potentially exposing people residing or working in these developments to excessive noise levels. The ability to mitigate this potential impact is contingent upon a variety of factors including the severity of the noise impact, existing land use conditions and the feasibility of being able to implement any proposed mitigation measures. Given the uncertainty as to whether future airport noise-related impacts could be adequately mitigated for all the individual projects that will be implemented as part of the proposed project, no additional feasible mitigation is available to reduce this impact to a less than significant level. Therefore, this impact remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's noise impacts, see RDEIR, Section 3.5.</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Cumulative Impacts	Cumulatively considerable	<p>As discussed in more detail in Sections 3.5 and 5.3 of the RDEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that serve to reduce or avoid noise impacts, including policies and implementation measures addressing Health and Safety, Land Use, Transportation and Circulation. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> provide a quiet environment for residents by addressing the effects of construction related noise; provide guidance on the analysis, mitigation and monitoring of noise-related impacts; promote compatible development within areas that minimize impacts to surrounding land uses; promoted development compatible with local airport land use compatibility plans <p>The EIR also identifies additional mitigation measures (i.e., new policies and implementation measures):</p> <ul style="list-style-type: none"> HS-8.13 Noise Analysis. The County shall require a detailed noise impact analysis in areas where current or future exterior noise levels from transportation or stationary sources have the potential to exceed the adopted noise policies of the Health and Safety Element, where there is development of new noise sensitive land uses or the development of potential noise generating land uses near existing sensitive land uses. The noise analysis shall be the responsibility of the project applicant and be prepared by a qualified acoustical engineer (i.e., a Registered Professional Engineer in the State of California, etc.). The analysis shall include recommendations and evidence to establish mitigation that will reduce noise exposure to acceptable levels (such as those referenced in Table 10-1 of the Health and Safety Element). 	<p>Finding: The Board finds that changes or alterations have been incorporated into the Project which mitigates the project's cumulatively considerable contribution to significant cumulative impacts on the environment from noise. Specifically, the mitigation measures adopted as new policies HS-8.13, HS-8.14, HS-8.15, HS-8.16, HS-8.17 and HS-8.18, are feasible and are adopted to mitigate significant effects of the GPU related to noise. However, even with implementation of these measures, the project's contribution to a significant cumulative impact remains <i>cumulatively considerable</i>.</p> <p>Rationale for Finding: As discussed more fully in RDEIR Section 3.5, development under the GPU will expose a variety of noise sensitive land uses to traffic and railroad noise, and groundborne vibrations. The ability to mitigate such impacts are contingent on a variety of factors, including the severity of impacts, existing land use conditions and technical feasibility of future, project specific mitigation measures. For these reasons, no additional feasible mitigation measures are currently available.</p> <p>Reference: For additional discussion regarding the Project's cumulative contribution to significant, cumulative noise impacts, see RDEIR Sections 3.5 and 5.3.</p>	Cumulatively considerable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>[New Policy – Draft EIR Analysis].</p> <ul style="list-style-type: none"> HS-8.14 Sound Attenuation Features. The County shall require sound attenuation features such as walls, berming, heavy landscaping, between commercial, industrial, and residential uses to reduce noise and vibration impacts. [New Policy – Draft EIR Analysis]. HS-8.15 Noise Buffering. The County shall require noise buffering or insulation in new development along major streets, highways, and railroad tracks. [New Policy - Draft EIR Analysis]. HS-8.16 State Noise Insulation Standards. The County shall enforce the State Noise Insulation Standards (California Administrative Code, Title 24) and Chapter 35 of the Uniform Building Code. [New Policy - Draft EIR Analysis]. HS-8.17 Coordinate with Caltrans. The County shall work with Caltrans to mitigate noise impacts on sensitive receptors near State roadways, by requiring noise buffering or insulation in new construction. [New Policy - Draft EIR Analysis]. HS-8.18 Construction Noise. The County shall seek to limit the potential noise impacts of construction activities by limiting construction activities to the hours of 7 am to 7 pm, Monday through Saturday when construction activities are located near sensitive receptors. No construction shall occur on Sundays or national holidays without a permit from the County to minimize noise impacts associated with development near sensitive receptors. 		

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Hydrology, Water Quality and Drainage				
Impact 3.6-1: The proposed project could violate water quality standards or waste discharge requirements, or otherwise degrade water quality.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.6, development under the updated general plan will result in the construction and use of new individual or community septic systems throughout the County. Septic systems and their associated leach fields can be a source of groundwater contamination. The updated general plan will implement a variety of policies designed to ensure compliance with water quality standards or waste discharge requirements. As discussed in more detail in Section 3.6 of the RDEIR, the GPU includes, as part of the project, mitigating policies and implementation measures to ensure that water quality standards are not violated, including Environmental Resource Management, Health and Safety, Public Facilities and Services, Planning Framework, Water Resources and Foothill Growth Management. These policies and implementation measures are designed to minimize this impact through adherence to appropriate levels of water, wastewater and storm drainage infrastructure planning, financing and construction; minimize water quality impacts associated with storm water, water and wastewater utility infrastructure needed to serve existing and planned urban areas, and ensure finding for County utilities to provide adequate service levels. In addition, CEQA review for future, individual projects will provide project-specific data and require feasible mitigation to reduce significant impacts. (RDEIR, pages 3.6-38 and 3.6-39). For these reasons, this impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project's impacts to hydrology, water quality and drainage issues see RDEIR Section 3.6.</p>	Less-than-Significant
Impact 3.6-2: The proposed project would result in impacts to groundwater supply, recharge, and secondary impacts to groundwater resources.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.6 of the RDEIR, the GPU includes, as part of the Project, a number of Water Resources policies that serve to reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> minimize groundwater impacts through early identification of required infrastructure and orderly construction and rehabilitation of facilities needed to serve existing and planned urban areas; and provide for and conserve water resources and 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains <i>significant and unavoidable</i>.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.6, development under the updated general plan will result in increased demand on groundwater supplies for urban, rural and agricultural uses</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		services. No additional, feasible mitigation measures identified.	<p>within the unincorporated areas of the County, and require additional groundwater pumping for designated urban development areas where surface water is not available. Depletion of groundwater supplies and declining water tables are continuing concerns affecting groundwater storage capacity, water quality and water supplies. Increasing urbanization within the County also reduces permeable surfaces, thus reducing percolation of water into underlying basins in urbanized areas. Conflicts over the nature and extent of groundwater use may result in adjudication of groundwater basins, and impact water supplies available for existing and anticipated demands. Future changes in groundwater law and the regulatory environment may have similar effects. The updated general plan will continue to implement a variety of policies designed to improve groundwater management efforts throughout the County and the larger region (RDEIR page 3.6-47). However, the effectiveness of future groundwater management efforts to eventually reverse declining groundwater levels is uncertain, as are future changes in the regulatory environment. Because of these uncertainties the type and extent of mitigation efforts required to address this impact cannot be determined. No additional feasible mitigation is currently available to reduce this impact to a less than significant level. Therefore, this impact remains significant and unavoidable.</p> <p>References: For additional discussion regarding the project's impacts to groundwater issues, see RDEIR, Section 3.6 and Master Response #6 (pages 4-29 through 4-32) of the FEIR.</p>	
Impact 3.6-3: The proposed project could substantially alter the existing drainage pattern of the area, 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 on- or off-site flooding.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be less-than-significant prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.6, development under the updated general plan will increase the amount of impervious surfaces, thereby increasing the amounts and speed of runoff. Increased runoff volumes and speeds are factors that can lead to erosion or siltation in downstream waterways and localized nuisance flooding in areas without adequate drainage facilities. As discussed in more detail in RDEIR Section 3.6, the updated general plan will implement a variety of policies (Environmental Resource Management, Health and Safety, Foothill Growth Management, Public Facilities and Services, Water Resources and Planning Framework) designed to minimize surface runoff and erosion impacts and by facilitating necessary stormwater and drainage facilities. (RDEIR page 3.6-49) These policies are designed to minimize this impact through adherence to appropriate levels of stormwater infrastructure planning, financing and construction; adherence to appropriate best management</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			practices to address soil erosion; preservation of floodplain areas and management of new development in hazardous areas; and by ensuring funding for County utilities to provide adequate service levels for public facilities and services. In addition, future CEQA review for future, individual projects will provide project-specific data and require feasible mitigation to reduce significant impacts to a less than significant level. For these reasons, this impact is considered less than significant. Reference: For additional discussion regarding the project's impacts to hydrology, water quality and drainage issues see RDEIR Section 3.6.	
Impact 3.6-4: The proposed project could create or contribute runoff water which would exceed the capacity of existing stormwater drainage systems or provide substantial additional sources of polluted runoff.	Less-than-Significant	No mitigation measures required.	Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation. Rationale for Finding: As discussed in greater detail in RDEIR Section 3.6, development under the updated general plan will increase the amount of impervious surfaces, thereby increasing the amounts and speed of stormwater runoff. Increased runoff volumes and speeds are factors that can increase the amount of trash and pollutants carried in stormwater runoff, which flows into local ponding basins and watercourses. The updated general plan will implement a variety of policies (Environmental Resource Management, Health and Safety, Foothill Growth Management, Public Facilities and Services, Water Resources and Planning Framework) designed to minimize runoff water that could result in impacts to the stormwater drainage system. These policies are specifically designed to minimize this impact through adherence to appropriate levels of stormwater infrastructure planning, financing and construction; adherence to appropriate best management practices to address soil erosion; preserve floodplain areas and manage new development in hazardous areas; and ensure funding for County utilities to provide adequate service levels. (RDEIR pages 3.6-51 and 3.6-52). In addition, CEQA review for future, individual projects will provide project-specific data and require feasible mitigation to reduce significant impacts to a less than significant level. For these reasons, this impact is considered less than significant. Reference: For additional discussion regarding the project's impacts to hydrology, water quality and drainage issues see RDEIR Section 3.6.	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Impact 3.6-5: The proposed project would expose people or structures to flood hazards from development within a 100-year Flood Hazard Area or from increased rates or amounts of surface runoff from development.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.6 of the RDEIR, the GPU includes, as part of the Project, a number of mitigating policies and implementation measures that serve to reduce or avoid this impact. These mitigating policies and implementation measures address Health and Safety and Public Facilities and Services. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • preserve floodplain areas and manage new development in hazardous areas • provide for continued coordination with service providers, implementation of emergency response plans, and emergency training programs; and • adhere to appropriate levels of stormwater infrastructure planning, financing and construction. <p>No additional, feasible mitigation measures identified.</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.6, development under the updated general plan will result in additional population and development within 100-year floodplains, as mapped by the Federal Emergency Management Agency (FEMA). These floodplain areas are located primarily along creeks, rivers and sloughs that flow throughout the County. Development in these areas may re-direct flood flows and cause new areas to be subject to flooding. Future climate change conditions may also change the extent and location of 100-year floodplains. The updated general plan will implement a variety of policies designed to address floodplain issues by requiring the preservation of floodplain areas, permitting development that addresses floodplain issues, and updating emergency response programs based upon new FEMA and DWR flood maps, flood data and flood management requirements. (RDEIR page 3.6-54). Although this approach addresses human health and safety, it could still result in property damage during a flood event. No additional feasible mitigation is currently available to reduce this impact to a less than significant level. Therefore, this impact remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's floodplain impacts, see RDEIR, Section 3.6.</p>	Significant and Unavoidable
Impact 3.6-6: The proposed project would expose people or structures to flood hazards from failure of a levee or dam.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.6 of the RDEIR, the GPU includes, as part of the Project, a number of mitigating policies and implementation measures that reduce or impact. These policies are designed to:</p> <ul style="list-style-type: none"> • preserve floodplain areas and manage new development in hazardous areas • provide for continued coordination with service providers, implementation of emergency response plans, and emergency training programs; and 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in Section 3.6, flood inundation resulting from levee or dam failure is a potential hazard</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<ul style="list-style-type: none"> adhere to appropriate levels of stormwater infrastructure planning, financing and construction. <p>No additional, feasible mitigation measures identified.</p>	<p>in the County. In the event of dam failure of major dams, areas within the County, including some areas containing cities and unincorporated communities and hamlets could be inundated. Localized flooding would result from dam failure of smaller dams. Future climate change conditions may also result in or contribute to changes in hydrologic regimes for which dams and levees were not designed for, making them more susceptible to failure. The updated general plan will implement a variety of policies designed to address floodplain issues by requiring the preservation of floodplain areas, permitting development that addresses floodplain issues, and updating emergency response programs based upon new FEMA and DWR flood maps, flood data and flood management requirements (RDEIR page 3.6-56). Similarly, this approach provides for human health and safety but would not prevent some property damage during a flood event. No additional feasible mitigation is currently available to reduce this impact to less than significant. Therefore, this impact remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's flooding impacts, see RDEIR, Section 3.6.</p>	
Cumulative Impacts	Cumulatively considerable	<p>As discussed in more detail in Section 3.6 of the RDEIR, and Sections 2.0 and 5.0 of the FEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that address Environmental Resource Management, Health and Safety, Public Facilities and Services, Foothill Growth Management, Planning Framework, Water Resources.</p> <p>These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> adhere to appropriate levels of water, wastewater, and storm drainage infrastructure planning, financing and construction; minimize water quality impacts associated with stormwater, water, and wastewater utility infrastructure needed to serve existing and planned urban areas; ensure funding for County utilities to provide adequate service levels; minimize groundwater impacts through the early identification of required infrastructure 	<p>Finding: The Board finds that changes or alterations have been incorporated into the Project which mitigates the project's cumulatively considerable contribution to significant cumulative impacts on the environment related to Hydrology, Water Quality and Drainage. No additional feasible mitigation is currently available reduce the Project's contribution, which therefore remains <i>cumulatively considerable</i>.</p> <p>Rationale for Finding: As discussed more fully in RDEIR Sections 3.6 and 5.3, new development allowed under the GPU may locate additional population and structures with areas subject to flooding. Although new development would be required to comply with federal, state and regional regulations designed to address flooding issues, the GPU has the potential to make a cumulatively considerable contribution to a significant, unavoidable flooding impact. The development under the GPU will also result in increased demand on groundwater supplies from currently overdrafted groundwater basins; this is a cumulatively considerable contribution to a significant, unavoidable cumulative impact to groundwater supply recharge, and other secondary impacts to groundwater.</p> <p>Reference: For additional discussion regarding the Project's cumulative contribution to significant, cumulative hydrologic impacts, see RDEIR Sections 3.6, 5.3, and Master Response #6 (pages 4-29 through 4-32) of the FEIR.</p>	Cumulatively considerable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>and the orderly construction and rehabilitation of facilities needed to serve existing and planned urban areas;</p> <ul style="list-style-type: none"> • provide and conserve water resources and service; • minimize water quality impacts through adherence to appropriate best management practices designed to address soil erosion; • preserve floodplain areas and manage new development in hazardous areas; • ensure funding for County utilities to provide adequate service levels; • provide for continued coordination with service providers, implementation of emergency response plans and emergency training programs 		
Geology, Soils, Seismicity and Mineral Resources				
Impact 3.7-1: The proposed project could result in substantial soil erosion or the loss of topsoil.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.7, development activities resulting from buildout of the designated growth areas under the updated general plan would accelerate the erosion rate through both an increase in short-term construction related activities and an overall increase in the amount of impervious surfaces within all of the County's individual planning areas. Development would be subject to local regulation (i.e., a County required Storm Water Management Plan), State codes and County requirements for erosion control and the grading permit process. National Pollutant Discharge Elimination System (NPDES) permits and development and implementation of Storm Water Pollution Prevention Plan also help reduce impacts associated with soil erosion. The updated general plan will implement a variety of Water Resources and Health and Safety policies, and Foothill Growth Management policies and an implementation measure designed to control erosion and protect surface water and groundwater resources from erosion-related impacts. (RDEIR page 3.7-18). In addition, CEQA review for future, individual projects will provide project-specific data and require feasible mitigation to reduce significant impacts to a less than significant level. For these reasons,</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>this impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project's soil erosion impacts, see RDEIR Section 3.7.</p>	
<p>Impact 3.7-2: The proposed project could expose people to injury or structures to damage from potential rupture of a known earthquake fault, strong groundshaking, seismic-related ground failure, or landslide.</p>	Significant	<p>As discussed in more detail in Section 3.7 of the RDEIR, the GPU includes, as part of the Project, a number of Health and Safety and Foothill Growth Management policies and implementation measures that serve to reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> minimize geologic hazard impacts to people and structures in the County <p>The EIR also identifies additional mitigation (i.e., a new policy) required to address this impact:</p> <ul style="list-style-type: none"> HS-2.8 Alquist-Priolo Act Compliance. The County shall not permit any structure for human occupancy to be placed within designated Earthquake Fault Zones (pursuant to and as determined by the Alquist-Priolo Earthquake Fault Zoning Act; Public Resources Code, Chapter 7.5) unless the specific provisions of the Act and Title 14 of the California Code of Regulations have been satisfied. 	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that a new policy is recommended and is incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as new policy HS-2.8 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Section 3.7, the County is not identified in a delineated Alquist-Priolo Earthquake Fault Zone, although isolated portions of the County may be subject to strong seismic groundshaking. Development under the updated general plan will comply with applicable development requirements, including the California Building Code. Policies included as part of the Project updated general plan will ensure that a variety of policies and implementation measures ensure compliance with these requirements (e.g., HS-1.4), and expand the knowledge base and awareness of hazardous lands (e.g., HS-1.2, HS-1.5, HS-1.11, HS-2.1). Other updated general plan policies will work to prohibit or restrict development in areas with particular hazards (e.g., HS-2.2, HS-2.7, HS-2.3, and FGMP-8.10). However, these policies would not prevent building in an Alquist-Priolo zone if and when such zones are identified in the County and this impact would be significant.</p> <p>New Policy HS-2.8 "Alquist-Priolo Act Compliance" will ensure that structures for human occupancy built within Alquist-Priolo zones that may be identified in the future, comply with applicable regulations. Consequently, implementation of updated general plan policies (RDEIR page 3.7-20) along with adoption of the required new policy (Policy HS-2.8 "Alquist-Priolo Act Compliance") will reduce ground shaking and seismic related impacts to a less than significant level.</p> <p>Reference: For additional discussion regarding the project's impacts related ground shaking and failure, see RDEIR Section 3.7.</p>	Less-than-Significant
<p>Impact 3.7-3: The proposed project could result in potential structural damage from development on a potentially unstable geologic unit or soil.</p>	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be less-than-significant prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in Section 3.7, the updated general plan will implement a variety of Health and Safety and Foothill Growth Management policies and implementation measures</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>designed to protect residents, visitors, and businesses from geologic hazards. (RDEIR, page 3.7-21 – 3.7-22) Adherence to all applicable State and local building codes and regulations in addition to implementation of the policies and implementation measures contained in the updated general plan (RDEIR, page 3.7-22) will minimize impacts associated with on- or off-site landslide, subsidence, liquefaction, or collapse. This impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project's soil and geologic impacts, see RDEIR Section 3.7.</p>	
Impact 3.7-4: The proposed project could increase the potential for structural damage from development on expansive soil.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.7, the updated general plan includes Health and Safety and Foothill Growth Management policies that require the preparation of engineering studies for all new development proposals within areas of potential soil instability, restrict development within a variety of hazardous areas, and promote awareness about natural hazards, including soil conditions. (RDEIR page 3.7-23) Adherence to these policies and all applicable State and local building codes and regulations will minimize impacts associated with expansive soils. This impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project's soil and geologic impacts, see RDEIR Section 3.7.</p>	Less-than-Significant
Impact 3.7-5: The proposed project could result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.7, the updated general plan will implement a variety of Environmental Resource Management policies and implementation measures designed to conserve and protect known mineral resources (RDEIR page 3.7-25). Updated general plan policies also serve to limit development of potentially incompatible uses near existing identified or potential mineral deposits to preserve future availability of mineral resources. Additionally, CEQA review for individual projects will provide project-specific data and require feasible mitigation to reduce significant impacts regarding the loss of availability of mineral resources to a less than significant level. This impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project's mineral resource impacts, see RDEIR Section 3.7.</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Impact 3.7-6: The proposed project could result in land use incompatibilities with adjacent mineral extraction operations.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.7, the updated general plan will implement a variety of Environmental Resource Management policies and implementation measures that address compatibility issues between mineral resource extraction activities and sensitive land uses or environmentally sensitive areas (RDEIR page 3.7-26). Additionally future CEQA for individual projects will provide project-specific data and require feasible mitigation to reduce significant compatibility impacts to a less than significant level. This impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project's mineral resource impacts, see RDEIR Section 3.7.</p>	Less-than-Significant
Impact 3.7-7: The proposed project could result in the loss of availability of a known oil and/or gas resource that would be of value to the region and the residents of the State.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.7, the updated general plan will implement several Environmental Resource Management policies designed to conserve and protect known oil and gas resources (RDEIR page 3.7-27). Future CEQA review for individual projects will provide project-specific data and require feasible mitigation to reduce significant impacts to oil and gas resources availability to a less than significant level. This impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project's mineral resource impacts, see RDEIR Section 3.7.</p>	Less-than-Significant
Impact 3.7-8: The proposed project could result in land use incompatibilities with adjacent oil and gas operations.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.7, the updated general plan will implement a several Environmental Resource Management policies that address compatibility issues between oil and gas extraction activities and sensitive land uses or environmentally sensitive areas. (RDEIR page 3.7-28). Additionally, CEQA review for individual projects will provide project-specific data and require feasible mitigation to reduce significant impacts related to land use incompatibility with adjacent oil and gas operations to a less than significant level. This impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project's mineral resource impacts, see RDEIR Section 3.7.</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Cumulative Impact	Less than cumulatively considerable	The GPU includes, as part of the project, mitigating policies and implementation measures addressing Water Resources, Health and Safety, Environmental Resources Management and Foothill Growth Management that serve to reduce or avoid impacts related to geology, soils, seismicity and availability of mineral resources.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in more detail in Section 3.7 and Section 5.3 of the RDEIR, and as revised in the Final EIR, regional development will increase the number of people and structures subject to geologic- and soils-related risks. State and local regulations addressing building construction, run-off and erosion reduce this risk. The GPU includes, as part of the project, mitigating policies and implementation measures that further reduce these risks to a less than significant level, and the GPU's incremental contribution to these impacts will be less than cumulatively considerable. The GPU also includes specific policies to avoid significant impacts to important mineral, timber and oil and gas resources in the County, in compliance with state law requiring local jurisdictions to take into consideration the continued availability of important natural resources in land use decisions.</p> <p>Reference: For additional discussion regarding the Project's cumulative contribution to significant, cumulative geologic and soils impacts, see RDEIR Sections 3.7 and 5.3.</p>	Less than cumulatively considerable
Hazardous Materials and Public Safety				
Impact 3.8-1: The proposed project could create a significant hazard to the public or the environment from the transportation, use, or disposal of hazardous materials.	Significant	<p>As discussed in more detail in Section 3.8 of the RDEIR, the GPU includes, as part of the Project, a number of Land Use policies and Health and Safety policies and implementation measures that serve to reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> promote compatible land use development and patterns that minimize impacts to surrounding land uses, including open space uses; minimize risks to County residents and property associated with the transport, distribution, use and storage of hazardous materials. <p>The EIR also identifies additional mitigation (i.e., a new policy) required to address this impact:</p> <ul style="list-style-type: none"> HS-4.8 Hazardous Materials Studies. The County shall ensure that the proponents of new development projects address hazardous materials concerns through the preparation of Phase I or Phase II hazardous materials studies 	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that a new policy is recommended and is incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as new policy HS-4.8 is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.8, hazardous materials are regularly used, transported, stored and disposed of in the County. The updated general plan will allow a range of land uses that utilize a variety of hazardous materials, and new development could increase the amount of hazardous materials transported into the County on a limited number of designated transportation routes. The County implements applicable federal, State and local regulations governing the use, transport, storage and disposal of these materials, and implements and regularly updates an emergency response plan (i.e., the Multi-Hazard Functional Plan). Although such activities are well monitored, releases due to accidents, misuse, or natural disasters could occur, resulting in public health and/or environmental impacts.</p> <p>The updated general plan will implement a number of Land Use policies</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		for each identified site as part of the design phase for each project. Recommendations required to satisfy federal or State cleanup standards outlined in the studies will be implemented as part of the construction phase for each project.	<p>and Health and Safety policies and implementation measures to protect the public and environment from hazardous materials.</p> <p>The EIR also identifies new Policy HS-4.8 “Hazardous Materials Studies” as required, additional mitigation. Policy HS-4.8 requires the County to ensure that hazardous materials concerns are addressed through preparation of Phase I or Phase II hazardous materials studies for each identified site as part of the design phase for new development projects, and implementation of recommendations to meet federal or State clean-up standards in the construction phase. Consequently, with implementation of the updated general plan policies and implementation measures, and new Policy HS-4.8 as a required, additional mitigation, impacts associated with the transportation, use, or disposal of hazardous materials are considered less than significant.</p> <p>Reference: For additional discussion regarding the project’s hazardous materials related impacts, see RDEIR Section 3.8.</p>	
Impact 3.8-2: The proposed project could include uses that emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of school sites.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.8, increased population levels in designated growth areas will necessitate construction of additional school facilities. New school site selection is subject to State regulation designed to exclude site with particular types of hazards from consideration. The updated general plan will implement a number of Land Use policies and Health and Safety policies and implementation measures designed to address hazardous materials concerns and support implementation of all relevant regulations governing the storage, use, transportation and disposal of hazardous materials. Additionally, future CEQA review for individual projects will provide project-specific data and require feasible mitigation to reduce significant impacts related to potential hazards to a less than significant level. This impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project’s hazardous materials related impacts, see RDEIR Section 3.8.</p>	Less-than-Significant
Impact 3.8-3: Development under the proposed project could be located on a hazardous waste site.	Significant	<p>As discussed in more detail in Section 3.8 of the RDEIR, the GPU includes, as part of the Project, a number of Land Use policies and Health and Safety policies and implementation measures that serve to reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> • promote compatible land use development and 	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that a new policy is recommended and is incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as new policy HS-4.8 is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p>	Less-than-Significant

