

4.9 LAND USE AND PLANNING, INCLUDING AGRICULTURE RESOURCES, POPULATION, AND HOUSING

4.9.1 ENVIRONMENTAL SETTING

PROJECT SITE LAND USES

The Project Site consists of approximately 487 acres of land area in unincorporated Solano County, California, west of the Suisun City. The Project Site is bounded to the east by the Union Pacific Railroad and to the north by SR 12. The western perimeter of the Project Site is bounded by the eastern edge of LedgeWood Creek in the northern portion of the site and Orehr Road in the southern portion of the Project Site. To the south, the Project Site meets the Suisun Marsh. See Exhibit 3-1 in Chapter 3, “Project Description,” for the Project Site’s location within the region, and Exhibit 3-2 in Chapter 3 for a more detailed depiction of the Project Site within the local vicinity.

The Project Site is currently agricultural grazing land and undeveloped open space. Cattle graze throughout the northern portion of the Project Site. Various utilities (e.g., telephone, power, natural gas lines) exist along Pennsylvania Avenue and Cordelia Road, but there are no known utility improvements or irrigation within the Project Site other than a raw water line bisecting the northern portion of the Project Site that is owned by the City of Vallejo.

Located near the center of the Project parcels, but not within the Project Site, are two commercial businesses operating near the intersection of Pennsylvania Avenue and the California Northern Railroad: (1) Kings of Auto/U-Haul, located at 1001 South Pennsylvania Avenue, consists of an auto repair shop and a U-Haul rental shop, and (2) Nor Cal Concrete, a concrete contractor, is immediately south of Kings of Auto. A homeless encampment exists within the northeastern corner of the Project Site, within a parcel that is within the city limits of Suisun City.

An approximately 5-acre parcel (APN 0032-020-040) is east of Pennsylvania Avenue and adjacent to the Project Site. The Project does not propose any change of use or any physical change of any kind to this property.¹

SURROUNDING LAND USES

The city of Fairfield southern city limit is on the opposite side of SR 12, north of the Project Site. Existing uses in this portion of Fairfield include single-family residences, offices, and light industrial uses. East of the Union Pacific Railroad tracks that are adjacent to the eastern perimeter of the Project Site is Downtown Suisun City and the Suisun City waterfront, which is developed with a variety of commercial, residential, assembly, repair, and retail land uses. To the west of the Project Site, across LedgeWood Creek, are industrial warehouse and office uses. Undeveloped land is to the west and south of the Project Site, including Suisun Marsh to the south.

¹ The land area within the Annexation Area – 161 acres – includes a 5-acre property east of Pennsylvania Avenue that is not a part of the Project Site. The acreage is included in the total Annexation Area since annexation of this property would be required to avoid an unincorporated “island.”

AGRICULTURAL RESOURCES

The California Department of Conservation’s Important Farmland classifications—Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance—recognize the land’s suitability for agricultural production by considering the physical and chemical characteristics of the soil, such as soil temperature range, depth of the groundwater table, flooding potential, rock fragment content, and rooting depth. The classifications also consider location, growing season, and moisture available to sustain high-yield crops. Together, Important Farmland and Grazing Land are defined by the California Department of Conservation as “Agricultural Land” (California Public Resources Code, Sections 21060.1 and 21095).

According to the Solano County Important Farmland map, published by the California Department of Conservation’s Division of Land Resource Protection, the Development Area is designated as Grazing Land and the Managed Open Space area is designated as Grazing Land and Other Land (California Department of Conservation 2018).

Williamson Act

Under the California Land Conservation Act of 1965, also known as the Williamson Act and explained further in Section 3.2.3, Regulatory Framework, local governments can enter into contracts with private property owners to protect land (within agricultural preserves) for agricultural and open space purposes. No lands are under Williamson Act contract on the Project Site or the off-site improvement areas.

Agricultural Zoning

The northern portion of the Development Area is zoned by Solano County as Exclusive Agriculture 40 Acres (A-40). The purpose of the A-40 zoning designation is to preserve agriculture, including allowing agricultural-related support uses, excluding incompatible uses, and protecting the viability of the family farm. The zoning regulations allow a secondary dwelling and, for farms with larger acreage, permit a reasonable number of farm labor housing on or near the farming activity. Allowable land uses include crop production, grazing, pastured livestock, wineries, one primary dwelling, and one secondary dwelling.

