

7 OTHER CEQA CONSIDERATIONS

7.1 GROWTH-INDUCING IMPACTS

7.1.1 INTRODUCTION TO GROWTH-INDUCING IMPACTS

CEQA (CEQA Guidelines, California Code of Regulations (CCR) section 15126.2(d) requires an examination of the direct and indirect impacts of the proposed Project, including the potential of the Project to induce growth leading to changes in land use patterns, population densities, and related impacts on environmental resources. Specifically, CEQA states that the Environmental Impact Report (EIR) shall:

[D]iscuss ways in which the proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects that would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring the construction of new facilities that could cause significant environmental effects.

Also discuss characteristics of some projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Direct growth-inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for example, if implementing a project resulted in any of the following:

- ▶ substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises); or
- ▶ removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area) or adding new urban development adjacent to undeveloped land.

Growth-inducement itself is not an environmental impact, but it may lead to foreseeable environmental impacts. These environmental impacts may include increased demand on other community and public services and infrastructure, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, or conversion of agricultural and open space land to urban uses.

7.1.2 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

The Project proposes to annex and pre-zone approximately 161 acres of the approximately 486-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, which is adjacent to the existing city limits and within the existing Sphere of Influence of the City. The remaining portion of the annexation area would be in public rights-

of-way and in Managed Open Space.¹ 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.

The proposed Project does not include a residential component and no new homes would be built at the proposed Project site. The proposed Project would include development of currently undeveloped areas, which would result in infrastructure being extended into these locations. Extensions of existing local utility lines (i.e., water, sewer, and electricity) would be installed to serve the proposed Project site. However, these utility extensions would be sized only to serve the needs of the proposed Project, and would not have additional capacity created to serve any other development. 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, the proposed Project does not include an extension of utilities or roads that would indirectly induce population growth.

The proposed Project would create approximately 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 LODES 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). The Development Area is also within the City's Sphere of Influence, in which employment-generating development is anticipated. Therefore, the project's employment opportunities would not be growth inducing.

7.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

CEQA Guidelines section 15216.2(b) requires an EIR to include a discussion of any significant environmental impacts that cannot be avoided if the proposed Project is implemented.

Chapter 4 of this EIR provides a detailed analysis of all significant and potentially significant environmental impacts from implementation of the proposed Project; identifies feasible mitigation measures, as appropriate, that could avoid or reduce these significant and potentially significant impacts; and presents a determination whether

¹ The Project Site also includes a 6.4-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.

the identified mitigation measures would reduce these impacts to less-than-significant levels. In addition, Chapter 5 of this EIR provides an analysis of the significant cumulative impacts resulting from the combined effects of the proposed Project and other lead agencies' planned projects. If a potentially significant or significant impact cannot be reduced to a less-than-significant level, it is considered a significant and unavoidable adverse impact.

Implementing the proposed Project would result in significant and unavoidable adverse impact(s) as identified below.

7.2.1 PROJECT-LEVEL SIGNIFICANT AND UNAVOIDABLE IMPACTS

AESTHETICS AND VISUAL RESOURCES

Impact 4.1-1. Effects on Scenic Vistas.

No feasible mitigation is available that could fully preserve the existing views of the Coast Ranges, Howell Mountains, Cement Hill, or the Vaca Mountains while also accommodating operation of the buildings and landscaping that are proposed as part of the Project. Because no other feasible mitigation measures are available, this impact would be **significant and unavoidable**.

Impact 4.1-3. Substantial New Light and Glare and Skyglow Effects.

Implementation of Mitigation Measure 4.1-3 would reduce potentially significant impacts from daytime and nighttime glare, and nighttime skyglow effects, to the maximum extent feasible because an exterior lighting plan with measures specifically designed to reduce nighttime light spillover, glare, and skyglow effects would be prepared and implemented. The Project Site currently has no sources of light, but nearby commercial areas and infrastructure, such as the Kings of Auto and NorCal Concrete areas and SR 12, emit minimal nighttime lighting for security reasons, while surrounding areas of Fairfield and Suisun City have nighttime lighting from commercial, light industrial, and residential development. Further, daytime and nighttime glare generated by urban development are present to the west, north, and east of the Project Site, in addition to the Kings of Auto and NorCal Concrete commercial areas located at the intersection of Pennsylvania Avenue and Cordelia Road. Proposed urban land uses in the 93-acre Development Area would introduce new street lighting, parking lot lighting, pedestrian way lighting, interior lighted building signage, interior and front-lighted landmark and directory signage, interior lighted LED security lighting, and architectural lighting, during the Project's operational stage. Even with implementation of Mitigation Measure 4.1-3, the proposed commercial and light industrial development on 93 acres of the Project Site would contribute to regional nighttime skyglow effects. Because no other feasible mitigation measures are available, this impact would be **significant and unavoidable**.

GREENHOUSE GAS

Impact 4.6-1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Implementation of Mitigation Measures 4.6-1a through 4.6-1d would reduce emissions associated with offroad equipment use during Project construction. Mitigation Measures 4.6-1e through 4.6-1m would reduce emissions associated with natural gas use, electricity consumption, worker vehicle and truck travel and idling, TRU operations, use of onsite offroad equipment such as forklifts, and backup generators. Implementation of these

mitigation measures would reduce the Project's generation of GHG emissions to support the Project's fair share contribution emissions reductions toward the State GHG reduction mandates and the State's goal of statewide carbon neutrality. The Project's GHG emissions and GHG efficiency with implementation of these measures would still exceed the GHG efficiency thresholds for 2030 and for 2045.

