



5 OTHER CEQA CONSIDERATIONS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. The environmental impact report (EIR) must also discuss (1) significant environmental effects of the proposed project, (2) significant environmental effects that cannot be avoided if the proposed project is implemented, (3) significant irreversible environmental changes that would result from implementation of the proposed project, and (4) growth-inducing impacts of the proposed project.

This chapter summarizes the significant environmental effects that cannot be avoided if the Sustainability Policy and Regulatory Update of the County of Santa Cruz (County) General Plan and Local Coastal Program (LCP) and County Code (Sustainability Update or project) is implemented (i.e., significant unavoidable impacts). It also addresses the significant irreversible environmental changes and growth-inducing impacts of the proposed project. An evaluation of the significant environmental effects of the proposed project, applicable mitigation measures, the level of impact significance before and after mitigation, and evaluation of cumulative impacts, is provided in Chapter 4, Environmental Setting, Impacts, and Mitigation Measures, and is summarized in Chapter 2, Summary. Chapter 6, Alternatives, addresses alternatives to the proposed project.

5.1 SIGNIFICANT UNAVOIDABLE IMPACTS

The CEQA Guidelines require a description of any significant impacts, including those that can be mitigated but not reduced to a level of insignificance (Section 15126.2[b]). Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

The EIR identified the following significant unavoidable project impacts,. A brief explanation is provided as to why these impacts were found to be significant and unavoidable. Alternatives to reduce or eliminate significant impacts are reviewed in Chapter 6 of this EIR.

- **Impact AGR-1: Farmland Conversion.** Adoption and implementation of the proposed Sustainability Update could indirectly lead to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- **Impact BIO-2B: Sensitive Habitats (Thurber Lane/Soquel Drive Parcel).** implementation of the proposed Sustainability Update could indirectly result in future development at the Thurber Lane/Soquel Drive property, which could impact sensitive habitats, including riparian and wetland habitats, and associated potential special status species.

- **Impact CUL-1: Historical Resources.** Adoption and implementation of the proposed Sustainability Update could indirectly lead to development that could result in a substantial adverse change in the significance of historical built resources.
- **Impact TRA-1: Conflict with County Vehicle Miles Traveled (VMT) Threshold.** Adoption and implementation of the proposed Sustainability Update would indirectly generate new development that could exceed the County's adopted VMT threshold.
- **Cumulative Transportation- VMT Impact.** Cumulative development and growth, both within the unincorporated county and in the incorporated cities, would result in a significant cumulative impact related to conflicts with VMT thresholds as the County's VMT threshold would not be met. The project's contribution would be a cumulatively considerable contribution, resulting in a significant and unavoidable cumulative impact related to VMT.
- **Impact UTL-2: Water Supplies.** Adoption and implementation of the proposed Sustainability Update could lead to development that could result in future increased demand for domestic water supplies, but two existing providers (City of Santa Cruz and Soquel Creek Water District [SqCWD]) may not have sufficient water supplies available to serve the development indirectly resulting from implementation of the Sustainability Update and reasonably foreseeable future development during normal, dry, and multiple years..
- **Cumulative Water Supplies Impact.** Cumulative development and growth within the service area of the SqCWD District could potentially result in a significant cumulative impact related to availability of adequate water supplies, and the project's contribution would be a cumulatively considerable contribution, resulting in a potentially significant and unavoidable cumulative impact related to water supplies for this water district.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The CEQA Guidelines require a discussion of significant irreversible environmental changes with project implementation, including uses of nonrenewable resources during the initial and continued phases of the project (Section 15126.2[c]). As described in Section 15126.2(c), uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts, such as those arising from highway projects that provide access to a previously inaccessible area, generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with a project.

Section 15127 further requires this discussion only for adoption of a plan, policy or ordinance by a public agency; the adoption by a Local Agency Formation Commission (LAFCO) of a resolution making determinations; and projects which require preparation of an Environmental Impact Statement under the

National Environmental Policy Act (NEPA). Since the proposed project is adoption of a general plan amendment, a discussion of significant irreversible changes is provided below.