POPULATION

Suisun City’s total population increased from 28,111 in 2010 to 29,119 in 2020, which is a 3.5-percent increase over this 10-year period (Placeworks 2022). The California Department of Finance estimates that the population of Suisun City was 28,896 as of January 2022, or an approximately 2.8-percent increase compared to the 2010 population and a 0.8-percent decrease compared to the 2020 population (California Department of Finance 2022).

The population in Suisun City is estimated to increase to 33,700 by 2040 (City of Suisun City 2015). This represents an increase of approximately 16.6 percent over the 2022 estimated population. Suisun City’s expected population increase is higher than that of the other jurisdictions in the county with the exception of Fairfield and Vacaville, which are higher (City of Suisun City 2015).

HOUSING

The California Department of Finance estimates that Suisun City’s total number of housing units increased from 9,450 in 2010 to 9,523 in 2022, or an approximately 1.2-percent increase over this 10-year period. Suisun City has

the lowest vacancy rate in the county at 2.4 percent, which can indicate a shortage of housing and high competition for available housing (California Department of Finance 2022, Placeworks 2022).

Suisun City has the largest household size in the County at 3.11 persons per household (California Department of Finance 2022). Approximately 85 percent of the housing units in 2022 were attached and detached single-family homes (California Department of Finance 2022).

LABOR FORCE

According to the U.S. Census Bureau, Suisun City had 15,687 employed civilians in the labor force in 2021 (U.S. Census Bureau 2021). The largest employment sector for Suisun City residents, with 21.8 percent of the total, is educational, health, and social services followed by the retail trade with 14.4 percent and manufacturing with 9.8 percent (U.S. Census Bureau 2021).

Unemployment

The unemployment rate reflects individuals 16 years or older, not members of the Armed Services, and not in institutions such as prisons, mental hospitals, or nursing homes. The unemployment rate in Solano County was lower than the statewide rate at 5.4 percent. In 2021, Suisun City's unemployment rate was 5.6 percent, which was slightly greater than Solano County (Placeworks 2022).

Jobs/Housing Relationship

A jobs-to-housing ratio is a calculation of the number of jobs per housing units that are available in a given area. A low jobs/housing ratio describes a housing-rich community with fewer available jobs for residents, while a high ratio describes a jobs-rich area with more jobs available for residents. The labor force in Suisun City is approximately 15,687, as noted above, and, as reported by the United States Census Bureau for 2020, the total number of jobs located in Suisun City is 3,118 (U.S. Census Bureau 2020d). This total number of jobs was likely affected by the COVID pandemic – the total number of jobs in the city in 2010 was estimated to be 4,190 (City of Suisun City 2010). Regardless, Suisun City has a deficit of jobs compared to employed residents.

In a community with a low jobs/housing ratio, working-age residents are more likely to need to commute to work, which, depending on their mode of travel, can contribute to regional congestion and air pollution and can increase individual time lost, stress, and travel costs. Improving the balance between the type and number of local jobs and the occupations and size of the local labor force can enhance quality of life and improve environmental conditions.

The balance of jobs and housing can be driven by the adequacy of supply of housing of the types and costs to house workers employed in a defined geographic area, such as a community, a city, or other subregion. Alternatively, a jobs/housing balance could focus more on the adequate provision of employment in a defined area that generates enough local workers to fill the housing supply. An area that has too many jobs relative to its housing supply is likely (in the absence of offsetting factors) to experience substantial in-commuting, escalations in housing prices, and intensified pressure for additional residential development. Conversely, if an area has relatively few jobs in comparison to the number of employed residents, many of the workers are required to commute to jobs outside of their area of residence. In order to maximize the environmental benefits of a jobs/housing balance, there needs to be a nexus between the types and costs of housing proposed to be located

near jobs to be provided, the education/skills required by those jobs relative to the local labor force, and the income levels associated with those jobs.

Beyond the locational relationship between jobs and housing, there is also an important relationship between jobs and workers. Housing has long been used as a proxy for workers and worker residences. In reality, the number of workers per household varies widely across the regions based on a variety of demographic factors (such as age and education/skills) and different housing types have the capacity for accommodating different numbers of workers. Additionally, areas with “good” jobs-housing balance may still result in longer commutes for workers, if available housing in the area is unaffordable to workers filling local jobs.

Even with a numeric balance between the number of local jobs and the local labor force, there can still be substantial commuting activity if the types of jobs are not matched with the skills and experience of the local labor force. The number of workers per household varies, and different types of housing accommodate different numbers of workers. In addition, the ratio depends on the geographic region used for the computation. A city with all residences on one side and all employment on the other side would have an acceptable numeric jobs-housing balance but a substantial amount of commuting. In a different scenario, workers with a substantially longer commute that is still within the city are counted, whereas workers that travel short distances outside of the city are not. Finally, employment necessarily concentrates in specific areas. Warehouses or industrial areas are usually not intermixed with housing. However, the jobs-ratio balance can provide some useful information for planning purposes.