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SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>patterns that minimize impacts to surrounding land uses, including open space uses;</p> <ul style="list-style-type: none"> minimize risks to County residents and property associated with the transport, distribution, use and <p>The EIR also identifies additional mitigation (i.e., a new policy) required to address this impact:</p> <ul style="list-style-type: none"> HS-4.8 Hazardous Materials Studies. The County shall ensure that the proponents of new development projects address hazardous materials concerns through the preparation of Phase I or Phase II hazardous materials studies for each identified site as part of the design phase for each project. Recommendations required to satisfy federal or State cleanup standards outlined in the studies will be implemented as part of the construction phase for each project. 	<p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.8, a list of contaminated sites within the County, included sites on the Cortese list, are available through the Regional Water Quality Control Board and the Department of Toxic Substance Control. The County also maintains records for generators of large quantities of hazardous waste and hazardous waste treatment facilities. Because of State and County programs, the likelihood of future development being located on an identified hazardous waste site is low, and clean-up prior to development is assumed. It is possible that future development could occur on unidentified contaminated sites. The updated general plan includes a number of Land Use policies and Health and Safety policies and implementation measures to protect the public and environment from hazardous waste sites. These policies and implementation measures direct the County to development standards and the Hazardous Waste Management Plan to avoid locating incompatible uses near each other. Health and Safety policies address hazardous materials concerns including safe storage, use, transportation, and disposal, and continued coordination with the California Highway Patrol to establish procedures for moving hazardous waste. Updated general plan policies also direct the County to work with State and federal land managers to coordinate handling and disposal of hazardous materials on public lands.</p> <p>The EIR also identifies new Policy HS-4.8 "Hazardous Materials Studies" as required, additional mitigation. (See Impact 3.8-1, above, for discussion of Policy HS-4.8.) Consequently, with implementation of the updated general plan policies and implementation measures, and new Policy HS-4.8 as a required, additional mitigation, impacts associated with the transportation, use, or disposal of hazardous materials are considered less than significant.</p> <p>Reference: For additional discussion regarding the project's hazardous waste related impacts, see RDEIR Section 3.8.</p>	
Impact 3.8-4: The proposed project could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.8 of the RDEIR, the GPU includes, as part of the Project, a number of Health and Safety policies that reduce this impact. These policies are designed to ensure a coordinated approach to emergency response and evacuation planning.</p> <p>No additional, feasible mitigation measures identified.</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Sections</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>3.8 and 3.2, development under the updated general plan will increase the number of vehicle trips and vehicle miles traveled within the County. Roadway level of service will deteriorate to unacceptable levels, physically impeding emergency response and evacuation plan implementation. The updated general plan will implement a number of Health and Safety policies designed to address conformance with local emergency response programs and continued cooperation with emergency response service providers. The County is also required to evaluate and upgrade vital streets and highways to an acceptable level for emergency services (Policy HS-7.4). However, roadways (including non-vital roadways) operating at unacceptable levels of service (through increased vehicle traffic associated with the Project) could physically impede the response times of emergency response vehicles or delay implementation of an evacuation plan. . No additional feasible mitigation is currently available to reduce this impact. As a result, this impact is significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's emergency response related impacts, see RDEIR, Section 3.8.</p>	
Impact 3.8-5: The proposed project could result in development located within an airport land use plan area or within the vicinity of a public or private airport and could result in a safety hazard for people residing or working in the project area.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.8, the Project will result in additional residential and nonresidential land use developments; new urban development may be located in the vicinity of public use airports located throughout the County. Some of these airports are located adjacent to developed urban areas. New development of multi-story structures, structures with aerial features, and/or large concentrations of people aviation facilities could result in safety hazards. New development in the defined vicinity of public airports is reviewed by the County's Airport Land Use Commission, reducing the chance of direct conflict with such plans. The updated general plan will implement a number of Land Use, Transportation and Circulation and Health and Safety policies designed to minimize airport related hazards or nuisances. In addition, CEQA review for individual projects will provide project-specific data and require feasible mitigation to reduce significant impacts related to airport safety to a less than significant level. This impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project's airport safety hazards related impacts, see RDEIR Section 3.8.</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Impact 3.8-6: The proposed project could expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.8, increases on population in or near high fire hazard areas of the County represent increased risks of loss, injury or death as a result of wildland fires. The updated general plan will implement a variety of Health and Safety, Planning Framework, Foothill Growth Management, and Public Facilities and Service policies and implementation measures designed to address fire hazards and minimize exposure of people and structures to fire hazards. More specifically, these policies and implementation measures minimize this impact through continued provision of fire protections services and emergency response planning, and by ensuring funding for County services and adequate service levels. In addition CEQA review of individual projects will provide project-specific data and require feasible mitigation to reduce significant impacts associated with fire hazards to a less than significant level. This impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project's wildland fire related impacts, see RDEIR Section 3.8.</p>	Less-than-Significant
Cumulative Impacts	Less than significant cumulative impact	The GPU includes, as part of the project, mitigating policies and implementation measures addressing Water Resources, Health and Safety, Environmental Resources Management and Foothill Growth Management that serve to reduce or avoid impacts related to geology, soils, seismicity and availability of mineral resources	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed more fully in RDEIR Sections 3.8 and 5.3, the increase in local population and employment that will occur under the GPU will result in the increased use and transportation of hazardous household, commercial and industrial materials. Compliance with local, regional, state and federal regulations reduce these impacts to less than significant at the project level. In addition, an increase in population will correspond to an increase in potential exposure to wildland fires and hazards associated with aircraft operation; local, regional, state and federal regulations reduce these impacts to less than significant at the project level. Similar effects are associated with growth throughout the San Joaquin Valley region and these impacts are also mitigated through compliance with local, regional, state and federal regulation, thereby reducing the potential for cumulative impacts associated with hazards and hazardous materials to a less than significant level. Further, the GPU's incremental contribution to these less than significant cumulative impacts is less than cumulatively considerable.</p> <p>Reference: For additional discussion regarding the Project's cumulative contribution to significant, cumulative geologic and soils impacts, see RDEIR Sections 3.8 and 5.3.</p>	Less than cumulatively considerable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Public Services, Recreation and Utilities				
Impact 3.9-1: The proposed project would require new or expanded water supplies, facilities and entitlements.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.9 of the RDEIR, the GPU includes, as part of the Project, a number of Planning Framework, Economic Development, Public Facilities and Services and Foothill Growth Management policies and Water Resources policies and implementation measures that serve to reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> minimize this impact through early identification of required infrastructure and orderly construction and rehabilitation of facilities need to serve existing and planned urban areas; provide and conserve water resources and services. <p>No additional, feasible mitigation measures identified.</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in more detail in RDEIR Section 3.9, future population and industry growth in the County and the greater San Joaquin Valley region will generate additional demand for water, beyond the range of demands historically seen and documented by the Department of Water Resources. Shifts in land use from irrigated agriculture to mixed-use urban development will likely result in increased groundwater extractions for urban uses, an effect which is expected to occur regardless of whether the Project is implemented. The updated general plan will continue to implement a variety of policies and programs designed to coordinate with local water service providers to ensure the provision of an adequate water supply that meets clean, safe water standards prior to development. More specifically, these policies will:</p> <ul style="list-style-type: none"> require the County to work with domestic water service providers as part of the community and hamlet planning process, and require consideration of the communities' short and long-term ability to provide necessary urban services (such as domestic water). (PF-2.3, PF-2.4, PF-2.5, PF-2.6, and PF-3.3.) encourage the County to participate in regional planning efforts to manage water resources within the County (PF-6.5, WR-1.1, WR-3.2, WR-3.4, WR-3.12 and WR-3.13.) encourage the County to pursue partnerships with water purveyor and special districts to work toward development of public facilities and infrastructure improvements. (ED-1.6, PFS-1.7, PFS-1.8, PFS-1.14 and PFS-1.16.) encourage water conservation through the use of drought tolerant landscaping; educational programs aimed at reducing water consumption on agricultural lands, and encouraging other public and private entities to develop educational programs targeting water conservation awareness and domestic use. (WR-3.5, WR-3.6, WR- 	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>3.7, and WR-3.8.)</p> <p>However, the uncertainty over long-term availability of water supplies and the lack of direct County jurisdiction over public water purveyors results in a level of unpredictability about the adequacy of future water supply availability (including long term sustainability) in some of the unincorporated areas throughout the County. In addition, several projects related to the acquisition of surface water for domestic use, construction of additional surface water conveyance facilities, and reservoir enlargement projects are currently pending and could significantly affect the long term availability of future water supplies throughout the County. No feasible mitigation is currently available to reduce this impact to less than significant. For this reason, this impact remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's water related impacts, see RDEIR, Section 3.9 and Master Response #6 (pages 4-29 through 4-32) of the FEIR.</p>	
Impact 3.9-2: The proposed project could result in wastewater treatment demand in excess of planned capacity that cannot be met by new or expanded facilities.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.9 of the RDEIR, the GPU includes, as part of the Project, a number of Planning Framework, Economic Development, Public Facilities and Services and Water Resources policies that serve to reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> minimize this impact through early identification of required infrastructure and orderly construction and rehabilitation of facilities need to serve existing and planned urban areas; provide and conserve water resources and services. <p>No additional, feasible mitigation measures identified.</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.9, wastewater treatment services are largely provided by public agencies that are not directly under the County's jurisdiction. These entities must plan for adequate capacity and facilities fifteen or twenty years in advance of anticipated growth, taking into consideration, so far as possible, funding limitations, permitting requirements and environmental entitlements. Many wastewater treatment providers are unable to provide additional capacity for future growth in advance, and rely on financial assistance or funding that becomes available only through proposed development. The updated general plan will continue to implement a variety of policies designed to improve coordination with local sanitary sewer service providers to ensure the provision of an adequate level of sanitary sewer service. More specifically, these policies are designed to:</p> <ul style="list-style-type: none"> require the County to work with special districts that provide urban 	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>services as a part of the community and hamlet planning process. (PF-1.4, PF-2.4, PF-2.5, PF-2.6, PF-2.7, and PF-3.3)</p> <ul style="list-style-type: none"> encourage the use of treated wastewater and household grey water for irrigation of agricultural lands, recreation and open space areas, and large landscaped areas in coordination with wastewater treatment providers to reduce demand for groundwater, and increase the effluent disposal capacity of wastewater treatment facilities without the need to acquire additional land for disposal (WR-1.6) reduce future wastewater demands through development of an emergency water conservation plan and educational programs (in conjunction with water purveyors);require the County to incorporate provisions for use of reclaimed water, water conserving appliances, drought tolerant landscaping, and other water conservation techniques into the County's building, zoning, and subdivision ordinances (WR-3.7, WR-3.8) require the County to review development proposals with regard to their impacts on infrastructure, require new development pay a proportionate share of infrastructure improvements costs and provide for County denial of a project or projects based on inadequate service (Policy PFS-1.3); ensure funding mechanisms to adequately cover costs related to planning, capital improvements, maintenance, and operations of necessary public facilities, require the County to develop and adopt an impact fee program for new development to ensure the provision, operation, and ongoing maintenance of County owned public facilities and services. (PFS-1.5, PFS-1.6, PFS-1.7, and PFS-1.8) require the County to prepare capital improvement programs for all County-owned and operated facilities and services (PFS-1.2) encourage cooperation between the County and special districts when applying for State and Federal funding for major wastewater related expansions/upgrades (PFS-3.7) require development proposals to ensure that the intensity and timing of proposed development is consistent with the availability of adequate wastewater treatment and disposal capacity (PFS-3.2) generally require new development within a wastewater provider service area or zone of benefit to connect to the wastewater system and pay appropriate fees for rights to capacity (PFS-3.3) <p>However, the long-term availability of wastewater capacity will depend upon decisions made by individual service providers, availability of State</p>	

TABLE 1
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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>and Federal funding assistance, timing and intensity of development, and other factors. Also, some of the wastewater treatment providers are currently operating under Cease and Desist Orders today. These factors lead to a level of unpredictability about the adequacy of future wastewater capacities in some urban areas of the County. In addition, the possible implementation of regional wastewater treatment projects could significantly affect the long term capacity available for some of the urban areas of the County. No feasible mitigation is currently available to reduce this impact to a less than significant level. For these reasons, this impact remains significant and unavoidable.</p> <p>Reference: For additional discussion regarding the project's wastewater related impacts, see RDEIR, Section 3.9.</p>	
<p>Impact 3.9-3: The proposed project would produce substantial amounts of solid waste that could exceed the permitted capacity of a landfill serving the County.</p>	Significant and Unavoidable	<p>As discussed in more detail in Section 3.9 of the RDEIR, the GPU includes, as part of the Project, a number of Public Facilities and Services policies and implementation measures that serve to reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> minimize this impact through continued provision of solid waste services and recycling activities; ensure funding for County utilities to provide adequate service levels. <p>No additional, feasible mitigation measures identified.</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.9, population growth associated with the Project will result in additional solid waste generation (approximately 89,930 tons/year). Through compliance with AB 939, a 50% diversion rate is expected, however, one or more of the County's landfills is expected to exceed its permitted daily waste acceptance policy and alternative disposal locations or methods may be required to ensure adequate solid waste disposal capacity. The updated general plan includes a number of policies and implementation measures designed to promote future County-wide recycling efforts and ensure the continued provision of solid waste recovery and collections services. Additionally, the County will continue to implement solid waste reduction programs in compliance with AB 939. However, to accommodate future solid waste needs resulting from additional growth associated with buildout of the proposed project, additional landfill capacity or waste disposal locations may be required for the County. The incorporated cities in Tulare County oversee solid waste collection within their city limits. Private companies offer solid waste collection services in other unincorporated areas of the County. It is assumed that these companies would continue to maximize the use of existing disposal options and plan for future waste disposal opportunities once existing</p>	Significant and Unavoidable

TABLE 1
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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			disposal options reach their capacity, although future waste disposal opportunities may require greater handling costs depending on their location and method of transfer. Consequently, because of the uncertain availability of where and what these future waste disposal options may be by 2030, no feasible mitigation is currently available and this impact remains significant and unavoidable. Reference: For additional discussion regarding the project's solid waste related impacts, see RDEIR, Section 3.9.	
Impact 3.9-4: The proposed project would comply with all federal, State, and local statutes and regulations related to solid waste.	Less-than-Significant	No mitigation measures required.	Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation. Rationale for Finding: As discussed in greater detail in RDEIR Section 3.9, the County continues to divert solid waste from local landfills in compliance with AB 939. Diversion efforts include conservation, recycling and composting. The updated general plan will implement a variety of Air Quality, Water Resources policies and Public Facilities Services policies and implementation measures designed to promote local and State solid waste and recycling programs and adhere to all relevant regulatory requirements. More specifically, these policies are designed to minimize this impact through continued provision of solid waste services and recycling activities, protection of air and water quality, and ensuring funding for County utilities to provide adequate service levels. In addition, CEQA review for future individual projects will provide project-specific data and require feasible mitigation to reduce significant solid waste impacts to a less than significant level. This impact is considered less than significant. Reference: For additional discussion regarding the project's solid waste related impacts, see RDEIR Section 3.9.	Less-than-Significant
Impact 3.9-5: The proposed project would increase the need or use of fire protection services in the County.	Significant	As discussed in more detail in Section 3.9 of the RDEIR, the GPU includes, as part of the Project, a number of Health and Safety and Planning Framework policies, and Public Facilities and Services policies and implementation measures that serve to reduce or avoid this impact. These policies are designed to: <ul style="list-style-type: none"> minimize this impact through continued provision fire protection services and emergency response planning; ensure funding for County utilities to provide 	Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that a revised implementation measure is recommended and is incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as revised implementation measure PFS #3 is feasible and is adopted to reduce this impact to <i>less-than-significant</i> . Rationale for Finding: As discussed in greater detail in RDEIR Section 3.9, population increases in mountain areas increase wildland urban interface problems, including demands on fire protection services. Future growth in accordance with the Project will increase overall demand on fire protection services, New fire facilities, vehicles, equipment and	Less-than-Significant

