

VI. CEQA-REQUIRED ASSESSMENT CONCLUSIONS

As required by CEQA, this chapter discusses the following types of impacts that could result from implementation of the proposed project: growth-inducing impacts; significant irreversible changes; cumulative impacts; effects found not to be significant; and unavoidable significant effects. The focus of this chapter is on the Draft Specific Plan. Subsequent development projects within the Plan Area could have project-specific impacts that would be addressed, as appropriate, on a project-by-project basis pursuant to CEQA.

A. GROWTH INDUCEMENT

A project is considered growth-inducing if it would directly or indirectly foster substantial economic or population growth or the construction of additional housing.¹ Examples of projects likely to have significant growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or industrial parks in areas that are currently only sparsely developed or are undeveloped. Typically, redevelopment projects on infill sites that are surrounded by existing urban uses are not considered growth-inducing because redevelopment by itself usually does not facilitate development intensification on adjacent sites.

The primary purpose of the Draft Specific Plan is to guide investment and future development projects in order to realize the community's goals for the Plan Area. As discussed in Chapter III, after implementation of the Draft Specific Plan there would be a net increase of 320,413 square feet of new and redeveloped mixed uses in the Plan Area. These uses would include 22 new residential units and a mixture of work/live units, retail and office space, and light industrial uses. The addition of 22 residential units would result in an increase of approximately 57 new residents within the Plan Area (not including additional residents generated by new live/work uses). This represents less than 0.25 percent of the City's projected population at buildout of the Draft Specific Plan; additional live/work residents are not expected to generate a substantial number of new residents. In addition, although the development of new and redeveloped recreation and community center, retail, office, and light industrial uses within the Plan Area would stimulate economic growth within the Plan Area and Benicia as a whole, these uses would not be expected to indirectly induce substantial residential growth beyond the 22 residential units and the live/work space that would result from implementation of the Draft Specific Plan. This growth would not exceed that planned to occur in the City under the existing General Plan. Therefore, the proposed project would not directly induce substantial population growth.

Development that would occur with implementation of the Draft Specific Plan would generally constitute infill development, as the Plan Area is in an existing urbanized area. Although implementation of the Draft Specific Plan would include some new roadways and upgraded and improved

¹ *CEQA Guidelines*, 2007. §15126.2(d).

infrastructure and service connections, these improvements are necessary to better serve both existing and future infill development in the Plan Area and would not facilitate development of surrounding areas. The Plan Area is surrounded by Port of Benicia uses to the north, east, and south; these areas are not expected to be available for redevelopment in the near future. Therefore, the Draft Specific Plan would not indirectly induce substantial population growth.

B. SIGNIFICANT IRREVERSIBLE CHANGES

An EIR must identify any significant irreversible environmental changes that could result from implementation of a proposed project. These may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses. CEQA dictates that irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.² The *CEQA Guidelines* describe three distinct categories of significant irreversible changes: 1) changes in land use that would commit future generations; 2) irreversible changes from environmental actions; and 3) consumption of non-renewable resources.

1. Changes in Land Use Which Would Commit Future Generations

While implementation of the Draft Specific Plan would encourage growth within the Plan Area, increased development would occur as infill or as re-use of urbanized sites that have been previously developed. In addition, the mix of uses that would develop in the Plan Area reflect land uses that currently exist within the Plan Area. The land use pattern that would be promoted by the Draft Specific Plan is one that would support the use of alternative transportation and allow for change as economic conditions evolve. Therefore, proposed changes in land use that would commit future generations would not constitute a substantial change.

2. Irreversible Changes From Environmental Actions

No significant irreversible environmental damage, such as what could occur as a result of an accidental spill or explosion of hazardous materials, is anticipated due to development and redevelopment activities associated with implementation of the Draft Specific Plan. Compliance with federal, State and local regulations, and the mitigation measures identified in Section IV.E, Hazards and Hazardous Materials, would reduce to a less-than-significant level the possibility that hazardous substances within the Plan Area would cause significant environmental damage.

3. Consumption of Nonrenewable Resources

Consumption of nonrenewable resources includes conversion of agricultural lands, loss of access to mining reserves, and use of non-renewable energy sources. The Plan Area is located within an urbanized area of Benicia. No agricultural lands exist within the Plan Area; therefore none would be converted to non-agricultural uses. In addition, the Plan area does not contain known mineral resources and does not serve as a mining reserve; thus, implementation of the Draft Specific Plan would not result in the loss of access to mining reserves.

² *CEQA Guidelines*, 2007. §15126.2(c).

The Draft Specific Plan, which would promote moderately-dense mixed-use development and the use of alternative transportation, would represent an efficient use of nonrenewable resources, including land and energy. Refer to Section IV.N, Sustainability and Energy, for a more information.