Finally, no simplistic numeric formula can capture the complex human decision-making process of where to live and where to work. For those households who have choices regarding employment and housing, lifestyle factors (good schools, community amenities and culture, available housing types, etc.) can outweigh the convenience of living closer to work.

Based on data from the U.S. Census Bureau, 92 percent of workers living in Suisun City commuted to work by car (U.S. Census Bureau 2021). The most recent Longitudinal Employer-Household Dynamics Origin-Destination Employment Statistics (LODES) data reported by the U.S. Census reports approximately 3.4 percent of city residents are employed and live within the city while 96.6 percent commute to jobs outside of the city (U.S. Census Bureau 2020a). Approximately 85 percent of local jobs within the city are filled by employees from outside of the city, mainly from the cities of Fairfield and Vacaville (U.S. Census Bureau 2020b, c).

The predominance of residential uses in Suisun City is reflected in the City’s jobs/housing ratio of 0.41, as most of the city’s residents commute to jobs in Fairfield, Vacaville, and Travis AFB (Placeworks 2022). While approximately 96.6 percent of Suisun City residents commute outside of the city for work, it is likely that many of these individuals are commuting to the AFB or into Fairfield as 49.6 percent of employed residents in Suisun City live within 10 miles of their place of employment (Placeworks 2022).

Plan Bay Area 2050 Growth Pattern identifies the plan’s projected household and job growth for the region out to the year 2050. Household and job projections were developed on regional, county, and sub-county levels to reach 2023-2031 regional housing needs assessment requirements, and includes estimates for northern Solano County, which includes Suisun City, Dixon, Fairfield, and Vacaville. Plan Bay Area 2050 estimates that the jobs/housing balance for northern Solano County would be 1.2 by 2050, indicating a near balance between jobs and housing (Association of Bay Area Governments [ABAG] 2021).

4.9.2 REGULATORY FRAMEWORK

FEDERAL PLANS, POLICIES, REGULATIONS AND LAWS

There are no federal plans, policies, regulations, or laws related to land use and planning that apply to the proposed Project.

STATE PLANS, POLICIES, REGULATIONS, AND LAWS

Cortese-Knox-Hertzberg Local Government Reorganization Act (AB 743)

The Cortese-Knox Local Government Reorganization Act (sec. 56000 et. seq. of the California Government Code) is the framework within which proposed city annexations are considered. This law sets forth the functions for a LAFCO, which are agencies that were created by state legislation to ensure that changes in local governmental organization occur in a manner that provides efficient and good-quality services and preserves open space land resources. In 1963, the California Legislature established LAFCOs in each county and gave them regulatory authority over local agency boundary changes. In the 1970s, the legislature recognized the connection between decisions concerning governmental organization and the issues of urban sprawl and loss of prime agricultural land. In response to these concerns, LAFCOs were charged with implementing changes in governmental organization in a manner that preserves agricultural and open space land resources, as well as provides the delivery of services. In 2000, the Cortese-Knox-Hertzberg Act was further amended as a result of AB 2838.

LAFCOs apply the policies and provisions of the Cortese-Knox-Hertzberg Act to decisions regarding annexations, incorporations, reorganizations, and other changes in government organization. LAFCOs are responsible for reviewing, approving, modifying, and approving or disapproving changes in organization to cities and special districts, including annexations, detachments, new formations, and incorporations. LAFCOs must, by law, perform municipal service reviews and update spheres of influence for each independent local governmental jurisdiction within their countywide jurisdiction.

California Important Farmland Inventory System and Farmland Mitigation and Monitoring Program

The Farmland Mapping and Monitoring Program was established by the State of California in 1982 to continue the Important Farmland mapping efforts begun in 1975 by the U.S. Soil Conservation Service (now called the Natural Resources Conservation Service, under the U.S. Department of Agriculture). The intent was to produce agricultural resource maps, based on soil quality and land use across the nation. The Department of Conservation sponsors the Farmland Mapping and Monitoring Program and also is responsible for establishing agricultural easements, in accordance with California Public Resources Code Sections 10250–10255.

