## **CHAPTER 5: OTHER CEQA CONSIDERATIONS**

## 5.1 - Significant Unavoidable Impacts

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(a)(b) requires an Environmental Impact Report (EIR) to identify and focus on the significant environmental effects of the proposed project, including effects that cannot be avoided if the project were implemented.

Based on the analyses contained in this Draft EIR, the City has determined that the proposed project in conjunction with other cumulative development in the City of Antioch would result in project-level or cumulative-level significant and unavoidable impacts listed below.

- The proposed project would substantially degrade the existing visual character or quality of public views of the site and its surroundings.
- The proposed project would result in significant and unavoidable impacts related to operational criteria pollutant emissions in violation of an air quality standard.
- The proposed project would result in a cumulatively considerable net increase in operational related air pollutants, which would exceed the Bay Area Air Quality Management District (BAAQMD) threshold of significance for annual and daily operational emissions.
- Because the availability and feasibility of carbon credits is unknown at this time and the fate
  of PG & E and its renewable resources programs is uncertain, the proposed project would
  result in significant and unavoidable impacts related to operational greenhouse gas emissions.
- The proposed project would conflict with a program plan, ordinances, or policy of the circulation system under Existing Plus Project traffic conditions.
- The proposed project would conflict with a program plan, ordinances, or policy of the circulation system under Near Term traffic conditions.
- The proposed project would conflict with a program plan, ordinances, or policy of the circulation system related to freeways.
- The proposed project would conflict with a program plan, ordinances, or policy of the circulation system under Cumulative traffic conditions.
- The proposed project would be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b).

## 5.2 - Growth-inducing Impacts

There are two types of growth-inducing impacts that a project may have: direct and indirect. To assess the potential for growth-inducing impacts, the project's characteristics that may encourage and facilitate activities that individually or cumulatively may affect the environment must be

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evaluated (CEQA Guidelines § 15126.2(d)). CEQA Guidelines, as interpreted by the City, state that a significant growth-inducing impact may result if the proposed project would:

- Induce substantial population growth in an area (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the general plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list when such infrastructure exceeds the needs of the project and could accommodate future developments.

Direct growth-inducing impacts occur when the development of a project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional developments in the same area. Also included in this category are projects that remove physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure projects cannot be considered isolated from the development they facilitate and serve. Projects that physically remove obstacles to growth, or projects that indirectly induce growth may provide a catalyst for future unrelated development in an area such as a new residential community that requires additional commercial uses to support residents.

The project site is located within the southwestern portion of the City of Antioch, in Contra Costa County. Implementing the proposed project would directly induce growth within the City, but not in a manner that is beyond Citywide land use densities/intensities envisioned in the City of Antioch General Plan. The California Department of Finance (CDF) estimated that the total population in the City of Antioch as of January 1, 2019, is approximately 113,901. The City of Antioch General Plan Housing Element states that the Association of Bay Area Governments (ABAG) estimates that the City's population would increase by 2,299 persons to 116,200 by the year 2030. The proposed project would develop 1,177 units and would result in an estimated increase of 3,931 persons. This would represent an approximate 3 percent increase in overall population, which is considered to be a negligible increase.

In addition to residential units, direct growth from the proposed project would include ancillary and recreational facilities and a village center consisting of retail, commercial, and office space. This growth would add an estimated 108 jobs under the proposed project. Infrastructure services would be expanded to serve the proposed project, without significant excess capacity. Therefore, the proposed project would not encourage additional growth beyond what is already planned in the City of Antioch General Plan. As a result, the proposed project would create minimal direct growth that would be inconsistent with the CDF projected increase in population for Contra Costa County.

The proposed project would also not significantly and adversely affect the permanent jobs/housing balance. The project would create a minor amount of nonresidential development and jobs that

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would not create a housing demand above what would otherwise occur in the County. However, the project would include 1,177 residential units and up to 3,931 residents.