C. CUMULATIVE IMPACTS

CEQA defines cumulative impacts as “two or more individual effects, which, when considered together, are considerable, or which compound or increase other environmental impacts.” Section 15130 of the *CEQA Guidelines* requires that an EIR evaluate potential environmental impacts that are individually limited but cumulatively considerable. These impacts can result from the proposed project alone, or together with other projects. The *CEQA Guidelines* state: “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.”³

1. Methodology

When evaluating cumulative impacts, CEQA envisions the use of either a list of past, present, and probable future projects, including projects outside the control of the lead agency, or a summary of projections in an adopted planning document, or some reasonable combination of the two approaches. This cumulative analysis uses the development assumptions in the City’s General Plan.

2. Cumulative Effects of the Proposed Project

The following analysis examines the cumulative effects of the Draft Specific Plan. The potential cumulative effects of the Specific Plan are summarized below for each of the topics that are analyzed in Chapter IV of the EIR.

a. Land Use and Planning Policy. Planned development in Benicia would generally occur on infill parcels and on smaller to medium-sized parcels of land near the City’s outer edges. Implementation of the Draft Specific Plan would result in new and redeveloped mixed uses within the Plan Area, as permitted by the General Plan, and would not result in any significant land use changes. The Draft Specific Plan is generally compatible with existing planning policies.

As described in Section IV.A, Land Use and Planning Policy, implementation of the Draft Specific Plan could result in both internal and external land use compatibility conflicts. However these impacts would be site-specific and would be reduced to a less-than-significant level with implementation of recommended mitigation measures. Therefore, no significant cumulative impact on land use would occur with implementation of the Draft Specific Plan in combination with the other anticipated development in Benicia.

b. Population, Employment and Housing. Cumulative projects in the City would increase Benicia’s employment and housing base. The population and employment growth that would result from implementation of the Draft Specific Plan would be minimal and is consistent with growth

³ *CEQA Guidelines*, 2007. §15355.

planned in the General Plan. Implementation of the Draft Specific Plan would not substantially induce population growth, result in the removal of existing housing, or result in the displacement of people. Therefore, the Draft Specific Plan would not make a significant cumulative contribution to adverse population, employment, and housing impacts.

c. Geology, Soils and Seismicity. Geology-related impacts of the proposed project are typical of development sites in the Bay Area. Implementation of the Draft Specific Plan would result in impacts associated with earthshaking, differential settlement, liquefaction, ground displacement, ground failure, and landslides. These impacts would be confined to the Plan Area, and in some cases, specific development zones, and would be reduced to a less-than-significant level with implementation of the mitigation measures recommended in Section IV.C, Geology, Soils and Seismicity, along with adherence to the construction standards in the applicable Uniform Building Code. The geologic impacts of other planned projects in Benicia would also be reduced with similar mitigation measures. Therefore, implementation of the Draft Specific Plan would not result in a significant cumulative geologic impact.

d. Hydrology and Water Quality. Like other anticipated development projects in Benicia, the Draft Specific Plan could increase storm water runoff and add pollution to surface water bodies, including Carquinez Strait and San Francisco Bay. However, the Draft Specific Plan's cumulative contribution to this potential impact would be negligible. Individual development projects would be required to incorporate stringent water quality controls, consistent with the requirements of the Regional Water Quality Control Board and the Benicia Storm Water Management Plan. These controls would ensure that runoff is retained and treated on-site, substantially reducing water quality impacts.

e. Hazards and Hazardous Materials. Implementation of the Draft Specific Plan could result in the release of hazardous materials during the ground-disturbing or construction periods of individual development projects. The construction of planned projects in Benicia could also result in the release of hazardous materials. However, the hazards impacts associated with Draft Specific Plan construction activities and planned projects would be reduced to a less-than-significant level through adherence to federal, State, and local hazardous materials regulations, and through the implementation of standard mitigation measures and conditions of approval. Therefore, the cumulative hazards impacts would not be considered significant.

f. Biological Resources. Implementation of Draft Specific Plan development would result in the loss of a small amount of seasonal wetlands and could diminish the habitat and population of a variety of protected plant and animal species, if such species occur on the site. Projects planned in Benicia for previously undeveloped sites would be expected to result in similar impacts. The impacts of Draft Specific Plan development would be reduced to a less-than-significant level with recommended mitigation measures. Because the habitat value in the Plan Area is of generally marginal quality, and because impacts to this habitat would be reduced to a less-than-significant level with implementation of recommended mitigation measures, the impact of the Draft Specific Plan on biological resources would not be considered cumulatively significant.

