

ATTACHMENT D

FINDINGS and STATEMENT OF OVERRIDING CONSIDERATIONS

Introduction

The California Air Resources Board (CARB), as the lead agency for the *Proposed SB 375 GHG Emissions Reduction Targets* (Target Update), prepared a Draft Environmental Analysis (EA) in accordance with its certified regulatory program (Cal. Code Regs., tit. 17, §§ 60000 – 60008) to comply with the requirements of the California Environmental Quality Act (CEQA) (Pub. Resources Code, §21000, *et seq.*). The Draft EA, entitled *Draft Environmental Analysis prepared for the Proposed SB 375 GHG Emissions Reduction Targets*, and included as Appendix E to the Target Update, provided an analysis of the potential environmental impacts associated with the measures recommended to achieve the targets in the Target Update. Following circulation of the Draft EA for a 45-day public review and comment period from June 13, 2017, through July 28, 2017, CARB prepared the *Final Environmental Analysis prepared for the Proposed SB 375 GHG Emissions Reduction Targets* (Final EA) which includes minor revisions to the Draft EA. While minor modifications have been made to the Final EA to ensure it reflects the proposed project as accurately as possible, these changes merely clarify, amplify, or make insignificant modifications to the otherwise-adequate Draft EA. Therefore, there is no significant new information that would require the Final EA to be recirculated. The Final EA was posted on CARB's webpage on March 09, 2018. This statement of findings and overriding considerations was prepared to comply with CEQA's requirement to address the environmental impacts identified in the Final EA. (Pub. Resources Code, §§ 21081, 21081.6, Cal. Code Regs, tit. 14, §§ 15091, 15093.)

This Final EA provides a programmatic analysis of the potential for adverse environmental impacts associated with implementation of the Target Update and describes feasible mitigation measures for identified significant impacts. The level of analysis in the Final EA reflects that the project is a State-level planning document that recommends measures to reduce greenhouse gas (GHG) emissions to achieve the SB 375 targets, and its approval does not directly lead to any adverse impacts on the environment. As described in Chapter 4 of the Final EA, implementation of the recommended measures in the Target Update may indirectly lead to adverse environmental impacts as a result of reasonably foreseeable compliance responses. Therefore, the Final EA discloses the potential significant adverse impacts and beneficial impacts of the reasonably foreseeable compliance responses for implementing the Target Update based on currently available information, without being speculative. The EA impact discussion includes, where relevant, construction-related effects, operational effects of new or modified facilities, and influences of the recommended measures on GHG and air pollutant emissions. Because the specific location, extent, and design of potential new and/or modified facilities cannot be known at this time, the impact discussions reflect a conservative assessment to describe the type of effects that may occur. These impact discussions are followed by the types of mitigation measures that could typically be required to reduce potentially significant environmental impacts. It is expected that many of these identified potentially significant impacts can be feasibly avoided or mitigated to a less-than-significant level either when the specific measures are designed and evaluated (e.g., during the rulemaking process) or through any project-specific approval or

entitlement process related to compliance responses, which typically requires a project-specific environmental review. Nonetheless, in the interest of informed decision making, the Final EA takes a conservative approach for CEQA compliance purposes. Namely, to avoid any risk of understating an impact at this early planning stage, the Final EA presents conclusions for post-mitigation significance of these indirect impacts as significant and unavoidable where there is the possibility that feasible mitigation either may not be sufficient or there is some risk it may not be implemented by third parties with the authority to approve actions undertaken as foreseeable compliance responses.

Collectively, across all categories, the Final EA concluded that the reasonably foreseeable compliance responses associated with implementation of the measures recommended to achieve the targets in the Target Update could result in the following short-term and long-term impacts: beneficial long-term impacts to greenhouse gas emissions reductions; less-than-significant impacts to energy demand, greenhouse gas emissions, land use planning, mineral resources, population and housing, public services, and recreational services; and potentially significant and unavoidable adverse impacts to aesthetics, agriculture and forest resources, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use planning, noise, population and housing, public services, transportation/traffic, and utilities and service systems. The potentially significant and unavoidable adverse impacts are disclosed for both short-term, construction-related activities and long-term operational activities, which explains why some resource areas are identified above as having both less-than-significant impacts and potentially significant impacts.