TABLE 1
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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>adequate service levels.</p> <p>The EIR also identifies additional mitigation (i.e., new implementation measure PFS Implementation Measure #3) required to address this impact (:</p> <ul style="list-style-type: none"> • PFS Implementation Measure #3. The County shall develop and adopt an impact fee program for new development to provide financing mechanisms to ensure the provision, operation, and on-going maintenance of appropriate public facilities and services (including, but not limited to, fire stations and equipment, police stations and equipment, utility infrastructure, recreational and library facilities). 	<p>personnel will be required to provide adequate response times to serve future growth, at increased cost to the County to acquire, develop and maintain. The updated general plan will ensure that a variety of policies and implementation measures are implemented to ensure fire protection services within the County. More specifically, these policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • require the County to plan for and expand a variety of public services, including fire protection services and facilities consistent with community needs; • direct the County to maintain fire department staffing and response time goals consistent with National Fire Protection Association standards • promote a locally and regionally coordinated emergency response plan • provide fire safety and building standards for new development • provide funding mechanisms for additional or expanded services in conjunction with new development • address unique fire protection issues within specific planning areas. <p>The EIR also identifies revised Implementation Measure PFS #3 as required, additional mitigation.) Implementation Measure PFS#3 requires the County to develop and adopt an impact fee program for new development to ensure financing mechanisms for providing, operating and maintaining appropriate public facilities and services including fire stations and equipment. Consequently, with implementation of the updated general plan policies and implementation measures, and Implementation Measure PFS#3 as required, additional mitigation, impacts associated with the proposed project are considered less than significant.</p> <p>Reference: For additional discussion regarding the project's fire protection related impacts, see RDEIR Section 3.9.</p>	
Impact 3.9-6: The proposed project would increase the need or use of law enforcement services in the County.	Significant	<p>As discussed in more detail in Section 3.9 of the RDEIR, the GPU includes, as part of the Project, a number of Health and Safety and Planning Framework policies, and Public Facilities and Services policies and implementation measures that serve to reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> • minimize this impact through continued 	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that a revised implementation measure is recommended and is incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as revised implementation measure PFS #3 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>provision fire protection services and emergency response planning;</p> <ul style="list-style-type: none"> ensure funding for County utilities to provide adequate service levels. <p>The EIR also identifies additional mitigation (i.e., new implementation measure PFS Implementation Measure #3) required to address this impact (:</p> <ul style="list-style-type: none"> PFS Implementation Measure #3. The County shall develop and adopt an impact fee program for new development to provide financing mechanisms to ensure the provision, operation, and on-going maintenance of appropriate public facilities and services (including, but not limited to, fire stations and equipment, police stations and equipment, utility infrastructure, recreational and library facilities). 	<p>3.9 the Project will increase overall demand on law enforcement services in the County. New police facilities, vehicles, equipment and personnel will be required in order to provide adequate response times to serve this future growth. County costs to acquire, develop and maintain these services will also increase. The updated general plan will ensure that a variety of policies and implementation measures are implemented to ensure police protection services within the County. More specifically, these policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> require the County to plan for and expand public services, including law enforcement services and facilities consistent with community needs; identify specific law enforcement standards, response times, staffing ratios and siting criteria; promote implementation of a locally and regionally coordinated emergency response plan; provide a funding mechanism for additional or expanded services in conjunction with new development; address unique law enforcement/public safety issues in specific planning areas. <p>The EIR also identifies revised Implementation Measure PFS #3 as required, additional mitigation.) Implementation Measure PFS#3 requires the County to develop and adopt an impact fee program for new development to ensure financing mechanisms for providing, operating and maintaining appropriate public facilities and services including fire stations and equipment. Consequently, with implementation of the updated general plan policies and implementation measures, and Implementation Measure PFS#3 as required, additional mitigation, impacts associated with the proposed project are considered less than significant.</p> <p>Reference: For additional discussion regarding the project's police protection related impacts, see RDEIR Section 3.9.</p>	
Impact 3.9-7: The proposed project would increase the need or use of school services or facilities.	Significant	As discussed in more detail in Section 3.9 of the RDEIR, the GPU includes, as part of the Project, a number of Economic Development, Environmental Resource Management, Planning Framework, Scenic Landscapes, Land Use policies, and Public Facilities and Services policies and implementation measures that serve to reduce or avoid this impact.	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that a revised implementation measure is recommended and is incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as revised implementation measure PFS #3 is feasible and is adopted to reduce this impact to less-than-significant.</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>These policies are designed to:</p> <ul style="list-style-type: none"> continue provision of school services ensure funding for County programs to provide adequate service levels <p>The EIR also identifies additional mitigation (i.e., PFS Implementation Measure #3 and Policy PFS-8.6 "School Funding:") required to address this impact:</p> <ul style="list-style-type: none"> PFS Implementation Measure #3. The County shall develop and adopt an impact fee program for new development to provide financing mechanisms to ensure the provision, operation, and on-going maintenance of appropriate public facilities and services (including, but not limited to, fire stations and equipment, police stations and equipment, utility infrastructure, recreational and library facilities). PFS-8.6 School Funding. To the extent allowed by State law, the County may require new projects to mitigate impacts on school facilities, in addition to the use of school fees. The County will also work with school districts, developers, and the public to evaluate alternatives to funding/providing adequate school facilities. 	<p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.9, the Project will result in additional residents and an increase in the student population in the County. New facilities and personnel will be required in order to provide adequate service for future growth resulting from the Project. The updated general plan will ensure that a variety of policies and implementation measures are implemented to ensure adequate school facilities within the County. More specifically, these policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> require the County to work with local school districts to develop solutions for overcrowded schools and financial constraints of constructing new facilities; require the County to coordinate future planning, siting, and construction of new school facilities with school districts to ensure adequate levels of service; provide funding mechanism(s) for additional or expanded services in conjunction with new development. <p>The EIR also identifies new policy PFS-8.6 "School Funding" and revised Implementation Measure PFS #3 as required, additional mitigation.) PFS-8.6 allows the County to require new projects to mitigate impacts on school facilities to the extent allowed by State law, in addition to the use of school fees, and directs the County to work with school districts, developers and the public to evaluate alternatives for funding/providing adequate school facilities. Implementation Measure PFS#3 requires the County to develop and adopt an impact fee program for new development to ensure financing mechanisms for providing, operating and maintaining appropriate public facilities. Consequently, with implementation of the updated general plan policies and implementation measures, and Policy PFS-8.6 and Implementation Measure PFS#3 as required, additional mitigation, impacts associated with the proposed project are considered less than significant.</p> <p>Reference: For additional discussion regarding the school facility related impacts, see RDEIR Section 3.9.</p>	
Impact 3.9-8: The proposed project would increase the need or use of libraries and other community facilities.	Significant	<p>As discussed in more detail in Section 3.9 of the RDEIR, the GPU includes, as part of the Project, a number of Environmental Resource Management, Planning Framework, Land Use policies and Public Facilities and Services policies and implementation measures that serve to reduce or avoid this impact. These policies are designed to:</p>	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that a revised implementation measure is recommended and is incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as revised implementation measure PFS #3 is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p>	Less-than-Significant

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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<ul style="list-style-type: none"> continue provision of community services ensure funding for County programs to provide adequate service levels <p>The EIR also identifies additional mitigation (i.e., PFS Implementation Measure #3) required to address this impact:</p> <ul style="list-style-type: none"> PFS Implementation Measure #3. The County shall develop and adopt an impact fee program for new development to provide financing mechanisms to ensure the provision, operation, and on-going maintenance of appropriate public facilities and services (including, but not limited to, fire stations and equipment, police stations and equipment, utility infrastructure, recreational and library facilities). 	<p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.9, the Project will increase overall demand on library services in the County. New facilities, books and personnel will be required in order to provide adequate service for this future growth. County costs to build and maintain facilities and sustain personnel costs will also increase. The updated general plan will ensure that a variety of policies and implementation measures are implemented to ensure adequate library services within the County. More specifically, these policies are designed to:</p> <ul style="list-style-type: none"> encourage expansion of library facilities and services as necessary to meet public needs encourage development of centrally located facilities; provide funding mechanisms for additional or expanded services in conjunction with new development. <p>The EIR also identifies revised Implementation Measure PFS #3 as required, additional mitigation.) Implementation Measure PFS #3 requires the County to develop and adopt an impact fee program for new development to ensure financing mechanisms for providing; operating and maintaining appropriate public facilities. Consequently, with implementation of the updated general plan policies and implementation measures, and Implementation Measure PFS#3 as required, additional mitigation, impacts associated with the proposed project are considered less than significant.</p> <p>Reference: For additional discussion regarding the project's library related impacts, see RDEIR Section 3.9.</p>	
Impact 3.9-9: The proposed project would increase the need or use of park and recreation facilities.	Significant	<p>As discussed in more detail in Section 3.9 of the RDEIR, the GPU includes, as part of the Project, a number of Environmental Resource Management policies and Public Facilities and Services implementation measures that serve to reduce or avoid this impact. These policies are designed to:</p> <ul style="list-style-type: none"> continue provision of community services ensure funding for County programs to provide adequate service levels <p>The EIR also identifies additional mitigation (i.e., PFS Implementation Measure #3) required to address this impact:</p> <ul style="list-style-type: none"> PFS Implementation Measure #3. The County 	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that a revised implementation measure is recommended and is incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as revised implementation measure PFS #3 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.9, future growth as a result of the Project will generate additional demand on park and recreation programs, services and facilities. County costs to build and maintain facilities and sustain personnel costs will also increase. The updated general plan will ensure that a variety of policies and implementation measures are implemented to ensure adequate park and recreation facilities within the County. More specifically, these</p>	Less-than-Significant

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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		shall develop and adopt an impact fee program for new development to provide financing mechanisms to ensure the provision, operation, and on-going maintenance of appropriate public facilities and services (including, but not limited to, fire stations and equipment, police stations and equipment, utility infrastructure, recreational and library facilities).	<p>policies are designed to, among other things:</p> <ul style="list-style-type: none"> • support the County's commitment to incorporated park facilities as part of future development within various UDB areas; • require dedication of land or funding for future acquisition and development of park sites and recreation programs; • provide guidelines on the types and sizes of parks necessary to accommodate future use; • provide funding mechanisms for additional or expanded services in conjunction with new development. <p>The EIR also identifies revised Implementation Measure PFS #3 as required, additional mitigation.) Implementation Measure PFS #3 requires the County to develop and adopt an impact fee program for new development to ensure financing mechanisms for providing; operating and maintaining appropriate public facilities. Consequently, with implementation of the updated general plan policies and implementation measures, and Implementation Measure PFS#3 as required, additional mitigation, impacts associated with the proposed project are considered less than significant.</p> <p>Reference: For additional discussion regarding the project's parks and recreation related impacts, see RDEIR Section 3.9.</p>	
Cumulative Impacts	Cumulatively Considerable	<p>As discussed in more detail in Sections 3.9 and 5.3 of the RDEIR, and Section 2.0 of the FEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that address Water Resources, Planning Framework, Economic Development, Public Facilities and Services, Foothills, Public Services and Utilities, Air Quality, Health and Safety, Economic Development, Environmental Resource Management, Scenic Landscapes.</p> <p>These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • provide for early identification of required infrastructure and orderly construction and rehabilitation of facilities needed to serve existing and planned urban areas; • provide and conserve water resources and service; 	<p>Finding: The Board finds that changes or alterations have been incorporated into the Project which mitigates the project's cumulatively considerable contribution to significant cumulative impacts on the environment from Public Services, Recreation and Utilities. Specifically, the mitigation measures adopted as new policy PFS PFS-8.6, and PFS Implementation Measure #3, are feasible and are adopted to mitigate significant effects of the GPU related to impacts to Public Services, Recreation and Utilities. However, even with implementation of these measures, the project's contribution to a significant cumulative impact remains <i>cumulatively considerable</i>.</p> <p>Rationale for Finding: As discussed more fully in RDEIR Sections 3.9 and 5.3, population growth within Tulare County and the greater San Joaquin Valley region contribute to the need for adequate solid waste disposal facilities. Even assuming that existing waste disposal companies continue to maximize use of existing disposal options and plan for future waste disposal opportunities as existing facilities reach capacity, the availability of future solid waste disposal options by 2030 is uncertain, therefore this is a significant cumulative impact. The project's contribution to this impact is cumulatively considerable.</p>	Cumulatively Considerable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<ul style="list-style-type: none"> continue provision of solid waste services and recycling activities; ensure funding for County utilities to provide adequate service levels; protect air and water quality; continue provision of fire protection services and emergency response planning, including within various planning areas; continue provision of law enforcement services and emergency response planning ensure funding for County programs to provide adequate service levels; continue provision of school services; continue provision of community services <p>The EIR also identifies additional mitigation measures (i.e., new policies and implementation measures) PFS-8.6, PFS Implementation Measure #3:</p> <ul style="list-style-type: none"> PFS-8.6 School Funding. To the extent allowed by State law, the County may require new projects to mitigate impacts on school facilities, in addition to the use of school fees. The County will also work with school districts, developers, and the public to evaluate alternatives to funding/providing adequate school facilities. PFS Implementation Measure #3. The County shall develop and adopt an impact fee program for new development to provide financing mechanisms to ensure the provision, operation, and on-going maintenance of appropriate public facilities and services (including, but not limited to, fire stations and equipment, police stations and equipment, utility infrastructure, recreational and library facilities). 	<p>Future population and industry growth in the County and the greater San Joaquin Valley region will generate additional demand for water. Due to uncertainty over long-term availability of water supplies and the minimal amount of County jurisdiction over public water purveyors results in a level of unpredictability about the adequacy of future water supply availability (including long term sustainability) in some of the unincorporated urban areas throughout the County, this is considered a significant cumulative impact and the project's contribution is considered cumulatively considerable.</p> <p>Long-term availability of wastewater capacity will depend upon decisions made by individual service providers, availability of state and federal funding assistance, timing and intensity of development, and other factors. Also, some wastewater treatment providers are currently operating under Cease and Desist Orders. These factors lead to a level of unpredictability about the adequacy of future wastewater capacities in some urban areas of the County. In addition, the possible implementation of regional wastewater treatment projects could significantly affect the long term capacity available for some of the urban areas of the County. This is considered a significant cumulative impact and the project's contribution is considered cumulatively considerable</p> <p>No additional feasible mitigation measures are available to reduce the project's contribution to less than cumulatively considerable.</p> <p>Reference: For additional discussion regarding the Project's cumulative contribution to significant, cumulative public service impacts, see RDEIR Sections 3.9, 5.3, and Master Response #6 (pages 4-29 through 4-32) of the FEIR.</p>	

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Agricultural Resources				
Impact 3.10-1: The proposed project would result in the substantial conversion of Important farmlands to non-agricultural uses.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.10 of the RDEIR, the GPU includes, as part of the Project, a number of Agricultural Resource and Economic Development policies and implementation measures, and Land Use, Planning Framework, Rural Valley Lands Plan and Mountain Framework policies that serve to reduce or avoid this impact. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • protect and conserve agricultural resources within the County; • promote continued productivity and employment of agricultural resources within the County <p>The EIR also identifies additional mitigation (i.e., revised existing Policy AG-1.6, new Policy AG-1.18 and new Agricultural Implementation Measure #15) required to address this impact:</p> <ul style="list-style-type: none"> • AG-1.6 Conservation Easements. The County may develop an Agricultural Conservation Easement Program (ACEP) to help protect and preserve agricultural lands (including "Important Farmlands"), as defined in this Element. This program may require payment of an in-lieu fee sufficient to purchase a farmland conservation easement, farmland deed restriction, or other farmland conservation mechanism as a condition of approval for conversion of important agricultural land to nonagricultural use. If available, the ACEP shall be used for replacement lands determined to be of statewide significance (Prime or other Important Farmlands), or sensitive and necessary for the preservation of agricultural land, including land that may be part of a community separator as part of a comprehensive program to establish community separators. The in-lieu fee or other conservation mechanism shall recognize the 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.10, future growth as a result of the Project will result in direct and indirect conversion of important farmlands (i.e., Prime Farmland, Unique Farmland, and Farmland of Statewide Importance to urban and on-farming uses. The majority of these conversions will occur within future growth areas (e.g., UDBs, CACUDBs, HDBs and CACUABs). A majority of agricultural lands classified as important farmlands are located in the Rural Valley Lands Plan Area. Full buildout of unincorporated community areas in the Rural Valley Lands Plan area would convert up to approximately 59,435 acres of important farmlands. Conversion in other areas of the County would convert smaller acreages of important farmland. However, the major cause of conversion in the County is downgrading to other agricultural uses such as expanded or new livestock facilities, replacing irrigated farmland with non-irrigated crops, or leaving lands fallow for six years or longer. These trends are expected to continue based on trends identified by the Department of Conservation. The updated general plan will implement a variety of policies designed to address agricultural conversion). In addition, County policies will (1) support continued agricultural uses, (2) seek to reduce conflicts between agricultural and urban uses ("right to farm" ordinance); and (3) coordinate regional efforts to preserve farmland or slow the conversion of farmland within Tulare County. However, while these policies will continue to promote the continued conservation of important farmlands, they will not prevent an overall net loss of important farmlands within the County associated with future development within existing agricultural areas.</p> <p>The EIR also identifies revised Policy AG-1.6 "Conversion Easements", new Policy AG-1.18 "Farmland Trust and Funding Sources", and Agricultural Element Implementation Measure #15 as required, additional mitigation. (RDEIR, page 3.1-15.) Policy AG-1.6, in conjunction with Agricultural Implementation Measure #15, will require the County to</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>importance of land value and shall require equivalent mitigation.</p> <ul style="list-style-type: none"> • AG-1.18 Farmland Trust and Funding Sources. The in-lieu fees collected by the County may be transferred to the Central Valley Farmland Trust or other qualifying entity, which will arrange the purchase of conservation easements. The County shall encourage the Trust or other qualifying entity to pursue a variety of funding sources (grants, donations, taxes, or other funds) to fund implementation of the ACEP. • Agricultural Element Implementation Measure #15. The County shall consider the implementation of an Agricultural Conservation Easement Program (ACEP) to help protect and preserve agricultural lands (including "Important Farmlands"), as defined in Policy AG-1.6. 	<p>consider implementing an Agricultural Conservation Easement Program. Features of such a program may require payment of in-lieu fees, farmland conservation easements, deed restrictions or other conservation mechanisms. Policy AG-1.18 will allow in-lieu fees to be transferred to the Central Valley Farmland Trust or other qualifying entity to arrange purchase of conservation easements. The County will also encourage such entities to pursue a variety of other funding sources. No additional feasible mitigation is currently available. Therefore, this is a significant and unavoidable impact.</p> <p>Reference: For additional discussion regarding the project's agricultural impacts, see RDEIR, Section 3.10.</p>	
Impact 3.10-2: The proposed project could conflict with the provisions of the Williamson Act contracts through early termination of active Williamson Act contracts.	Less-than-Significant	No mitigation measures required.	<p>Finding: The Board hereby finds that this impact will be <i>less-than-significant</i> prior to mitigation.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.10, the Project is expected to result in future development on lands currently subject to Williamson Act contracts. Proper Williamson Act procedures for contract termination, including minimization of early termination of active contracts will be followed. The updated general plan will implement a variety of Agricultural Resource, Land Use and Planning Framework policies, and Agriculture and Economic Development Implementation Measures designed to prevent premature conversion of agricultural land and cancellation of Williamson Act contracts. As a result, conflicts with the Williamson Act are not expected and this impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project's Williamson Act impacts, see RDEIR Section 3.10.</p>	Less-than-Significant
Impact 3.10-3: The proposed project would involve other land use conflicts between agricultural and urban uses.	Significant and Unavoidable	As discussed in more detail in Section 3.10 of the RDEIR, the GPU includes, as part of the Project, a number of Agricultural Resource and Economic Development policies and implementation measures, and Land Use, Planning Framework,	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>Rural Valley Lands Plan and Mountain Framework policies that serve to reduce or avoid this impact. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> protect and conserve agricultural resources within the County; promote continued productivity and employment of agricultural resources within the County <p>The EIR also identifies additional mitigation (i.e., revised existing policy (Policy AG-1.6 new Policy AG-1.18, and new Agricultural Implementation Measure #15) required to address this impact:</p> <ul style="list-style-type: none"> AG-1.6 Conservation Easements. The County may develop an Agricultural Conservation Easement Program (ACEP) to help protect and preserve agricultural lands (including "Important Farmlands"), as defined in this Element. This program may require payment of an in-lieu fee sufficient to purchase a farmland conservation easement, farmland deed restriction, or other farmland conservation mechanism as a condition of approval for conversion of important agricultural land to nonagricultural use. If available, the ACEP shall be used for replacement lands determined to be of statewide significance (Prime or other Important Farmlands), or sensitive and necessary for the preservation of agricultural land, including land that may be part of a community separator as part of a comprehensive program to establish community separators. The in-lieu fee or other conservation mechanism shall recognize the importance of land value and shall require equivalent mitigation. AG-1.18 Farmland Trust and Funding Sources. The in-lieu fees collected by the County may be transferred to the Central Valley Farmland Trust or other qualifying entity, which will arrange the purchase of conservation 	<p>infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.10-3, indirect changes caused by development under the Project may include nuisance or "edge" effects resulting from urban expansion into agricultural areas. Edge effects may be greater adjacent to various unincorporated community areas within the County. Agricultural activities produce noise, dust, odors and drift of agricultural chemicals. From an agricultural perspective, conflicts with urban development include restrictions on use of agricultural chemicals, noise and dust complaints, trespass, vandalism and damage from domestic animals. Increase costs to agricultural operation may result from these conflicts and rising land values as residential development expands. As discussed above under Impact 3.10-1, the updated general plan will implement a variety of policies designed to address agricultural conversion. Reducing agricultural conversion will reduce land use conflicts between agricultural and urban uses. In addition, County policies will (1) support continued agricultural uses, (2) seek to reduce conflicts between agricultural and urban uses ("right to farm" ordinance); and (3) coordinate regional efforts to preserve farmland or slow the conversion of farmland within Tulare County. However, while these policies would continue to promote the continued conservation of important farmlands, it would not prevent an overall net loss of important farmlands within the County associated with future development within existing agricultural areas.</p> <p>As discussed above under Impact 3.10-1, the EIR also identifies revised Policy AG-1.6 "Conversion Easements", new Policy AG-1.18 "Farmland Trust and Funding Sources", and Agricultural Element Implementation Measure #15) as required, additional mitigation. (RDEIR, page 3.10-19). No additional feasible mitigation is currently available. Therefore, this is a significant and unavoidable impact.</p> <p>Reference: For additional discussion regarding the project's agricultural impacts, see RDEIR, Section 3.10.</p>	

