

CHAPTER 4 CUMULATIVE AND GROWTH-INDUCING IMPACTS

4.1 INTRODUCTION

CEQA Guidelines Section (§) 15130 requires that an EIR include a discussion of cumulative impacts “...when the project’s incremental effect is cumulatively considerable, as defined in [*CEQA Guidelines* §15065(c)].” Cumulatively considerable effects are those “...incremental effects of an individual project that are significant when viewed in conjunction with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” (*CEQA Guidelines* §15065(c)) A lead agency need not consider every incremental effect as “cumulatively considerable,” but does need to briefly describe the basis for concluding that the incremental effect is not a cumulatively considerable contribution to a cumulatively significant impact.

“The discussion of cumulative impacts shall reflect the severity of impacts and their likelihood of occurrence, but the discussion need not provide as great [a level of] detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.” (*CEQA Guidelines* §15130(b))

Following the discussion of cumulative impacts, this chapter also addresses the potential for growth-inducing impacts associated with the proposed project, as required by CEQA. Section 15126.2 (d) of the *CEQA Guidelines* outlines the factors that determine the growth-inducing effects of a project. A project would have growth-inducing effects if it would:

- Foster economic or population growth, or the construction of additional housing (either directly or indirectly) in the surrounding environment;
- Remove obstacles to population growth;
- Tax existing community services or facilities, requiring the construction of new facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

As such, this chapter of the EIR analyzes both the cumulative impacts associated with the proposed project and the potential environmental consequences of the foreseeable growth and development of the surrounding area that would be induced by implementation of the proposed project and all entitlement actions.

4.2 CUMULATIVE IMPACTS

4.2.1 Related Projects

The cumulative impact analysis considers impacts of the proposed project along with the potential impacts of “related projects” other projects that are reasonably foreseeable to take place near the proposed project. Currently, seven related projects within the project’s vicinity are either under construction, approved and awaiting construction, or undergoing review by the City or the Town of Moraga. The seven projects are briefly described in Table 4-1 (Related Projects for Cumulative Impacts Analysis).

Table 4-1. Related Projects for Cumulative Impacts Analysis

Project and Location	Size	Distance from Project Site	Status
<u>Commercial:</u> Lafayette Mercantile Southeast corner of Mount Diablo Boulevard and Dewing Avenue, Lafayette	22,000 square feet of retail; 33,000 square feet of office	2.87 miles	Construction expected to begin in summer 2005.
<u>Public Projects:</u> Lafayette Library and Learning Center Southeast corner of Mount Diablo Boulevard and First Street, Lafayette Veteran's Memorial Building North side of Mount Diablo Boulevard at Risa Road, Lafayette	30,321-square-foot library; 33,019-square-foot garage 10,500-square-foot veteran's and civic building	2.72 miles 3.5 miles	Construction expected to begin in summer 2006. Under construction; expected to be completed in September 2005.
<u>Residential:</u> Hidden Oaks 2880 Kinney Drive, Lafayette Town Center Phase III North side of Mount Diablo Boulevard at Dewing Avenue, Lafayette Palos Colorados Town of Moraga Rancho Laguna Town of Moraga	21-lot single-family subdivision 75-unit apartment building 120 single-family homes and 18-hole golf course 43 single-family homes	2.96 miles 2.87 miles 3.02 miles 2.84 miles	Approved; began last year. In City's review process; if approved construction expected to begin in 2006. Currently undergoing Town review. Currently undergoing Town review.
Source: City of Lafayette, Planning and Building Services			

4.2.2 Environmental Analysis

The following environmental resource areas have the potential for significant project impacts and are discussed in relation to their potential cumulative impacts.

In considering the potential effect of the proposed project in concert with the seven related projects listed in Table 4-1, it is important to consider that the approximate distance between the proposed project and the related projects range from 2.72 to 3.5 miles. This spatial separation would diminish the potential for and magnitude of cumulative impacts.

4.2.2.1 Land Use and Planning

Each of the four projects approved by the City has been determined, through its entitlement process, to be consistent with the applicable policies of the City of Lafayette *General Plan (General Plan)* and development standards applicable to each project. The Town Center III project currently under review by the City will not be approved unless it also is consistent with applicable *General Plan* policies. The two

projects in the Town of Moraga, to be approved, must be consistent with the Town of Moraga's General Plan policies and development standards. Cumulatively, the seven projects would not be expected to produce a cumulative impact with regard to land use and planning.

Section 3.2 (Land Use and Planning) concludes that the proposed project would not produce any significant impacts on the environment. Furthermore, the proposed project would not make a considerable contribution to significant cumulative land use or planning impacts. No mitigation is required.

