5 CEQA Required Conclusions

This section presents a summary of the impacts of the proposed Visalia General Plan in several subject areas specifically required by CEQA, including significant irreversible environmental changes, significant unavoidable impacts, growth-inducing impacts, cumulative impacts, and impacts found not to be significant. These findings are based on the analysis provided in Chapter 3: Settings, Impacts, and Mitigation Measures.

5.1 Significant Irreversible Environmental Changes

CEQA Guidelines require the EIR to consider whether "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" (CEQA Guidelines Section 15126.2(c)). "Nonrenewable resource" refers to the physical features of the natural environment, such as land, waterways, etc. Irretrievable commitments of non-renewable resources associated with the proposed Visalia General Plan include:

AIR QUALITY

Increases in vehicle trips and traffic resulting from implementation of the proposed General Plan would potentially contribute to long-term degradation of air quality and atmospheric conditions in the region, other parts of California, and the Western United States. However, technological improvements in automobiles, as well as commercial and industrial machinery, may lower the rate of air quality degradation in the coming decades.

WATER CONSUMPTION

New development under the proposed Plan will increase the demand for public water. It would place a greater demand on the California Water Service Company (Cal Water), which derives its water from the supply wells that extract groundwater from the Kaweah Groundwater Sub-basin, to increase its water capacity. This increased demand for public water represents an irreversible environmental change.

ENERGY SOURCES

New development under the proposed Plan would result in increased energy use, in the form of new building energy use and transportation. Both residential and nonresidential development use electricity, natural gas, and petroleum products for power, lighting, heating, and other indoor and outdoor services, while cars use both oil and gas. Use of these types of energy for new develop-

ment would result in the overall increased use of nonrenewable energy resources. This represents an irreversible environmental change.

FARMLAND CONSUMPTION

Because the majority of the land in the Planning Area is farmland, any new development under the proposed Plan would result in a decrease in the amount of farmland. Just over half of the farmland within the Planning Area is classified as Prime Farmland. The proposed General Plan would result in the conversion of 33 percent of the existing Important Farmland within the Planning Area, which implies a permanent change in the use of the land. This conversion represents and irreversible environmental change.

CONSTRUCTION-RELATED IMPACTS

Irreversible environmental changes could also occur during the course of constructing development projects made possible by the proposed General Plan. New construction would result in the consumption of building materials, such as lumber, sand and gravel for construction. Some of these resources are already being depleted worldwide.

5.2 Significant Unavoidable Impacts

Significant unavoidable impacts are those that cannot be mitigated to a level that is less than significant. According to CEQA Guidelines 15126(b), an EIR must discuss any significant environmental impacts that cannot be avoided under full implementation of the proposed program. Chapter 3 identified the following significant unavoidable impacts when comparing the proposed Plan to existing conditions:

TRANSPORTATION

Buildout of the General Plan will result in added traffic on local transportation facilities. Certain facilities are already experiencing some congestion. Planned roadway system improvements, including widening major arterials, new bridge crossings, interchange improvements, and new road construction have been identified in the proposed General Plan to meet LOS "D" standards. Under the proposed General Plan, all local roadways and intersections would operate at LOS "D" standards or above. However, SR 198 would operate at an unacceptable LOS in the following segments:

- State Route 99 to Akers Street (LOS E)
- Akers Street to Mooney Boulevard (LOS F)
- Mooney Boulevard to Lovers Lane (LOS F)

Caltrans' 2012 Transportation Concept Report for SR 198 identifies a four-lane freeway to meet the year 2035 LOS D within the Planning Area, with an ultimate design (beyond 2035) being a six-lane freeway. As a six-lane freeway, SR 198 would provide acceptable LOS on these roadway segments. However, per the current Transportation Concept Report, the ultimate design condition for SR 198 would be implemented beyond 2035, after General Plan buildout in 2030. The widening is feasible—the right of way will accommodate an additional travel lane in each direction—but the timing of the improvement may need to be reconsidered as Visalia grows under the

proposed General Plan. Implementation of the improvements to SR 198 (a Caltrans facility) is the primary responsibility of Caltrans. The City will work with Caltrans to modify the SR 198 Transportation Concept Report to schedule needed improvements prior to General Plan buildout (Policy T-P-27), assuming that the forecasted growth and development in the Planning Area occurs and necessitates the widening within the planning period. However, because Caltrans has exclusive control over state route improvements, the City cannot guarantee that these improvements will be completed prior to General Plan buildout. Therefore, this impact is considered significant and unavoidable.