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>easements. The County shall encourage the Trust or other qualifying entity to pursue a variety of funding sources (grants, donations, taxes, or other funds) to fund implementation of the ACEP.</p> <ul style="list-style-type: none"> • Agricultural Element Implementation Measure #15. The County shall consider the implementation of an Agricultural Conservation Easement Program (ACEP) to help protect and preserve agricultural lands (including "Important Farmlands"), as defined in Policy AG-1.6. 		
Cumulative Impacts	Cumulatively Considerable	<p>As discussed in more detail in RDEIR Sections 3.10 and 5.3, and as modified in the FEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that address Agriculture, Land Use, Economic Development, Planning Framework, Rural Valley Lands Plan, Foothill Growth Management, and the Mountain Framework Plan</p> <p>These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • conserve agricultural resources within the County; • promote continued productivity and employment of agricultural resources within the County; • protect and conserve agricultural resources within the County; • promote future development patterns that focus growth within established community areas; • conserve and encourage continued economic value of agricultural resources within various planning areas <p>The EIR also identifies additional mitigation measures (i.e., new policies and implementation measures) AG-1.6, AG-1.18 and Agricultural Implementation Measure #15:</p>	<p>Finding: The Board finds that changes or alterations have been incorporated into the Project which mitigates the project's cumulatively considerable contribution to significant cumulative impacts on the environment related to loss of agricultural land. Specifically, the mitigation measures adopted as new policies AG-1.6, AG-1.18 and new Agricultural Implementation Measure #15, are feasible and are adopted to mitigate significant effects of the GPU related to loss of agricultural land. However, even with implementation of these measures, the project's contribution to a significant cumulative impact remains cumulatively considerable.</p> <p>Rationale for Finding: As discussed more fully in RDEIR Sections 3.10 and 5.3, and in the FEIR, growth associated with development under the GPU, along with development within the County will result in a loss of some existing agricultural lands within the County. The loss of agricultural land within the County as a result of urban development is part of an overall trend within the San Joaquin Valley and the County will continue to face development pressure for the foreseeable future. In addition to direct loss, urban expansion into agricultural areas creates edge effects that may increase costs to agricultural operations, and encourage further conversion of agricultural lands to residential and other uses. Continued urbanization, consistent with GPU policies designed to promote development patterns that focus growth within established community areas, and other GPU policies designed to protect and conserve agriculture, will result in the loss of agricultural lands. This loss is considered a significant cumulative impact and the project's contribution is cumulatively considerable.</p> <p>No additional feasible mitigation measures are currently available to reduce the project's contribution to less than cumulatively considerable.</p>	Cumulatively Considerable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<ul style="list-style-type: none"> • AG-1.6 Conservation Easements. The County may develop an Agricultural Conservation Easement Program (ACEP) to help protect and preserve agricultural lands (including "Important Farmlands"), as defined in this Element. This program may require payment of an in-lieu fee sufficient to purchase a farmland conservation easement, farmland deed restriction, or other farmland conservation mechanism as a condition of approval for conversion of important agricultural land to nonagricultural use. If available, the ACEP shall be used for replacement lands determined to be of statewide significance (Prime or other Important Farmlands), or sensitive and necessary for the preservation of agricultural land, including land that may be part of a community separator as part of a comprehensive program to establish community separators. The in-lieu fee or other conservation mechanism shall recognize the importance of land value and shall require equivalent mitigation. • AG-1.18 Farmland Trust and Funding Sources. The in-lieu fees collected by the County may be transferred to the Central Valley Farmland Trust or other qualifying entity, which will arrange the purchase of conservation easements. The County shall encourage the Trust or other qualifying entity to pursue a variety of funding sources (grants, donations, taxes, or other funds) to fund implementation of the ACEP. • Agricultural Implementation Measure #15. The County shall consider implementation of an Agricultural Conservation Easement Program (ACEP) to help protect and preserve agricultural lands (including "Important Farmlands"), as defined in Policy AG-1.6. 	<p>Reference: For additional discussion regarding the Project's cumulative contribution to significant, cumulative agricultural resource impacts, see RDEIR Sections 3.10 and 5.3.</p>	

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Biological Resources				
Impact 3.11-1: The proposed project would have a substantial adverse effect, either directly or through habitat modifications, on a variety of special status species.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.11 of the RDEIR, the GPU includes, as part of the Project, a number of Environmental Resource Management policies and implementation measures, and Foothill Growth Management policies that serve to reduce or avoid this impact. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> protect sensitive habitats from impacts of future development; identify and mitigate development impacts on key biological resources; preserve and maintain biological resources within the Foothill Growth Management Plan area <p>The EIR also identifies additional mitigation (i.e., revised existing Policy ERM-1.9 and Policy ERM-1.15) required to address this impact:</p> <ul style="list-style-type: none"> ERM-1.9 Coordination of Management on Adjacent Lands. The County shall work with other government land management agencies (such as the Bureau of Land Management, US Forest Service, National Park Service) to preserve and protect biological resources, including those within and adjacent to designated critical habitat, reserves, preserves, and other protected lands, while maintaining the ability to utilize and enjoy the natural resources in the County ERM-1.15 Minimize Lighting Impacts. The County shall ensure that lighting associated with new development or facilities (including street lighting, recreational facilities, and parking) shall be designed to prevent artificial lighting from illuminating adjacent natural areas at a level greater than one foot candle above ambient conditions. 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.11, the Project will call for introduction of new urban and agricultural-related development in a variety of habitats throughout the County. These habitat areas support a number of special status species. Impacts to special status species will result from direct and indirect effects of development. Impacts include habitat conversion and fragmentation, invasive species, and new sources of light. Introduction of new sources of light (resulting from development) could affect existing patterns of behavior or movement of wildlife species, including the attraction of species to incompatible areas (i.e., airports, industrial facilities, etc.). The majority of impacts to special status species within UDBs, CACUDBs, HDBs, CACUABs, Corridors, and Mountain Service Centers will occur as a result of project-specific activities. Within the RVLP area and limited areas within the Foothill Growth Management Plan area, impacts will generally result from conversion of wildlife compatible agriculture to more intensive agricultural uses. Increased erosion, sedimentation, temperature, and contamination associated with construction of new urban development or intensification of agricultural land uses will affect special status species and habitat through water quality and water supply effects. The updated general plan will implement a variety of policies designed to address special status species. More specifically, updated general plan policies are designed to:</p> <ul style="list-style-type: none"> require the County protect key sensitive habitats (i.e., riparian, wetlands, oak woodlands, etc.) by encouraging future County growth outside these sensitive habitat areas; encourage planting of native vegetation in order to provide habitat conditions suitable for native vegetation and wildlife; encourage the County to work with other government land management agencies to preserve and protect sensitive habitat; support the establishment and administration of a mitigation banking 	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>program;</p> <ul style="list-style-type: none"> require the County to address development impacts to local waterways through use of lakefront and river bank vegetation buffers designed to protect habitats and the scenic quality of local lakes and water courses; protect sensitive habitats and associated plant and wildlife species; identify and mitigate impacts to affected habitats and plant and wildlife species resulting from the Project. <p>Although these policies seek to protect a variety of open space resources within the County, implementation of the General Plan 2030 Update would still result in the conversion of some open space and habitat areas, which would result in the overall reduction of a plant or wildlife species habitat.</p> <p>The EIR identified revised Policy ERM-1.9 “Coordination of Management on Adjacent Lands” and new Policy ERM-1.15 “Minimize Lighting Impacts” as required additional mitigation to address impacts to special status species. (RDEIR pages 3.11-34 and 3.11-35. New Policy ERM-1.15 “Minimize Lighting Impacts” requires the County to ensure that lighting associated with new development be designed to prevent artificial lighting from illuminating adjacent natural areas at a specific light level (no more than one foot candle above ambient conditions). Revised Policy ERM-1.9 requires the County to work with other government land management agencies to preserve and protect biological resources including those within and adjacent to critical habitat, reserves, preserves and other protected lands, thus conserving habitat values in and adjacent to these areas. (See RDEIR Figure 3.11-2 for reference.) No additional feasible mitigation is currently available. Therefore, this is a significant and unavoidable impact.</p> <p>Reference: For additional discussion regarding the project’s biological impacts, see RDEIR, Section 3.11.</p>	
Impact 3.11-2: The proposed project would have a substantial adverse effect on riparian habitats or other sensitive natural communities.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.11 of the RDEIR, the GPU includes, as part of the Project, a number of Environmental Resource Management and Foothill Growth Management policies and implementation measures that serve to reduce or avoid this impact. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> protect sensitive habitats from impacts of future development; 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<ul style="list-style-type: none"> identify and mitigate development impacts on key biological resources; preserve and maintain biological resources within the Foothill Growth Management Plan preserve and maintain biological resources within the Foothill Growth Management Plan area <p>The EIR also identifies additional mitigation (i.e., revised existing policy (Policy ERM-1.9 and Policy ERM-1.15) required to address this impact:</p> <ul style="list-style-type: none"> ERM-1.9 Coordination of Management on Adjacent Lands. The County shall work with other government land management agencies (such as the Bureau of Land Management, US Forest Service, National Park Service) to preserve and protect biological resources, including those within and adjacent to designated critical habitat, reserves, preserves, and other protected lands, while maintaining the ability to utilize and enjoy the natural resources in the County ERM-1.15 Minimize Lighting Impacts. The County shall ensure that lighting associated with new development or facilities (including street lighting, recreational facilities, and parking) shall be designed to prevent artificial lighting from illuminating adjacent natural areas at a level greater than one foot candle above ambient conditions. 	<p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.11, some of the limited population growth associated with the Project will allow for introduction of development (predominately agricultural land uses) into largely undisturbed areas. The primary impact will be removal of sensitive habitats for building pad development and construction of buildings, infrastructure and roadways. Additional impacts will result from a continued increased incidence of fire due to human activity, increased erosion from roadways and introduction of non-native we species. Future developed land uses will also result in elimination of habitat and food resources for wildlife through removal of vegetation communities. New sources of light and glare will affect nesting habitat and migratory corridors. Effects may be particularly pronounced for wildlife species with low tolerance for habitat modification or disturbance, especially some riparian bird and reptile species. Impacts to sensitive habitats and individual plant and wildlife species will be significant as a result. The updated general plan will implement a variety of policies designed to address biological resources. More specifically, updated general plan policies are designed to:</p> <ul style="list-style-type: none"> preserve sensitive habitats; encourage future County growth outside sensitive habitat areas in order to protect key sensitive habitats (including, riparian, wetland, and oak woodland, etc.); support establishment and administration of a mitigation banking program; use lakefront and water bank vegetation buffers to protect habitats and the scenic quality of local lakes and waterways; protect sensitive habitats and their associated species (e.g., San Joaquin kit fox) develop procedures to identify impacts and mitigation measures for affected habitats and plant and wildlife species; address impacts to sensitive habitats and species unique to the Foothill Growth Management Plan areas with similar policies and implementation measures. <p>The EIR identified revised Policy ERM-1.9 "Coordination of Management on Adjacent Lands" and new Policy ERM-1.15 "Minimize Lighting Impacts") as required additional mitigation to address impacts to sensitive riparian habitats or other sensitive natural communities. (RDEIR pages 3.11-34 and 3.11-35).The mitigating effects of these measures are described above, under Impact 3.11-1.</p>	

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>Although these policies, including required additional mitigation, are designed to address impacts to biological resources (including officially designated endangered, threatened, candidate, or special status species) and seek to protect a variety of open space resources within the County, implementation of the General Plan 2030 Update will still result in the conversion of some open space and habitat areas, which will result in the overall reduction of a plant or wildlife species habitat. No additional feasible mitigation is currently available. Therefore, this is a significant and unavoidable impact.</p> <p>Reference: For additional discussion regarding the project's biological impacts, see RDEIR, Section 3.11.</p>	
Impact 3.11-3: The proposed project would have a substantial adverse effect on "federally protected" wetlands and other waters.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.11 of the RDEIR, the GPU includes, as part of the Project, a number of Environmental Resource Management, Foothill Growth Management policies and implementation measures, and Water Resources policies that serve to reduce or avoid this impact. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • protect sensitive habitats from impacts of future development; • identify and mitigate impact of development on key biological resources • minimize water supply and water quality impacts <p>No additional, feasible mitigation measures identified.</p>	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.11, wetlands and vernal pools are scattered throughout the valley area of the County. Many vernal pool habitats are unmapped due to their small size and could be located within areas identified as annual grasslands or vineyard/cropland habitats. Direct impacts to these habitats will result from new, urban development and intensification of agricultural uses. Wetland habitats are sensitive to changes in water quality and availability indirect impacts will result from increased erosion, sedimentation, temperature and contamination. The updated general plan will adopt and implement a variety of policies and implementation measures designed to address impacts to biological resources (including federally protected wetlands as defined by Section 404 of the Clean Water Act). More specifically, updated general plan policies are designed to:</p> <ul style="list-style-type: none"> • preserve wetlands; • protect key sensitive habitats (e.g., riparian, wetlands, oak woodlands, etc.) • encourage future County growth outside sensitive habitat areas in order to protect key sensitive habitats (including, riparian, wetland, 	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>and oak woodland, etc.);</p> <ul style="list-style-type: none"> encourage planting of native vegetation to provide habitat conditions suitable for native vegetation and wildlife; support establishment and administration of a mitigation banking program; use lakefront and water bank vegetation buffers to protect habitats and the scenic quality of local lakes and waterways identify wetland resources using USACE protocols in addition to identification of impacts and mitigation measures to other habitats and plant and wildlife species; incorporate buffer dedication requirements to mitigate impacts to riparian and wetland areas into County zoning ordinance; minimize effects of future growth through use of site surveys, preparation of plans for habitat protection, zoning code and a mitigation banking program; direct the County to collaborate with preservation groups to implement preservation and mitigation plans and programs of the Environmental Resources Management Element; minimize impacts to water supply and water quality; address impacts to sensitive habitats specific to the unique Foothill Growth Management area; protect water quality and water resources in the foothills. <p>However, the exact locations of these wetland habitat areas and the exact locations of future development are uncertain, and this impact is significant.</p> <p>Although these policies seek to protect a variety of open space resources within the County, including wetlands, implementation of the General Plan 2030 Update would still result in the conversion of some open space areas and associated wetlands, which would result in the overall reduction of a plant or wildlife species habitat. No feasible mitigation is currently available to reduce this impact to less than significant. Therefore, this is a significant unavoidable impact.</p> <p>Reference: For additional discussion regarding the project's biological impacts, see RDEIR, Section 3.11.</p>	

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
Impact 3.11-4: The proposed project would have a substantial adverse effect on wildlife movement opportunities, migratory corridors, or native wildlife nursery sites.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.11 of the RDEIR, the GPU includes, as part of the Project, a number of Environmental Resource Management, Foothill Growth Management policies and implementation measures, and Water Resources policies that serve to reduce or avoid this impact. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> protect sensitive habitats from impacts of future development; identify and mitigate impact of development on key biological resources minimize water supply and water quality impacts <p>The EIR identifies additional mitigation (i.e., Policies ERM-1.9, ERM-1.15 and ERM-1.16) required to address this impact:</p> <ul style="list-style-type: none"> ERM-1.9 Coordination of Management on Adjacent Lands. The County shall work with other government land management agencies (such as the Bureau of Land Management, US Forest Service, National Park Service) to preserve and protect biological resources, including those within and adjacent to designated critical habitat, reserves, preserves, and other protected lands, while maintaining the ability to utilize and enjoy the natural resources in the County ERM-1.15 Minimize Lighting Impacts. The County shall ensure that lighting associated with new development or facilities (including street lighting, recreational facilities, and parking) shall be designed to prevent artificial lighting from illuminating adjacent natural areas at a level greater than one foot candle above ambient conditions. ERM-1.16 Cooperate with Wildlife Agencies. The County shall cooperate with State and federal wildlife agencies to address linkages between habitat areas. 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.11, development under the Project will result in habitat loss, degradation, fragmentation and encroachment by exotic weeds. These direct and indirect impacts will remove or interfere with existing linkages between habitat areas that currently provide cover and increase the distances that species need to traverse. Increases vehicular travel levels and nighttime light levels will also deter wildlife movement through the area. The updated general plan will implement a variety of policies and implementation measures designed to address impacts to biological resources (including any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or native wildlife nursery sites). More specifically, these policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> preserve open space areas and biological resources; protect key sensitive habitats (e.g., riparian, wetlands, oak woodlands, etc.) encourage future County growth outside sensitive habitat areas and require buffer areas between development projects and these areas; support establishment and administration of a mitigation banking program; use lakefront and water bank vegetation buffers to protect habitats and the scenic quality of local lakes and waterways; protect sensitive habitat corridors and their associated species (e.g., Pixley National Wildlife Refuge, etc.); develop procedures to identify impacts and mitigation measures for affected habitats and plant and wildlife species; promote fencing standards in Foothill Growth Management and Mountain areas, consistent with Department of Fish and Game recommendations, to permit deer movement. <p>The EIR identified new Policies ERM-1.15 "Minimize Lighting Impacts",</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>ERM-1.16 “Cooperate with Wildlife Agencies”, and revised Policy ERM-1.9 “Coordination of Management on Adjacent Lands”) as required additional mitigation to address impacts to wildlife movement, migratory corridors and native wildlife nursery sites. . The mitigating effects of ERM-1.9 and ERM-1.15 are described above, under Impact 3.11-1. Policy ERM-1.16 requires the County to work with other government land management agencies to preserve and protect biological resources, including resources within and adjacent to critical habitat, reserves, preserves, and other protected lands.</p> <p>Although these policies, and required additional mitigation measures ERM-1.9, ERM-1.15 and ERM-1.16, seek to protect a variety of open space resources within the County, implementation of the General Plan 2030 Update will still result in the conversion of some open space areas, which will result in the overall reduction of a plant or wildlife species habitat, including habitat areas that would otherwise function as corridors facilitating the movement of wildlife species through developed areas. No additional feasible mitigation is currently available.</p> <p>Reference: For additional discussion regarding the project’s biological impacts, see RDEIR, Section 3.11.</p>	
Impact 3.11-5: The proposed project could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Less-than-Significant	No mitigation measures required.	<p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.11, the updated general plan will implement a variety of policies designed to protect biological resources, and promote consistency with other planning documents. Additionally, CEQA review for individual projects will provide project-specific data and require feasible mitigation for significant impacts resulting from conflicts with local policies or ordinances protecting biological resources. This impact is considered less than significant.</p> <p>Reference: For additional discussion regarding the project’s biological impacts, see RDEIR Section 3.11.</p>	Less-than-Significant
Impact 3.11-6: The proposed project could conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.	Less than Significant	<p>Although this impact is considered less-than-significant, the following new policy is recommended to ensure that this impact remains less-than-significant:</p> <ul style="list-style-type: none"> • ERM-1.17 Conservation Plan Coordination. The County shall coordinate with local, State, and federal habitat conservation planning efforts (including Section 10 Habitat Conservation Plan) to protect critical habitat areas that support endangered species and 	<p>Finding: The Board hereby finds that this impact will be less than significant prior to mitigation. However, the Board also finds that a new policy is recommended and is incorporated into the project to avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, the mitigation measure adopted as a new policy ERM-1.17 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.11, the updated general plan will ensure that a variety of policies and implementation measures are implemented to protect biological</p>	Less-than-Significant

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		other special-status species.	resources within the County. Although not required, new Policy ERM-1.17 "Conservation Plan Coordination" is adopted to ensure that this impact remains less than significant. Consequently, with implementation of the updated general plan policies and implementation measures impacts associated with the proposed project are considered less than significant. Reference: For additional discussion regarding the project's biological impacts, see RDEIR Section 3.11.	
Cumulative Impacts	Cumulatively Considerable	<p>As discussed in more detail in RDEIR Sections 3.11 and 5.3, and as modified in the FEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that address Environmental Resources Management, Foothill Growth, Water Resources, and the Mountain Framework Plan,</p> <p>These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • protect sensitive habitats from impacts of future development in Tulare County; • identify and mitigate impacts of development on key biological resources; • preserve and maintain biological resources within the Foothill growth Management Plan • minimize water supply and water quality impacts. <p>The EIR also identifies additional mitigation measures (i.e., new policies and implementation measures) ERM-1.9, ERM-1.15, and ERM-1.16:</p> <ul style="list-style-type: none"> • ERM-1.9 Coordination of Management on Adjacent Lands. The County shall work with other government land management agencies (such as the Bureau of Land Management, US Forest Service, National Park Service) to preserve and protect biological resources, including those within and adjacent to designated critical habitat, reserves, preserves, and other protected lands, while maintaining the ability to utilize and enjoy the natural 	<p>Finding: The Board finds that changes or alterations have been incorporated into the Project which mitigates the project's cumulatively considerable contribution to significant cumulative impacts on biological resources. Specifically, the mitigation measures adopted as new policies ERM-1.9, ERM-1.15, ERM-1.16 and ERM-1.17, are feasible and are adopted to mitigate significant effects of the GPU related to biological resources. However, even with implementation of these measures, the project's contribution to a significant cumulative impact remains <i>cumulatively considerable</i>.</p> <p>Rationale for Finding: As discussed more fully in RDEIR Sections 3.11 and 5.3, and in the FEIR, development under the GPU will contribute to the ongoing loss of natural, open space and agricultural lands in Tulare County which currently provide habitat for a variety of special status species, as well as other wildlife and plant resources. Existing habitat areas will continue to be converted to urban uses. Loss of biological resources is considered a significant, unavoidable impact of the project. Combined with habitat loss attributable to population growth in the County and the region, impacts to biological resources are a significant cumulative impact and the GPU's contribution is cumulatively considerable. GPU policies and mitigation measures adopted as new policies ERM-1.9, ERM-1.15, ERM-1.16 and ERM-1.17, as well as adherence to regional, state and federal regulations will reduce these impacts, but not to a level that is less than cumulatively considerable.</p> <p>Reference: For additional discussion regarding the Project's cumulative contribution to significant, cumulative biological resource impacts, see RDEIR Sections 3.11 and 5.3.</p>	Cumulatively Considerable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>resources in the County.</p> <ul style="list-style-type: none"> • ERM-1.15 Minimize Lighting Impacts. The County shall ensure that lighting associated with new development or facilities (including street lighting, recreational facilities, and parking) shall be designed to prevent artificial lighting from illuminating adjacent natural areas at a level greater than one foot candle above ambient conditions. • ERM-1.16 Cooperate with Wildlife Agencies. The County shall cooperate with State and federal wildlife agencies to address linkages between habitat areas • ERM-1.17 Conservation Plan Coordination. The County shall coordinate with local, State, and federal habitat conservation planning efforts (including Section 10 Habitat Conservation Plan) to protect critical habitat areas that support endangered species and other special-status species 		
Cultural Resources				
Impact 3.12-1: The proposed project could cause a substantial adverse change to a historic resource.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.12 of the RDEIR, the GPU includes, as part of the Project, a number of Land Use, Scenic Landscape, Environmental Resource Management and Foothill Growth Management policies and implementation measures that serve to reduce or avoid this impact. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • preserve and maintain historic resources in the County • preserve and maintain Foothill Growth Management Plan historic and archaeological sites. <p>The EIR identifies additional mitigation (i.e., revised existing policies ERM-6.2, ERM-6.3 and ERM-6.6) required to address this impact:</p> <ul style="list-style-type: none"> • ERM-6.2 Protection of Resources with 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.12, existing, identified historic resources (e.g., Colonel Allensworth Historic State Park) or those considered potentially eligible for National Register of Historic Resources listing within County unincorporated areas could be affected by the Project. Impacts to these resources will result from development related activities and/or project design elements, including ground-disturbing activities and damage, destruction or alteration of historic buildings or structures. The updated general plan will continue to ensure that a variety of preservation efforts are</p>	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>Potential State or Federal Designations. The County shall protect cultural and archaeological sites with demonstrated potential for placement on the National Register of Historic Places and/or inclusion in the California State Office of Historic Preservation's California Points of Interest and California Inventory of Historic Resources. Such sites may be of Statewide or local significance and have anthropological, cultural, military, political, architectural, economic, scientific, religious, or other values as determined by a qualified archaeological professional.</p> <ul style="list-style-type: none"> • ERM-6.3 Alteration of Sites with Identified Cultural Resources. When planning any development or alteration of a site with identified cultural or archaeological resources, consideration should be given to ways of protecting the resources. Development can be permitted in these areas only after a site specific investigation has been conducted pursuant to CEQA to define the extent and value of resource, and mitigation measures proposed for any impacts the development may have on the resource. • ERM-6.6 Historic Structures and Sites. The County shall support public and private efforts to preserve, rehabilitate, and continue the use of historic structures, sites, and parks. Where applicable, preservation efforts shall conform to the current Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. 	<p>implemented under all future development projects to minimize impacts to historic resources (as defined in Section 15064.5). More specifically, these policies are designed to:</p> <ul style="list-style-type: none"> • Promote preservation and adaptive reuse of historic buildings and areas to preserve the county's unique historic heritage; • Encourage the restoration, preservation and integration of cultural resources into development of new communities within the unincorporated communities and hamlet areas; • Protect cultural or historic resources along county scenic routes and highways and consider the location of historic resources during the design phase of proposed roadways or highways; • provide for development of historical sites inventory and protection of significant cultural resource sites in the Foothill Growth Management area; • continued implementation of State and federal standards in evaluation of potential historic resources and call for development of a historic resources inventory. <p>The EIR also identified revised Policies ERM-6.2 "Protection of Resources with Potential State or Federal Designations", ERM-6.3 "Alteration of Sites with Identified Cultural Resources", and ERM-6.6 "Historic Structures and Sites" as required additional mitigation. Policy ERM-6.2 requires the County to use qualified archaeological professionals to identify cultural and archaeological sites with <u>demonstrated</u> potential for placement on the National Register of Historic Places and/or inclusion in the California State Office of Historic Preservation's California Points of Interest and California Inventory of Historic Resources. Policy ERM-6.3 restricts development on sites with identified cultural or archaeological resources, by requiring site-specific investigation and mitigation pursuant to CEQA. Policy ERM-6.6 requires the County to support public and private efforts to preserve, rehabilitate and continue the use of historic structures, sites and parks, and, where applicable, require preservation efforts to conform to current Secretary of the Interior's Standards and Guidelines for these efforts. However, implementation of the proposed project, and required additional mitigation (i.e., Policies ERM-6.2, ERM-6.3 and ERM-6.6) may nonetheless result in a "substantial adverse change" (physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings) through various development activities for which no possible mitigation may be available to maintain the historic integrity of the affected resource or its surroundings. No additional technologically or economically mitigation is currently</p>	

