

21 Other CEQA Considerations

The California Environmental Quality Act (CEQA) Guidelines Section 15126 requires an Environmental Impact Report (EIR) to describe the broader effects of a project in relationship to the surrounding environment, in addition to detailed technical analysis of a project's impacts on the environment. The topics covered in this chapter address this requirement and identify significant and unavoidable project impacts, growth inducement associated with the proposed project, and significant irreversible changes associated with the proposed project if approved and subsequently constructed. In addition, this chapter briefly addresses Appendix F of the CEQA Guidelines as it relates to the broader effects of the proposed project and provides a discussion of the potentially significant energy implications of the project. A more detailed analysis of the effects the proposed project would have on energy conservation is addressed in Chapter 19 of this Draft EIR. In addition, a detailed analysis of the effects of the proposed project on the each of the environmental resource topics identified in Appendix G of the State CEQA Guidelines is provided in Chapters 5 through 19 of this Draft EIR.

21.1 Significant and Unavoidable Impacts

Section 15162(b) of the CEQA Guidelines requires an EIR to discuss the significant environmental effects of a proposed project that cannot be avoided if the proposed project is implemented, including those which can be mitigated, but not reduced to a less-than-significant level. These impacts are referred to as "significant and unavoidable impacts" of the project. More information on these impacts is found in Chapters 5 through 19 of this Draft EIR.

Noise

Impact N-1: The proposed project would result in short-term construction noise impacts to existing sensitive receptors.

- Short-term construction noise.

Public Services and Recreation

Impact PSR-1: The proposed project would result in impacts associated with maintaining acceptable service ratios, response time, or other performance objectives for fire protection services.

- ECCFPD ladder truck and emergency response times.

Transportation and Circulation

Impact TR-1e: The proposed project would result in increased delays at SR 4 between Balfour Road and Marsh Creek Road.

- Increase in travel time along SR 4 between Balfour Road and Marsh Creek Road.

21.2 Growth-Inducing Effects

Section 15126.2(d) of the State CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical growth inducing factors might involve construction of new housing. A project can have indirect growth-inducement potential if it would establish substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it would involve a substantial construction effort with substantial short-term employment opportunities and indirectly stimulate the need for additional housing and services to support the new employment demand.

Section 15126.2(d) also states that the lead agency is not to assume that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. However, it should be noted that growth can be detrimental if it is not consistent with land use plans and growth management policies established to ensure orderly growth and development that is supported by adequate public services. Should a proposed project induce growth beyond planned levels or rates or exceed reliable population projections, it could indirectly cause additional adverse impacts on the environment and public services beyond those identified, mitigated, or acknowledged in local planning documents. Therefore, this growth inducement analysis evaluates the consistency of the growth caused or induced by the project with the growth envisioned for Brentwood in the City's General Plan.

Typically, growth-inducing impacts result from the provision of urban services and the extension of infrastructure (including roadways, sewers, or water service) into an undeveloped area. Growth-inducing impacts can also result from substantial population increase, if the added population may impose new burdens on existing community service facilities, such as increasing the demand for service and utilities infrastructure and creating the need to expand or extend services, which may induce further growth.

The proposed project would include the development of two age restricted housing communities, which would accommodate up to 560 units, resulting in a potential population increase of 840 persons. This population estimate is based on the proposed number of residential units multiplied by an estimated average household size for the proposed project, which is 1.5 persons per household for a senior project¹.

As noted in Chapter 15, an additional 840 people would represent approximately 1 percent of the General Plan's full population buildout within the city limits. While the City's General Plan did not calculate population growth for the project site, a 1 percent increase is still considered within the range of population growth forecasted by DOF and ABAG. Therefore, the proposed

¹ The *Water Supply Assessment* prepared by Coleman Engineering for the Brentwood Golf Course Redevelopment indicates that for a senior project, 1.5 persons/unit may be used as an average household size in the city of Brentwood.

project's population growth would be consistent with ABAG's projections for the city and with the City's General Plan.

