DRAFT STATEMENT OF OVERRIDING CONSIDERATIONS

State CEQA Guidelines Section 15093

For

CENTENNIAL PROJECT
Final Environmental Impact Report SCH No. 2004031072
County Project No. 02-232-(5)
Specific Plan No. 02-232
General Plan Amendment No. 02-232
Zone Change No. 02-232
Vesting Tentative Parcel Map No. 060022
Conditional Use Permit No. 02-232
Development Agreement No. RPPL2016003940

Lead Agency:
County of Los Angeles Department of Regional Planning

The California Environmental Quality Act ("CEQA") requires a public agency to balance the benefits of a proposed project against its significant unavoidable adverse impacts in determining whether to approve the project. The Centennial Project, encompassing the approvals listed above, will result in environmental effects, which, although mitigated to the extent feasible by the implementation of mitigation measures required for the project, will remain significant and unavoidable, as discussed in the Final Environmental Impact Report (EIR) and CEQA Findings of Fact. These impacts are summarized below and constitute those impacts for which this Statement of Overriding Considerations is made.

Construction-Related Significant and Unavoidable Impacts

1. Despite the implementation of all feasible and reasonable mitigation, construction-related emissions of volatile organic compounds (VOC) and nitrogen oxides (NOx) would result in significant impacts. Mitigation measures would be implemented to reduce emissions; however, the impacts would remain significant and unavoidable. Construction emissions could cause a potential temporary exceedance of federal, State, and South Coast Air Quality Management District (SCAQMD) standards for respirable particulate matter with a diameter of 10 microns or less (PM10) and fine particulate matter with a diameter of 2.5 microns or less (PM2.5) at Project residences that would be completed and occupied; this would be a significant impact. Implementation of Antelope Valley Air Quality Management District (AVAQMD) and SCAQMD dust control rules would substantially reduce dust, but it cannot be quantitatively demonstrated that the impact would be reduced to a less than significant level. This impact would be significant and unavoidable.

2. Despite implementation of all feasible and reasonable mitigation, during construction of the Project, construction emissions of PM10 and PM2.5 could exceed the federal and State ambient air quality standards and SCAQMD-established local significance thresholds, exposing sensitive receptors to substantial pollutant concentrations. This impact would be significant and would be reduced with implementation of standard conditions and mitigation measures; however, they would not reduce impacts to a level considered less than significant.
Operational Significant and Unavoidable Impacts

3. Despite implementation of all feasible and reasonable mitigation, long-term operational emissions of carbon monoxide (CO), VOCs, NOx, PM10, and PM2.5 would result in significant impacts. Mitigation measures would be implemented to reduce emissions; however, the impacts would remain significant and unavoidable after mitigation.

4. Despite the implementation of all feasible and reasonable mitigation, the Project would result in the conversion of approximately 642 acres of on-site Prime Farmland, for which there is no feasible mitigation to reduce this impact to a less than significant level. Therefore, this would be a significant and unavoidable impact related to conversion of farmland.

5. Despite the implementation of all feasible and reasonable mitigation, the Project would result in a maximum resident population of approximately 57,150 persons at Project buildout, which is estimated to occur in 2035. This would represent 14.1 percent of the buildout population of the Antelope Valley’s unincorporated area, and would result in a population increase that would be consistent with anticipated population increases under the Antelope Valley Area Plan (AVAP). Implementation of the Project is considered growth accommodating rather than growth inducing at a regional level based on Southern California Association of Governments (SCAG) projections. Therefore, would be less than significant in relation to planned growth in the region. However, because the Project would substantially increase population and housing relative to the existing Project site conditions, this increase in population and housing on the Project site is considered significant and unavoidable. However, no mitigation would be appropriate because the Project is consistent with approved growth plans in the region. Regarding growth-inducing impacts, the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments would be made outside the West Economic Opportunity Area, which is considered a significant adverse indirect growth-inducing impact.

6. Despite the implementation of mitigation measures, and although the Project’s incremental contribution to the County’s solid waste stream during construction would be nominal in comparison to available capacity (i.e., less than one percent), the permitted Class III landfill capacity in the County cannot be guaranteed at the time of Project buildout and through the life of the Project, which are beyond the County of Los Angeles Department of Public Works’ (LACDPW’s) 15-year planning horizon for solid waste disposal. Therefore, while the County is committed to handling all solid wastes generated within the County now and in the future, to be conservative, it is assumed that the Project buildout would result in a significant impact on the County’s anticipated Class III landfill capacity. The Project would thus result in significant and unavoidable impact related to municipal solid waste during operation of the Project.