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			available. For this reason, this is a significant and unavoidable impact. Reference: For additional discussion regarding the project's historic impacts, see RDEIR, Section 3.12.	
Impact 3.12-2: The proposed project could cause a substantial adverse change to archaeological resources, paleontological resources, and/or disturb human remains.	Significant and Unavoidable	<p>As discussed in more detail in Section 3.12 of the RDEIR, the GPU includes, as part of the Project, a number of Environmental Resource Management and Foothill Growth Management policies and implementation measures that serve to reduce or avoid this impact. These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • preserve and maintain County archaeological resources; • preserve and maintain Foothill Growth Management Plan historic and archaeological sites. <p>The EIR identifies additional mitigation (i.e., revised existing Policy ERM-6.2, Policy ERM-6.3, ERM Implementation Measures 55A, 55B, 55C) required to address this impact:</p> <ul style="list-style-type: none"> • ERM-6.2 Protection of Resources with Potential State or Federal Designations. The County shall protect cultural and archaeological sites with demonstrated potential for placement on the National Register of Historic Places and/or inclusion in the California State Office of Historic Preservation's California Points of Interest and California Inventory of Historic Resources. Such sites may be of Statewide or local significance and have anthropological, cultural, military, political, architectural, economic, scientific, religious, or other values as determined by a qualified archaeological professional. • ERM-6.3 Alteration of Sites with Identified Cultural Resources. When planning any development or alteration of a site with identified cultural or archaeological resources, consideration should be given to ways of protecting the resources. Development can be 	<p>Finding: The Board finds that although changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen this impact, specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible additional mitigation measures or alternatives identified in the environmental impact report. Since no feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Rationale for Finding: As discussed in greater detail in RDEIR Section 3.12, previously undiscovered paleontological and archaeological deposits may be encountered in almost any location in the County. Due to extensive agricultural development, prehistoric site will most likely be encountered in the southern and western portions of the County. Previously undiscovered paleontological, archaeological resources and/or human remains could be damaged or inadvertently unearthed during ground-disturbing activities such as grading, trenching or use of staging areas. The updated general plan will continue to ensure that a variety of preservation efforts are implemented. More specifically updated general plan policies are designed to:</p> <ul style="list-style-type: none"> • establish protocols to address archaeological resources, including pre-project activities (preparation of an archaeological sensitivity map) and resource protection measures (impact mitigation, confidentiality policies, public education, etc.); • protect important archaeological sites in the Foothill Growth Management area and other culturally sensitive areas of the County • support continued County involvement in a variety of educational programs to encourage continued public support of local cultural and archaeological resources • required the County to consult with representatives of the Native American Heritage Commission at the onset of specific projects; • in the Foothill Growth Management area, develop a historical sites inventory and information on archaeologically sensitive areas and protection of significant cultural resource sites (e.g., Rocky Hillm, etc.) 	Significant and Unavoidable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>permitted in these areas only after a site specific investigation has been conducted pursuant to CEQA to define the extent and value of resource, and mitigation measures proposed for any impacts the development may have on the resource.</p> <ul style="list-style-type: none"> • ERM Implementation Measure 55A Archaeological Resource Surveys. Prior to project approval (for any project involving ground disturbing or demolition of a potentially historic building), the County shall determine the need for a project applicant to have a qualified archeologist conduct the following activities: (1) conduct a record search at the Regional Archaeological Information Center and other appropriate historical repositories, (2) conduct field surveys where appropriate, and (3) prepare technical reports, where appropriate, meeting California Office of Historic Preservation Standards (Archeological Resource Management Reports). • ERM Implementation Measure 55B Discovery of Archaeological Resources. In the event that archaeological or paleontological resources are discovered during site excavation, the County shall require that grading and construction work on the project site be suspended until the significance of the features can be determined by a qualified archaeologist or paleontologist. The County will require that a qualified archeologist / paleontologist make recommendations for measures necessary to protect any site determined to contain or constitute an historical resource, a unique archaeological resource, or a unique paleontological resource or to undertake data recovery, excavation, analysis, and curation of archaeological or paleontological materials. County staff shall consider such recommendations and implement them where they are feasible in light of project design as previously approved by the County. 	<p>Additionally, CEQA review of future development projects will provide project-specific data and require feasible mitigation minimize significant impacts to archaeological resources (as defined in Section 15064.5), or human remains.</p> <p>The EIR also identified revised new ERM Implementation Measures 55A "Archaeological Resource Surveys", 55B "Discovery of Archaeological Resources", and 55C "Discovery of Human Remains" and revised Policies ERM-6.2 "Protection of Resources with Potential State or Federal Designations" and ERM-6.3 "Alteration of Sites with Identified Cultural Resources" as required additional mitigation. The mitigating effects of Policies ERM-6.2 and ERM-6.3 are described above, under Impact 3.12-1. ERM Implementation Measure 55A requires the County to determine the need for project applicants to have a qualified archaeologist conduct an appropriate record searches and field surveys, and prepare appropriate technical reports meeting California Office of Historic Preservation Standards. ERM Implementation Measure 55B requires the County to halt grading and construction work in the event archaeological or paleontological resources are discovered. Work must be suspended until a qualified archaeologist makes recommendations to measures necessary to protect the site and its resources; the County is required to consider these recommendations and implement as feasible in light of project design as previously approved by the County. In the event human remains are discovered during project construction, ERM Implementation Measure 55C requires compliance with applicable state laws and sets forth the necessary steps including halting further site disturbance and contacting the Sheriff/County Coroner and additional steps to be taken if the remains are determined to be of Native American origin.</p> <p>Under CEQA, however, any "substantial adverse change in the significance of a historical resource" (e.g., the destruction of such a resource) is considered a significant environmental effect as a matter of law. Because it is possible that, after County decision-makers have approved a development project, grading activities in an area identified for development reveal an archaeological resource meeting the definition of an historical resource, and that such a previously unknown historical resource cannot be preserved or avoided without substantial redesign at significant cost, the County cannot be sure that impacts on all such historical resources can be mitigated to less than significant levels. No additional feasible mitigation is currently available. For these reasons, impacts to historical resources are significant and unavoidable impact. Similar considerations do not apply to unique archaeological resources</p>	

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<ul style="list-style-type: none"> • ERM Implementation Measure 55C Discovery of Human Remains. Consistent with Section 7050.5 of the California Health and Safety Code and (CEQA Guidelines) Section 15064.5, if human remains of Native American origin are discovered during project construction, it is necessary to comply with State laws relating to the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission (Public Resources Code Sec. 5097). In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps should be taken: <ol style="list-style-type: none"> 1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until: <ol style="list-style-type: none"> a. The Tulare County Coroner/Sheriff must be contacted to determine that no investigation of the cause of death is required; and b. If the coroner determines the remains to be Native American: <ol style="list-style-type: none"> i. The coroner shall contact the Native American Heritage Commission within 24 hours. ii. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American. iii. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave 	<p>and paleontological resources, which therefore can be fully mitigated through data recovery where avoidance or preservation is infeasible or unnecessary. Therefore, implementation of the proposed project including the adoption of the policies identified above as required additional mitigation will result in less than significant impacts with respect to human remains and archaeological resources and paleontological resources that do not qualify as historical resources.</p> <p>Reference: For additional discussion regarding the project's archeological and historical impacts, see RDEIR, Section 3.12.</p>	

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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>goods as provided in Public Resources Code section 5097.98, or</p> <p>2. Where the following conditions occur, the landowner or his authorized representative shall reburial the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance.</p> <p>a. The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.</p> <p>b. The descendant fails to make a recommendation; or</p> <p>c. The landowner or his authorized representative rejects the recommendation of the descendent.</p>		
Cumulative Impacts	Cumulatively Considerable	<p>As discussed in more detail in RDEIR Sections 3.12 and 5.3, and as modified in the FEIR, the GPU includes, as part of the project, mitigating policies and implementation measures that address Land Use, Scenic Landscape, Environmental Resource Management, Foothill Growth Management, .</p> <p>These policies and implementation measures are designed to:</p> <ul style="list-style-type: none"> • preserve and maintain historic resources in Tulare County; • preserve and maintain Foothill Growth Management Plan historical and archaeological sites; • preserve and maintain FGMP historical and archaeological sites <p>The EIR also identifies additional mitigation measures (i.e., new policies and implementation</p>	<p>Finding: The Board finds that changes or alterations have been incorporated into the Project which mitigates the project's cumulatively considerable contribution to significant cumulative impacts on cultural resources. Specifically, the mitigation measures adopted as new policies and implementation measures ERM-6.2, ERM-6.3, ERM-6.6, ERM Implementation Measure 55A, ERM Implementation Measure 55B, and ERM Implementation Measure 55C, are feasible and are adopted to mitigate significant effects of the GPU related to cultural resources. However, even with implementation of these measures, the Project's contribution to a significant cumulative impact remains <i>cumulatively considerable</i>.</p> <p>Rationale for Finding: As discussed more fully in RDEIR Sections 3.12 and 5.3, some of the Project's impacts to unique archaeological resources and paleontological resources can be fully mitigated through data recovery where avoidance or preservation is infeasible or unnecessary. In these instances, implementation of the proposed project including the adoption of the policies identified above as required additional mitigation will result in less than significant impacts with respect to human remains and archaeological resources and paleontological resources that do not qualify as historical resources.</p>	Cumulatively Considerable

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>measures) ERM-6.2, ERM-6.3, ERM-6.6, ERM Implementation Measure 55A, ERM Implementation Measure 55B, and ERM Implementation Measure 55C:</p> <ul style="list-style-type: none"> • ERM-6.2 Protection of Resources with Potential State or Federal Designations. The County shall protect cultural and archaeological sites with demonstrated potential for placement on the National Register of Historic Places and/or inclusion in the California State Office of Historic Preservation's California Points of Interest and California Inventory of Historic Resources. Such sites may be of Statewide or local significance and have anthropological, cultural, military, political, architectural, economic, scientific, religious, or other values as determined by a qualified archaeological professional. • ERM-6.3 Alteration of Sites with Identified Cultural Resources. When planning any development or alteration of a site with identified cultural or archaeological resources, consideration should be given to ways of protecting the resources. Development can be permitted in these areas only after a site specific investigation has been conducted pursuant to CEQA to define the extent and value of resource, and mitigation measures proposed for any impacts the development may have on the resource. • ERM-6.6 Historic Structures and Sites. The County shall support public and private efforts to preserve, rehabilitate, and continue the use of historic structures, sites, and parks. Where applicable, preservation efforts shall conform to the current Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. • ERM Implementation Measure 55A 	<p>However, because of the possibility that construction activities for approved development may reveal previously unknown archaeological resources that meet the definition of an historic resource at a time when mitigation or project re-design is technologically and/or economically infeasible, impacts to historic resources are significant and unavoidable. Cumulative impacts to cultural resources (i.e. historic, archaeological and paleontological resources) throughout the County and the larger San Joaquin Valley region will be significant. The Project will make a cumulatively considerable contribution to a significant cumulative impact on these resources. The EIR identifies required additional mitigation (i.e., ERM Policies 6.2, 6.3, 6.6 and ERM Implementation Measures 55A, 55B and 55C) to mitigate the Project's impacts. The mitigating effects of these policies and implementation measures are described above under Impact 3.12-1 and Impact 3.12-2. No additional feasible mitigation is currently available. Therefore, the Project's contribution to this significant cumulative impact remains cumulatively considerable.</p> <p>Reference: For additional discussion regarding the project's archeological and historical impacts, see RDEIR Sections 3.12 and 5.3.</p>	

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>Archaeological Resource Surveys. Prior to project approval (for any project involving ground disturbing or demolition of a potentially historic building), the County shall determine the need for a project applicant to have a qualified archeologist conduct the following activities: (1) conduct a record search at the Regional Archaeological Information Center and other appropriate historical repositories, (2) conduct field surveys where appropriate, and (3) prepare technical reports, where appropriate, meeting California Office of Historic Preservation Standards (Archeological Resource Management Reports)</p> <ul style="list-style-type: none"> • ERM Implementation Measure 55B Discovery of Archaeological Resources. In the event that archaeological or paleontological resources are discovered during site excavation, the County shall required that grading and construction work on the project site be suspended until the significance of the features can be determined by a qualified archaeologist or paleontologist. The County will require that a qualified archeologist / paleontologist make recommendations for measures necessary to protect any site determined to contain or constitute an historical resource, a unique archaeological resource, or a unique paleontological resource or to undertake data recovery, excavation, analysis, and curation of archaeological or paleontological materials. County staff shall consider such recommendations and implement them where they are feasible in light of project design as previously approved by the County. • ERM Implementation Measure 55C Discovery of Human Remains. Consistent with Section 7050.5 of the California Health and Safety Code and (CEQA Guidelines) Section 15064.5, if human remains of Native American origin are discovered during project 		

TABLE 1
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Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
		<p>construction, it is necessary to comply with State laws relating to the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission (Public Resources Code Sec. 5097). In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps should be taken:</p> <ol style="list-style-type: none"> 1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until: <ol style="list-style-type: none"> a. The Tulare County Coroner/Sheriff must be contacted to determine that no investigation of the cause of death is required; and b. If the coroner determines the remains to be Native American: <ol style="list-style-type: none"> i. The coroner shall contact the Native American Heritage Commission within 24 hours. ii. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American. iii. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98, or 2. Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with 		

TABLE 1
SUMMARY OF ENVIRONMENTAL IMPACTS, FINDINGS, AND RATIONALE FOR FINDINGS

Impact	Significance without Mitigation	Adopted Policies and/or Mitigation Measures	Findings /Rationale for Finding	Significance with Mitigation
			<p>appropriate dignity on the property in a location not subject to further subsurface disturbance.</p> <p>a. The Native American Heritage Commission is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 24 hours after being notified by the commission.</p> <p>b. The descendant fails to make a recommendation; or</p> <p>c. The landowner or his authorized representative rejects the recommendation of the descendent.</p>	

Project Alternatives

Alternative Selection Process

As discussed in Section 4.2 of the RDEIR, the proposed project and alternatives are based on ideas and concepts developed with the public during community workshops held in Visalia, Lindsay, Goshen, Pixley, Orosi, and Springville, along with input from the Technical Advisory Committee and County staff.

The following factors were considered in the process of identifying and selecting alternatives for evaluation in the EIR:

- The extent to which the alternative would accomplish most of the basic goals and objectives of the proposed project;
- The extent to which the alternative would avoid or lessen any of the identified significant environmental effects of the project;
- The potential feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, and consistency with various applicable plans and regulatory limitations;
- The appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
- The requirement of the CEQA Guidelines to consider a “no project” alternative, consistent with CEQA Guidelines Section 15126.6(e).

Alternatives Screened Out from Detailed Consideration in the RDEIR

The following alternatives were eliminated from further consideration:

- **Proportional Growth Alternative.** Future growth under the Proportional Growth Alternative would be distributed throughout the County at a rate proportional to current conditions. The ratio of existing population to the total county population would be held constant. Consequently, the cities and communities would maintain the same percentage of the County’s total population in the future. Under this alternative, 30% of future growth would occur in unincorporated areas of the County. This alternative was dropped from further consideration because the growth trend was considered infeasible and the assumed land use patterns would not seek to eliminate or reduce significant environmental impacts associated with the proposed project.
- **Alternative Project Location.** None of the alternatives includes consideration of an alternative location. The CEQA Guidelines (Section 15126.6(3) (f) (2)) recommend considering an alternative location to reduce potential impacts of a project. However, the goals and policies of the proposed project are specific to the geographic context of the County’s planning area. Build-out consistent with the goals and policies of the proposed project at another location does not make sense for a general plan that applies to all properties within the County’s jurisdiction and within its planning area. Furthermore,

- **Existing Trends Alternative.** The Existing Trends Alternative would allow future growth in cities and unincorporated areas of the County to continue to grow at the rate of growth that occurred in those areas from 1990 through 2000. This would result in approximately 28% of future growth to occur within unincorporated areas of the County. Under the existing trends alternative, future development proposals would be evaluated on a case-by-case basis with limited policy guidance available to direct future population growth or development toward incorporated cities and selected unincorporated communities. Without this fundamental policy guidance, future development would continue to occur throughout the County including those areas with limited infrastructure (i.e., water supply, wastewater treatment, roadways, etc.) capacity and within prime agricultural areas. In consideration of one of the County's primary objectives (to focus growth within existing city/community areas), this alternative was eliminated from further consideration.

The Board finds that all of the alternatives eliminated from further consideration in the Draft EIR are infeasible, would not meet most project objectives and/or would not reduce or avoid any of the significant effects of the proposed project, for the reasons detailed in Section 4.2 of the RDEIR.

Alternatives Analyzed in the EIR

The RDEIR and FEIR examined a reasonable range of alternatives to the proposed project to determine whether any of these alternatives could meet most or all of the proposed project's objectives, while avoiding or substantially lessening its significant, unavoidable impacts. (RDEIR, pages 4-1 through 4-36)

The following five alternatives were selected for further examination:

- Alternative 1: No Project Alternative;
- Alternative 2: City Centered Alternative;
- Alternative 3: Rural Communities Alternative;
- Alternative 4: Transportation Corridors Alternative; and
- Alternative 5: Confined Growth Alternative

Of the five alternatives evaluated; one would allow development according to the density established under the existing general plan (No Project Alternative); and the remaining four would alter the land use/density patterns throughout the unincorporated County. The five alternatives reduced or avoided at least one significant environmental impact; however in some instances other impacts were increased (See RDEIR, pages 4-1 through 4-36 and Table 4-3). As discussed in Section 4.4 of the RDEIR, Alternative 5 was determined to be the environmentally superior alternative. As discussed in RDEIR Section 4.3 and presented in RDEIR Table 4.3, compared to the proposed project, Alternative 5 will convert less open space and prime agricultural farmland, reducing impacts to scenic, agricultural, and biological resources, however, impacts to biological, agricultural, air quality, greenhouse gas emissions, and traffic resources will still be significant and unavoidable.

Tables 4-1, 4-2 and 4-3 in the RDEIR present a summary comparison of the alternatives to the proposed project.

Alternative 1: No Project Alternative

Description

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the environmental impacts of the “No-Project” Alternative. When the project is the revision of an existing land use or regulatory plan or policy, the no-project alternative will be the continuation of the existing plan or policy into the future. Therefore, Alternative 1 (No-Project or Existing General Plan) analyzes the effects of continued implementation of the County’s existing General Plan (with some features not having been updated since 1964), which would remain as the adopted long-range planning policy document for the County. Consequently, current development patterns would continue to occur in accordance with the existing General Plan, Zoning Ordinance, and Community/Area Plans. Implementation of the No-Project Alternative would likely result in a larger buildout population (RDEIR, page 4-4) as that provided under the proposed project, which is primarily due to the lack of guiding policies (such as those identified in the new Planning Framework Element included as part of the proposed project) designed to manage growth near existing city boundaries. Additionally, this alternative would not include any of the new policies and implementation measures designed to address the environmental impacts of future County development.