CARB's certified regulatory program requires that before adoption of an action for which significant adverse environmental impacts have been identified during the review process, CARB consider feasible mitigation measures and alternatives that could substantially reduce the impacts. (Cal. Code Regs, tit. 17, §60006.) CEQA places the burden on the approving agency to affirmatively show that it has considered feasible mitigation and alternatives that can lessen or avoid identified impacts through a statement of findings for each identified significant impact. (Pub. Resources Code, §21081.) CEQA Guidelines section 15091 provides direction on the content of the statement of findings. That section states that one or more of the following findings should be identified for each impact:

- Changes or alterations have been required in, or incorporated into, such projects which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency, or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the environmental impact report.

The potential adverse impacts identified in this programmatic level EA are potential indirect impacts associated with the compliance responses reasonably foreseeable in response to

implementing the measures recommended in the Target Update based on currently available information. The authority to determine site- or project-specific impacts of projects carried out by third parties and the ability to require feasible mitigation lies with those agencies with authority to approve such actions, e.g., local permitting authorities in city or county governments and local air districts. CARB does not have the ability to determine with any specificity the project level impacts, nor the authority to require project level mitigation for these types of actions in approving the Target Update, as discussed in the findings below.

An agency may approve a project with unavoidable (unmitigated) adverse environmental impacts. When doing so, CEQA requires the agency to make a statement in the record of its views on the ultimate balancing of the merits of approving the project despite the environmental impacts in a “statement of overriding considerations” (Pub. Resources Code, §21081(b); Cal. Code Regs, tit. 14, §15093.) The following presents the Board’s statement of findings for each significant adverse impact identified in the Final EA, accompanied by a brief explanation, and its statement of overriding considerations.

STATEMENT OF FINDINGS

The Board has independently reviewed and considered the entire record, including the information contained in the Final EA, public testimony, written comments received, and the written responses to environmental comments, all of which are hereby incorporated by reference. The Board makes the following written findings for each significant adverse impact identified, accompanied by a brief explanation of the rationale for each finding. These findings are supported by substantial evidence in the record.

Aesthetics

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant short-term construction-related impacts and long-term operational impacts on aesthetic resources. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-

emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

The Final EA includes Mitigation Measures 1-1 and 1-2, which identify existing statutes and regulations and operating permit requirements, as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measures 1-1 and 1-2 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measures 1-1 and 1-2 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the Final EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Agriculture and Forest Resources

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant short-term construction-related impacts and long-term operational impacts on agriculture and forest resources. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur

to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measure 2-1, which identify existing statutes and regulations and construction and operating permit requirements as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measure 2-1 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measure 2-1 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Air Quality

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant short-term construction-related impacts and long-term operational impacts on air quality resources and odor impacts. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation

Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measures 3-1, 3-2 and 3-3, which identify existing statutes and regulations and construction and operating permit requirements, as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measures 3-1, 3-2 and 3-3 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measures 3-1, 3-2 and 3-3 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Biological Resources

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant short-term construction-related impacts and long-term operational impacts on biological resources. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and

facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measures 4-1 and 4-2, which identify existing statutes and regulations and construction and operating permit requirements, as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measures 4-1 and 4-2 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measures 4-1 and 4-2 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Cultural Resources

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant short-term construction-related impacts and long-term operational impacts on cultural resources. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measure 5-1, which identifies existing statutes and regulations and construction and operating permit requirements, designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measure 5-1 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measure 5-1 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative

approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Geology and Soils

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant short-term construction-related impacts and long-term operational impacts on geology and soil resources. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measures 7-1 and 7-2, which identify existing statutes and regulations and construction and operating permit requirements, as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measures 7-1 and 7-2 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measures 7-1 and 7-2 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of

mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Hazards and Hazardous Materials