The Department of Conservation Farmland Mapping and Monitoring Program maps are updated every two years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance. The following list provides a comprehensive description of all the categories mapped by the Department of Conservation (DOC 2023):

- ▶ **Prime Farmland**—Land that has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields.
- ▶ **Farmland of Statewide Importance**—Land similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture.
- ▶ **Unique Farmland**—Land of lesser quality soils used for the production of the state’s leading agricultural cash crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California.
- ▶ **Farmland of Local Importance**—Land that is of importance to the local agricultural economy, as defined by each county’s local advisory committee and adopted by its board of supervisors. The Solano County Board of Supervisors has determined no Farmland of Local Importance will be designated in the county.
- ▶ **Grazing Land**—Land with existing vegetation that is suitable for grazing.
- ▶ **Urban and Built-Up Lands**—Land that is used for residential, industrial, commercial, institutional, and public utility structures and for other developed purposes.
- ▶ **Other Lands**—Land that does not meet the criteria of any of the previously described categories and generally includes low-density rural developments, vegetative and riparian areas not suitable for livestock grazing, confined-animal agriculture facilities, strip mines, borrow pits, and vacant and nonagricultural land surrounded on all sides by urban development. In Stanislaus County, Other Land is further divided into five subcategories: Rural Residential Land, Semi-Agricultural and Rural Commercial, Vacant and Disturbed Land, Defined Animal Agriculture, Nonagricultural and Natural Vegetation.

Important Farmland is classified by the Department of Conservation as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. Under CEQA, the designations for Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are defined as “agricultural land” or “farmland” (Public Resources Code Sections 21060.1 and 21095, and CEQA Guidelines Appendix G).

REGIONAL AND LOCAL PLANS, POLICIES, REGULATIONS, AND ORDINANCES

Plan Bay Area 2050

Plan Bay Area 2050 is a long-range regional plan for the nine-county San Francisco Bay Area, adopted by ABAG and the Metropolitan Transportation Commission (MTC) in October 2021. Plan Bay Area originally was developed out of the California Sustainable Communities and Climate Protection Act of 2008 (California Senate Bill 375), which requires each of the state’s 18 metropolitan areas, including the Bay Area, to reduce greenhouse gas emissions from cars and light-duty trucks. Thirty-five strategies comprise the plan to improve housing, the economy, transportation, and the environment across the Bay Area’s nine counties — Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma. These strategies are public policies or set of investments that can be implemented in the Bay Area at the city, county, regional, or state level over the next 30 years (ABAG 2021).

The Development Area is identified by the Plan Bay Area 2050 as a Priority Production Area (PPA) (ABAG 2021). PPAs are defined as locally identified places for job growth in middle-wage industries like manufacturing, logistics, or other trades (ABAG 2021). An area must be zoned for industrial use or have a predominantly industrial use, at least one-half mile from a major rail commute hub, and be located in a jurisdiction with a certified housing element to be defined as a PPA (ABAG 2023).

Solano Local Agency Formation Commission

Solano LAFCO is responsible for determining whether an annexation is consistent with the LAFCO objectives and policies of ensuring that services would be available to new development within proposed annexation areas; avoiding premature conversion of farmland; and ensuring planned, logical, and orderly patterns of urban growth. Future annexation of lands within Suisun City's SOI into the City's jurisdiction would need to be approved by Solano LAFCO. The City is required to coordinate with LAFCO during the annexation process to ensure that municipal services are provided to newly annexed areas. The following Solano LAFCO mandatory standards are applicable to the proposed Project (Solano LAFCO 2019):

- ▶ **Mandatory Standard 1: Consistency with Sphere of Influence Boundaries.** An area proposed for change of organization or reorganization shall be within the affected agency's Sphere of Influence. An application for change of organization or reorganization for lands outside an adopted Sphere of Influence may be considered concurrently with a request for amendment to the Sphere of Influence, at LAFCO's discretion.
- ▶ **Mandatory Standard 2: Change of Organization and Reorganization to the Limits of the Sphere of Influence (SOI) Boundaries.** Annexation to the limits of the SOI boundary shall not be allowed if the proposal includes land designated for open space use by the affected city's general plan for city change of organization or reorganization or County General Plan for district change or organizations or reorganization unless such open space logically relates to existing or future needs of the agency. Open space uses which may be located within agency limits include but are not limited to community and city-wide parks, recreational facilities, permanently protected open space lands, reservoirs, and storm water detention basins.
- ▶ **Mandatory Standard 3: Consistency with Appropriate City General Plan, Specific Plan, Area-Wide Plan, and Zoning Ordinance.** An application for a city change of organization or reorganization which involves the conversion of open space lands to urban use shall be denied by LAFCO if the proposed conversion is not consistent with appropriate city plans (general plans, specific plans, area-wide plans and associated zoning ordinance). The determination of consistency shall be the responsibility of the affected agency, and shall be met by a resolution approved by the agency council certifying that the proposed change of organization or reorganization meets all applicable consistency requirements of State Law, including internal consistency between the agency's adopted plans and the zoning ordinance. In the event that plan consistency is contested, LAFCO shall retain the discretion to determine the consistency question and may require additional environmental information.
- ▶ **Mandatory Standard 5: Requirement for Pre-Approval.** Prior to approval by LAFCO of a city change or organization or reorganization, the affected agency shall have approved, a specific plan, pre-zoning, or an equivalent providing similar detail of information on the proposed land use for the affected territory and where the change of organization or reorganization process is clearly described. Prior to approval by LAFCO of a district change of organization or reorganization, the affected agency shall pass a resolution supporting the proposal.

