

# 6 Other CEQA Considerations

---

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. The environmental impact report (EIR) must discuss (1) significant environmental effects of the proposed project and mitigation measures proposed to minimize the significant effects, (2) significant environmental effects that cannot be avoided if the proposed project is implemented, (3) significant irreversible environmental changes that would result from implementation of the proposed project, (4) growth-inducing impacts of the proposed project, and (5) alternatives to the proposed project.

This chapter summarizes the significant environmental effects that cannot be avoided if the Santa Cruz Water Rights Project (Proposed Project) is implemented (i.e., significant unavoidable impacts). It also addresses whether significant irreversible environmental changes of the Proposed Project are required to be evaluated for the Proposed Project. An evaluation of the significant environmental effects of the Proposed Project, applicable mitigation measures, the level of impact significance before and after mitigation, and evaluation of cumulative impacts, is provided in Chapter 4, Environmental Setting, Impacts, and Mitigation Measures. Chapter 5, Growth Inducement, addresses the growth-inducing impacts of the Proposed Project, if any, and Chapter 8, Alternatives, addresses alternatives to the Proposed Project.

## 6.1 Significant Unavoidable Impacts

The CEQA Guidelines require a description of any significant impacts, including those that can be mitigated but not reduced to a level of insignificance (Section 15126.2[c]). Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described. This EIR identified significant unavoidable impacts associated with construction noise impacts from the well drilling activities of the new aquifer storage and recovery (ASR) facilities and the Beltz 9 ASR facility (see Impact NOI-2 in Section 4.10, Noise) and construction of new or expanded water facilities that would result in significant impacts (see Impact UTL-1 in Section 4.13, Utilities and Energy).

## 6.2 Significant Irreversible Environmental Changes

The CEQA Guidelines require a discussion of significant irreversible environmental changes with project implementation, including uses of nonrenewable resources during the initial and continued phases of the project (Section 15126.2[d]). However, CEQA Guidelines Section 15127 indicates that information concerning irreversible changes needs to be included only in EIRs prepared in connection with:

- (a) The adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency;
- (b) The adoption by a Local Agency Formation Commission of a resolution making determinations; or
- (c) A project which will be subject to the requirement for preparing an environmental impact statement pursuant to the requirements of the National Environmental Policy Act of 1969, 42 United States Code Sections 4321–4347.

As the Proposed Project is not one of the above project types, this EIR is not required to include an analysis of significant irreversible environmental changes.

INTENTIONALLY LEFT BLANK