

5. OTHER CEQA CONSIDERATIONS

This chapter provides a discussion of the effects of the proposed Project based on the analyses presented in Sections 3.1 through 3.18 of this Draft Environmental Impact Report (EIR). The topics covered in this chapter include effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, and growth-inducing effects. A more detailed analysis of the effects that the proposed Project would have on the environment, and proposed mitigation measures to minimize significant impacts, are provided in Chapter 3, *Environmental Analysis*, of this Draft EIR.

5.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

California Environmental Quality Act (CEQA) Guidelines Section 15128, *Effects Not Found to be Significant*, allows environmental issues for which there is no likelihood of significant impact to be “scoped out” and not analyzed further in the Draft EIR.

Forestry Resources

Because the EIR Study Area does not contain any national- or State-designated forestland and the woodland/forest communities do not qualify as forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)), the significance thresholds outlined in Appendix G, *Environmental Checklist Form*, of the CEQA Guidelines related to forestry resources are not evaluated in this Draft EIR (California Department of Forestry and Fire Protection 2026).

5.2 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(a) requires that “[d]irect and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short- and long-term effects.” CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Table ES-1, *Summary of Significant Environmental Impacts and Mitigation Measures*, in the *Executive Summary* of this Draft EIR summarizes the significant impacts, mitigation measures, and levels of significance with and without mitigation.

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Though mitigation measures, where feasible, would reduce the level of impact of the proposed Project, the following impacts would remain significant and unavoidable:

Agricultural Resources

- **Impact AGR-1:** Implementation of the proposed Project could result in the conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to nonagricultural uses.
- **Impact AGR-2:** Implementation of the proposed Project could conflict with existing zoning for agricultural use and Williamson Act contracts.
- **Impact AGR-3:** Implementation of the proposed Project could involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use.
- **Impact AGR-4:** Implementation of the proposed Project could result in a significant cumulative impact with respect to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), existing zoning for agricultural uses, and Williamson Act properties, and farmland to nonagricultural uses.

Air Quality

- **Impact AQ-2:** Implementation of the proposed Project could result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard during construction and operation.
- **Impact AQ-5:** Implementation of the proposed Project could result in cumulative air quality impacts with respect to generation of criteria pollutants and exposure of substantial pollutant concentrations at sensitive receptors.

Greenhouse Gas Emissions

- **Impact GHG-1:** Implementation of the proposed Project could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- **Impact GHG-2:** Implementation of the proposed Project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
- **Impact GHG-3:** Implementation of the proposed Project could result in a significant cumulative impact with respect to generation of greenhouse gas (GHG) emissions that may have a significant impact on the environment and conflict with an applicable plan adopted for the purpose of reducing GHG emissions.

Mineral Resources

- **Impact MIN-1:** Implementation of the proposed Project could result in the loss of availability of known mineral resources that would be of value to the region and the residents of the State.
- **Impact MIN-3:** Implementation of the proposed Project could result in a significant cumulative impact with respect to the loss of availability of known mineral resources that are of value to the region and the residents of the State.

Noise

- **Impact NOI-1:** Implementation of the proposed Project could generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- **Impact NOI-4:** Implementation of the proposed Project could generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, resulting in a significant cumulative impact.

5.3 SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss whether “[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.” The discussion shall consider primary and secondary impacts that generally commit future generations to similar uses, irreversible damage from environmental accidents, and irretrievable commitments of resources. The three CEQA-required categories of irreversible changes are discussed herein.

Changes in Land Use that Commit Future Generations

As described in detail in Chapter 2, *Project Description*, of this Draft EIR, the proposed Project changes some parcels’ land use designations, most of which are to create the Midtown Specific Plan Area, though generally maintains the land use pattern of the existing General Plan. Development is encouraged in existing urban areas, and new development is required to be adjacent to the existing City Limit. The existing General Plan provided development allocations for buildout of the city through the year 2025. Some future development consistent with the proposed Project would be on land that is generally urbanized or on infill sites and sites in developed areas that are underutilized. However, some future development may occur on vacant non-urban sites that are already designated for development. Once future development

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occurs, it would not be feasible to return the developed land to its existing (pre-project) condition. Therefore, there is potential that some of the development consistent with the proposed Project would lead to irreversible changes in land use.

Irreversible Damage from Environmental Accidents

Irreversible changes to the physical environment could occur from accidental release of hazardous materials associated with development activities under the proposed Project; however, compliance with the applicable existing regulations and proposed General Plan 2045 goals, policies, and actions as discussed in Section 3.9, *Hazards and Hazardous Materials*, of this Draft EIR would ensure these impacts would be less than significant. Therefore, irreversible damage is not expected to result from the adoption and implementation of the proposed Project.

Large Commitment of Nonrenewable Resources

Future development would result in the commitment of limited, renewable resources, such as lumber and water. In addition, future development would irretrievably commit nonrenewable resources for the construction of buildings, infrastructure, and roadway improvements. These nonrenewable resources include mined minerals, such as sand, gravel, steel, lead, copper, and other metals. Future development also represents a long-term commitment to the consumption of fossil fuels, such as natural gas and gasoline. Increased energy demand would be used for construction, lighting, heating, and cooling of residences, and transportation of people. However, as discussed in Section 3.6, *Energy*, and in Section 3.17, *Utilities and Service Systems*, of this Draft EIR, several regulatory measures and proposed General Plan 2045 goals and policies, and actions encourage energy and water conservation, alternative energy use, waste reduction, alternatives to automotive transportation, and green building. Future development would be required to comply with all applicable building and design requirements, including those set forth in Title 24 relating to energy conservation. In compliance with CALGreen, the State's Green Building Standards Code, future development would be required to reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials.