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant short-term construction-related impacts and long-term operational impacts on hazards and hazardous materials. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measure 9-1, which identify existing statutes and regulations and construction and operating permit requirements, as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measure 9-1 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation

Measure 9-1 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Hydrology and Water Quality

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant short-term construction-related impacts and long-term operational impacts on hydrology and water quality. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measures 10-1, and 10-2, which identify existing statutes and regulations and construction and operating permit requirements, as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the

authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measures 10-1, and 10-2 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measures 10-1, and 10-2 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Land Use Planning

Finding and Explanation

The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

Localized implementation of specific land use and transportation projects or programs included in future RTP/SCSs under the Target Update could result in variety of localized adverse effects, such as the conversion or modification of natural and working lands, adverse effects on sensitive species or habitat, long-term erosion effects, adverse effects on local or regional water resources, long-term water quality deterioration associated with erosion and run-off, and, other effects. New roadways or transit projects could also have the potential to divide or displace an existing community, depending on the nature or configurations of future alignments. The specific environmental effects associated with land use changes are considered in their respective sections of the Final EA. Potential indirect environmental effects associated with land use change on agriculture and forestry, biology, geology and soils, and hydrology and their related mitigation measures are discussed in further detail throughout this document under Agricultural and Forest Resources; Biological Resources; Geology, Seismicity, and Soils; and Hydrology and Water Quality. Potential indirect effects related to the displacement of housing and people from land use projects are discussed under Population and Housing.

Noise

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant short-term construction-related impacts and long-term operational impacts on noise resources. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measures 13-1 and 13-2 which identify existing statutes and regulations and construction and operating permit requirements, as well as other recognized

practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measures 13-1 and 13-2 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measures 13-1 and 13-2 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Population and Housing

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant long-term operational impacts on population and housing. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure

modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle (v2v) and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measure 14-1, which identifies existing statutes and regulations and construction and operating permit requirements, as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measure 14-1 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measure 14-1 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Public Services

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant long-term operational impacts on public services. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-

emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measure 15-1, which identifies existing statutes and regulations and construction and operating permit requirements, as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measure 15-1 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measure 15-1 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Transportation and Traffic

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant short-term construction-related impacts and long-term operational impacts on transportation and traffic resources. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes,

parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle [v2v] and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measures 17-1 and 17-2, which identify existing statutes and regulations and construction and operating permit requirements, as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measures 17-1 and 17-2 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measures 17-1 and 17-2 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Utilities and Service Systems

Finding and Explanation

The Final EA found that the reasonably foreseeable actions associated with implementation of the Target Update could result in potentially significant long-term operational impacts on utilities and service systems. The reasonably foreseeable compliance responses associated with the Target Update include construction and operation of infill, high-density residential, and mixed-use development; focused growth in Transportation Priorities Areas (TPAs); and, expansion of associated infrastructure and facilities, which could result in the demolition of existing structures. Regional and local planning documents (e.g., general plans, specific plans) could be amended to include programs to preserve rural agricultural and open space. Increased funding for transit could include construction and operation of new transit (e.g., light-rail) routes and stations. Use of Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies could require the installation of

metering, traffic calming (e.g., roundabouts), and park-and-ride lot infrastructure, as well as modifications to existing roadways to support managed lanes. Toll-related infrastructure could be constructed to implement pricing programs. Modifications or expansions to existing roadways could occur to support redevelopment of streets and pedestrian- and bicycle-related facilities (e.g., lanes, parking, greenbelts). Construction of public and individual electric charging and hydrogen fueling infrastructure to support low-emission transit, automobiles, and light-duty trucks could be directly and indirectly incentivized through funding for infrastructure, and vehicle rebate, last-mile delivery, and neighborhood electric vehicle (NEV) programs. Increased use of low-emission vehicles (e.g., battery electric vehicles [BEVs], plug-in hybrid electric vehicles [PHEVs], zero emission vehicles [ZEVs]) could produce an elevated rate of battery disposal such that new or modified facilities would be required to accommodate recycling of lithium-ion batteries. Roadway infrastructure modifications could be needed to support autonomous vehicles (AVs) and expansion of intelligent transportation systems (e.g., vehicle-to-vehicle (v2v) and vehicle-to-infrastructure [v2i] software).

