

## Environmental Impact Analysis

### **5.18 Significant Effects That Cannot be Avoided (CCR 15126.2(b))**

#### **Air Quality**

Implementation of the Proposed Program and Alternatives could result in significant and unavoidable impacts to air quality because five of the six criteria pollutants could exceed California's Ambient Air Quality Standards.

#### **Biological Resources**

The Proposed Program, and Alternatives 1 through 4 could create significant unavoidable short-term impacts to the following special status species: valley elderberry longhorn beetle, California tiger salamander, San Joaquin kit fox, California red-legged frog, blunt-nosed leopard lizard, Nelson's Antelope Squirrel, giant kangaroo rat, Smith's blue [butterfly], black legless lizard, Belding's orange-throated whiptail, and the San Diego cactus wren.

There could be significant unavoidable consequences to several desert shrub habitats due to the potential for invasive species to "take over" the following desert plant communities: sagebrush, low sage, bitterbrush and pinyon-juniper vegetation types.

There could also be significant unavoidable impacts to oak regeneration in oak woodland types in the Sacramento and San Joaquin Valley bioregions as most treatment types have detrimental impacts on oak seedling and sapling vegetation.

#### **Noise**

Implementation of the Proposed Program and Alternatives could have significant and unavoidable short-term impacts to schools, churches, hospitals and other sensitive receptor sites due to noise generated by heavy equipment and chainsaws. These impacts are short lived.

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### ***5.19 Significant Irreversible Environmental Changes (CCR 15126.2(c))***

For some projects, the environmental impacts caused by implementing the project may result in the irreversible or irretrievable commitment of environmental resources (CCR §15126.2c). EIR's are required by CEQA to describe any significant irreversible environmental changes that would result from the proposed action.

Implementation of the Proposed Program and the Alternatives could create significant irreversible environmental changes to special status species: valley elderberry longhorn beetle, blunt-nosed leopard lizard, Nelson's Antelope Squirrel, giant kangaroo rat, Smith's blue [butterfly], black legless lizard, Belding's orange-throated whiptail, and the San Diego cactus wren. The potential impacts are considered irreversible because these species are in such an endangered/threatened condition, that loss of habitat from program implementation could result in extinction.

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### **5.20 Growth Inducing Impacts (CCR 15126.2(d))**

Certain projects, such as freeway interchanges, housing developments, wastewater treatment plants, etc., clearly result in secondary growth inducing impacts that must be analyzed. This section provides limited discussion regarding the absence of growth inducing factors associated with adoption of the Proposed Program or the Alternatives. The Proposed Program will not have any growth-inducing impacts because it will not foster growth or result in new housing or construction of facilities. Based on the above discussion, no reasonably foreseeable growth inducing impacts have been identified that would result from implementation of the Proposed Program or the Alternatives to the Program.