Regional growth would be subject to review for consistency with adopted land use plans and policies by Contra Costa County, the City of Brentwood, and other cities in the county, in accordance with the requirements of CEQA, the State Zoning and Planning Law, and the State Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development.

This population increase associated with the proposed project would not represent a substantial increase in housing or residents, based on the projected buildout numbers included in the General Plan. Further, as stated in the Brentwood Housing Element (2015), while the City has approved a number of projects for senior housing, "the City expects a strong future demand for various types of senior housing as the active senior population ages in place. This will result in the need for a continuum of housing options from independent living units to nursing home facilities." Consequently, the level of growth under the proposed project would be within existing growth projections for the City of Brentwood and the increase in population would not represent a substantial increase in, or inducement of, indirect growth.

While residential development of the project site would require new infrastructure to serve the change in land use on-site, the infrastructure would connect to the City's existing roadway and utility systems and would not require an extension or upsizing of the existing system(s). Consequently, the proposed project would not induce substantial growth within the project site vicinity that was not previously considered for some level of development. Residential development on the project site, like other development in the project vicinity, would connect to existing utilities and occur within an urbanized area adequately served by transportation systems and infrastructure.

While the City's 2015 Housing Element did not include the proposed project site on the inventory of potential residential sites for housing development (Figure H-1), the Housing Element did identify areas within the city that could ultimately support 8,097 additional residential units and also identified a need for more senior housing in the city, as the city expects a continuing demand for various types of age-restricted/assisted living communities as the region's active senior population ages.

Therefore, the potential household growth resulting from implementation of the proposed project would be consistent with the City's overall planned population and household levels, outlined in the City's Housing Element. Impacts are considered less than significant.

21.3 Significant Irreversible Changes

Section 15126.2(c) of the State CEQA Guidelines requires an EIR to discuss the significant irreversible environmental changes that would result from implementation of a proposed

project. Examples include: primary or secondary impacts of the project that would generally commit future generations to similar uses (e.g., highway improvements that would provide access to a previously inaccessible area); uses of nonrenewable resources during the initial and continued phases of the project (because a large commitment of such resources make removal or nonuse thereafter unlikely); and/or irreversible damage that could result from any potential environmental accidents associated with the project.

21.3.1 Changes in Land Use Which Commit Future Generations

Implementation of the proposed project would result in the conversion of approximately 32 acres of existing golf course uses to residential uses. Also included, would be approximately 181 acres of golf course uses and 142 acres of open space and recreational uses, for a total of 355 acres. Development of the proposed project would constitute a long-term commitment to these uses, as it is unlikely that circumstances would arise that would justify the return of the land to its original or prior condition.

21.3.2 Consumption of Non-Renewable Resources

A variety of resources, including land, energy, water, construction materials, and human resources would be irretrievably committed for the project's initial construction, infrastructure installation, and connection to existing utilities and its continued maintenance. Construction of the proposed project would require the commitment of a variety of other non-renewable or slowly renewable natural resources such as lumber and other forest products, sand and gravel, asphalt, petrochemicals, and metals.

Additionally, a variety of resources would be committed to the ongoing maintenance and life of the proposed project. An increase in the public use of land on the site would result in an increase in area traffic over existing conditions. Fossil fuels are the principal source of energy and the project would increase consumption of available supplies, including gasoline. These energy resource demands relate to initial project construction, project operation, and on-going maintenance, as well as the transport of people and goods to and from the project site.

21.3.3 Irreversible Damage from Environmental Accidents

No explosives or other hazardous materials would be used within the project area. Accidental spills of fuel, paints, or other construction-related materials might occur during construction. However, these types of accidents would be limited because site development would be implemented and overseen by experienced construction workers. Such potential spills would not result in irreversible environmental changes. The proposed project may include storage of hazardous materials, such as cleaning products and other products, which would not be regarded as sufficient to create a significant hazard to the public. All hazardous materials would be subject to existing State and local storage, handling, and disposal regulations that limit the potential exposure to workers and the public.