- ▶ **Mandatory Standard 6: Effect on Natural Resources.** An application for annexation shall describe the amount of land involved, and the land, water, air, and biological resources affected, including topography, slope, geology, soils, natural drainages, vegetative cover, and plant and animal populations. Effects to be covered include those which will be both positive and negative and the means proposed to offset potential negative impact. LAFCO shall certify that provisions of the Solano LAFCO Environmental Guidelines for the Implementation of the California Environmental Quality Act have been complied with.
- ▶ **Mandatory Standard 7: Establishing Proposal Boundaries, Map and Geographic Description Requirements, Other Required Map Exhibits.** This Standard sets forth guidelines for establishing the boundaries of proposals. The Legislature has delegated the authority to determine the boundary of any proposal to local LAFCOs. The purpose of this Standard is to assure planned, orderly, and efficient patterns of urban growth by when possible, avoid annexing or detaching portions of parcels, avoid conditions that would make the annexation of adjacent parcels difficult at a later date, and avoid excluding parcels that are necessary to promote efficient patterns of urban growth. Inconsistencies with any of these requirements need to be thoroughly explained and justified.
- ▶ **Mandatory Standard 8: Likelihood of Significant Growth and Effect on Other Incorporated or Unincorporated Territory.** Prior to approving an annexation, LAFCO shall make a determination that the proposed conversion of open space lands to urban use is justified by probable urban growth within a 10 year-period of time. A determination on the likelihood of significant growth justifying the conversion shall be based on analysis of local and regional demand for the proposed use.

Solano County General Plan

The Solano County General Plan (Solano County 2008, last updated 2015) designates the northern portion of the Project Site, generally north of Cordelia Road and the California Northern Railroad as Urban Industrial and the southern portion of the Project Site as Marsh, with a Resource Conservation Overlay. The Project proposes to annex the northern portion of the Project Site to the City of Suisun City. With respect to the southern portion of the Project Site, the Marsh land use designation in the County’s General Plan “[p]rovides for protection of marsh and wetland areas...[p]ermits aquatic and wildlife habitat, marsh-oriented recreational uses, agricultural activities compatible with the marsh environment and marsh habitat, educational and scientific research, educational facilities supportive of and compatible with marsh functions, and restoration of historic tidal wetlands” (Solano County 2008, page LU-19).

City of Suisun City General Plan

The City of Suisun City 2035 General Plan (City of Suisun City 2015) establishes the overall amount, character, and location of development, as well as preservation and natural resource conservation, economic development, transportation, safety, public facilities and services, and housing in the city over the long term. The following policies and actions would apply to the proposed Project.

Land Use

- ▶ **Policy LU-4.1:** The City will support the provision of facilities, services, or infrastructure only in areas that are planned for development. The City will not induce growth by supporting the provision of services or infrastructure in areas that are not planned for development under the General Plan.

- ▶ **Policy LU-4.2:** The City will only allow annexation of land that is on or adjacent to lands with available urban services.
- ▶ **Policy LU-4.4:** Annexation requests shall provide studies requested by Solano Local Agency Formation Commission.

Economic Development

- ▶ **Policy ED-3.1:** The City will encourage development that improves the balance between local jobs and housing, including new commercial and industrial development, home-based businesses, business incubators, and other uses that produce high-quality local jobs.
- ▶ **Policy ED-3.3:** The City will place greater emphasis on attracting skilled production businesses that match the skills of Suisun City’s workforce.

City of Suisun City Municipal Code

The City of Suisun City Municipal Code regulates land use, buildings, public rights-of-way, and other proposed physical changes within the city. The Zoning Code, Title 18 of the Municipal Code, is the primary implementation tool for the City General Plan. The Municipal Code would apply to the Development Area after annexation.