Consumption of building materials and energy, as described, is common to most other development in the region. The commitments of resources associated with the proposed Project are not unique or unusual. Although future development would require nonrenewable resources during construction and operation, compliance with applicable standards and regulations and implementation of proposed General Plan 2045 goals and policies would reduce the use of nonrenewable resources to the maximum extent practicable. Therefore, development would not be expected to involve an unusual commitment of nonrenewable resources, nor be expected to consume any resources in a wasteful manner.

While development would increase resource consumption during construction and operation, it would also result in some benefits related to long-term resource consumption in the region. The proposed Project would allow for the development of future housing to meet the housing needs in the city and region. Additionally, future development would accommodate much of the anticipated growth within existing developed areas. Prioritizing infill development protects natural lands and open space and reduces fossil fuel consumption attributable to longer commuting distances and lack of transit options. For these reasons, the irretrievable commitment of resources attributable to the proposed project would not be considered significant.

5.4 GROWTH-INDUCING EFFECTS

Section 15126.2(e) of the CEQA Guidelines requires that an EIR discuss the ways in which a project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical factors may include the removal of obstacles to population growth, such as through a major expansion of a wastewater plant.

This section evaluates the proposed Project's potential to create such growth inducements. As CEQA Guidelines Section 15126.2(e) requires, "[it] must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment." Negative impacts associated with growth inducement occur only where the projected growth would cause significant adverse environmental impacts.

Growth-inducing impacts fall into two general categories: direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped area. Indirect, or secondary growth-inducing impacts consist of growth induced in the region by additional demands for housing, goods, and services associated with the population increase caused by, or attracted to, a new project.

As discussed in detail in Section 3.14, *Population and Housing*, of this Draft EIR, the General Plan is the policy document that plans ahead to accommodate the amount of reasonably foreseeable growth given past growth trends and the ability of existing services and infrastructure to support future growth. Therefore, the proposed Project would not directly induce growth but rather is a response to growth that is likely to occur whether the proposed Project is adopted or not. Because the proposed General Plan 2045 also includes recommendations for future roadway and infrastructure extension, as it is required to do by State law, it has the potential to indirectly induce growth. However, the proposed General Plan 2045 itself is the City's effort to adequately plan for this growth.

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This additional growth would likely occur incrementally over a period of approximately 20 years and a policy framework is in place to ensure adequate planning occurs to accommodate. The proposed Project would allow mixed-use development and employment centers and would implement energy and water conservation requirements related to existing and new development, thereby minimizing consumption of non-renewable resources to the extent practicable.

Direct Impacts

The proposed Project consists of plan-level documents and does not propose any specific development; however, implementation of the proposed Project would induce growth by increasing the development potential in the EIR Study Area, as shown in Table 2-3, *Proposed 2045 Buildout Projections in the EIR Study Area*, in Chapter 2, *Project Description*, of this Draft EIR. As shown in Table 2-3, the 2045 forecast for the EIR Study Area is approximately 131,750 total population, 49,640 housing units, and 63,330 jobs.

State law requires the City to promote the production of housing to meet its fair share of the regional housing needs distribution made by the Association of Bay Area Governments in the Regional Housing Needs Assessment (RHNA). While the City provides adequate sites to meet its fair-share housing obligations, the additional housing capacity provided by the proposed Project would meet the additional demand generated by new job growth. Furthermore, pursuant to Senate Bill 166, Housing Elements are required to include a “buffer” of additional sites to ensure that if the sites listed in the housing opportunity sites inventory are developed without housing, or are developed with less than the full amount of housing claimed in the inventory, there is remaining capacity to ensure an ongoing supply of sites for the full RHNA during the eight years of the Housing Element cycle. The proposed General Plan 2045 land use map includes enough land designated for housing to fulfill the City’s 2023-2031 RHNA as well as future buffer sites identified through the 2023-2031 Housing Element.

In addition, the proposed Project would result in regional benefits by directing growth in a manner that supports reduced automobile dependence, which could result in improved air quality and reduced greenhouse gas (GHG) emissions. Encouraging infill growth in designated areas would help to reduce development pressures on lands outside the City Limit.

Indirect Impacts

The proposed Project could be considered growth inducing because it includes goals and policies that encourage new growth. Much of the development would consist of infill development on underutilized sites, sites that have been previously developed, and that are vacant and have been determined to be suitable for development. However, infrastructure is largely in place, and growth would be required to comply with the proposed General Plan 2045,

zoning regulations, and standards for public services and utilities; secondary effects associated with this growth do not represent a new, significant environmental impact that has not already been addressed in the individual resource sections of this Draft EIR. As discussed in detail throughout Chapter 3, most of the potential environmental impacts would be avoided or lessened with adherence to federal, State, and local policies and implementation of proposed General Plan 2045 policies, including policies related to growth management, and by implementation of mitigation measures. Therefore, by design, the General Plan 2045 reduces most of the impacts of the growth it could otherwise have induced. Those impacts that cannot be reduced to a less-than-significant level are described in Section 5.1, *Significant Unavoidable Impacts*. Additional population and employment growth would likely occur incrementally over a period of approximately 20 years and would be consistent with the regional planning objectives established for the Alameda County region.

5.5 REFERENCES

California Department of Forestry and Fire Department. 2026. CAL FIRE Timber Harvesting Plans All WGS84.

<https://www.arcgis.com/apps/mapviewer/index.html?layers=e465165103474d14b684b7effb3e1a43>, accessed January 30, 2026.

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