7. Despite the implementation of all feasible and reasonable mitigation, the Project would result in significant and unavoidable impacts related to a change in visual character experienced from public vantage points (primarily transportation thoroughfares including State Route (SR) 138, 300th Street West, 290th Street West, and Malinda Avenue). Visual character impacts related to grading and development of the Project would be reduced through implementation of mitigation measures; however, the change of the Project site from a rural to urban condition and the varying degrees of obstruction of existing views of local foothills and the Tehachapi Mountains would be considered a significant unavoidable impact, for which no additional feasible mitigation exists. Since the Project site is in an undeveloped area with few existing light sources, implementation of the Project would result in significant and unavoidable impacts by introducing new sources of daytime and nighttime light and glare into the area. Project implementation would also cause a significant and unavoidable impact regarding a new source of sky glow, even after mitigation.
Significant and Unavoidable Impacts with Mitigation Outside the Control of the Lead Agency

8. Despite the implementation of all of the feasible and reasonable mitigation, and while the on-site roadway network has been designed to accommodate projected traffic from the proposed land uses, if improvements at Project access points on SR-138 are not constructed by the California Department of Transportation (Caltrans), impacts would be significant and unavoidable. Also, Project buildout would result in significant traffic impacts on off-site roadways and freeways, including SR-138, I-5 mainline segments and interchange ramps, and arterial roadway intersections. Mitigation measures have been identified to reduce all significant Project impacts. However, it is outside the County’s control to implement these measures. If Caltrans does not implement the needed improvements, the Project would result in significant and unavoidable impacts.

9. Despite the implementation of mitigation measures, increases in the ambient noise environment adjacent to SR-138 between Gorman Post Road and Old Ridge Route Road would exceed the applicable significance criterion at identified noise-sensitive receptors. Feasible mitigation measures would involve alterations to private property and/or within Caltrans’ right-of-way, which are not in the County’s or the Project Applicant’s control and, therefore, this impact would be significant and unavoidable.

Significant and Unavoidable Cumulative Impacts

10. Despite the implementation of all feasible and reasonable mitigation, a significant and unavoidable cumulative impact on Important Farmland would occur through the Project’s conversion of approximately 642 acres of Prime Farmland to urban uses. The on-site conversion of farmland is part of the total of 6,169 acres of Important Farmland the AVAP EIR would be converted as part of future growth consistent with the AVAP. Thus, the Project’s contribution to conversion of agricultural resources is cumulatively considerable and is considered a significant and unavoidable impact.

11. Despite the implementation of all feasible and reasonable mitigation measures, construction annual emissions of NOx (an O3 precursor), construction daily emissions of VOC and NOx (O3 precursors), and operational emissions of PM10, PM2.5, VOC, and NOx, would be directly significant and therefore cumulatively considerable and significant. Feasible mitigation measures to reduce the impacts from construction and operation emissions would be implemented for the proposed Project; however, even after mitigation, the direct and cumulative impact would be significant and unavoidable.

12. Despite the implementation of all feasible and reasonable mitigation, due to the cumulative loss of native grasslands in the larger region and the State as a whole, and the lack of a widely-accepted definition for “native grassland” or a published standard for a mitigation ratio, Project impacts on native grasslands are considered cumulatively significant after mitigation.

13. Despite the implementation of all feasible and reasonable mitigation, due to the potentially heightened sensitivity of movement through the region for some species, the potential for a project or set of projects to substantially interfere with a wildlife corridor is greater. As such, as a conservative assessment, wildlife movement impacts are considered to be cumulatively significant for the Project.

14. Despite the implementation of all feasible and reasonable mitigation, at the completion of Project buildout (2035), operation of the Project would expose some existing off-site noise-sensitive
receptors adjacent to SR-138 between Gorman Post Road and Old Ridge Route Road to increases in exterior ambient noise levels that exceed the 3 A-weighted decibels (dBA) threshold criterion due to Project-related traffic. The impact would be considered significant and unavoidable because feasible mitigation to reduce these impacts is not within County jurisdiction. Therefore, when considering the additional regional traffic to the SR-138, the Project would contribute to a significant and unavoidable cumulative impacts to these receptors.