AIR QUALITY

Buildout of the proposed General Plan would facilitate development within the City that would allow additional residential units and commercial/office/industrial space by the year 2030 over existing conditions. Local and regional vehicle emissions and vehicle travel generated by future population growth associated with General Plan buildout would result in an increase in criteria pollutant emissions. Motor vehicles travelling throughout the Planning Area would result in emissions of ozone precursors (ROG and NO_X), CO, PM10, and PM2.5 emitted primarily as vehicle exhaust.

Net annual mobile source emissions in 2030 compared to existing conditions would exceed the significance thresholds for PM10 and PM2.5 as a result of increased dust raised from paved roadways with increased traffic, resulting in a significant impact. While this impact would be less under the proposed General Plan than under the No Project alternative (due to proposed General Plan buildout network resulting in lower VMT), the increase under the proposed General Plan relative to the existing conditions would result in a significant impact.

Policies within the proposed General Plan would help to reduce mobile source emissions by promoting mixed-use, transit-oriented development, alternative forms of transportation. It is likely that these policies would reduce trips and VMT beyond what is shown in the emissions modeling. However, without a quantitative analysis of reductions anticipated under the General Plan policies, there is insufficient data to determine whether operational emissions would be below SJVAPCD thresholds.

The City will implement a variety of policies designed to address air quality issues. Future compliance with SJVAPCD Rules and Regulations as part of environmental review for new master plan or specific plan areas, or for proposed development that is not consistent with earlier EIRs covering specific plan areas will also help to reduce air quality emissions associated with individual projects. However, total emissions associated with development of the proposed General Plan would still exceed SJVAPCD thresholds for PM10 and PM2.5. No additional feasible mitigation measures are currently available to reduce this impact to a less-than-significant level. Consequently, the impact remains significant and unavoidable.

AGRICULTURE

Loss of agricultural land as a result of the proposed General Plan, including the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use is expected to occur over the next 20 years. Under the proposed Plan, it is expected that 14,265

acres of Important Farmland would be converted to urban uses within the Planning Area. The total amount of acres to be converted under the proposed Plan includes 12,490 acres of Prime Farmland, 44 acres of Unique Farmland, 399 acres of Farmland of Statewide Importance, and another 1,333 acres of Farmland of Local Importance. Prime Farmland currently accounts for 51 percent of the Planning Area, but will account for 86 percent of the total converted farmland, while all other categories would account for less than 10 percent each, meaning a disproportionately higher loss of Prime Farmland compared to any other type. Despite the significant impacts on farmland, the proposed Plan is being offered in order to provide for the expected growth in Visalia over the next 20 years. The conversion of farmland as a result of the proposed General Plan is essential for this projected growth expected to occur under the proposed Plan.

The proposed General Plan includes policies that limit the conversion of Important Farmland areas to the minimum extent needed to accommodate long-term growth, and phasing development in such a way that prevents the possibility of reducing the viability of remaining farmland. However, because agriculture is an important economic aspect for Visalia and for Tulare County, multiple policies are identified in the proposed General Plan to prevent excessive agricultural land conversion, including prioritizing infill development within the existing city limits, clear phasing of growth, compact development in new growth areas, and the continuation of most agricultural activities in the Planning Area. The significant impacts related to the conversion of Important Farmland under the proposed General Plan would not be considerably different under any other likely growth scenario for Visalia that accommodates planned approved residential and non-residential development proposed for the city.

NOISE

Noise resulting from vehicles, trains, and stationary operations are expected to increase as a result of the proposed General Plan. Increases are expected to occur along major roadways in the city. It is expected that noise sensitive land uses will experience an increase in noise that results in noise in excess of standards found in the existing Visalia General Plan Noise Element. Implementation of the proposed Plan is expected to increase noise traffic noise levels on 11 specific roadway segments (as described in Chapter 3.10, Noise). However, the actual level of impact will depend on the presence and location of existing or proposed land uses and barriers in relation to the noise source resulting from increased traffic levels. Potential impacts as a result of increased traffic noise are considered significant and unavoidable.