According to Section 15126.2(d), a project would generally result in a significant irreversible impact if:

- The project would involve a large commitment of nonrenewable resources during initial and continued phases of the project;
- Primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve uses in which irreversible damage could result from environmental accidents; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Future development would result in the permanent and continued consumption of electricity, natural gas, and fossil fuels. Future development that is accommodated as a result of the proposed Sustainability Update would irretrievably commit nonrenewable resources to the construction and maintenance of buildings, infrastructure and roadways. Energy demands would result for construction, lighting, heating and cooling of residences, and transportation of people throughout the county. However, the consumption of these resources would not represent unnecessary, inefficient, or wasteful use of resources as explained in the analyses in Section 4.6, Energy, given the implementation of proposed policies and continued compliance with energy-efficient building regulations. A summary of the existing and proposed General Plan/LCP policies that serve to reduce energy and fossil fuel consumption is presented in Table 4.6-2 in Section 4.6, Energy.

As discussed in Section 4.6, although electricity and natural gas consumption in the county would increase with the proposed project, future development would be required to comply with the efficiency standards of the California Building Code (Title 24 Part 6 and Part 11), and the additional electricity and natural gas demand indirectly resulting from the proposed project would not be unusual or wasteful as compared to overall local and regional demand for energy resources. In addition, the proposed project includes a number of amended policies in the County's General Plan/LCP that seek to improve energy efficiency and encourage alternative energy, as summarized in Table 4.6-2, which would also serve to reduce/minimize energy consumption. Use of petroleum is expected to decrease over time, primarily due to advances in fuel economy and increased use of electric vehicles. For these reasons, electricity consumption of the proposed project would not be considered inefficient or wasteful, and impacts would be less than significant.

In addition, new structures will be required to be constructed in accordance with specifications contained in Title 24 of the California Code of Regulations. Anticipated changes in state building and energy efficiency requirements to help reduce greenhouse gas emissions will also reduce the rate of energy consumption increases. However, future construction activities would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil, natural gas, and gasoline) for automobiles and construction equipment.

Irreversible changes to the physical environment could occur from accidental release of hazardous materials associated with development activities. However, environmental accidents would be minimized with adherence to federal, state and local regulations as discussed in Section 4.9, Hazards and Hazardous Materials. Future development accommodated by the proposed Sustainability Update would be required to comply with all applicable federal, state and local laws regarding, transportation, storage, use and disposal of hazardous materials, which reduces the likelihood and severity of accidents that could result in irreversible environmental damage. Compliance with state and federal hazardous materials regulations would reduce the potential for accidental release of hazardous materials to a less-than-significant level.

No other irreversible changes or irreversible damages are expected to result from the adoption and implementation of the proposed project.

5.3 GROWTH-INDUCING IMPACTS

CEQA requires that any growth-inducing aspect of a project be discussed in an EIR. This discussion should include consideration of ways in which the project could directly or indirectly foster economic or population growth in adjacent and/or surrounding areas. Projects that could remove obstacles to population growth, such as expansion of major public services, must also be considered in this discussion.

According to CEQA Guidelines Section 15126.2(e), a project would have the potential to induce growth if it would:

- Remove obstacles to population growth (e.g., through the expansion of public services into an area that does not currently receive these services), or through the provision of new access to an area, or a change in restrictive zoning or land use designation; or
- Result in economic expansion and population growth through employment opportunities and/or construction of new housing.

The proposed General Plan/LCP would indirectly induce population, employment and economic growth by accommodating future development and growth and allowing for intensified development the County's Urban Services Line (USL). Adoption and implementation of the proposed Sustainability Update would not directly result in increased housing units or population. However, the proposed amendments to the General Plan/LCP include policies that support additional development and areas of increased intensification and density, in part due to recommendations set forth in the Sustainable Santa Cruz County (SSCC) Plan and the Pleasure Point Commercial Corridor Vision and Guiding Design Principles, the latter of which calls for transition and redevelopment of underutilized properties. The proposed amendments to the Santa Cruz County Code (SCCC) also include a new higher density residential zone district to implement the new proposed General Plan Residential-Urban High Flex (R-UHF) land use designation. The purpose of the Residential Flex (RF) zone district is to accommodate a greater intensity of residences along and near public transportation corridors within the County's USL, creating opportunities for infill housing.

As discussed in Section 4.13, Population and Housing, it is estimated that the proposed project could accommodate a potential increase of approximately 4,500 dwelling units between 2020 and 2040 with a corresponding population increase of approximately 11,340 new residents. This potential population and housing growth resulting from the project would slightly exceed the Association of Monterey Bay Area Governments (AMBAG) regional population and housing projections. However, the resulting population increase represents an annual average growth rate of approximately 0.4%, which is slightly higher than the AMBAG forecast annual average rate of 0.2% and an average annual rate of 0.3% based on existing 2020 population. The annual average growth indirectly resulting from the project would also be slightly higher than the 2021 and 2022 annual Measure J growth rate established by the County (0.25%), but less than the 2020 County-established annual growth rate of 0.5%.