4.2.2.2 Aesthetics

Each of the four projects approved by the City is required to adhere to the *General Plan* policies and development standards related to the protection of visual resources and harmonious integration with surrounding development. The Town Center III project currently under review by the City will not be approved unless it also is consistent with the same *General Plan* policies and standards. The two projects in the Town of Moraga, to be approved, must comply with Moraga's General Plan policies and development standards related to visual resources and aesthetics. In addition, the proposed project site is a significant distance from these seven related projects, and would not be viewed together with any of them. Cumulatively, these seven projects would not be expected to produce a cumulative impact with regard to aesthetics and visual resources.

Section 3.3 (Aesthetics and Visual Resources) states that the proposed project, with mitigation, would not produce any significant impacts on the environment related to aesthetics and visual resources. The proposed project would not make a considerable contribution to significant cumulative aesthetic or visual resource impacts because the project site is not within the same viewshed as the other seven projects. No further mitigation is required.

4.2.2.3 Air Quality

In general, all projects construction activities are required to comply with BAAQMD regulations and policies to minimize the emission of criteria air pollutants during construction. The staggered construction schedules of the seven projects, combined with their dispersed locations, would reduce the potential for cumulative air quality impacts.

The seven projects would also generate emissions from additional vehicle traffic after construction. However, the number of vehicle trips associated with these projects and the anticipated airborne emissions would be relatively imperceptible within the context of the region's air shed.

Section 3.4 (Air Quality) states that the proposed project, with mitigation, would not produce any significant impacts on the environment related to air quality. The proposed project would not make a considerable contribution to significant cumulative air quality impacts because of the project's mitigation measures, the dispersed locations of the seven related projects, and the staggered construction schedules of the projects. No further mitigation is required.

4.2.2.4 Biological Resources

The three commercial and public use related projects are located in the urbanized center of the community, where there are no sensitive biological resources. The four residential projects would have a potential impact on plant and wildlife habitat. However, appropriate mitigation measures have been or would be incorporated into these project's approvals. Mitigation measures would minimize impacts on biological resources to a less than significant level.

Section 3.5 (Biological Resources) concludes that all potentially significant biological resources impacts of the proposed project would be mitigated to less than significant levels with implementation of mitigation measures. The project would not make a considerable contribution to significant cumulative biological resource impacts because of its limited biological impact and the mitigation measures incorporated by the four related projects with potential impacts on biological resources. No further mitigation is required.

4.2.2.5 Cultural Resources

Implementation of the seven related projects has the potential to damage cultural resources. Because, the nearest of the seven projects is 2.72 miles away, it is highly unlikely that any unidentified cultural resources would (because of spatial displacement) be from the same or a contiguous cultural record as that of the proposed project. Therefore, the proposed project would not contribute an incrementally significant impact leading to the loss of an historic record.

Section 3.6 (Cultural Resources) concludes that all potentially significant cultural resource impacts would be mitigated to less than significant levels with implementation of outlined mitigation measures. The proposed project would not make a considerable contribution to significant cumulative cultural resource impacts because of the specified mitigation measures, combined with similar mitigation measures implemented by the other related projects. No further mitigation is required.

4.2.2.6 Geology and Soils

The project site, as well as most of the San Francisco Bay Area, is seismically active, and the development of most land within the region carries with it a certain degree of risk. The seven related projects would expose people and structures to these and other risks related to geology and soils. However, building codes and current engineering standards are routinely employed to minimize the risks associated with land development. The nearest of the seven projects is 2.72 miles from the proposed project, which is beyond the range of associative impact that could be influenced by development of the project site.

Section 3.7 (Geology and Soils) concludes that all potentially significant geology and soils impacts would be mitigated to less than significant levels with implementation of mitigation measures. The project would not make a considerable contribution to significant cumulative geology and soils impacts because of the mitigation measures, combined with the dispersed locations of the related projects. No further mitigation is required.

4.2.2.7 Hydrology and Water Quality

In general, all projects are required to comply with federal, state and local water quality regulations and policies in order to reduce the amount of point/non-point source pollutants, as well as sediment discharge. Compliance with the Clean Water Act provisions, the National Pollutant Discharge Elimination System permit requirements and the Contra Costa Clean Water Program best management practices by all seven projects would reduce the potential for cumulative hydrology and water quality impacts.

Section 3.8 (Hydrology and Water Quality) concludes that all potentially significant hydrology and water quality impacts would be mitigated to less than significant levels with the implementation of the specified mitigation measures. The project would not make a considerable contribution to significant cumulative hydrology and water quality impacts because of the mitigation measures, combined with similar mitigation measures implemented by the other related projects. No further mitigation is required.

4.2.2.8 Noise

The proposed project would have short-term (temporary) construction noise and long-term operational noise impacts. To reduce noise created by construction activities, the City requires construction activities to adhere to a series of project conditions, such as limitations on construction hours and the installation of sound attenuation on construction equipment; the Town of Moraga has similar project conditions to limit construction noise. Furthermore, construction schedules of the related projects would be staggered enough to avoid or reduce cumulative noise impacts of the seven projects.