HYDROLOGY AND FLOODING

The majority of the Visalia is subject to potential dam inundation in the event of failure of the Terminus Dam, owned and operated by the U.S. Army Corps of Engineers. While there is a low probability of failure of the Terminus Dam, the dam inundation area is designated for residential, commercial, industrial and public uses, which could expose people and structures to flooding risk. As placing a moratorium on development, requiring new houses and structures to be raised, raising the ground level, or moving existing structures in at-risk areas are considered infeasible, this impact is considered significant and unavoidable.

5.3 Growth-Inducing Impacts

An EIR must examine the potential growth-inducing impacts of the proposed General Plan. More specifically, CEQA Guidelines require that the EIR "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly" (CEQA Guidelines Section15126.2(d)). This analysis must also consider the removal of obstacles to population growth, such as improvements in the regional transportation system.

Growth-inducing impacts, such as those associated with job increases that might affect housing and retail demand in other jurisdictions over an extended time period, are difficult to assess with precision, since future economic and population trends may be influenced by unforeseeable events, such as natural disasters and business development cycles. Moreover, long-term changes in economic and population growth are often regional in scope; they are not influenced solely by changes or policies related to a single city or development project. Business trends are influenced by economic conditions throughout the state and country, as well as around the world.

Another consideration is that the creation of growth-inducing potential does not automatically lead to growth. Growth occurs through capital investment in new economic opportunities by the private or public sector. These investment patterns reflect, in turn, the desires of investors to mobilize and allocate their resources to development in particular localities and regions. These and other pressures serve to create policy. These factors, combined with the regulatory authority of local governments, mediate the growth-inducing potential or pressure created by a proposed plan. Despite these limitations on the analysis, it is still possible to qualitatively assess the general potential growth-inducing impacts of the proposed Plan.

PROJECTED GROWTH

Population

The Planning Area will accommodate a population of approximately 210,000 people at buildout, an increase of 68 percent over the 2010 population of 124,440.[1] This represents an average annual growth rate of 2.6 percent.

Urban Development Boundary and Urban Growth Boundary

The General Plan establishes a three-tier growth boundary system to define stages of future development. The Tier I Urban Development Boundary (UDB) includes slightly over half of the potentially developable land under the Plan, and accommodates a population of approximately 160,000. Tier I includes the City limits, County islands (excepting the West 198 scenic corridor), and the following additional areas currently outside of City jurisdiction: R.J. Hill property, Sierra Village property, Kaweah Delta Hospital property (southwest corner of Lovers Lane and Caldwell Avenue), future East Visalia City Park, all regional commercial designated land along Mooney, all

[1] US Census Bureau, 2010.

currently-designated industrial land within the current 129,000 UDB, 320 acres of industrial-designated land on north side of Riggin Avenue between Kelsey Street and Shirk Road.

Tier II UDB is the original Tier I recommended by the General Plan Update Review Committee (GPURC). Tier II is intended to accommodate roughly ten years' worth of growth, and support an estimated population of approximately 178,000. With buildout to the UDB, the City would grow to 27,936 acres. The criterion for land in Tier II to become available for annexation and development is that such activity shall only occur if it does not result in excess of a 10-year supply of undeveloped residential land within the new Tier I. This is intended to be consistent with LAFCO policies discouraging residential annexations exceeding a 10-year housing inventory. Thus, Tier II is distinguished from the GPURC-recommended Tier I in that it is not based on projected capacity and need, but rather on a requirement to be able to demonstrate that less than a ten year inventory of residential land exists.

Tier III represents the overall Urban Growth Boundary, and comprises full buildout of the General Plan at 32,648 acres and could support a target buildout population of 210,000, with growth occurring in a balanced way in all quadrants. The overall urban footprint would cover 49 percent of the Planning Area, meaning that half of the Planning Area is expected to remain primarily agricultural through the planning period. The expansion criteria for land in Tier III is that land would only become available for development when building permits have been issued in Tier I and Tier II at the following levels:

- Residential: after permits for 12,800 housing units have been issued, resulting in a target City population in Tier I of 178,000;
- Commercial: after permits for 960,000 square feet of commercial space have been issued; and
- Industrial: after permits for 2,800,000 square feet of industrial space have been issued.