g. Transportation and Circulation. Refer to Section IV.G, Transportation and Circulation, for a detailed description of the cumulative transportation-related effects of the proposed project. In the

cumulative condition, the addition of project-related trips to the roadway network would be expected to worsen conditions or contribute to unacceptable operating conditions at the following intersections:

- East 5th Street / I-780 Westbound Ramps;
- East 5th Street / I-780 Eastbound Ramps;
- East 2nd Street / Military East;
- Park Road / Industrial Way; and
- Park Road / Bayshore Road: LOS F in both the AM and PM peak hours

In addition, the construction of individual development projects would result in cumulatively significant levels of wear and tear on area roads. However, cumulative impacts to roadway congestion and roadway quality would be reduced to a less-than-significant level with implementation of recommended mitigation measures.

h. Air Quality. Implementation of the Draft Specific Plan would generate significant dust, exhaust, and organic emissions during construction activities and could expose sensitive receptors to toxic air contaminants. Depending on construction schedules for development projects within the Plan Area and planned development in the vicinity of the Lower Arsenal, generation of fugitive dust and pollutant emissions during construction may result in substantial short-term increases in air pollutants. However, each individual project would be subject to the rules and regulations, and other mitigation requirements during construction that are recommended by the Bay Area Air Quality Management District (BAAQMD) to reduce all construction related emissions to a less-than-significant level. As with other planned projects in Benicia, impacts to sensitive receptors would also be reduced to a less-than-significant level with implementation of standard mitigation measures. Therefore, cumulative air quality impacts would be less than significant.

i. Noise. Implementation of the Draft Specific Plan and cumulative projects would increase noise levels in Benicia and surrounding areas due to construction-period activity and increased traffic on City streets. Other foreseeable projects in Benicia would have similar impacts. However, noise increases associated with Draft Specific Plan development would be limited to the Plan Area and would not adversely affect sensitive receptors after implementation of recommended mitigation measures. Therefore, the implementation of the Draft Specific Plan would not result in significant noise impacts in conjunction with other planned projects in Benicia.

j. Visual Resources. The Draft Specific Plan is highly protective of visual resources in the Lower Arsenal, including the character of historic districts and visual connections between notable buildings. Implementation of recommended mitigation measures would ensure that existing views are not adversely affected by new development. Implementation of the Draft Specific Plan would not result in any significant cumulative impacts to visual resources.

k. Cultural and Paleontological Resources. Construction activities associated with development projects occurring under the Draft Specific Plan could result in significant impacts to archaeological resources and human remains. However, the Draft Specific Plan would be subject to measures that protect identified and previously unidentified archeological resources. Other foreseeable projects in the City would be subject to similar measures.

Implementation of the Draft Specific Plan could result in significant impacts to historic structures within the Plan Area and to the integrity of Historic District C. Impacts to already-identified historic buildings would be reduced to a less-than-significant level with implementation of recommended mitigation measures. Other foreseeable projects in the City would be subject to similar measures. Therefore, the proposed project, in conjunction with other prospects in the City would not result in a significant cumulative impact to cultural resources.

l. Public Services. Development associated with implementation of the Draft Specific Plan, along with other planned projects in Benicia, would increase the demand for police, fire, and maintenance services. As the providers of these services regularly review the growth in population and new projects to identify any resultant need for additional staffing, cumulative effects related to these services would be less-than-significant with the implementation of Draft Specific Plan actions addressing these issues.

m. Utilities. Development associated with implementation of the Draft Specific Plan, in conjunction with planned future development in the vicinity, would cumulatively increase demand on utility providers in the Plan Area. None of the various utility and infrastructure services analyzed would experience significant impacts due to implementation of the Draft Specific Plan. Because utilities in the area have generally been planned to accommodate future growth anticipated in the General Plan, buildout of the cumulative projects would not result in impacts related to physical capacities, service levels, or funding availability. Therefore, implementation of the Draft Specific Plan would not result in a significant cumulative impact to utilities and infrastructure.

n. Sustainability and Energy. The Draft Specific Plan would promote efficient land patterns, alternative transportation, the preservation of important open space and historic structures, and long-term economic viability. The proposed project would benefit sustainability and energy conservation in the cumulative condition.

D. EFFECTS FOUND NOT TO BE SIGNIFICANT

Based on visits to the project site and preliminary research, the Draft Specific Plan is not expected to result in significant impacts related to mineral resources. Mineral resources is one of the environmental topics listed in the *CEQA Guidelines*. The Plan Area does not contain significant mineral resources, as such, this topic was not further evaluated in this EIR.

E. SIGNIFICANT UNAVOIDABLE IMPACTS

The proposed project would not result in any significant unavoidable impacts.