Operational noise from automobiles, heating and cooling systems, pool and spa equipment, human voices, and landscape maintenance are considered long-term sources of unwanted noise. These sources would not increase noise to levels that exceed the City's standards. Impacts would be less than significant and no mitigation would be required, except locating mechanical equipment as far from sensitive receptors as feasible. In addition, the project site is at a significance distance (at least 2.72 miles) from the other related projects, thus cumulative operational noise impacts would be relatively imperceptible.

Section 3.9 (Noise) concludes that implementation of mitigation measures would reduce the temporary construction noise impacts to a less than significant level. The proposed project would not make a considerable contribution to significant cumulative noise impact because of the specified mitigation measures, incorporation of similar mitigation measures implemented by the other related projects, and the dispersed location of the other projects. No further mitigation is required.

4.2.2.9 Public Services, Utilities, and Service Systems

The City of Lafayette has determined that, of the related projects the four approved projects and the one proposed project do not represent a potentially significant impact on the balance between supply and demand for public services, utilities, and service systems. It is assumed that the project currently in the City's approval process would not receive approval if it would individually or cumulatively result in significant impacts on public services, utilities, and service systems. In addition, the two projects in the Town of Moraga would not be approved if it is determined that they would contribute to any significant cumulative impacts on public services and utilities.

Section 3.10 (Public Services Utilities, and Service Systems) states that the proposed project, with mitigation, would not produce any significant impacts on the environment related to the provision of public services, utilities, and service systems. The proposed project would not make a considerable contribution to significant cumulative public services and utilities impacts because of the limited demand and the City's adequate capacity. No further mitigation is required.

4.2.2.10 Transportation and Traffic

The seven related projects would incrementally increase the number of vehicle trips in the circulation system. The Final EIR prepared for the City's *2002 General Plan Revision* noted that Highway 24 would operate at unacceptable levels of service, even if no future development occurs within the City. The Final EIR concluded that there is no planned method of reducing the impacts on Highway 24, and that the impact, with or without additional growth in Lafayette, is unavoidable and, for the time, unmitigable.

The proposed project is forecast to generate approximately 114 daily trips, which includes approximately 13 a.m. peak hour trips and approximately 11 p.m. peak hour trips. This increase in trips is not considered to be substantial, and impacts would be less than significant on Lucas Drive and other area streets. In addition, the traffic study prepared for the project determined that vehicle trips associated with the

proposed project, combined with trips from related projects, would not result in cumulative impacts on the study intersections.

Section 3.11 (Transportation and Traffic) states that the proposed project would produce a less than significant impact on transportation and traffic. The proposed project would incrementally add to the existing Highway 24 traffic, but this impact would be imperceptible. The proposed project would not make a considerable contribution to significant transportation or traffic impacts because the number of new trips that would be generated by the proposed project would be limited, and the locations of the other seven projects are dispersed. No mitigation is required.

4.3 GROWTH INDUCING-IMPACTS

Section 15126.2(d) of the *CEQA Guidelines* requires preparers of an EIR to consider the growth-inducing impacts of a proposed project. The project would provide new housing for approximately 20 people, and would not add any permanent jobs to the existing employment base. According to the Association of Bay Area Governments (ABAG), the City of Lafayette will experience a 5.7 percent rate of growth between 2005 and 2025. The addition of the project's eight single-family residences is beneficial to the City because it would provide additional housing needed to accommodate this expected growth.

The residents of the proposed project would be new residents to the City or current residents from the City moving to the new development. Because the number of proposed residences is small, the project is not expected to generate demand for services that might be typical of larger residential developments. Therefore, there is no potentially significant growth-inducing impact related to public services or utilities. No further mitigation is required.

As a residential development, the project would not add any new permanent jobs to the existing employment base. Therefore, the proposed project would not add to the regional need for housing and is not regarded as a potentially significant growth-inducing impact. No further mitigation is required.

The proposed project would not remove any obstacles to population growth for the City of Lafayette, the City of Walnut Creek, the Town of Moraga, or Contra Costa County. The proposed project is located next to existing single-family residences and Burton Valley Ridge, and can be classified as infill development. There are no other opportunities for development in close proximity to the project site.

The proposed project would be consistent with the *General Plan* and the City of Lafayette Zoning Ordinance. However, the project would need a Hillside Development Permit pursuant to Chapter 6-20 of the Lafayette Municipal Code (LMC). The proposed project would also need exceptions to the Hillside Development Ordinance to allow development on slopes greater than 30 percent and within Class I and II ridgeline setbacks. Of the 87.9-acre project site, only 28.28 acres would be developed; the remaining portion of the property would remain in permanent open space. Although the project would require some minor infrastructure improvements, the size of the improvements would not accommodate growth beyond that of the proposed project, nor beyond currently projected growth of the City.