Public Services, Facilities, and Utilities

The Planning Area is located in an area that is mostly agriculture and rural residential land, and is served by existing roadways, utility infrastructure, and service systems. California Water Service Company (Cal Water) provides water distribution to the city. Cal Water's Urban Water Management Plan (UWMP) determined that the existing resources are considered adequate to meet the projected demand under the proposed Plan. The City owns and operates a Water Conservation Plant (WCP) to serve sanitary sewer needs. With the proposed 2014 upgrades to the WCP processing capabilities, the WCP has sufficient capacities to process the expected flows from land use in the proposed Plan and would expand its treatment capacity as needed.

Solid waste generated by the future residents is disposed of through the refuse collection service provided by the city. Recyclable material is processed by Sunset Waste Systems, which has a contract with the city. Waste from Visalia is diverted into one of the three county landfills, including the Visalia landfill northwest of Visalia. Although these sites are nearing capacity and will reach their permitted ceased operation dates before buildout, the County is undertaking efforts to expand the landfills and extend their lifespans. Expansion plans are currently in development and revised permits would be issued upon their completion.

The Visalia Police Department, the Visalia Fire Department, Visalia Unified School District (VUSD), and the City of Visalia Parks and Recreation Department, provide police, fire, school and parks and recreation services, respectively. Police and fire stations would be constructed as needed to maintain service levels in proportion to population growth. Using VUSD's targets for school capacity and State guidelines for determining space needs, Visalia will need 22 new elementary, middle, and high schools in total. The proposed Plan includes policies that ensure that VUSD and other districts provide facilities as needed. The proposed Plan also provides for an additional 441 acres of parkland, for a total of 1,057 acres to maintain the current (and proposed) parkland ratio of 5.0 acres per 1,000 residents.

Jobs/Employment Balance

Jobs/employment balance is defined as the ratio of the number of jobs to the number of employed residents in a given area. Visalia's jobs to employed residents ratio would be 1:1 if the number of local jobs in the City equaled the number of employed residents. In theory, a perfect 1:1 ratio could result in no one commuting in or out of the City to find work. In reality, this balance is more of a planning technique than a regulatory tool, and successful plan implementation must ultimately recognize the myriad considerations that influence where people choose to live and work.

The current jobs to employed residents ratio in Visalia is estimated to be 1.25, which means the City is a regional jobs center, supplying jobs to both local residents and workers from outside the City. The proposed Plan is projected to add jobs at a slightly slower rate than it adds new residents. With the labor force participation rate assumed to stay the same, the jobs/employment ratio may be expected to fall slightly to 1.12 at buildout, thereby bringing the City closer to a balance.

Indirect growth-inducing impacts such as those associated with job increases that might affect housing and retail demand in other jurisdictions over an extended time period are difficult to assess with precision, since future economic trends may be influenced by unforeseeable events, such as natural disasters and business and development cycles. Moreover, long-term changes in economic and population growth are often regional in scope; they are not influenced solely by changes or policies in Visalia. The General Plan seeks to create a balanced community, with retail uses, parks, and other features to accommodate population growth, and thus will not induce growth or lead to growth pressure or pressure on services in surrounding communities.

5.4 Cumulative Impacts

CEQA requires that the EIR examine cumulative impacts. As discussed in CEQA Guidelines Section 15130(a)(1), a cumulative impact "consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." Furthermore, the analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall "reflect the severity of the impacts and their likelihood of occurrence" (CEQA Guidelines Section 15130(b)). In order to assess cumulative impacts, the EIR must analyze either a list of past, present, and probable future projects or a summary of projections contained in an adopted general plan or related planning doc-

ument. In conducting the analysis for this EIR, population and employment projections for the City of Visalia and the adjacent unincorporated areas were reviewed.