The EA includes Mitigation Measure 18-1, which identifies existing statutes and regulations and construction and operating permit requirements, as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measure 18-1 is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measure 18-1 should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the authority and responsibility to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource.

Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the proposed actions in the Target Update would be potentially significant and unavoidable. This impact is overridden by the project's benefits as set forth in the statement of overriding considerations.

Cumulatively Considerable Impacts

The EA concluded the Target Update could result in a cumulatively considerable contribution to significant cumulative impacts to aesthetics, agricultural and forest resources, air quality and odor impacts, biological resources, cultural resources, hydrology and water quality, noise, population and housing, public services, transportation and traffic, and utilities and service systems. While suggested mitigation is provided within the respective resource areas of the EA analyses that could address the contribution of the Target Update to each of these potentially cumulatively considerable impacts, the Board finds that because these adverse impacts are potential indirect impacts associated with the compliance responses of covered

entities, the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Public agencies with authority can and should implement the identified measures to the degree feasible. Consequently, while cumulative impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the cumulatively considerable contribution of the Target Update to existing significant cumulative impacts to aesthetics, agricultural and forest resources, air quality and odor impacts, biological resources, cultural resources, hydrology and water quality, noise, population and housing, public services, transportation and traffic, and utilities and service systems to be potentially significant and unavoidable.

Findings on Alternatives to the Project

In addition to the No-Project Alternative, the EA considered a reasonable range of potentially feasible alternatives that could potentially reduce or eliminate the significant adverse environmental impacts associated with the Target Update, while accomplishing most of the basic project objectives.

The Board finds the alternatives analysis is sufficient to inform the Board and the public regarding the tradeoffs between the degree to which the alternatives could reduce environmental impacts and the corresponding degree to which the alternatives could achieve the project objectives. Further, the Board finds that none of the alternatives discussed in the Final EA is clearly environmentally superior, and the discussion of the environmental advantages and disadvantages of each alternative in comparison to the proposed scenario is sufficient to inform the Board of alternative options under CEQA.

Based upon a full evaluation of the alternatives, and the entirety of the record, the Board finds that adoption and implementation of the Target Update is the most desirable, feasible, and appropriate action for achieving the objectives of the project, and the Board rejects the other alternatives because they either fail to meet most project objectives, or are infeasible based on consideration of the relevant factors identified in the EA and briefly described below:

Alternative 1: No Project Alternative

Alternative 1 in the EA describes a reasonably foreseeable scenario if CARB did not approve the Target Update. Under the No-Project Alternative, the Target Update would not be adopted. CARB's existing targets would continue to be implemented.

It is not clear that it would be legally feasible for CARB to implement the No-Project Alternative. First, SB 375 requires that CARB take action to update the targets every 8 years. Further, in April 2015, Governor Brown issued Executive Order B-30-15 to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. In doing so, the Governor called on California to pursue a new and ambitious set of strategies, in line with the five climate change pillars from his inaugural address to reduce GHG emissions and prepare for the unavoidable impacts of climate change. In order to develop a clear plan of action to achieve the State's goals, the Executive Order called on CARB to update the AB 32 Climate Change Scoping Plan to incorporate the 2030 target. In summer 2016, the Legislature affirmed the importance of addressing climate change through passage of SB 32 (Pavley,

Chapter 249, Statutes of 2016), which codified into statute the 2030 GHG reduction target contained in Executive Order B-30-15. The proposed Strategy for Achieving California's 2030 Greenhouse Gas Target reflects the 2030 target and would serve as the framework to define the State's climate change priorities for the next 13 years and beyond. The proposed Strategy for Achieving California's 2030 Greenhouse Gas Target includes a reduction of vehicle miles traveled (VMT) that is to be achieved at least in part by increasing the stringency of the regional per capita GHG targets for SCSs for 2035 as part of the statewide strategy to achieve the 2030 statewide emissions target. Therefore, CARB would be violating these legal mandates if it chose the No-Project Alternative.