15. Despite the implementation of all feasible and reasonable mitigation, the Project is the development of a new community in a largely undeveloped area, and the accompanying visual change is considered significant and unavoidable after mitigation. While the related projects in the region would not all be visible within the same viewsheds as the Project, visual changes in the surrounding areas that would result from continued development would contribute to the Project’s impact. Thus, the Project’s contribution to impacts on visual resources would be cumulatively considerable and significant and unavoidable.

16. Despite the implementation of all feasible and reasonable mitigation, Project implementation would introduce development at a scale that would result in significant increases in lighting levels, and the related projects would also increase lighting levels at individual development sites. While these related projects would not be located adjacent to the site, increases in ambient lighting levels would occur throughout the Project area. Regulations that prevent glare and light spillover into adjacent properties, including Project design standards and guidelines, would reduce impacts but increases in sky glow are expected to occur. However, this impact would be significant and unavoidable with the Project and would be cumulatively significant and unavoidable with mitigation.

17. Despite the implementation of all feasible and reasonable mitigation, and although the Project is consistent with each of the Los Angeles County Community Climate Action Plan’s (CCAP’s) goals and policies, with SCAG’s 2012–20 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2016–2040 RTP/SCS, the AVAP policies, and State regulatory programs that reduce greenhouse gas (GHG) emissions, the Project would nonetheless emit GHGs at an estimated rate of 244,379 metric tons of carbon dioxide equivalent per year, and would contribute to the global inventory of GHGs. The Project’s GHG efficiency would be 3.02, which would not exceed the SCAQMD-staff-proposed “plan-level” 4.1 GHG efficiency threshold, but would exceed the SCAQMD-staff-proposed “project-level” 3.0 GHG efficiency threshold. To date, the vast majority of other states and nations have not followed California's lead in mandating GHG emission reductions across a broad spectrum of economic sectors and have not enacted regulations similar to those adopted in California, which already has nearly the lowest level of GHG per capita of any state. The County of Los Angeles has no jurisdictional control or responsibility for GHG reductions from many types of products and activities (e.g., passenger vehicles, consumer products) both on site and elsewhere in California, nor does the County have jurisdiction or control of GHG emissions outside California within or outside the United States. Therefore, because of the global context of GHG emissions and the Project’s forecasted GHG emission rate, the environmental impact related to greenhouse gas emissions is considered to be cumulatively significant.

18. Despite the implementation of all feasible and reasonable mitigation, permitted Class III landfill capacity cannot be guaranteed at the time of Project buildout and through the life of the Project, which are beyond the required 15-year LACDPW planning horizon for solid waste disposal. Therefore, while the County is committed to handling all solid waste generated within the County now and in the future, to be conservative, this EIR concludes that the Project would result in a significant impact on the County’s anticipated Class III landfill capacity. The Project’s contribution to solid waste disposal and associated landfill capacity would be cumulatively considerable.
19. Despite the implementation of all feasible and reasonable mitigation, as determined during the AVAP and General Plan update CEQA review process, assuming buildout of the AVAP and General Plan within the Antelope Valley, regional water demands could exceed existing and planned supplies under post-2035 conditions. The Project has sufficient supplies to meet demand, Project-level impacts to water supply are less than significant with mitigation, and the Project will result in an increment of regional growth that incorporates state of art water use and conservation measures that would reduce per capita demand below existing levels. These conservation and efficiency measures would reduce, but not eliminate, the cumulative regional water supply impacts identified in the AVAP and General Plan EIRs be significant and unavoidable.