CUMULATIVE ANALYSIS PROVIDED IN CHAPTER 3

It is important to note that several analyses presented in Chapter 3 represent cumulative analyses of issues over the General Plan time horizon to 2030 because they combine the anticipated effects of the proposed General Plan with anticipated effects of regional growth and development. Issue areas for which Chapter 3 analyses are specifically cumulative include transportation, air quality, energy and greenhouse gases, and noise, because the project-specific effects cannot reasonably be differentiated from the broader effects of regional growth and development. The cumulative conclusions are summarized there, and where applicable, significant unavoidable impacts listed above in Section 5.2.

Other cumulative impacts are identified below and within the relevant sections of Chapter 3.

OTHER CUMULATIVE IMPACTS

For some issue areas evaluated as direct impacts in Chapter 3, concurrent implementation of the proposed Plan, along with regional growth and development, may result in cumulative impacts such as:

Cumulative Changes to Land Use Character

Land use changes that would alter the scale, density, and character of urban areas and neighborhoods could change the visual character of many areas in the region, especially where development would occur on in existing rural or agricultural lands.

Within Visalia City limits, Visalia's General Plan is not required to maintain consistency with the Tulare County General Plan. However, in order to promote effective and orderly management of urban development along growth boundaries at the edges of the city, the two plans should conflict as little as possible. The proposed General Plan is generally consistent with the Tulare County General Plan, and many of its policies are supportive of the County Plan's goals, as described in Section 3.1.

There is an overlap in the planning areas of the proposed General Plan and the County's General Plan in relation to numerous unincorporated County "islands." However, no land use changes are proposed for these areas, and their policies are consistent with existing County policies. The areas are within the City's LAFCO-approved Sphere of Influence and may be annexed by the City in the future. The proposed Plan's Sphere of Influence does not overlap with those of any other surrounding jurisdictions.

Due to the proposed Plan's goal to maintain and enhance Visalia's visual qualities and small-town characteristics, and attention to preserving visual compatibility with existing development through policies and land use, the contribution to this potentially significant cumulative impact is less than cumulatively considerable.

Cumulative Effects on Hydrology

Future development associated with projected population growth in the county will result in increased impervious surfaces within the county's watersheds, which will result in hydrologic impacts associated with absorption rates, drainage patterns, or rates of surface runoff. The construction of new development, as well as some redevelopment activities, could result in the conversion of natural vegetated pervious groundcover to impervious surfaces such as paved highways, streets, rooftops, and parking lots. Unlike natural vegetated soils, conventional pavement and concrete cannot absorb rainwater. The introduction of new or expanded impermeable surface areas can potentially affect absorption rates, drainage patterns, or the rate of surface runoff. The infill and redevelopment that would be likely to occur under the proposed General Plan could have impacts on existing absorption rates, drainage patterns, or the rate of surface runoff, and could also result in hydrological impacts.

Unless improvements to drainage conditions are undertaken, increased development could contribute to increased risk of storm flooding in these newly developed areas. If the City does not design storm drainage systems to handle adequate stormwater flows during sufficient peak storm events, then flooding would occur from build-out. However, due to Plan policies designed to improve stormwater management, the proposed Plan's contribution to this potentially significant cumulative impact is less than cumulatively considerable.

Cumulative Effects on Water Quality

The majority of water bodies in the region are located in multiple jurisdictions. As a result, water pollution produced by urban development in one jurisdiction can result in water quality impacts that affect other jurisdictions or the entire water basin. Implementation of the proposed General Plan would include policy provisions as well as compliance with the city's Grading and Drainage Ordinance, which would reduce the city's contribution to cumulative water quantity and quality impact to a less than cumulatively considerable level. This impact is also mitigated through the requirements of the Central Valley RWQCB, which address the use of water quality and quantity control through design measures and use of BMPs. Effective BMPs relate to site preparation, runoff control, sediment retention, and other similar features. The effectiveness of BMPs has been recognized in the California Stormwater Quality Association and California Stormwater Best Management Practice Handbooks.

Therefore, with adherence to the existing regulatory requirements regarding stormwater control and the policies identified above, the cumulative contribution of the proposed General Plan is less than cumulatively considerable.