Mitigation Measure 4.-1n further reduces the proposed Project's impacts related to the generation of GHG emissions, as it requires the purchase and retirement of GHG emissions credits based on protocols approved by ARB, consistent with Section 95972 of Title 17 of the California Code of Regulations. Mitigation Measure 4.6-1n also requires the Project applicant to provide documentation demonstrating that the mitigation credits are real, additional, quantifiable, verifiable, enforceable, permanent, and consistent with the standards set forth in Health and Safety Code section 38562, subdivisions (d)(1) and (d)(2). Mitigation Measure 4.6-1n would ensure that the Project's GHG emissions efficiency would be consistent with that of the State SB 32 regulatory GHG emissions reduction target for 2030 and with the State AB 1279 regulatory GHG emissions reduction target for 2045 over the long-term operations of the Project. Therefore, with implementation of Mitigation Measures 4.7-1a through 1n, the generation of GHG emissions associated with the proposed Project would not result in a substantial contribution to the significant impact of climate change or conflict with an applicable plan, policy, or regulation adopted for the purposes of reduction GHG emissions. However, the City cannot guarantee the availability of emissions credits meeting the standards outlined in Mitigation Measures 4.6-1n presented above. There is no additional feasible mitigation available. Therefore, with implementation of Mitigation Measures 4.6-1a through 4.6-1n, the Project construction and operations would result in a **cumulatively considerable and significant and unavoidable**.

NOISE & VIBRATION

Impact 4.10-1. Temporary, Short-term Exposure of Sensitive Receptors to Construction Noise.

Implementation of Mitigation Measure 4.10-1a, construction would be limited to daytime hours, for which associated noise levels are considered exempt from the provisions of applicable standards established by the City and the County. On-site and off-site impacts from temporary, short-term exposure of sensitive receptors to increased equipment noise from the project would be reduced. However, given the uncertainty of future potential development of the proposed project area and the possibility of off-site infrastructure improvements that may be required to serve currently unknown developments within the Proposed project area, it is not now possible to determine the effectiveness of mitigation with certainty. With enforcement of the above mitigation measure and existing noise regulations, future development in the Proposed project area and off-site improvements would be designed to minimize potential impacts. For example, when installed properly, acoustic barriers can reduce construction noise levels by approximately 8–10 dB (EPA 1971). This mitigation measure would reduce potential impacts. However, it is not possible to demonstrate that this would avoid significant construction noise impacts in every case. Because no other feasible mitigation measures are available, this impact would be **significant and unavoidable**.

7.2.2 CUMULATIVELY SIGNIFICANT AND UNAVOIDABLE IMPACTS

AESTHETICS AND VISUAL RESOURCES

Impact 4.1-1. Effects on Scenic Vistas.

Scenic views to the north at the Project Site from Key Community Gateway 2 and from Viewpoint 10 along Cordelia Street would be blocked by proposed buildings and landscaping, and scenic views from Key Community Gateway 3 to the southwest would also be blocked. The loss of scenic vistas from Key Community Gateway 2 would still occur under Alternative 2. There are no feasible mitigation measures that would preserve scenic vistas from these locations while still allowing development to proceed under the proposed Project or Alternative 2. Because no other feasible mitigation measures are available, the proposed Project would result in a **cumulatively considerable contribution** to this Significant and unavoidable impact related to scenic vistas. There is no feasible mitigation to reduce the proposed Project's contribution to this significant cumulative impact. The impact would be **significant and unavoidable**.

Impact 4.1-3. Substantial New Light and Glare and Skyglow Effects.

The proposed Project and Alternative 2 would result in additional nighttime lighting and skyglow effects from the proposed development. Implementation of Mitigation Measure 4.1-3 would reduce the potentially significant impacts from nighttime lighting, glare, and skyglow effects associated with the proposed Project and Alternative 2 to the maximum extent feasible because an exterior lighting plan would be prepared for City review and approval and implemented. However, even with implementation of Mitigation Measure 4.1-3, the proposed commercial and light industrial development on the Project Site and Alternative 2 site would contribute to regional nighttime skyglow effects. No additional feasible mitigation measures are available. Therefore, the proposed Project or Alternative 2 would result in a **cumulatively considerable contribution** to this significant and unavoidable impact related to nighttime skyglow effects. There is no feasible mitigation to reduce the proposed Project's contribution to this significant cumulative impact. The impact would be **significant and unavoidable**.

GREENHOUSE GAS EMISSIONS

Impact 4.6-1.

GHGs typically persist in the atmosphere for extensive periods time—long enough to be dispersed throughout the globe and result in long-term global impacts that contribute to climate change. As such, the proposed Project would not, by itself, result in climate change; however, cumulative emissions from many projects and plans all contribute to global GHG concentrations and the climate system. Accordingly, impacts related to GHG emissions are inherently cumulative. See discussion of Impact 4.6-1 in Section 7.2.1, Project Level Significant and Unavoidable Impacts.