20. Despite the implementation of all feasible and reasonable mitigation, the Project traffic analysis indicates that, under 2035 cumulative conditions, the Project contributes to significant impacts along SR-138 in regards to the percent of time-spent-following between the Interstate (I) 5 and SR-14 interchanges, as well as increased delay for side street vehicles, traffic signal requirements and intersection capacity at multiple locations along SR-138 between the westerly access of the Project area to SR-14. Under cumulative conditions, the Project contributes to a significant cumulative impact to the I-5 mainline freeway; the truck lane in between the Grapevine and Fort Tejon Road interchanges; the segments between SR-138 to Parker Road interchange, as well as segments from Magic Mountain Parkway and SR-14 interchange. The Project would be fully mitigated with implementation of the Northwest 138 Corridor Project currently being advanced by Caltrans, and mitigation measures for impacts to the I-5 and off-site intersections involving fair share contributions to identified improvements would reduce all cumulative traffic impacts to a less than significant level. The proposed Centennial Transportation Improvement Program Agreement provides a mechanism for the needed transportation improvements to be implemented by providing advance funding for planning, design, and construction of certain improvements and establishing a funding program to collect fair shares for other improvements. With these traffic mitigation assurances, there would not be a significant cumulative impact from Project traffic. However, if Caltrans does not implement planned and needed improvements on State facilities, the Project would contribute to significant unavoidable impacts since the County (as the Lead Agency) has no control over these facilities and cannot enforce the construction of the needed improvements.

Findings

The Board of Supervisors finds and determines in approving the Centennial Project that the Final EIR has considered the identified means of lessening or avoiding the Project’s significant effects and that to the extent any significant direct or indirect environmental effects, including cumulative project impacts, remain unavoidable or not mitigated to below a level of significance after mitigation, such impacts are at an acceptable level in light of the social, legal, economic, environmental, technological and other project benefits discussed below, and such benefits override, outweigh, and make “acceptable” any such remaining environmental impacts of the project (CEQA Guidelines Section 15092(b)).

The following benefits and considerations, taken together or individually, outweigh such significant and unavoidable adverse environmental impacts. All of these benefits and considerations are based on the facts set forth in the Findings, the Final EIR (including, without limitation, the response to comments and appendices and attachments thereto), and the record of proceedings for the Project. This Board of Supervisors determines that the evidence in the record constitutes substantial evidence to support the determinations made in this Statement of Overriding Considerations, that the facts stated in this document and in the Findings are supported by substantial evidence in the record, including testimony received at the public hearing, the staff presentations, staff reports and all materials in the project files. The Board also determines that to the extent other evidence was presented that is contrary to the
determinations made herein or in the Findings, such evidence was nevertheless considered, weighed and determined to be either lacking in credibility or insufficient in weight to detract from the determinations made herein or in the Findings such that the Board reached these determinations after due consideration of all evidence presented to it. Each of these benefits and considerations is a separate and independent basis that justifies approval of the Project, so that if a court were to set aside the determination that any particular benefit or consideration will occur and justifies project approval, this Board of Supervisors determines that it would stand by its determination that the remaining benefit(s) or consideration(s) is or are sufficient to warrant project approval.

Facts in Support of Statement of Overriding Considerations

Each benefit set forth below constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, and the Board of Supervisors determines that the adverse environmental impacts of the Project are “acceptable” if any one of these benefits will be realized. The Project will provide benefits to Los Angeles County and the region as follows:

1. **Provides Economic Benefits and Jobs to Los Angeles County.** At buildout, the Project is expected to annually generate approximately $43,394,902.00 (as calculated in 2017 dollars) of revenues and about $21,827,596.00 of annual costs to the County’s General Fund (as calculated in constant 2017 dollars) for re-occurring public services to Centennial, representing an annual net benefit to the General Fund of about $21,567,306.00. General Fund revenues are used for a wide variety of County services and activities and are subject to the appropriation discretion of the County Board of Supervisors, and a portion of property taxes are also paid directly to local school districts, thereby increasing funding for local schools. The Project will generate approximately $22,328,502.00 of property tax revenues. Additionally, the Project includes 7,363,818 square feet of Business Park uses to provide for research and development, light industrial, manufacturing, professional office, private educational and trade schools, hotels, and the smaller commercial services required to support these uses. It is estimated that approximately 14,513 employment opportunities would be created by such uses. If hotel(s) are developed, approximately 300 additional employment opportunities would be provided and the operation of such hotels would provide additional revenue to the County in the form of transient occupancy tax receipts. In addition, the Project includes 1,568,160 sf of Institutional/Civic (I/C) land uses, which accommodates higher education facilities, postsecondary schools, hospitals/medical centers, libraries, and other public/institutional safety facilities. It is estimated that approximately 23,675 permanent jobs would be created by such uses. The Project is also expected to create approximately 25,000 construction jobs, with many construction jobs extending over the project buildout period. In addition, the Project will attract more prospective customers to existing local businesses, which should see direct economic benefits and the County would also receive corresponding increases in sales tax for goods and services purchased by project residents and guests. In addition, the Project Development Agreement includes provisions that obligate the applicant to [TBD – various funding obligations]. The County determines that these additional funding sources are significant and provide a meaningful ability for the County to fund public services at a level that would not exist but for the Project’s approval, thus benefiting the County and its residents. [NOTE: All above-listed dollar amounts will need to be updated prior to BOS consideration, after DA is finalized and 2018 dollars calculated.]