Cumulative Effects on Biological Resources

Tulare County's population is expected to increase in coming years, which could result in a decrease in habitat for native flora and fauna, increased indirect effects such as noise disturbance, increased night lighting, harassment from pets, increased mortality from automobiles, and increased fragmentation of habitat. Visalia contains habitat for several special-status plants, invertebrate, amphibian, reptile and mammal species, and will experience population growth, which has the potential to cause the loss of sensitive habitat areas. As the region continues to grow, these losses will increase in importance as natural habitat areas become scarcer. These habitat losses can

cause cumulative adverse impacts on special-status species and protected wetlands and other waters that occur in the region.

This analysis evaluates whether the impacts of development under the proposed Plan, together with the impacts of other development, would result in a cumulatively significant impact on special-status species, wetlands and other waters of the U.S., or other biological resources protected by federal, state, or local regulations or policies (based on the significance criteria and thresholds presented earlier). It then considers whether the incremental contribution of the proposed Plan to this cumulative impact would be considerable. Both conditions must apply in order for a project's cumulative effects to rise to the level of significance. The geographic context for analysis of cumulative impacts to biological resources includes sites within and adjacent to the Planning Area.

Actions undertaken under the proposed General Plan, and other future projects within the cumulative geographic context, would be required to comply with local, State, and federal laws and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts on biological resources, including wetlands, other waters of the U.S., and special-status species.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the proposed General Plan policies (as outlined in the impact analyses above) and compliance with federal, state, and local regulations would preclude incremental biological resources impacts. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

Future discretionary projects proposed under the proposed General Plan would be required to protect sensitive habitat areas and special status species and demonstrate that they will not have significant effects on these biological resources, although it is possible that some projects may be approved despite having significant and unavoidable impacts on biological resources. However, with implementation of proposed General Plan policies and adherence to existing regulatory requirements protecting biological resources, the cumulative contribution of the proposed General Plan is less than cumulatively considerable.

Cumulative Increases in Hazardous Materials

Projected population and employment growth in Tulare County and in the Planning Area would increase the number of people potentially exposed to impacts from hazardous materials transportation safety, the increased use of hazardous household, commercial, and industrial materials, as well as a cumulative increase in exposure to risk associated with accidental release of hazardous materials into the environment. However compliance with City, State, and federal regulations pertaining to the production, use, and transportation of hazardous materials would apply to development countywide; therefore, the proposed Plan's contribution to this potential cumulative impact is less than cumulatively considerable.

Cumulative Effects on Historical Resources

Because the accommodation of future growth also constitutes a likelihood that future development will encounter challenges associated with known and unknown historic resources, there is the possibility of cumulative impacts to historical resources in the future in the context of regional growth and development. Future development associated with projected population growth would involve ground-disturbing activities such as grading or excavation with the potential to result in impacts to historic and/or archaeological resources or prehistoric human remains. In addition, development within the county could involve impacts associated with the substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, and sites. Archaeological resources and prehistoric human remains may be difficult to detect prior to construction activities, as they are generally located below the ground surface. The potential to affect important archaeological sites and prehistoric human remains exists if a development activity requires even minimal grading and/or excavation. The likelihood of encountering archaeological resources is greatest on sites that have been minimally excavated in the past, such as undeveloped parcels or vacant lots. The City of Visalia cannot be sure that all cumulative impacts on such historical resources can be reduced to less than significant levels. Consequently, the proposed Plan has the potential to contribute to cumulative impacts to these historic resources. However, with implementation of proposed Plan policies and state and federal law, as described in Section 3.12 (Cultural Resources), the proposed Plan's contribution to this significant cumulative impact is less than cumulatively considerable.

The types of cumulative impacts described above are not limited to the Planning Area; rather, they are characteristic of any area that is experiencing population and employment growth.

5.5 Impacts Found Not to Be Significant

CEQA requires that an EIR provide a brief statement indicating why various possible significant impacts were determined to be not significant. Chapter 3 of this EIR discusses all potential impacts, regardless of their magnitude. A similar level of analysis is provided for impacts found to be less than significant as impacts found to be significant. Significance of an impact is assessed in relation to the significance criteria provided in each section in Chapter 3. A summary of all impacts is provided in the Executive Summary of this EIR.

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