Ability to Meet Project Objectives

Under the No-Project Alternative, the County would continue with implementation of its existing General Plan, which would remain as the adopted long-range planning policy document for the County. Current development patterns would continue to occur in accordance with the existing General Plan, Zoning Ordinance, and Community/Area Plans. Consequently, this alternative would fundamentally fail to meet a majority of the Project Objectives described above because failure to update the County’s existing General Plan will not result in a comprehensive update to the County’s existing goals and policies to help incorporate current planning, environmental, and regulatory trends and objectives. (See RDEIR Table 4-2.) Failure to incorporate these updated goals and policies could make it more difficult to provide the necessary planning framework that would set standards for the protection of open space areas, habitats, agricultural areas, and scenic landscapes. The lack of updated economic development policies or programs may also make it more difficult to promote the desired level of reinvestment within existing communities and hamlets. However, it is assumed that the County would still continue to coordinate and cooperate with other local agencies and organizations on a variety of relevant land management issues regardless of whether the General Plan is updated or not.

Summary of Environmental Impacts

Aesthetics

Under the No-Project Alternative, the existing General Plan does not have a separate Scenic Landscapes Element and lacks updated Land Use and Community Design policies that regulate aesthetics or scenic resource issues (both rural and urban resources). The current Land Use Element includes some policy guidance with respect to community character and scenic highways; however, the proposed goals and policies provided as part of the proposed project are considerably more

comprehensive and detailed than those in the existing General Plan. Additionally, the No-Project Alternative does not provide the necessary policy direction to cluster development within the future growth areas (i.e., UDBs, CACUDBs, HDBs and CACUABs) of the County to help minimize aesthetic (including new sources of light and glare or dark sky effects) impacts throughout the County. However, even under the No-Project Alternative it is assumed that the County would continue to evaluate the environmental impacts of these projects on a case-by-case basis and would identify all applicable feasible mitigation measures for significant impacts.

As with the proposed project, the No Project Alternative would result in a significant and unavoidable impact because growth would occur over currently undeveloped or agricultural land. Growth within these undeveloped areas would affect the existing visual character of the County and would also result in increased sources of nighttime light and glare.

Agricultural Resources

As previously described, this analysis assumes that similar population patterns to the proposed project would occur under the No Project Alternative. Additionally, the No-Project Alternative does not provide the necessary policy direction to cluster development within the future growth areas (i.e., UDBs, CACUDBs, HDBs and CACUABs) of the County to help minimize the conversion of agricultural resource lands. Consequently, quantifying the amount of land conversion that could occur is considered speculative at this point in time. However, implementation of the No-Project Alternative is assumed to result in similar or slightly greater impacts to agricultural resources compared to the proposed project. This is because a greater amount of land designated as Prime, Unique or Farmland of Statewide Importance could be converted to urban uses under the No Project Alternative compared to the amount of farmland that would be converted to urban uses under the proposed project. This conversion of important farmland to urbanized uses is also considered a significant and unavoidable impact.

Air Quality

Under the No-Project Alternative, the County would continue to function under the direction of the existing General Plan. Consequently, buildout under the existing General Plan could result in a slightly greater number of jobs, dwelling units (within the County growth areas), and residents in the unincorporated areas to those anticipated under the proposed project. These dwelling units and other types of development would result in slightly increased levels of both mobile and stationary sources of air quality emissions and toxic air contaminants. Consequently, implementation of the No Project Alternative would still result in a significant and unavoidable impact because future development would still contribute to air pollutant emissions that would exceed the annual SJVAPCD thresholds for NO_x and ROG.

Energy and Global Climate Change

Similarly, under the No-Project Alternative, the County would continue to function under the direction of the existing General Plan, which provides very limited policy direction specific to global climate change and methods to help reduce greenhouse gas emissions. Buildout under the existing General Plan could result in a slightly greater number of jobs, dwelling units (within the

County growth areas), and residents in the unincorporated areas to those anticipated under the proposed project. These dwelling units and other types of development would result in slightly increased levels of energy consumption and greenhouse gas emissions from buildings and from mobile and stationary sources. Consequently, implementation of the No Project Alternative would still result in a significant and unavoidable impact because future development would still contribute to an increase in greenhouse gas emissions that may conflict with the goal of the State to reduce up to 174 million metric tons CO₂e/year by 2020.

Biological Resources

As previously described, the No-Project Alternative does not provide the necessary policy direction to cluster development within the future growth areas (i.e., UDBs, CACUDBs, HDBs and CACUABs) of the County to help minimize the conversion of existing open space lands to a developed use. This increased potential to affect open space areas relative to the proposed project could result in greater County-wide development that could result in adverse impacts to sensitive habitats, wetlands, riparian areas, wildlife movement, and tree preservation policies. Additionally, the new goals and policies included as part of the proposed project to protect federal and state listed and threatened species are more comprehensive than those in the existing General Plan. Therefore, the No Project Alternative could result in a slightly greater significant and unavoidable impact because growth would occur over currently undeveloped or habitat land and would result in the overall reduction of a plant or wildlife species habitat.

Cultural Resources

Under the No Project Alternative, continued development consistent with the existing General Plan could result in the disturbance of designated local, State, and/or national historical resources. Urbanized areas may also contain a variety of historic resources (i.e., buildings, bridges, etc.). In addition, potential but as of yet undesignated historical resources exist that could be affected by future development.

The existing General Plan does not have the full range of policies designed to address cultural resources. The current Environmental Resource Management Element includes some policy guidance with respect to cultural resources; however, the proposed goals and policies provided as part of the proposed project (including the “Community Design” section of the Land Use Element) are considerably more comprehensive and detailed, including, in particular, those related to historic resources.

Similar to the proposed project, urbanization associated with future growth could damage or destroy a variety of cultural resources during various construction-related activities. Similar to the proposed project this would be a significant impact.

Geology and Soils

The No-Project Alternative proposes development that is similar in nature to that anticipated under the proposed project. Current State and federal regulations require specific engineering and design criteria to avoid impacts related to geologic, soils, and seismic hazards, which would apply to both the No-Project Alternative and the proposed project. For this reason, geologic and soils impacts under the No-Project Alternative are considered to be similar to those of the proposed project.

Hazards and Hazardous Materials

The No-Project Alternative proposes development that is similar in nature to that anticipated under the proposed project. Similar to the proposed project, implementation of this alternative would involve a decrease in the use of pesticides, herbicides, and other hazardous materials used for agricultural practices. Although hazards related to agricultural uses would be reduced, potential new commercial and industrial uses may introduce new sources of hazardous materials. The No Project Alternative would not include the additional hazardous materials and public safety policies and implementation measure contained as part of the proposed project. However, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations that would apply to both the No-Project Alternative and the proposed project. For this reason, hazards and hazardous materials impacts under the No-Project Alternative are considered to be similar to those of the proposed project.

Hydrology and Water Quality

Under the No-Project Alternative, development could convert additional amounts of open space land to urban uses than the proposed project. As with the proposed project, the creation of impervious surfaces associated with urbanization would increase the amount of runoff, which could affect water quality. An increase in impervious surfaces could also reduce groundwater recharge potential. The potential reduction in groundwater recharge potential along with the lack of updated policies designed to address water quality, water resource, and water conservation issues could result in a slightly greater significant and unavoidable impact under the No Project Alternative.

The No-Project Alternative also proposes development in areas that are within the 100-year floodplain in a similar manner to the proposed project. Similarly, levees are regulated at the State level with maintenance activities delegated to local flood control and levee districts. The County is limited in terms of alternatives to mitigate for the identified flood risks. Consequently, flood risk impacts are also considered to be significant and unavoidable.

Land Use and Planning

Neither the No-Project Alternative nor the proposed project would result in the division or alteration of an existing community. However, under the existing General Plan, the County would have less of an ability to direct specific development changes (as provided in the Planning Framework Element of the updated General Plan) to ensure that new development is well-connected and compatible with surrounding uses. However, similar to the proposed project, development proposed under the No-Project Alternative would still need to be consistent with existing plans and policies. Existing General Plan policies would generally ensure that new development is compatible with surrounding land uses. For these reasons, the land use impacts of the No-Project Alternative are considered to be similar to those of the proposed project.

Mineral Resources

The No-Project Alternative would result in similar or slightly greater amounts of development than the proposed project, so there could be greater potential land use incompatibilities and development of land containing local mineral and oil resources. Policy guidance in the existing

General Plan is similar to that provided under the proposed project and the overall impacts are considered to be similar to those identified for the proposed project.

Noise

Under the No-Project Alternative, the County would continue to function under the direction of the existing General Plan. As previously described, buildout under the existing General Plan could result in a slightly greater number of jobs, dwelling units (within the County growth areas), dwelling units, and residents as the proposed project. These additional dwelling units and other types of development could result in increased levels of both mobile and stationary noise sources. Consequently, implementation of the No Project Alternative would still result in a significant and unavoidable impact because growth could still contribute additional sources of noise that in some cases could exceed local standards.

Public Services, Facilities and Recreation

Build-out under the existing General Plan could result in a slightly greater number of jobs, dwelling units and residents than the proposed project. This increased level of population growth and development could result in similar although slightly greater impacts to the public services and utilities in the County that would be required to adequately serve the levels of development projected under the No-Project Alternative.

Similar to any other development in areas of new growth the construction of future public service and utility facilities could result in some level of permanent conversion of agricultural and open space lands. Without definitive plans, it cannot be determined at this time whether such conversion of land would be substantial and would therefore have to be characterized as significant and unavoidable. As with the proposed project, mechanisms to reduce such impacts to less than significant may not exist. Due to this uncertainty, potential impacts resulting from construction and/or expansion of public service and utility facilities are also considered significant and unavoidable at this time.

Transportation/Traffic

Build-out of the County's existing General Plan could result in a slightly greater number of jobs, dwelling units and residents than the proposed project. Total daily vehicle trips generated under this alternative over most roadway segments could be higher under Alternative 1 than the proposed project. Additionally, Alternative 1 may result in similar localized level of service impacts on some roadway segments within the County as those anticipated under the proposed project.

Finding/Rationale:

The County finds that this alternative is infeasible for specific economic, legal, social, technological, or other reasons and rejects this alternative. Specifically, this alternative would fundamentally fail to meet all the Project Objectives described above because failure to update the County's existing General Plan will not result in a comprehensive update to the County's existing goals and policies to help incorporate current planning, environmental, and regulatory trends and objectives. Failure to incorporate these updated goals and policies would make it more difficult to provide the necessary planning framework to standards for the protection of open space areas, habitats, agricultural areas,

and scenic landscapes. The lack of updated economic development policies or programs would also make it more difficult to promote the desired level of reinvestment within existing communities and hamlets. This alternative is also considered environmentally infeasible as it would increase certain environmental impacts (Impacts 3.1-3, 3.1-4, 3.1-5, 3.10-1, 3.10-3, 3.11-1, 3.11-2, 3.11-3, 3.11-4, 3.4-3, 3.5-2, 3.5-3, 3.9-1, 3.9-2, 3.9-3, 3.2-1). This alternative is also rejected as being infeasible on the grounds that it does not represent the desired policy of the County. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957)

Alternative 2: City-Centered Alternative

Description

The City Centered Alternative (Alternative 2) assumes that cities will accept additional population by increasing the density and developing contiguous land in and around incorporated cities. The cities will also continue to provide sites for urban commercial services and industry. This approach would not ignore the needs of unincorporated communities, and would look at policy solutions to address housing, services, and infrastructure needs to meet future growth. Under this alternative, net new growth for the CACUDBs would account for a higher percentage (80%) of the overall net new growth for the entire County (RDEIR, page 4-4). While this alternative assumes a higher degree of city growth, Alternative 5 (more fully described below) assumes an even higher degree of city directed growth.

Key advantages for this scenario include protecting agricultural land and maintaining the rural character of the county. It also can be more readily supported by a regional transit system.

Ability to Meet Project Objectives

Under Alternative 2, the County would revise the Tulare County General Plan 2030 Update with lower population growth assumptions because the County by including more policies (within the Planning Framework Element) directing growth within existing City planning boundaries. Lower levels of anticipated growth and development may make it more difficult to achieve the desired level of reinvestment within existing communities and hamlets. Consequently, Alternative 2 would not meet this objective and would not fully satisfy project objectives that encourage additional opportunities for small unincorporated communities to grow, address public health and safety concerns, and improve their quality of life (compared to the proposed project), with more growth being focused in CACUDB. More specifically, this alternative would not meet Objective #1 (“Provide opportunities for small unincorporated communities to grow and improve quality of life and their economic viability.”), and would not meet Objective #2 (“Promote reinvestment in existing unincorporated communities in a way that enhances the quality of life and their economic viability in these locations.”) As with all the alternatives, it is assumed that the County would still continue to coordinate and cooperate with other local agencies and organizations on a variety of relevant land management issues regardless of whether the general plan is updated or not.

Summary of Environmental Impacts

The environmental impacts of the City-Centered Alternative (Alternative 2) are summarized below.

Aesthetics

Alternative 2 would result in similar types of development with a lower buildout population to that anticipated under the proposed project. City-centered growth would focus a majority of the County's new growth within existing urban areas and would convert less County open space areas to developed uses. Development of less County open space would result in less impacts to existing County scenic landscapes. However, similar to the proposed project, Alternative 2 would still result in a significant and unavoidable impact, since there would be some level of future development that would affect existing scenic landscapes. Light and glare impacts would also be lessened under this alternative. However the resultant impact would also be similar to the proposed project.

Agricultural Resources

City-centered development proposed under Alternative 2 could result in a reduced impact to agricultural resources compared to the proposed project if development in cities is more efficient than development in unincorporated areas. Therefore a fewer number of acres of land designated as Prime, Unique or Farmland of Statewide Importance would be converted to urban uses under this alternative compared to the amount of important farmland that could be converted to urban uses under the proposed project. However, similar to the proposed project, Alternative 2 would also result in a significant and unavoidable impact, since conversion of important farmland to urbanized uses under this alternative would be unavoidable.

Air Quality

Under Alternative 2, similar levels of growth would still occur within the County by 2030. City-centered growth may reduce the overall number of vehicle miles driven; however city focused dwelling units and other types of development would still result in similar overall emission levels of both mobile and stationary sources of air quality emissions, toxic air contaminants, and the potential for odor emissions. Consequently, development proposed under Alternative 2 would still result in a significant and unavoidable impact because growth would still contribute to air pollutant emissions that could exceed the annual SJVAPCD thresholds for a variety of air pollutants.

Biological Resources

Development proposed under Alternative 2 would result in similar impacts to biological resources (compared to the proposed project) through the conversion of open space lands to developed uses. However, under this alternative, a fewer number of acres of land designated as natural or open space would be converted to urban uses compared to the same types of land uses that would be converted under the proposed project. Alternative 2 would still result in a significant and unavoidable impact because a certain degree of new growth would still occur over currently undeveloped or habitat land and would result in the overall reduction of a plant or wildlife species habitat.

Cultural Resources

Development proposed under this alternative would focus new growth within existing City areas, which could result in similar or greater impacts to historic resources located within existing urbanized areas. The intensification of land uses within the existing City limits may result in greater impacts to the design qualities of individual City neighborhoods and historic districts to those anticipated under the proposed project. However, any undiscovered historical resources located in current agricultural or open space areas that would not be converted to urban development would remain undisturbed. Similar to the proposed project this would also result in a significant impact.

Energy and Climate Change

Under Alternative 2, similar levels of growth would still occur within the County by 2030. City-centered growth may reduce the overall number of vehicle miles driven; however, city focused dwelling units and other types of development would still result in similar energy consumption and greenhouse gases from buildings and stationary sources. The lower vehicle miles driven would slightly reduce energy use and greenhouse gas emissions; however, implementation of Alternative 2 would still result in a significant and unavoidable impact because growth would still contribute to an increase in greenhouse gases that may conflict with the goal of the State to reduce up to 174 million metric tons CO₂e/yr by 2020.

Geology and Soils

Alternative 2 proposes development that is similar in nature to that anticipated under the proposed project. Current State and federal regulations require specific engineering and design criteria to minimize impacts related to geologic, soils, and seismic hazards, which would apply to local geologic/soil conditions under each of the alternatives and the proposed project. Policies and implementation measures included as part of the proposed project incorporate all applicable regulations to minimize these impacts. For this reason, geologic and soils impacts under Alternative 2 are considered similar to those of the proposed project.

Hazards and Hazardous Materials

Alternative 2 proposes development that is similar in nature to that anticipated under the proposed project. Similar to the proposed project, implementation of this alternative would involve a decrease in the use of pesticides, herbicides, and other hazardous materials used for agricultural practices. Similar to the proposed project, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations that would apply to both Alternative 2 and the proposed project. For this reason, hazardous materials impacts under Alternative 2 are considered to be similar to those of the proposed project.

Hydrology and Water Quality

Under Alternative 2, development would convert less open space land to urban uses than the proposed project. As with the proposed project, the creation of impervious surfaces associated with urbanization would increase the amount of runoff, which could affect water quality. An increase in impervious surfaces could also reduce groundwater recharge potential. However, because land conversion would be less than the proposed project, fewer impervious surfaces

would be developed. Overall, hydrologic and water quality impacts under Alternative 2 are considered to be similar to those of the proposed project.

Alternative 2 also proposes development in areas that are within the 100-year floodplain in a similar manner to the proposed project. Similarly, levees are regulated at the State level with maintenance activities delegated to local reclamation districts. The County is limited in terms of alternatives to mitigate for the identified flood risks. Consequently, flood risk impacts are also considered to be significant and unavoidable.

Land Use and Planning

Alternative 2 would result in similar types of development. However, implementation of this alternative could intensify development within City planning areas and would convert less open space areas within the County to developed uses. Consequently, neither the proposed project nor Alternative 2 would divide existing communities and they would both be subject to the same policy direction with regards to ensuring land use compatibility with surrounding uses.

Mineral Resources

Alternative 2 would result in slightly less development than the proposed project on lands similar to those affected by the proposed project. Similar to the proposed project, this alternative would result in similar impacts to mineral, timber, and oil resources.

Noise

Although Alternative 2 includes a slightly reduced development footprint, development anticipated under this alternative would be similar in nature to that anticipated under the proposed project. Similar to the proposed project, significant noise level increases (3 dBA Ldn or greater) associated with increased traffic and railroad operations would likely occur adjacent to existing noise sensitive land uses during the 30-year planning horizon. Overall, implementation of Alternative 2 would still result in a significant and unavoidable impact because growth could still contribute additional sources of noise and vibration that in some cases could exceed local standards.

Public Services, Facilities and Recreation

Alternative 2 would be expected to result in lower levels of development within the County. However, anticipated levels of development would still require the expansion of a variety of local County services (including police, fire, water supply, parks, etc.) in addition to those provided by several local school districts. Overall, public service and utility impacts are also anticipated to be similar.

Transportation/Traffic

Alternative 2 would result in the intensification of similar types of development within the planning areas of existing cities. Overall, total daily vehicle trips generated under this alternative would be similar to those anticipated with the proposed project (see Table 4-3). However, Alternative 2 would focus growth and consequently more traffic within existing urban areas, which could see reductions in their local roadway levels of service. Implementation of Alternative 2 would still result in significant and unavoidable traffic impacts.

Finding/Rationale:

The County finds that this alternative is infeasible for specific economic, legal, social, technological, or other reasons and rejects this alternative. Specifically, this alternative would not fully satisfy all the Project Objectives, as discussed above. This alternative is also considered environmentally infeasible as it would increase certain environmental impacts (Impacts 3.12-1, 3.12-2). This alternative is also rejected as being infeasible on the grounds that it does not represent the desired policy of the County. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957)

Alternative 3: Rural Communities Alternative***Description***

The Rural Communities Alternative (Alternative 3) emphasizes growth in the eleven unincorporated communities that have or are expected to soon have an adopted Redevelopment Project Area (RPA) and Community Plan. Although the State of California has dissolved local redevelopment agencies as of February 2012, these areas have previously undergone or are undergoing current redevelopment activities; therefore, growth in adopted RPAs and Community Plan areas are still considered appropriate target areas under this alternative. Key advantages for this scenario include the utilization of existing infrastructure, services, and community cooperation while protecting agricultural lands and maintaining the rural character of the county.

Under this alternative, 70 percent of net new population growth is directed to incorporated cities. (RDEIR, page 4-4) The remaining 30 percent is directed to the 20 unincorporated communities along with other rural areas of the County. Of the total amount distributed to the County, 80 percent is targeted to the eleven unincorporated communities that have an adopted, or are expected to soon have adopted, a RPA and Community Plan. Distribution of new population is based on each community's share of total UDB population of the eleven communities in 2000. The eleven communities are Cutler-Orosi, Ducor, Earlimart, Goshen, Ivanhoe, Pixley, Poplar, Richgrove, Terra Bella, Tipton, and Traver. The other 20 percent is allocated to the other nine communities based on each community's percentage share of total UDB population of those nine communities in 2000.

Ability to Meet Project Objectives

Under Alternative 3, the County would revise the General Plan 2030 Update with slightly higher population growth assumptions that would focus growth within existing communities and hamlet areas. As outlined in Table 4-2, Alternative 3, would not meet Objective 4 ("Strictly limit rural residential development in important agricultural areas outside of unincorporated communities' UDBs and cities' CACUABs and CACUDB's (i.e. avoid sprawl).")

Summary of Environmental Impacts

The environmental impacts of the Continued Growth Alternative are summarized below.

Aesthetics

Under Alternative 3, the County is expected to continue with similar development patterns within the County's growth areas which could result in a slightly higher population level (30% of new growth versus 25% under the proposed project) within a development footprint similar to that anticipated under the proposed project. Consequently, this alternative has the potential to result in the use or conversion of slightly more open space land within the proposed County than that anticipated to occur with implementation of the proposed project.

As with the proposed project, Alternative 3 would result in a significant and unavoidable impact because growth would occur over currently undeveloped land. This growth would affect the existing visual character of the County and may result in a slightly greater impact to aesthetic resources due to the larger area that would be developed under this alternative.

Light and glare impacts would also be slightly greater under this alternative due to the increased number of currently undeveloped acres that would be developed with an urban use, such as additional parking lots, building lights, and streetlights.