The population projections resulting from the proposed project represent a maximum estimate between 2020 and 2040 for the purposes of analyses included in this EIR. Future development projects within the unincorporated area are subject to annual growth rates and residential building permit limits established by the County of Santa Cruz Board of Supervisors. However, even as a worst-case estimate, the average annual growth rate resulting from the proposed project (0.4%) is not substantially higher than forecast rates (0.2%) and the historical average annual growth rates of 0.3% experienced between 2010 and 2020 and 0.4% experienced between 1990 and 2000. Therefore, the proposed project would not induce substantial unplanned population growth in the unincorporated area of Santa Cruz County.

Development could occur under the existing General Plan/LCP without the proposed project. It is estimated that the project's contribution to potential future development and growth beyond what could be developed under the existing General Plan/LCP is approximately 1,590 housing units with a corresponding 4,000 residents, which represents an approximate 40-50% increase over existing adopted regional housing and population projections. However, future growth estimated to indirectly result from the project would be within historical and previously projected annual average growth rates. Therefore, while the proposed Sustainability Update could indirectly accommodate development of new housing and population growth, the project would not induce substantial unplanned growth in the unincorporated area of the county. Furthermore, for the purpose of this discussion, the State CEQA Guidelines indicate that it must not be assumed that growth is necessarily beneficial, detrimental or of little significance to the environment.

The proposed project also estimates an increase in non-residential development of approximately 6,200,500 square feet by the year 2040; see section 4.0.3 for further discussion. Thus, the project would indirectly accommodate economic growth through future development of new businesses and jobs, although some of this growth, approximately 50%, would occur under the existing General Plan/LCP without the proposed project.

CEQA Guidelines Section 15126.2(e) also require consideration of whether a project would have the potential to induce growth if it would remove obstacles to population growth (e.g., through the expansion of public services into an area that does not currently receive these services), or through

the provision of new access to an area. The proposed Sustainability Update does not include new or amended policies or regulations that would result in construction or expansion of major infrastructure or public facilities that could remove obstacles to growth. However, proposed policy revisions in the Agriculture, Natural Resources + Conservation (ARC) Element discourage, rather than prohibit, expansion of County-controlled sewer facilities onto agricultural lands in the absence of public health considerations for existing development (ARC-1.1.13). The proposed amendments would allow extension of sewer and water lines on commercial agricultural lands in the coastal zone, but only under specified circumstances that would require safeguards to ensure that such facilities would not result in the subsequent conversions of commercial agricultural lands to non-agricultural uses due to the utility extensions (ARC-1.1-14). These circumstances include water transmission lines along the North Coast to the City of Santa Cruz for irrigation and related agricultural uses, including limited agricultural employee/farmworker housing; sewer transmission lines to and from the City of Watsonville sewage treatment plant; water and sewer lines to serve existing development which has failing wells and/or sewage disposal systems; and placement of water and sewer lines that provide access to wastewater treatment and distribution facilities, if the purpose is to prevent saltwater intrusion, recharge groundwater basins, provide tertiary treated wastewater for agricultural uses and purposes; and/or provide service to other public/quasi-public uses and facilities as may be approved by the County (ARC-1.14). ARC-1.1.15 would, however, prohibit hookups to trunk lines through commercial agricultural lands and levying of assessment fees against commercial agricultural land for the construction of sewage transmission lines running through the commercial agricultural parcels. Thus, proposed policy revisions would not lead to indirect growth inducement (or conversion of agricultural lands) as a result of potential extension of water or sewer lines for protection of public health and safety and/or as part of recycled water projects.

The proposed project does include some new proposed road segments within the USL, primarily in the Live Oak, Soquel, and Aptos planning areas. These roads would be local linkages within existing neighborhoods, that in part would enhance pedestrian and bicycle circulation, and would not provide access to areas that are currently undevelopable due to lack of access.

The proposed project General Plan/LCP amendments support construction of specific water or wastewater facilities, and the proposed Parks, Recreation + Public Facilities Element of the General Plan/LCP supports water system improvements for storage, treatment, and distribution of water supplies. However, as discussed in Section 4.16, Utilities, such improvements are planned by individual water purveyors to support existing and future growth identified in their service areas.

Therefore, the proposed project would not directly or indirectly result in public service expansion or construction of new infrastructure improvements that would removal obstacles to growth.