The Board finds that this alternative fails to meet the project's objectives of updating targets to reflect the latest information on State GHG-reduction measures and technical data, tools, and methods; would not foster increased co-benefits relative to existing conditions, and would not encourage further innovation, action, and planning toward more sustainable communities compared to existing condition.; and most importantly, would not help to attain SB 32 GHG targets. Furthermore, adoption of the No Project Alternative does not create an environmentally advantageous outcome because as part of the MPOs' regular SCS reevaluation and update processes, they may find that implementing the existing targets may involve implementing or expanding existing strategies discussed and including some of the potential new GHG reduction strategies identified in the Final EA. Therefore, it is foreseeable that impacts discussed in Chapter 4 of the Final EA could occur even under the No Project Alternative. Further, implementation of some of those strategies could occur as a result of requirements required by other statutes or because of commitments in existing plans or ones under development for other purposes. For this reason, the Board rejects this alternative.

Alternative 2: Re-Adoption of Existing Targets Alternative

Under Alternative 2, CARB would consider all information and conclude that no changes should be made to the existing targets for each MPO, and take action to re-adopt the existing targets that were established in 2010 for each MPO for 2020 and 2035. Alternative 2 would result in potential adverse environmental impacts that are similar to those described in Chapter 4 of the Final EA, but to a lesser degree because emissions reduction targets and actions needed to achieve them would not be as stringent as proposed for the Target Update. Potential impacts include those resulting from short-term construction and long-term operational impacts that may occur as a result of activities carried out in response to regulations or programs enacted to implement the recommended targets. As described in Chapter 4 of the Final EA, the resource areas affected include: aesthetics; agricultural and forest resources; air quality; biological resources; cultural resources; geology, seismicity, and soils; greenhouse gases; hazards and hazardous materials; hydrology and water quality; noise; population and housing; public services; transportation and traffic; and utilities and service systems.

The Board finds that Alternative 2 would not meet the project's objectives of updating targets to reflect the latest information on State GHG-reduction measures and technical data, tools, and methods; would not foster increased co-benefits relative to existing conditions, and would not encourage further innovation, action, and planning toward more sustainable communities compared to existing condition.; and most importantly, would not help to attain SB 32 GHG targets. Thus, this alternative may not feasibly meet objectives related to the

purpose and need of the Target Update. For these reasons, the Board rejects this alternative.

Alternative 3: Adoption of MPO Target Recommendations Alternative

Alternative 3 would include accepting the MPOs' target recommendations. Each MPO's target recommendation is described in detail in Appendices A and B of the Staff Report. According to the information submitted by the MPOs, many MPOs would look to pursue additional strategies, such as increased funding for transit and active transportation, that foster additional co-benefits; they would pursue cutting-edge strategies not included in prior SCSs, such as funding for innovative mobility solutions like on-demand ride sourcing services for rural areas; and the recommended targets could be achieved through financially constrained, enforceable SCSs.

Alternative 3 would result in potential adverse environmental impacts that are similar to those described in Chapter 4 of the Final EA. Potential impacts include those resulting from short-term construction and long-term operational impacts that may occur as a result of activities carried out in response to regulations or programs enacted to implement the recommended targets. As described in Chapter 4 of the Final EA, the resource areas affected include: aesthetics; agricultural and forest resources; air quality; biological resources; cultural resources; geology, seismicity, and soils; greenhouse gases; hazards and hazardous materials; hydrology and water quality; noise; population and housing; public services; transportation and traffic; and utilities and service systems.

The Board finds that Alternative 3 would meet the project's objectives of updating targets to reflect the latest information on State GHG-reduction measures and technical data, tools, and methods; but would not foster increased co-benefits relative to existing conditions, and would not encourage further innovation, action, and planning toward more sustainable communities compared to existing conditions; and most importantly, would not help to attain SB 32 GHG targets directly from new or enhanced transportation and land use strategies compared to commitments under currently adopted SCSs to the same extent as the proposed project. For this reason, the Board rejects this alternative.