2. **Provides Community Buildings, Programs, and Public Services.** The proposed Project provides additional direct economic benefits to Los Angeles County such as enhanced fire, law enforcement, school services, and other public services, as required by mitigation measures
imposed as conditions of Project approval. The Project will dedicate seven public school sites (five K-8, one K-5, and one high school) in coordination with the Gorman Joint School District and the Antelope Valley Union High School District. The Project will also dedicate up to four new fire station sites and would construct up to three medium fire stations and one large station on the Project site, with the large station site sized to also accommodate training facilities for firefighters. The Project’s provision of fire station facilities as mitigation will be a benefit to wildfire and rangeland fire management in a geographical region that is both subject to fire events and includes rough terrain that makes dispatch of fire resources time consuming and costly from stations that are not as close as those stations to be provided by the Project. Moreover, the Project will be required to dedicate a site for, and fund and construct, a new Sheriff’s station, in coordination with the Los Angeles Sheriff’s Department. Finally, the Project will be required to fund and construct: public roads and associated facilities (e.g., intersections, signage, signals, bike lanes, curbs); water supply, treatment, and conveyance facilities; stormwater management facilities; a solid waste transfer station; parks, trails and associated recreational facilities

3. **Accommodates the Need for Regional Housing.** Over its projected buildout period, the Project proposes to construct up to 19,333 new dwelling units. In accordance with the Centennial Affordable Housing Implementation Plan, the Project would also include a minimum of 10 percent or 1,933 units that would be affordable to either very low, low, or moderate income households. A mix of single family attached, multi-family attached, and mixed-use units would be provided throughout the Project site. A total of 387 units or 20 percent of the affordable units would be affordable to very low income households. A total of 483 units or 25 percent of the affordable units would be affordable to low income households. The remaining 1,063 units or 55 percent of the affordable units would be affordable to moderate income households. These units would include for sale units that would be deed restricted for sale to very low, low and moderate income households and for rent units that would be restricted for rent to very low, low, and moderate income households. In accordance with the Regional Housing Needs Allocation, the County’s Housing Element states that for the entirety of the unincorporated areas of the County, 30,145 new housing units are needed to meet future housing needs between 2014 and 20210. The proposed Project will help meet the County’s projected growth needs for regional housing in an environmentally superior development pattern that includes sustainable, mixed-use community design features, and this Board of Supervisors finds that the accommodation of housing is an essential public purpose whose benefits outweigh the Project’s environmental impacts.

4. **Enhances Public Access and Recreational Opportunities.** The Project would provide abundant and varied on-site recreational amenities in an area that currently has little local parkland, including public (i.e., State or federal owned or County-dedicated and maintained) and private (i.e., Homeowner’s Association or other privately maintained) parks and other recreation amenities. The Project would include approximately 163 acres of Park Overlay, which includes neighborhood parks, community parks, and community regional parks that would be dedicated to the County of Los Angeles in a developed condition. A trails system is also proposed by the Project that would include a non-vehicular circulation system providing pedestrian, bicycle, equestrian, and multi-use trails at locations throughout the Project site. The trails network would contribute to the recreational experience within the Project site while also providing alternative means of transportation within the community. The Project’s on-site multi-use trail system is planned to link to the planned location of the County bikeway near the intersection of SR-138 and Quail Lake adjacent to the Project site. The County multi-use (hiking, equestrian, and mountain biking) trail would traverse the Project site just south of the SR-138 and connect with the proposed re-alignment of the PCT along 300th Street West,
increasing regional trail connectivity. Because the Project site is private property that did not previously result in recreational connectivity of open spaces, the presence of the proposed regional trail with equestrian access and facilities would also increase regional connectivity.