Agricultural Resources

Alternative 3 has the potential to result in a slightly greater impact to agricultural resources compared to the proposed project. This is because an additional number of acres of land designated as Prime, Unique or Farmland of Statewide Importance have the potential to be converted to urban uses under this alternative compared to the amount of farmland that would be converted to urban uses under the proposed project. Similar to the proposed project, Alternative 3 would also result in a significant and unavoidable impact, since there would be some conversion of important farmland to urbanized uses under this alternative.

Air Quality

Under Alternative 3, the County is expected to continue with similar development patterns through the 2030 planning horizon, which would result in a slightly higher population level within a development footprint similar to that anticipated under the proposed project. Consequently, build-out under this alternative could result in a slightly greater number of overall jobs, dwelling units, and residents than the proposed project. These additional dwelling units and other types of development would result in increased levels of both mobile and stationary sources of air quality emissions and toxic air contaminants. Similar to the proposed project, development proposed under Alternative 3 would result in a significant and unavoidable air quality impact because growth would also contribute to air quality emissions that would exceed the annual SJVAPCD thresholds for NO_x and ROG.

Biological Resources

Development proposed under Alternative 3 would result in similar impacts to biological resources (compared to the proposed project) associated with the conversion of open space lands to developed uses. However, under this alternative, a slightly greater amount of land has the potential to be converted to urban uses compared to the same types of land uses that would be converted under the proposed project. As with the proposed project, this impact is still considered to be significant and unavoidable

due to the proposed development on several acres of currently undeveloped land, which would result in the overall reduction of a plant or wildlife species habitat.

Cultural Resources

Similar to the proposed project, development associated with future growth could damage or destroy a variety of previously undiscovered cultural resources during various construction-related activities. However, development proposed under this alternative would affect a slightly larger area and could result in potentially greater impacts to additional cultural resources within new development areas.

Energy and Climate Change

Under Alternative 3, the County is expected to continue with current development patterns through the 2030 planning horizon, which would result in a slightly higher population level within a development footprint similar to that anticipated under the proposed project. Consequently, build-out under this alternative could result in a slightly greater number of overall jobs, dwelling units, and residents than the proposed project. These additional dwelling units and other types of development would result in increased levels of energy consumption and greenhouse gas emissions. Similar to the proposed project, development proposed under Alternative 3 would result in a significant and unavoidable impact because growth would still contribute to an increase in greenhouse gases that may conflict with the goal of the State to reduce up to 174 million metric tons CO₂e/yr by 2020.

Geology and Soils

Alternative 3 proposes development that is similar in nature to that anticipated under the proposed project. Current State and federal regulations require specific engineering and design criteria to minimize impacts related to geologic, soils, and seismic hazards, which would apply to local geologic/soil conditions under each of the alternatives and the proposed project. Policies and implementation measures included as part of the proposed project incorporate all applicable regulations to minimize these impacts. For this reason, geologic and soils impacts under Alternative 3 are considered similar to those of the proposed project.

Hazards and Hazardous Materials

Alternative 3 proposes development that is similar in nature to that anticipated under the proposed project. Similar to the proposed project, implementation of this alternative would involve a decrease in the use of pesticides, herbicides, and other hazardous materials used for agricultural practices. Although hazards related to agricultural uses would be reduced, potential new commercial and industrial uses may introduce new sources of hazardous materials. However, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations that would apply to both Alternative 3 and the proposed project. For this reason, hazardous materials impacts under Alternative 3 are considered similar to those of the proposed project.

Hydrology and Water Quality

Under Alternative 3, development has the potential to convert greater amounts of open space land to urban uses as those anticipated under the proposed project. As with the proposed project, the

creation of impervious surfaces associated with urbanization would increase the amount of runoff, which could affect water quality. An increase in impervious surfaces could also reduce groundwater recharge potential. For these reasons, hydrologic and water quality impacts under Alternative 3 are considered similar to those of the proposed project.

Alternative 3 also proposes development in areas that are within the 100-year floodplain in a similar manner to the proposed project. Similarly, levees are regulated at the State level with maintenance activities delegated to local reclamation districts. The County is limited in terms of alternatives to mitigate for these identified flood risks. Consequently, flood risk impacts are also considered to be significant and unavoidable.

Land Use and Planning

Alternative 3 would result in additional development within the County than that anticipated under the proposed project. However, neither the proposed project nor Alternative 3 would divide existing communities and they would both be subject to the same policy direction with regards to ensuring land use compatibility with surrounding uses. Overall, this alternative would result in similar impacts to land use issues as those anticipated to occur with implementation of the proposed project.

Mineral Resources

Alternative 3 would result in a slightly larger development footprint than the proposed project on lands similar to those affected by the General Plan Update. Overall, this alternative would result in similar impacts to mineral, timber, and oil resources as those anticipated to occur with implementation of the proposed project.

Noise

Alternative 3 includes slightly higher levels of development that would be of a type similar to that anticipated under the proposed project. Similar to the proposed project, significant noise level increases (3 dBA Ldn or greater) associated with increased traffic and railroad operations would occur adjacent to existing noise sensitive land uses during the 20-year planning horizon (see Table 4-3). Overall, implementation of Alternative 3 would still result in a significant and unavoidable impact because growth would still contribute additional sources of noise and vibration that in some cases could exceed local standards.

Public Services, Facilities and Recreation

Alternative 3 would be expected to result in slightly higher levels of development within the County. This development would require the expansion of a variety of local County services (including police, fire, water supply, parks, etc.) in addition to those provided by several local school districts. Because development proposed under this alternative would be similar to that anticipated under the proposed project (although slightly higher), public service and utility impacts are also anticipated to be similar. As described in Section 3.9 “Public Services, Recreation and Utilities”, the County is committed to implementing a variety of policies designed so that the County works with service providers and developers to ensure that adequate levels of service are available to support development within the County’s growth areas.

Transportation/Traffic

Alternative 3 would result in slightly higher but similar types of development. Overall, total daily vehicle trips generated under this alternative would be greater than the proposed project for some roadways. However, Alternative 3 would still result in the same type of significant and unavoidable impacts on vehicular traffic as those identified for the proposed project, in that there would be some road segments operating at LOS E or F, and some of the improvements necessary to accommodate each alternative would be outside the County's control and could not be guaranteed solely through the County's actions. Because development proposed under this alternative would be similar to that anticipated under the proposed project (although slightly higher), transportation impacts are also anticipated to be greater within the County's growth areas.

Finding/Rationale:

The County finds that this alternative is infeasible for specific economic, legal, social, technological, or other reasons and rejects this alternative. Specifically, this alternative would not fully satisfy all the Project Objectives, as discussed above. This alternative is also considered environmentally infeasible as it would increase certain environmental impacts (Impacts 3.1-3, 3.1-4, 3.1-5, 3.10-1, 3.10-3, 3.3-2, 3.3-4, 3.11-1, 3.11-2, 3.11-3, 3.11-4, 3.12-1, 3.5-1, 3.5-2, 3.5-3, 3.9-3, 3.2-1). This alternative is also rejected as being infeasible on the grounds that it does not represent the desired policy of the County. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957)

Alternative 4: Transportation Corridors Alternative

Description

The Transportation Corridors Alternative (Alternative 4) assumes that cities and communities along Highways 99 and 65 will accept additional population by increasing the density and developing contiguous land within their UDBs, CACUDB or CACUAB. These communities and cities would also continue to provide sites for urban commercial services and industry.

Under this alternative, 70 percent of net new population growth is directed to incorporated cities, with the remaining 30 percent directed to the 20 unincorporated communities along with other rural areas of the County. (RDEIR, page 4-4) The primary difference between this alternative and Alternative 3 is how the future growth is allocated within the unincorporated communities. Of the total amount distributed to the County, the majority of growth (estimated at 80%) would be allocated to the eight communities located on Highways 99 and 65. These eight communities are Ducor, Earlimart, Goshen, Pixley, Strathmore, Terra Bella, Tipton, and Traver. The remaining growth would be allocated within the other 12 unincorporated communities and County area.

Ability to Meet Project Objectives

Under Alternative 4, the County would adopt the General Plan 2030 Update with slightly higher population growth assumptions that would focus growth within existing cities, communities and hamlet areas adjacent to the major transportation corridors in Tulare County, Highways 99 and 65. As outlined in Table 4-2, Alternative 4, would not meet Objective 3 ("Protect the County's

important agricultural uses and scenic natural lands from urban encroachment through the implementation of the Goals and Policies of the General Plan.”), and would not meet Objective 4 (“Strictly limit rural residential development in important agricultural areas outside of unincorporated communities’ UDBs and cities’ CACUABs and CACUDB’s (i.e. avoid sprawl).”

Summary of Environmental Impacts

The environmental impacts of the Transportation Corridors Alternative are summarized below.

Aesthetics

Under Alternative 4, the County is expected to continue with similar development patterns within the County’s growth areas which could result in a slightly higher population level (30% of new growth versus 25% under the proposed project). However, unlike the proposed project, new unincorporated County growth would be focused within the unincorporated communities along Highways 99 and 65. This alternative would only allow very minimal development of open space in rural areas of the County. However, development along transportation corridors would develop some open space and agricultural areas and would eliminate views of open space and agricultural landscapes currently found along these highways. Similar to the proposed project, Alternative 4 would result in a significant and unavoidable impact; however, given that growth is focused within specific areas around transportation corridors, scenic resource and light and glare impacts would likely be intensified within these growth areas.

Agricultural Resources

Data from the 2010 Background Report (Appendix B of this RDEIR) shows that a majority of the areas along Highways 99 and 65 contain a significant amount of important farmland. Consequently, transportation corridor development proposed under Alternative 4 would result in a significant impact to agricultural resources. This is because an additional number of acres of land designated as Prime, Unique or Farmland of Statewide Importance have the potential to be converted to urban uses under this alternative compared to the amount of farmland that would be converted to urban uses under the proposed project. Similar to the proposed project, Alternative 4 would also result in a significant and unavoidable impact, since there would be some conversion of important farmland to urbanized uses under this alternative.

Air Quality

Under Alternative 4, slightly higher levels of growth would still occur within the County by 2030. Transportation corridor growth may reduce the overall number of vehicle miles driven; however city and community focused dwelling units and other types of development would still result in similar overall emission levels of both mobile and stationary sources of air quality emissions, toxic air contaminants, and the potential for odor emissions. Consequently, development proposed under Alternative 4 would still result in a significant and unavoidable impact because growth would still contribute to air pollutant emissions that could exceed the daily SJVAPCD thresholds for a variety of air pollutants.

Biological Resources

Development proposed under Alternative 4 would result in similar impacts to biological resources (compared to the proposed project) through the conversion of open space lands, primarily cropland, vineyards, and grassland, to developed uses. However, under this alternative, conversion of land designated as natural or open space would be focused around the cities and communities located along Highways 99 and 65. Although a similar amount of natural or open space lands may be converted, Alternative 4 may result in less habitat fragmentation than the proposed project.

Cultural Resources

Development proposed under this alternative would focus new growth within existing City and community areas along transportation corridors in the County, which could result in similar or greater impacts to historic resources located within existing urbanized areas than the proposed project. The intensification of land uses within and adjacent to the existing City limits or community boundaries may result in greater impacts to the design qualities of individual City neighborhoods and historic districts to those anticipated under the proposed project.

Energy and Climate Change

Under Alternative 4, slightly higher levels of growth would occur within the County by 2030. Transportation corridor growth may slightly reduce the overall number of vehicle miles driven but this would be offset by the slightly higher level of growth accommodated. City and community transportation corridor focused dwelling units and other types of development would result in similar energy use and greenhouse gas emissions compared to the proposed project. Alternative 4 would also result in a significant and unavoidable impact because growth would still contribute to an increase in greenhouse gases that may conflict with the goal of the State to reduce up to 174 million metric tons CO₂e/yr by 2020.

Geology and Soils

Alternative 4 proposes development that is similar in nature to that anticipated under the proposed project. Current State and federal regulations require specific engineering and design criteria to minimize impacts related to geologic, soils, and seismic hazards, which would apply to local geologic/soil conditions under each of the alternatives and the proposed project. Policies and implementation measures included as part of the proposed project incorporate all applicable regulations to minimize these impacts. For this reason, geologic and soils impacts under Alternative 4 are considered similar to those of the proposed project.

Hazards and Hazardous Materials

Alternative 4 proposes development that is similar in nature to that anticipated under the proposed project. Similar to the proposed project, implementation of this alternative would involve a decrease in the use of pesticides, herbicides, and other hazardous materials used for agricultural practices. Similar to the proposed project, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations that would apply to both Alternative 4 and the proposed project. For this reason, hazardous materials impacts under Alternative 4 are considered to be similar to those of the proposed project.

Hydrology and Water Quality

Under Alternative 4, development could convert more agricultural/open space land to urban uses than the proposed project. As with the proposed project, the creation of impervious surfaces associated with urbanization would increase the amount of runoff, which could affect water quality. An increase in impervious surfaces could also reduce groundwater recharge potential. However, because land conversion could be more than the proposed project, more impervious surfaces would be developed. Overall, hydrologic and water quality impacts under Alternative 4 are considered to be similar to those of the proposed project.

Alternative 4 also proposes development in areas that are within the 100-year floodplain in a similar manner to the proposed project. Similarly, levees are regulated at the State level with maintenance activities delegated to local reclamation districts. The County is limited in terms of alternatives to mitigate for the identified flood risks. Consequently, flood risk impacts are also considered to be significant and unavoidable.

Land Use and Planning

Alternative 4 would result in similar types of development as the proposed project. Implementation of this alternative would intensify development within and adjacent to city and community planning areas and would convert similar amounts of open space areas within the County to developed uses. Consequently, neither the proposed project nor Alternative 4 would divide existing communities and they would both be subject to the same policy direction with regards to ensuring land use compatibility with surrounding uses. Similar to the proposed project, this alternative would result in similar impacts to land use.

Mineral Resources

Alternative 4 would result in about the same amount of development than the proposed project on lands similar to those affected by the proposed project. This alternative would result in similar impacts to mineral, timber, and oil resources.

Noise

Development anticipated under Alternative 4 would be similar in nature to that anticipated under the proposed project. Similar to the proposed project, significant noise level increases (3 dBA Ldn or greater) associated with increased traffic and railroad operations would likely occur adjacent to existing noise sensitive land uses during the 20-year planning horizon. Overall, implementation of Alternative 4 would still result in a significant and unavoidable impact because growth could still contribute additional sources of noise and vibration that in some cases could exceed local standards.

Public Services, Facilities and Recreation

Alternative 4 would be expected to result in similar levels of development within the County as would occur under the proposed project. Development under Alternative 4 would be directed adjacent to major transportation corridors and within or adjacent to existing cities and communities. However, anticipated levels of development would still require the expansion of a variety of local County services (including police, fire, water supply, parks, etc.) in addition to those provided by

several local school districts. Overall, public service and utility impacts are also anticipated to be similar to the proposed project. As described in Section 3.9 “Public Services, Recreation and Utilities”, the County is committed to implementing a variety of policies designed so that the County works with service providers and developers to ensure that adequate levels of service are available to support development within the County’s growth areas.

Transportation/Traffic

Alternative 4 would result in development within the planning areas of existing cities and communities adjacent to Highways 99 and 65. Overall, total daily vehicle trips generated under this alternative would be similar to those anticipated with the proposed project (see Table 4-3). However, Alternative 4 would focus growth and consequently more traffic within existing urban areas, which could see reductions in their local roadway levels of service. Implementation of Alternative 4 would still result in significant and unavoidable traffic impacts.

Finding/Rationale:

The County finds that this alternative is infeasible for specific economic, legal, social, technological, or other reasons and rejects this alternative. Specifically, this alternative would not fully satisfy all the Project Objectives, as discussed above. This alternative is also considered environmentally infeasible as it would increase certain environmental impacts (Impacts 3.1-3, 3.1-4, 3.1-5, 3.10-1, 3.10-3, 3.3-2, 3.3-4, 3.12-1, 3.12-2, 3.5-1, 3.5-2, 3.5-3, 3.9-3, 3.2-1). This alternative is also rejected as being infeasible on the grounds that it does not represent the desired policy of the County. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.)

Alternative 5: Confined Growth Alternative

Description

Similar to the proposed project, Alternative 5 assumes that all of the proposed policies and implementation measures contained in the Goals and Policies Report (Part I of the General Plan Update) would be included as part of this alternative. The primary objective of this alternative is to minimize significant and unavoidable impacts to open space areas, agricultural lands, and aesthetic resources. Unlike the proposed project, growth under Alternative 5 would be directed to occur only within established UDB and Hamlet Development Boundaries (HDB). A key assumption of Alternative 5 is that boundary expansion would only be allowed under a “no net gain” scenario. A “no net gain” scenario could allow modifications to the “hard boundaries”, which are defined by the UDBs and Hamlet Boundaries, only if these are offsetting equivalent deductions in boundaries elsewhere. Another opportunity for adjustments to boundaries could occur through transferring UDB capacity between cities and communities. Under this alternative, these growth patterns are assumed to continue through the entire 2030 planning horizon, with total unincorporated population being similar to the anticipated population under the proposed project. (RDEIR, page 4-4)

Under Alternative 5, the General Plan 2030 Update would incorporate some land use strategies that would require greater land use efficiency standards for development on important farmlands and promote increased densities and mixed use areas within developed areas. These strategies

would be integrated into the policies and implementation measures of the Goals and Policies Report (Part I of the General Plan Update) in order to direct growth within existing UDBs and Hamlet Boundaries. Elements of the General Plan that could incorporate these strategies include the Planning Framework, Agriculture, Land Use, Environmental Resources Management, and Public Facilities and Services Elements. Expansion of UDBs or Hamlet Boundaries without offsets would only be allowed under extenuating circumstances. Criteria for expansions might include:

- Mandatory agriculture impact fees for important farmlands added to Urban Development Boundaries.
- Significant job generation projects or projects of regional importance (such as a four year college).
- Regional growth corridors which involve high density mixed use as well as commercial or industrial opportunities.
- Boundary adjustments where Master Planning efforts demonstrate exemplary land use efficiency standards above and beyond base standards.
- Boundary expansion is consistent with the San Joaquin Valley Regional Blueprint.

However, no boundary adjustments would be permitted unless it can be demonstrated that land use efficiency standards (to be set in the General Plan Update) have been or can be met. No new towns would be allowed on important farmland unless equivalent capacity is transferred from UDBs or HDBs through mechanisms such as purchase and transfer of development rights to offset the loss of important farmland.

The hard boundaries concept would link well with the intent of the San Joaquin Valley Regional Blueprint to protect important agricultural resource areas and natural habitats. County cooperation with and input from LAFCo, municipalities, and special districts would be integral in implementing the County's General Plan and achieving the goals of this alternative.

Ability to Meet Project Objectives

Under Alternative 5, mechanisms would be put in place that insure the existing capacity for development already present in the existing General Plan is used efficiently and smartly under the General Plan Update. As outlined in Table 4-2, Alternative 5, would not meet Objective 1 ("Provide opportunities for small unincorporated communities to grow and improve quality of life and their economic viability.")

Summary of Environmental Impacts

Aesthetics

Alternative 5 would result in similar types of development with a smaller footprint than that anticipated under the proposed project. City-centered growth would focus a majority of the County's new growth within existing urban areas and would convert less County open space areas to developed uses. Development of less County open space would result in less impacts to existing County scenic landscapes. However, similar to the proposed project, Alternative 5 would still result in a significant and unavoidable impact, since there would be some level of future

development that would affect existing scenic landscapes. Light and glare impacts would also be lessened under this alternative. However the resultant impact would also be similar to the proposed project.

Agricultural Resources

Confined growth development proposed under Alternative 5 would result in a reduced impact to agricultural resources compared to the proposed project. Because of “hard boundaries” limiting the outward growth of cities and communities and other land use controls, a fewer number of acres of land designated as Prime, Unique or Farmland of Statewide Importance would be converted to urban uses under this alternative compared to the amount of important farmland that would be converted to urban uses under the proposed project. However, similar to the proposed project, Alternative 5 would also result in a significant and unavoidable impact, since there would be some conversion of important farmland to urbanized uses under this alternative.

Air Quality

Under Alternative 5, similar levels of growth would still occur within the County by 2030. Confined growth may reduce the overall number of vehicle miles driven; however city focused dwelling units and other types of development would still result in similar overall emission levels of both mobile and stationary sources of air quality emissions, toxic air contaminants, and the potential for odor emissions. Consequently, development proposed under Alternative 5 would still result in a significant and unavoidable impact because growth would still contribute to air pollutant emissions that could exceed annual SJVAPCD thresholds for a variety of air pollutants.

Biological Resources

Development proposed under Alternative 5 would result in similar impacts to biological resources (compared to the proposed project) through the conversion of open space lands to developed uses. However, because of the “hard boundaries” utilized under this alternative, a fewer number of acres of land designated as natural or open space would be converted to urban uses compared to the same types of land uses that would be converted under the proposed project.

Cultural Resources

Development proposed under Alternative 5 would focus new growth within existing City areas, which could result in similar or greater impacts to historic resources located within existing urbanized areas. The intensification of land uses within the existing City limits may result in greater impacts to the design qualities of individual City neighborhoods and historic districts to those anticipated under the proposed project.

Energy and Climate Change

Under Alternative 5, confined growth may reduce the overall number of vehicle miles driven; however, city focused dwelling units and other types of development would result in similar energy consumption and greenhouse gas emission levels for buildings and mobile and stationary sources. Consequently, development proposed under Alternative 5 would still result in a significant and unavoidable impact

because growth would still contribute to an increase in greenhouse gases that may conflict with the goal of the State to reduce up to 174 million metric tons CO₂e/yr by 2020.

Geology and Soils

Alternative 5 proposes development that is similar in nature to that anticipated under the proposed project. Current State and federal regulations require specific engineering and design criteria to minimize impacts related to geologic, soils, and seismic hazards, which would apply to local geologic/soil conditions under each of the alternatives and the proposed project. Policies and implementation measures included as part of the proposed project incorporate all applicable regulations to minimize these impacts. For this reason, geologic and soils impacts under Alternative 5 are considered similar to those of the proposed project.