The project site currently contains one single-family residence in addition to various barns and outbuildings. The proposed project would connect to existing water, wastewater, electricity, natural gas, and telecommunications facilities, to serve the new units within the project site. Furthermore, the proposed project would be consistent with the surrounding residential, open space, and mixed medical facility uses, and thus, would not trigger growth beyond that which is already contemplated by the City of Antioch General Plan. Therefore, the proposed project would not remove a barrier to growth or create an indirect increase in population.

Since the proposed project would not result in indirect growth, negatively alter the existing jobs/housing balance, or be inconsistent with the City of Antioch General Plan, the growth-inducing impact would be less than significant.

## **5.3 - Significant Irreversible Environmental Changes**

As mandated by CEQA Guidelines Section 15126.2(c), the Draft EIR must address significant irreversible environmental changes that would result from implementation of the project. Specifically, such an irreversible environmental change would occur if:

- The project would involve a large commitment of nonrenewable resources;
- Irreversible damage can result from environmental accidents associated with the project; and
- The proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy). (Refer to Section 3.15, Utilities and Service Systems, which addresses this topic in accordance with CEQA Guidelines Appendix F). The proposed project involves the construction and operation of a master planned community. The proposed project would include 1,177 residential units consisting of a mix of Low Density (LD), Medium Density (MD), and Age Restricted (AR) housing. Average lot sizes for LD housing would range from 7,000 to 10,000 square feet. Average MD lot sizes would be approximately 4,500 square feet, and average lot sizes for the AR units would be approximately 5,000 square feet. Additionally, the proposed project would include a 5.00-acre village center, 3.00 acres of public use facilities including a fire station and trail staging areas, 20.00 acres of parks, and 229.50 acres of open space.

Construction debris recycling practices would be expected to allow for the recovery and reuse of building materials such as concrete, lumber, and steel and would limit disposal of these materials, some of which are non-renewable. Construction would include the use of building materials, such as petroleum-based products and metals that cannot reasonably be recreated. Construction also would involve significant consumption of energy, usually petroleum-based fuels that deplete supplies of nonrenewable resources. Construction of structures and infrastructure would consume energy and water; however, because of its temporary and one-time nature, construction under the proposed project would not represent a significant irreversible use of resources.

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Once construction is complete, the land uses associated with the proposed project would use some nonrenewable fuels to heat and light structures and consume water. The new residential and recreational uses would be required to be built to and adhere to the latest adopted edition of the California Green Building Standards Code, which includes a number of standards that would reduce energy demand, water consumption, wastewater generation, and solid waste generation that would collectively reduce the demand for resources. This would result in the emission and generation of less pollution and effluent and lessen the severity of corresponding environmental effects. Thus, although the proposed project would result in an irretrievable commitment of non-renewable resources, energy for heat and light and water for irrigation and plumbing would not be consumed inefficiently, unnecessarily, or wastefully.

Furthermore, the proposed residential uses do not have the potential to cause significant environmental accidents through releases into the environment, as they would not involve large quantities of hazardous materials (see Section 3.8, Hazards, Hazardous Materials, and Wildfire). According to the California Department of Forestry and Fire Protection (CAL FIRE), the project site is not located in a Very High Fire Hazard Severity Zone, and the closest designated "High" fire hazard zone is located more than 7 miles southeast of the project site. Additionally, because the proposed project and surrounding areas are within a non-Very High Fire Hazard Severity Zone, the project site would not be prone to wildfire risk. As discussed in Section 3.13, Public Services and Recreation, the existing fire protection facilities would be adequate to serve the proposed project with implementation of all applicable mitigation, and the proposed project would not result in a significant and unavoidable impact related to the need for new or altered fire protection facilities. Thus, implementation of the project's proposed residential and recreational uses do not have the potential to result in significant environmental accidents related to wildfire hazards with mitigation incorporated, (see Section 3.8, Hazards, Hazardous Materials, and Wildfire) and would not result in significant irreversible environmental changes.

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