4.9.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

METHODOLOGY

Evaluation of the potential impacts of the proposed Project related to land use and planning, including agricultural resources, population, housing, and employment was based on a review of the following planning documents:

- ▶ *Solano County General Plan* (Solano County 2008),
- ▶ *City of Suisun City General Plan* (City of Suisun City 2015),
- ▶ *City of Suisun City 2023-2031 Housing Element* (Placeworks 2022),
- ▶ *Solano County Local Agency Formation Commission Standards and Procedures* (Solano LAFCO 2019), and
- ▶ *Plan Bay Area 2050* (ABAG 2021).

Additional background information on population, housing, and employment was obtained from California Department of Finance and the United States Census Bureau.

The evaluation of potential impacts on agricultural resources was based on a review of the Department of Conservation Important Farmland map and Williamson Act Contract map for Solano County (Department of Conservation 2018). Appendix G of the CEQA Guidelines focuses the analysis on conversion of agricultural land on Prime Farmland, Farmland of Statewide Importance, or Unique Farmland; therefore, any conversion of these lands is generally considered a significant impact under CEQA.

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the CEQA Guidelines, the proposed Project would have a significant impact related to land use and planning, agricultural and forestry resources, and population and housing if it would:

- ▶ physically divide an established community;
- ▶ cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect;
- ▶ convert Prime Farmland, Unique Farmland, or 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 use;
- ▶ conflict with existing zoning for agricultural use or a Williamson Act contract;
- ▶ conflict with existing zoning for, or cause rezoning of, forestland (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]);
- ▶ result in the loss of forestland or conversion of forestland to nonforest use;
- ▶ involve other changes in the existing environment that, because of their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to nonforest use;
- ▶ induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or
- ▶ displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

ISSUES NOT DISCUSSED FURTHER

Physically Divide an Established Community—There are no residential land uses within the Project Site or the off-site improvement areas. The nearest established community is located 0.2 mile north of the Development Area, north of the SR 12. The proposed Project does not include any linear features or other physical features that would create a barrier, divide, or separate adjacent uses. The proposed Project would improve Pennsylvania Avenue and Cordelia Road along the Project frontages and construct a northbound right turn lane on northbound Pennsylvania Avenue and SR 12. These roadway improvements would not divide established communities near the Project Site and off-site improvement area. Supporting underground utilities, including water, wastewater, electricity, natural gas, and telecommunications, would be installed on-site or within public rights-of-way. Therefore, **no impact** would occur, and this issue is not addressed further in this EIR.

Convert Prime Farmland, Farmland of Statewide Importance, or Unique Farmland—The Project Site and off-site improvement areas are designated by the Solano County Important Farmland map as Grazing Land (California Department of Conservation 2018). Grazing Land is not considered Important Farmland under CEQA (Public Resources Code Sections 21060.1 and 21095 and CEQA Guidelines Appendix G). Therefore, the

proposed Project would not convert Important Farmland to nonagricultural uses. Therefore, **no impact** would occur, and this issue is not addressed further in this EIR.

Conflict with Existing Zoning for an Agricultural Use—The northern portion of the Development Area is zoned by Solano County as Exclusive Agriculture 40 Acres (A-40). The Project proposes to pre-zone and annex approximately 161 acres of land (referred to as the ‘Annexation Area’) into the City of Suisun City. The Project proposes an amendment to the City’s General Plan Land Use Diagram so that the General Plan’s Commercial Mixed Use and Open Space land use designations are consistent with the proposed Development Area and Managed Open Space area proposed as a part of the Project. Approximately 93.4 acres of the Annexation Area would be pre-zoned as Commercial Services & Fabricating (CSF), and the remaining Annexation Area would be pre-zoned as Open Space (OS) or within roadway rights-of-way. The CFS zoning would accommodate light manufacturing, research and development, warehousing, and accessory office space. The OS zoning would allow agriculture, resource protection and restoration, and resource-related recreation. With approval of the proposed Project, annexation of the Development Area into the City of Suisun City, and associated zoning changes, development of the proposed Project would not conflict with zoning for agricultural use. Therefore, **no impact** would occur, and this issue is not addressed further in this EIR.

Conflict with Existing Williamson Act Contract— No lands are under Williamson Act contract on the Project Site or the off-site improvement areas. Therefore, implementing the proposed Project would not conflict with an existing Williamson Act contract. Therefore, **no impact** would occur, and this issue is not addressed further in this EIR.