Hazards and Hazardous Materials

Alternative 5 proposes development that is similar in nature to that anticipated under the proposed project. Similar to the proposed project, hazardous materials generation, storage and clean-up are heavily regulated by federal, State and local regulations that would apply to both Alternative 5 and the proposed project. For this reason, hazardous materials impacts under Alternative 5 are considered to be similar to those of the proposed project.

Hydrology and Water Quality

Under Alternative 5, development would convert less open space land to urban uses than the proposed project. As with the proposed project, the creation of impervious surfaces associated with urbanization would increase the amount of runoff, which could affect water quality. An increase in impervious surfaces could also reduce groundwater recharge potential. However, because land conversion would be less than the proposed project, fewer impervious surfaces would be developed. Overall, hydrologic and water quality impacts under Alternative 5 are considered to be similar to those of the proposed project.

Alternative 5 also proposes development in areas that are within the 100-year floodplain in a similar manner to the proposed project. Similarly, levees are regulated at the State level with maintenance activities delegated to local reclamation districts. The County is limited in terms of alternatives to mitigate for the identified flood risks. Consequently, flood risk impacts are also considered to be significant and unavoidable.

Land Use and Planning

Alternative 5 would result in similar types of development. However, implementation of this alternative would intensify development within City planning areas and would convert less open space areas within the County to developed uses. Consequently, neither the proposed project nor Alternative 5 would divide existing communities and they would both be subject to the same policy direction with regards to ensuring land use compatibility with surrounding uses.

Mineral Resources

Alternative 5 would result in slightly less development than the proposed project on lands similar to those affected by the proposed project. Similar to the proposed project, this alternative would result in similar impacts to mineral, timber, and oil resources.

Noise

Although Alternative 5 includes a slightly reduced development footprint, development anticipated under this alternative would be similar in nature to that anticipated under the proposed project. Similar to the proposed project, significant noise level increases (3 dBA Ldn or greater) associated with increased traffic and railroad operations would likely occur adjacent to existing noise sensitive land uses during the 20-year planning horizon. Overall, implementation of Alternative 5 would still result in a significant and unavoidable impact because growth could still contribute additional sources of noise and vibration that in some cases could exceed local standards.

Public Services, Facilities and Recreation

Alternative 5 would be expected to result in lower levels of development within the County. However, anticipated levels of development would still require the expansion of a variety of local County services (including police, fire, water supply, parks, etc.) in addition to those provided by several local school districts. Overall, public service and utility impacts are also anticipated to be similar.

Transportation/Traffic

Alternative 5 would result in the intensification of similar types of development within the planning areas of existing cities. Overall, total daily vehicle trips generated under this alternative would be similar to those anticipated with the proposed project (see Table 4-3). However, Alternative 5 would focus growth and consequently more traffic within existing urban areas, which could see reductions in their local roadway levels of service. Implementation of Alternative 5 would still result in significant and unavoidable traffic impacts.

Finding/Rationale:

The EIR determined that Alternative 5 would be environmentally superior to the Project being approved. The County finds that this alternative is infeasible for specific economic, legal, social, technological, or other reasons and rejects this alternative. Specifically, this alternative would not fully satisfy all the Project Objectives, as discussed above. This alternative is also considered environmentally infeasible as it would increase certain environmental impacts (Impacts 3.12-1 and 3.12-2). This alternative is also rejected as being infeasible on the grounds that it does not represent the desired policy of the County. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.)

Findings on Rejected Mitigation Measures & Alternatives

Numerous comments on the RDEIR suggested additional changes to policies, mitigation measures and/or project alternatives. For example, well over a thousand individual comments were identified in the comment letters and a large number of these individual comments suggested policy changes. In many instances commenters did not explain how their suggestions would reduce or avoid an environmental impact and should not be considered a mitigation measures under CEQA, as described in FEIR Master Response #1.

The County finds that (1) changes or alterations have been required in, or incorporated into the project, which avoid or substantially lessen the significant environmental effects as identified in the FEIR, and (2) Specific economic, legal, social, technological, or other considerations, including provisions for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the FEIR.

The Responses to Comments and Master Responses in the Final EIR (FEIR Chapters 4 and 5) addressed the feasibility of adopting these suggestions. In some instances, the suggestions have been incorporated into the project. In other instances the suggestions were determined to be consistent with other requirements already incorporated into the project or the suggestions were determined to be infeasible. The Responses to Comments and Master Responses are incorporated by reference. Furthermore, County Staff, Planning Commission, and the Board of Supervisors reviewed the suggestions and further addressed the feasibility of incorporating these suggestions into the General Plan. This additional review occurred in the Public Policy Comment Matrix (Attachment 3A) BOS Agenda Item Attachment E Item 7, the Tulare County 2030 General Plan Update Summary of Changes (Attachment 3B) BOS Agenda Item Attachment E Item 8, the General Plan 2030 Update Correctory Table (Attachment 3C) BOS Agenda Item Attachment E Item 9 and the Addendum to Attachment 3C titled “Addendum to Attachment 3C General Plan City Section PF – 4” BOS Agenda Item Attachment E Item 10 which are also incorporated by reference. It would not be feasible or practical to list every suggestion again in the Findings. As discussed *Santa Clarita Organization for Planning the Environment v. City of Santa Clarita* (2011) 197 Cal.App.4th 1042 “Considering the large number of possible mitigation measures set forth in the letter [50 suggestions], as well as the letter's indication that not all measures would be appropriate for every project, it is unreasonable to impose on the city an obligation to explore each and every one.” To the extent the suggestions have been determined to be infeasible in the documents incorporated by reference above, the suggestions are also considered to be infeasible based upon being undesirable from a policy standpoint. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.) The Board hereby adopts the specific reasons for declining such measures contained in the documents described above as its additional grounds for rejecting these measures.

Findings Regarding Other CEQA Considerations

Potential for Growth Inducement

Finding

The Board finds that changes or alterations have been required in, or incorporated into the Project which avoid or substantially lessen the significant environmental effect as identified in the FEIR. Specifically, those measures described above for air quality, open space and agricultural land, visual resources, and Public Services, Recreation and Utilities. The Board further finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible mitigation measures or project alternatives identified in the FEIR. Therefore, this impact remains significant and unavoidable.

Rationale

CEQA requires a discussion of the ways in which the proposed project could be growth inducing. CEQA Guidelines Section 15126.2, subdivision (d), identifies a project as growth inducing if it fosters economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. New employees from retail, commercial, and industrial development along with new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. Examples of development that would indirectly facilitate growth include the installation of new roadways or the construction/expansion of utility infrastructure such as wastewater or water delivery/treatment facilities.

Chapter 5.0 (Section 5.2, pages 5-1 through 5-3) of the RDEIR provides a discussion of growth inducing impacts of the proposed project. As discussed in that section, implementation of the updated general plan (the Project) will induce some of the population and housing growth in the County, therefore, the Project is considered growth-inducing. The Project provides the framework to guide public officials' decisions relative to development within Tulare County, and takes into account market conditions, realistic growth assumptions that accommodate projected TCAG projected population increases. As discussed more fully in the EIR, the Project includes policies to discourage undesirable development in areas with sensitive natural resources, critical habitats and important scenic resources, and policies to encourage orderly growth in areas adjacent to existing urban uses and requires developers to provide service extensions. Although Project policies are designed to contain growth within existing community areas to help protect agricultural and open space areas, the Project policies are not binding on the legislative bodies of surrounding jurisdictions. Consequently, these policies cannot prevent other jurisdictions from developing areas adjacent to the County, or prevent existing cities from annexing territory for development or expanding their spheres of influence (areas subject to future annexation).. Implementation of land use policies will incrementally increase demands for public services, utilities, and infrastructure, and the need for medical, educational, and recreation facilities. For

these reasons, the growth permitted by the Project leads to significant unavoidable adverse impacts. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. In addition, some changes or alterations are within the responsibility and jurisdiction of other public agencies and have been, or can and should be, adopted by those other agencies. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

References

For additional discussion regarding the project's significant irreversible changes, see Chapter 5, Section 5.5 and 5.6 "Significant Irreversible Environmental Effects" of the RDEIR (see pages 5-17 and 5-18)

Finding

The Board finds that changes or alterations have been required in, or incorporated into the Project which avoid or substantially lessen the project's significant irreversible environmental changes as identified in the FEIR. Specifically, those measures described above for Hydrology and Water Quality and Drainage, Energy and Global Climate Change. The Board further finds that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible mitigation measures or project alternatives identified in the FEIR. Therefore, this impact remains significant and irreversible.

Rationale

Section 5.5 of the RDEIR examined "significant irreversible environmental effects." Approval and implementation of actions related to the proposed project would result in an irretrievable commitment of non-renewable resources such as energy supplies and other construction related materials. Development allowed under the proposed project would irreversibly commit nonrenewable resources to the construction and maintenance of buildings, infrastructure and roadways. These non-renewable resources include mining resources such as sand, gravel, steel, lead, copper and other metals. Buildout of the proposed project also represents a long-term commitment to the consumption of fossil fuels, natural gas and gasoline. Increased energy demands would be used for construction, lighting, heating and cooling of residences, and transportation of people within, to and from the County. (RDEIR, page 5-18)

Development within Tulare County as envisioned by the updated general plan would result in the construction of structures, facilities, and/or infrastructure on lands that are currently undeveloped. Development of lands would generally result in their future and permanent commitment to urban uses. (RDEIR, page 5-18) Development under the Project will result in the conversion of some vacant and agricultural /open space lands to urban uses, and the intensification of underutilized areas.

The Project includes policies and implementation measures promoting waste recycling and energy conservation which will result in some savings in non-renewable energy supplies (See RDEIR Section 3.4, Energy and Global Climate Change). Project policies promoting water resource and water conservation will also result in some savings of these resources (See RDEIR Sections 3.6, (Hydrology, Water Quality and Drainage) and 3.4.) Project policies designed to promote future development patterns that focus growth within established community areas, and policies designed to conserve and encourage continued economic viability of agricultural resources will serve to limit conversion of some vacant and agricultural/open space lands to urban uses.

References

For additional discussion regarding the project's significant irreversible changes, see Chapter 5, Section 5.5 and 5.6 "Significant Irreversible Environmental Effects" of the RDEIR (see pages 5-17 and 5-18)

Findings on Disagreement among Experts and Recirculation

To the extent the comment letters and correspondence submitted by the public or outside agencies or organizations are considered expert opinion, the Board of Supervisors finds that the assumptions, data, methodology, and analysis included in the FEIR (not including the comment letters) prepared by the County and its Consultants, is supported by substantial evidence and was the appropriate assumption, data, methodology, and analysis to use to support the impact conclusion reached in the FEIR.

The County further finds that the following do not change the impact conclusions reached in the FEIR or otherwise trigger recirculation under CEQA: (1) information submitted and incorporated into the FEIR; (2) revisions incorporated into the proposed project after release of the Recirculated Draft EIR; (3) all oral and written comments and testimony received by the County.

Statement of Overriding Considerations

As set forth in the preceding sections, the Board of Supervisors' approval of the Project will result in significant adverse environmental impacts that cannot be avoided even with the adoption of all feasible mitigation measures.

In the Board's judgment, the benefits of the proposed project, as approved, outweigh its unavoidable significant effects. As stated previously, the No-Project alternative would fail to incorporate updated goals and policies could make it more difficult to provide the necessary planning framework that would set standards for the protection of air quality, open space areas, habitats, water resources, agricultural areas, and scenic landscapes. The lack of updated economic development policies or programs may also make it more difficult to promote the desired level of reinvestment within existing communities and hamlets. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and into the documents found in the Record of Proceedings, described above.

Having adopted all feasible mitigation measures, rejected as infeasible alternatives to the Project discussed above, and recognized all significant, unavoidable impacts, the Board has weighed the economic, legal, social, technological, and other benefits of the Tulare County General Plan 2030 against unavoidable significant environmental impacts in determining whether to approve the Project. In accordance with section 15093 of the CEQA Guidelines, the Board hereby finds that the benefits of the Project outweigh its unavoidable adverse environmental effects such that the adverse environmental effects may be considered “acceptable.” Each benefit set forth below constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, despite each and every unavoidable impact.

Legal and Regulatory Considerations

The County has been working on the proposed project since 2003 to take the place of the existing general plan. The Tulare County General Plan 2030 acknowledges landowner and resident expectations arising from historic County land use planning. The Tulare County General Plan 2030 is the first comprehensive update amendment to the Tulare County General Plan, since the first elements were adopted in 1964. The update process began with an intensive facilitated workshop process that provided input on concepts for the proposed project including goals, objectives, and policies to address key public concerns. Throughout the process, there has been continued involvement of stakeholders in shaping the Tulare County General Plan 2030, and the Board appointed various advisory committees to attempt to reach a consensus on General Plan issues.

The proposed project balances the protection of property rights, the need for decent housing and the need for economic growth with strong commitments to environmental protection. The proposed project represents the best compromise in balancing property owners’ ability to fully use and enjoy their land with necessary environmental protections to protect the public good. The Tulare County General Plan 2030 provides a comprehensive update of the County’s general plan, while retaining its historic three-tier structure. The General Plan 2030 Update will delete obsolete policies, add new goals and policies, and modify other policies. These changes to the County’s general plan balance the needs and priorities expressed in the Project Objectives, which include providing economic opportunities for small unincorporated communities, preserving agriculture as well as scenic and natural resources, limiting sprawl, and enhancing planning coordination and cooperation with other agencies and organizations with land management responsibilities in and adjacent to Tulare County. The proposed project implementation process will include and require the involvement of multi-interest stakeholders, regulatory community and scientific community in the development of ordinances and policy documents mandated by the Plan, thus continuing to address the balancing of economic interests with environmental protection.

The Tulare County General Plan 2030 represents the best compromise between accommodating new growth consistent with State General Plan law, and minimizing impacts to key resources by designating areas to accommodate growth with a focus on existing urbanized areas and existing rural centers. This is consistent with the goals of SB 375 (Steinberg) of 2008, which marries the achievement of regional greenhouse gas reduction targets and regional housing needs allocation

(RHNA) targets so that greenhouse gas reduction strategies will recognize the need to accommodate community housing needs.

Improving the Quality of Life and Economic Conditions of Unincorporated Communities

Tulare County is a large, geographically diverse area predominately rural/agricultural in nature. Pursuant to Government Code Section 65300, the County is required to adopt “a comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency’s judgment bears relation to its planning.” The California General Plan Guidelines of the Governor’s Office of Planning and Research recommend that a general plan have a 20-year planning horizon. As such, a 20-year growth plan (General Plan) will cause significant environmental impacts that cannot be fully mitigated. Substantial evidence in the record demonstrates the following benefits that the County would derive from the 2010 General Plan.

The Tulare County General Plan 2030 Update, as approved (also referred to as the Project, or the updated general plan), best promotes reinvestment and provides opportunities for small unincorporated communities to grow or improve their quality of life and their economic viability. The updated general plan promotes a strong, community-centered economy by focusing growth and development within existing unincorporated communities’ and cities’ UABs and UDBs and avoiding sprawl. Such development will allow for thriving community-centered commercial uses in those areas consistent with the diversity of needs and lifestyles in the County. The Project ties growth to infrastructure by requiring concurrent provision of adequate public facilities and services and by encouraging urban development to locate in areas with existing infrastructure which is either adequate or can be expanded to serve additional urban development. For example, PF-1.4 encourages urban development to locate in existing UDBs and HDBs where adequate infrastructure is already available or may be expanded in conjunction with development and requires the County to ensure that development does not occur unless adequate infrastructure is available. Also, the Planning Framework Element of the Project describes community and hamlet planning boundaries, and the relationship between unincorporated areas and cities. To specifically focus growth, the Planning Framework Element includes a set of policies designed to address this issue. These policies are summarized below in **Table 2**.

Key to these policies are the County Adopted City UAB and UDBs (CACUAB and CACUDB) for each city. A variety of measures are identified in the policies to help focus growth within these areas. For example, Policy PF-4.20 “Application of a Checklist to Control Development in a CACUDB” calls for the County to work with individual cities using the Rural Valley Lands Plan or a similar checklist to evaluate applications for special use permits, variances, or land divisions within CACUDBs to address impacts on regional issues (i.e., transportation infrastructure, availability of water, etc.).

TABLE 2
SUMMARY OF POLICIES (SECTION 2.4 – CITIES) FROM PLANNING FRAMEWORK ELEMENT

PF-4.1	CACUABs for Cities	PF-4.15	Urban Improvement Areas for Cities
PF-4.2	CACUDBs for Cities – Twenty Year Planning Area	PF-4.16	Coordination with Cities in Adjacent Counties
PF-4.3	Modification of CACUABs and CACUDBs	PF-4.17	Cooperation with Individual Cities
PF-4.4	Planning in CACUDBs	PF-4.18	Future Land Use Entitlements in a CACUDB
PF-4.5	Spheres of Influence	PF-4.19	Future Land Use Entitlements in a CACUAB
PF-4.6	Orderly Expansion of City Boundaries	PF-4.20	Application of a Checklist to control Development in a CACUDB
PF-4.7	Avoiding Isolating Unincorporated Areas	PF-4.21	Application of the RVLP Checklist to Control Development in a CACUAB
PF-4.8	General Plan Designations Within City UDBs	PF-4.22	Reuse of Abandoned Improvements in a CACUDB
PF-4.9	Updating Land Use Diagram in CACUDBs	PF-4.23	Reuse of Abandoned Improvements in a CACUAB
PF-4.10	City Design Standards	PF-4.24	Annexations to a City within the CACUDB
PF-4.11	Transition to Agricultural Use	PF-4.25	Sphere of Influence Criteria
PF-4.12	Compatible Project Design	PF-4.26	City 50 Year Growth Boundaries
PF-4.13	Coordination with Cities on Development Proposals	PF-4.27	Impacts of Development within the County on City Facilities
PF-4.14	Revenue Sharing		

Focused economic growth within existing unincorporated community areas will also benefit the environment of an area by reducing the amount of land converted from agricultural/open space land to urban uses and reduce commute times and distances between residential areas and employment centers. Longer commutes result in increased vehicle trip length, which creates environmental effects associated with transportation, air quality, and noise.

Improvement to Roadways

While the region as a whole is expected to grow over the life of the planning period, through the implementation of focused growth within established UDBs, and Hamlet Development Boundaries (similar to “smart growth” principles), a corresponding benefit will be some reduction in commute times, even as the number of vehicles on the road increases with population growth. Without the policies of the updated general plan promoting these benefits, the condition of roadways within the County and surround area could be expected to become much worse as the inevitable population growth occurs. Several land use (LU) and AQ policies support the creation of mixed use, infill, high density developments (see Policies LU-1.1, LU-1.2, LU-1.8, and AQ-3.6 and LU Implementation Measure #7). Policy LU-2.1, LU-3.1, LU-3.3, LU-4.1, LU-6.3, TC-4.4, AQ-3.1, and AQ-3.2 and LU Implementation Measure #3 direct development to within cities, unincorporated communities, and hamlets where public services and facilities, infrastructure, employment centers and other amenities are available. TC Implementation Measure #6 requires the County to update roadway improvement standards to account for air emissions reductions, enhancement of public safety, and smart growth design principles for pedestrian/bicycle facilities and traffic calming devices. TC Implementation Measures #8 and #18 contain provisions for the County and other entities to obtain funding for alternative modes of transportation. Policies LU-2.1, PFS-1.8, PFS-1.15, PFS-1.16, PFS-2.4, and PFS-3.3 direct new development to locate where there are existing utilities and services.

Preservation of Open Space and Agricultural Areas

The updated general plan ensures community-centered growth by directing growth towards cities, established UDBs, and Hamlet Development Boundaries. The updated general plan incorporates many principles of “Smart Growth” which promotes compact land development patterns that reduce land consumption and vehicle trips. Encouraging development in existing areas results in fewer impacts from the construction of new infrastructure, maximizes use of existing impervious surfaces, reduces vehicle miles traveled which translates into a reduction in green house gas emissions, and reduces pressures on the conversion of farmland and open space.

Policies from the Planning Framework and Land Use Elements have also been developed to focus future growth within established future growth areas (i.e., UDBs, CACUDBs, HDBs and CACUABs) in an effort to minimize the conversion of important farmlands. These policies include PF-1.2 “Location of Urban Development” which requires the County to consider future growth within designated community areas where infrastructure is available or can be readily established in conjunction with future development (see PF-1.4 “Available Infrastructure”). Other policies include LU-2.1 “Agricultural Lands” which also calls for the maintenance of agriculturally designated lands. Additional policies have been developed for each of the County’s planning areas (i.e., Valley, Foothills, etc.) to address their own unique agricultural-related issues. These policies include RVLP-1.1 “Development Intensity”, RVLP-1.2 “Existing Parcels and Approvals”, RVLP-1.3 “Tulare County Agricultural Zones”, RVLP-1.4 “Determination of Agricultural Land”, FGMP-1.10 “Development in Success Valley”, and FGMP-5.1 “Protect Agricultural Lands”.

Improvements to Long-Term Water Supply

The updated general plan requires that long term sustainable water supply needs of new development projects be taken into account before approval of discretionary permits or tentative subdivision maps. Specifically, criteria will be developed in order to demonstrate a confirmed water supply before approval of any discretionary permit, with limited exceptions. Specifically, Policies PF-2.3, PF-2.4, PF-2.5, PF-2.6, and PF-3.3 would require the County to work with domestic water service providers as a part of the community and hamlet planning process. As a part of the community and hamlet planning process, the communities’ short- and long-term ability to provide necessary urban services is to be considered, which requires close coordination between the County and special districts that provide urban services (such as domestic water) to the respective communities.

A variety of water conservation measures are also provided in the updated general plan. Specifically, policies WR-3.5, WR-3.6, WR-3.7, and WR-3.8 encourage water conservation through the use of drought tolerant landscaping, educational programs aimed at reducing water consumption on agricultural lands, and encouraging other public and private entities to develop educational programs targeting water conservation awareness and domestic use. Under Policy WR-3.7 the County would develop and emergency water conservation plan for County operated water systems to identify appropriate conservation policies that can be implemented during times of water shortages caused by drought, or other circumstances.