5. **Accommodates the Need for Orderly Development in Close Proximity to Jobs.** Consistent with the Antelope Valley Area Plan’s Rural Preservation Strategy, the proposed Project provides new development which channels land uses in a phased, orderly manner and is coordinated with the provision of infrastructure, public improvements, and open space preservation. The proposed Project allows for the incremental expansion of infrastructure and public services and provides a high-quality environment for living. The Project provides a variety of housing types, as well as commercial, industrial and recreational uses. In addition, the proposed Project provides a safe and efficient street system that links all parts of the area for movement of people as well as provides safe and efficient non-motorized and pedestrian traffic movement through an extensive trail system. This Project will be required to use and expand the existing local road system and contribute to certain regional transportation improvements which will help to develop the transportation system in this area. The Project includes neighborhood commercial uses to encourage walking and short trip lengths using local streets instead of long distance trips needed now for existing regional residents. The proposed Project also maintains a coordinated planning and implementation program for the provision of public utilities and public services to the planning area. Finally, the proposed Project provides a mechanism to provide for parks and recreation facilities to meet the planning area’s diverse needs. Although the public parks would be completed as a condition of approval, and would serve the proposed Project’s communities, these parks would be available for use by all County residents (including those near the proposed project, who would benefit from more proximate park facilities). The proposed project would thus encourage healthy living through active lifestyles and promote access to local agricultural products.

6. **Conserves Natural Resources and Habitat for Sensitive Species.** As dwelling units, commercial/industrial uses, and associated infrastructure and amenities are sited and built over time, undeveloped portions of the Project site would be preserved as open space. Of the Project’s 5,624 acres of designated Open Space, approximately 5,478 acres (44 percent of the total Project site) are intended to (1) remain in their original natural condition; (2) be restored; and/or (3) be enhanced by weed abatement, fencing, and native species planting, among other means. Of this amount, approximately 3,867 acres are designated as Los Angeles County Significant Ecological Area (SEA) 17 to be preserved within the Project site boundaries. The Project development envelope has been designed to avoid sensitive resources and high-quality habitat for sensitive species on the basis of the Project’s biological and other environmental surveys. Furthermore, the Centennial Specific Plan components, and mitigation measures adopted as conditions of Project approval, address 1) sensitive habitat management, 2) sensitive species management, 3) flood plain management, 4) agricultural activities, 5) cultural resource management, 6) wildfire management, 7) sustainability principles and resource management implementation. Together, these measures ensure the Project’s commitment to natural resource protection, including preservation of high-quality habitat for sensitive species.

7. **Promotes Renewable Energy Use.** The proposed Project is required to demonstrate that 50 percent of the Project’s anticipated electrical energy demand at buildout will be satisfied from on-site renewable energy generation. In addition, Project will equip a minimum of 70 percent of public and community pools and spas with active solar water heating systems where heating is necessary or desired, and will provide all single-family homebuyers the option to include a photovoltaic array system as a home design feature. Moreover, the Project will comply with CalGreen Code voluntary measure A4.203.1.2.1 Tier 1 for newly-constructed low-rise
residential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 15 percent. Similarly, the Project will comply with CalGreen Code voluntary measure A5.203.1.2.1 Tier 1 for nonresidential buildings, thus ensuring that these buildings will exceed the 2016 Title 24 energy efficiency requirements by 10 percent. Finally, the Centennial Specific Plan’s Green Development Program requires the installation of onsite solar panel systems on roof areas for a minimum of 30 percent of all single-family detached and attached residential units; a minimum of 30 percent of all multi-family residential units, and a minimum of 60 percent of buildings located within Business Park land use designations.

Conclusion

CEQA requires a public agency to balance the benefits of a proposed project against its significant and unavoidable adverse impacts in determining whether to approve the project. As discussed more fully above, the proposed Project would result in significant and unavoidable project-level and/or cumulative impacts to visual resources, agricultural resources, air quality, biological resources, greenhouse gases, noise, population and housing, municipal solid waste, traffic and circulation, and water resources, which, although mitigated to the extent feasible by the implementation of mitigation measures required for the Project, will remain unavoidable adverse impacts. This Board of Supervisors finds that such impacts are at an acceptable level in light of the social, legal, economic, environmental, and other Project benefits and make “acceptable” any such remaining environmental impacts of the Project.