Conflict with Existing Zoning for, or Cause Rezoning of, Forest Land, Timberland, or Timberland Zoned Timberland Production—The Project Site and the off-site improvement areas are not zoned as forestland, timberland, or a Timberland Production Zone. Thus, the proposed Project would not conflict with existing zoning for, or cause rezoning of, forestry resources. Therefore, **no impact** would occur, and this issue is not addressed further in this EIR.

Result in the Loss of Forest Land or Conversion of Forest Land to Non-Forest Use—The Project Site and the off-site improvement areas do not contain timberland as defined by Public Resources Code Section 4526 or contain 10 percent native tree cover that would be classified as forestland under Public Resources Code Section 12220(g). Thus, the proposed Project would not result in conversion of forest land to non-forest use. Therefore, **no impact** would occur, and this issue is not addressed further in this EIR.

Displace Substantial Numbers of People or Existing Housing—There are no residences within the Project Site or within the off-site improvement areas. Therefore, the proposed Project would not displace substantial numbers of people or existing housing that would necessitate the construction of replacement housing elsewhere. Therefore, **no impact** would occur, and this impact is not evaluated further in this EIR.

IMPACT ANALYSIS

Impact 4.9-1: Conflict with Any Land Use Plan, Policy, or Regulation Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect. *Implementation of the proposed Project would not conflict with plans, policies, or regulations in a way that would generate any adverse physical impacts beyond those addressed in detail in the environmental*

sections of this Draft EIR (e.g., agriculture, air quality, biological resources, cultural resources, etc.). Therefore, this impact is considered **less than significant**.

The Project proposes to annex and pre-zone approximately 161 acres of the approximately 487-acre Project Site into the City of Suisun City (see Exhibit 3-4 in Chapter 3). The proposed Development Area would be on approximately 93 acres within this Annexation Area. The remaining portion of the Annexation Area would be in public rights-of-way and in Managed Open Space.² The portion of the Project Site south and southeast of the California Northern Railroad and Cordelia Road is outside the City's SOI, is not proposed for development or any SOI change or annexation, and would be proposed as Managed Open Space and protected in perpetuity with a deed restriction or conservation easement within unincorporated Solano County. Consistent with General Plan Policy LU-4.4, studies prepared for the proposed Project, as well as this Draft EIR will be submitted to Solano LAFCO, and Solano LAFCO will require consistency with their policies before approval of annexation.

The area of the Project Site proposed for development, shown in Exhibit 3-5 as proposed for the Commercial Mixed Use General Plan land use designation, would be pre-zoned as CSF as part of the annexation process. With approval of the proposed Project, approval of the proposed General Plan amendment, annexation of the Development Area into the City of Suisun City, and associated zoning changes, development of the proposed Project would not conflict with the City's General Plan or zoning.

With respect to the relationship between the proposed Project and other plans (the City's General Plan, the County's General Plan, Play Bay Area, etc.), policy inconsistencies are not physical effects on the environment under CEQA unless it relates to a physical impact on the environment that is significant in its own right. While EIRs must discuss inconsistencies between the proposed Project and applicable plans, plan consistency is not generally a CEQA issue.³ For an impact to be considered significant under this threshold, any inconsistency would also need to result in a significant adverse change in the environment not already addressed in the other resource sections of this EIR. Specific impacts and Project consistency issues associated with other resource and issue areas are addressed in each technical section of this EIR, as appropriate. These technical sections provide a detailed analysis of other relevant physical environmental effects that could result from implementation of the proposed Project and identify mitigation measures, as necessary, to reduce impacts. Implementation of the proposed Project would not conflict with adopted City General Plan policies or other land use plan, policy, or regulation that would generate any adverse physical impacts beyond those addressed in detail in the environmental sections of this Draft EIR (agriculture, air quality, biological resources, cultural resources, etc.). Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation measures are required.

Impact 4.9-2: Induce Substantial Population Growth. *The Project does not propose housing that would generate new residents in the city. Development of approximately 1.28 million square feet of building space could indirectly lead to some population growth by creating 1,275 new local jobs. However, based on 2022 estimates, the city had a jobs to housing ratio of*

2 The Project Site also includes a 4.5-acre parcel northeast of the proposed Annexation Area, southeast of the intersection of SR 12 and the UPRR line; this parcel is within the City's current SOI and therefore not proposed for annexation but is included in the overall Project Site and the total area to be maintained as Managed Open Space.

3 "The issue of whether a proposed project is consistent with a county's general plan is not a CEQA issue..." (*The Highway 68 Coalition v. County of Monterey, et al.* [6th Dist. 2017] Cal.App.5th).