Alternative 4: Substantially More Stringent Targets Alternative

Alternative 4 includes a substantial increase in reduction targets for each MPO that would require further GHG emissions reductions beyond the proposed targets shown in Table 2-1 of the Final EA. An example of substantially more stringent targets would include setting MPO 2035 targets to a level that would meet the full VMT reduction needs assumed in the 2017 Scoping Plan Update. If distributed equally by regional population, this would mean increasing staff's proposed targets by two to three percentage points for the largest four MPOs in the State, up to six percentage point increases for the eight MPOs in the Valley, and up to nine percentage point increases for the remaining MPOs. This alternative would rely on either additional new strategies, or an increase in the intensity or extent of expanded or new strategies already described under the reasonably foreseeable compliance responses discussed in the Final EA, to meet the increased targets if feasible, or the development of an alternative planning strategy (APS).

Under Alternative 4, for MPOs that would be able to achieve substantially more stringent GHG targets, there could be more individual construction projects than anticipated for the

Target Update in order to meet substantially more stringent GHG emissions reductions targets. For example, substantial construction of new infrastructure could be required to support new alternative fuel technologies, increased density of infill development could bring substantial building construction, and new or expanded transit options could require construction of infrastructure and facilities. This would result in a greater magnitude to impacts such as aesthetics, air quality, biological resources, and transportation and traffic as compared to the Target Update. For MPOs that would not be able to achieve the substantially-increased targets under Alternative 4 through preparation of an RTP/SCS, preparation of an APS could result in status quo development patterns that rely less on the mix of sustainable land use and transportation strategies than would have come to fruition under an RTP/SCS. This could result in increased land use development and transportation investments in greenfield areas or areas outside transit priority areas. Such actions could result in potentially greater magnitude of adverse environmental impacts to agriculture and forest resources, biological resources, cultural resources, air quality, hydrology and water quality, public services, utility and service systems, and traffic and transportation.

The Board finds that if MPOs are not able to utilize RTP/SCSs under Alternative 4, then it would not meet the project's objectives of updating targets to foster increased co-benefits relative to existing conditions and encourage further innovation, action, and planning toward more sustainable communities compared to existing conditions; and most importantly, would not help to attain SB 32 GHG targets. For this reason, the Board rejects this alternative.

STATEMENT OF OVERRIDING CONSIDERATIONS

CARB expects that many of the significant adverse impacts identified in the EA will be avoided or mitigated; however, since uncertainty exists as to the extent of mitigation that other agencies will require at the site- and project-specific level, the Board is conservatively considering the impacts to be significant and unavoidable. The Board finds that despite the potential for adverse environmental impacts associated with the Target Update, other benefits of the proposed actions are determined to be overriding considerations that warrant approval of the Target Update and outweigh and override its unavoidable significant impacts. 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. These benefits include:

1. Reduction in transportation-related greenhouse gas emissions, and mitigation of climate change effects—including sea level rise and disrupted precipitation patterns—from reduced automobile dependence, increased transit and active transportation use, increased vehicle electrification, decreased industrial emissions related to fuels, increased land conservation, increased building energy and water efficiency, and enhanced carbon sequestration;
2. Reduction in regional criteria air pollutant emissions and air quality improvements from reduced automobile dependence, increased transit and active transportation use, increased vehicle electrification, decreased industrial emissions related to fuels, increased land conservation, and increased building energy and water efficiency;

3. Promotion of statewide health benefits, including reduced premature mortality and chronic health risks, from increased daily physical activity through greater accessibility to active transportation opportunities such as walking and bicycling;
4. Socioeconomic benefits from providing more housing and transportation choices with access to daily amenities within communities;
5. Economic benefits from reduced transportation costs, increased building energy and water efficiency, and local job growth from increased development of advanced clean technologies; and
6. Natural resource and land conservation, including preservation of agricultural land and open space.

LOCATION AND CUSTODIAN OF THE RECORD

The documents and other materials that constitute the record of proceedings on which these findings are based are located at 1001 I Street Sacramento, CA 95814. The custodian for these documents is the California Air Resources Board Legal Office.