0.41, which indicates a predominance of residential uses and less jobs potentially available to workers. The proposed Project supports the City's goals to create opportunities to generate jobs and attract new employment-creating industries to Suisun City. Furthermore, the proposed Project contributes to meeting the Plan Bay Area 2050's goal of a 1.2 jobs/housing balance for North Solano County by improving the City of Suisun City's jobs-to-housing ratio by locating employment land uses on historically underutilized land near existing infrastructure, transportation corridors, and residential areas. New and expanded infrastructure would be planned to meet demands for new development and would not create additional utility capacity in the Development Area beyond what would be necessary to serve the proposed Project. Therefore, the proposed Project would not induce substantial planned or unplanned population growth. This impact is **less than significant**.

A project's impacts caused by inducing substantial unplanned population growth are analyzed based on the following three inquiries: (1) does the project induce unplanned population growth (direct or indirect), (2) is that growth substantial, and (3) does this substantial unplanned growth result in significant adverse environmental impacts.

Indirect growth can result from many factors, but typical causes are the extension of roads and infrastructure or increases in infrastructure capacity; the approval of so-called leapfrog development, in which urban development is approved in a satellite area and this spurs development of the land between the satellite area and the urban edge; or the approval of significant uses or an imbalance of uses which result in a regional draw of people and/or services. The proposed Development Area is adjacent to the existing city limits and within the existing Sphere of Influence of the City. The factors most relevant to the proposed Development Area are the extension of utility infrastructure and new employment opportunities. These issues are evaluated below.

The proposed Project would include development of currently undeveloped areas, which would result in infrastructure being extended into these locations. The proposed Project would improve Pennsylvania Avenue and Cordelia Road along the Project frontages and construct a northbound right turn lane on northbound Pennsylvania Avenue and SR 12. These roadway improvements would accommodate the increased traffic generated by the proposed Project. The new and expanded infrastructure is designed to meet demands of the proposed Project, and would not create additional utility capacity in the Development Area beyond what would be necessary to serve the proposed Project. Therefore, off-site roadway improvements and extension of this utility infrastructure would not induce unplanned growth.

The Project does not propose housing that would generate new residents in the city. However, the Project proposes development of approximately 1.28 million square feet of building space on approximately 93 acres of land area (Development Area). This development could indirectly encourage population growth by creating 1,275 new jobs (EPS 2021). Based on 2022 estimates, the City had a jobs-to-housing ratio of 0.41, which indicates a predominance of residential uses and less jobs potentially available to local resident-workers. The most recent LODS data reported by the U.S. Census reports approximately 96.6 percent of City residents commute to jobs outside of the city and 85 percent of local jobs within the city are filled by employees from outside of the city, mainly from the cities of Fairfield and Vacaville (U.S. Census Bureau 2020b, c). The proposed Project supports the City's goals to create opportunities to generate jobs and attract new employment-creating industries to Suisun City. Furthermore, as stated above, the Plan Bay Area 2050 jobs/housing balance for northern Solano County would be 1.2 by 2050, indicating a near balance between jobs and housing (ABAG 2021). The proposed Project contributes to this goal by improving the City of Suisun City's jobs-to-housing ratio by locating employment land uses on historically underutilized land near existing infrastructure, transportation corridors, and residential areas. Furthermore, the Development Area is identified by the Plan Bay Area 2050 as a PPA, which are defined as

locally identified places for job growth in middle-wage industries like manufacturing, logistics, or other trades (ABAG 2021).

Population and employment growth associated with buildout of the proposed Project are not, in and of themselves, an environmental impact under CEQA. However, CEQA treats as potentially significant the direct and indirect impacts associated with unplanned population growth, such as new housing, employment, and increased travel demand that requires additional roadways and other transportation infrastructure and the associated air pollutant emissions and traffic noise, impacts related to public facilities and utilities expansions needed to serve new growth, and other impacts, each of which is addressed in the technical sections of this EIR. These technical sections provide analysis of relevant environmental effects of implementing the proposed Project. The indirect effects associated with the proposed Project's potential for inducing additional population and employment growth are also discussed in Chapter 7 of this EIR, "Other CEQA Considerations."

The foregoing analysis demonstrates that the proposed Project would not directly or indirectly induce substantial unplanned growth that could lead to significant environmental impacts not already detailed throughout the environmental topic specific sections of this EIR; therefore, the impact is considered **less than significant**.

Mitigation Measures

No mitigation measures are required.