CHAPTER 6: OTHER CEQA CONSIDERATIONS

6.1 - Significant Unavoidable Adverse Impacts

The proposed project would result in the following significant and unavoidable impacts:

- **Views from Peterson Road:** The proposed project would impact views of Potrero Hills from a segment of Peterson Road. The project has been designed, however, to retain some intermittent views for any passersby who might be inclined toward viewing Potrero Hills from their moving vehicle. Despite views of Potrero Hills being fleeting and partially obstructed, and despite the non-mandatory nature of the applicable policy, views from the approximate 0.5-mile stretch of Peterson Road along the project site would be degraded in a manner that may be considered substantially adverse by certain individuals. As a result, this direct and cumulative impact is considered potentially significant, with no known feasible mitigation to lessen it.

- **Consistency with Air Quality Management Plan:** The proposed project would emit criterial pollutants during construction and operations that would exceed adopted thresholds and, thus, be inconsistent with regional air quality planning assumptions. Mitigation is proposed requiring emissions reduction measures. However, after implementation of feasible mitigation, criterial pollutant would still exceed adopted thresholds. The residual significance of this impact is significant and unavoidable.

- **Cumulative Criteria Pollutant Emissions:** The proposed project would emit criterial pollutants during construction and operations that would exceed adopted thresholds. Mitigation is proposed requiring emissions reduction measures. However, after implementation of feasible mitigation, criterial pollutant emissions would still exceed adopted thresholds. The residual significance of this impact is significant and unavoidable.

- **Special-Status Species:** The proposed project would result in adverse impacts to the pappose tarplant. Mitigation is proposed requiring either salvaged seeds to be provided to a mitigation bank or the purchase of credits at a mitigation bank. However, there is uncertainty regarding whether mitigation banks would accept salvaged seeds or have credits available for purchase and, therefore, the residual significance of this impact is significant and unavoidable.

- **Greenhouse Gas Emissions:** The proposed project would emit greenhouse gas (GHG) emissions during construction and operations that would exceed adopted thresholds. Mitigation is proposed requiring emissions reduction measures. However, after implementation of feasible mitigation, operational and cumulative GHG emissions would still exceed adopted thresholds. The residual significance of this impact is significant and unavoidable.

- **Vehicle Miles Traveled:** The proposed project's Vehicle Miles Traveled (VMT) per employee would exceed adopted thresholds. Mitigation is proposed requiring implementation of

transportation demand management measures. However, because the lead agency cannot assure that the transportation demand measures would reduce VMT, the residual significance of this impact is significant and unavoidable.

6.2 - Growth-Inducing Impacts

There are two types of growth-inducing impacts that a project may have: direct and indirect. To assess the potential for growth-inducing impacts, the project's characteristics that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated (CEQA Guidelines § 15126.2(e)). CEQA Guidelines, as interpreted by the City, state that a significant growth-inducing impact may result if the project would:

- Induce substantial population growth in an area (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the general plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list, when such infrastructure exceeds the needs of the project and could accommodate future developments.

Direct growth-inducing impacts occur when the development of a project imposes new burdens on a community by directly inducing unplanned population growth, or by leading to the construction of additional developments in the same area. Also included in this category are projects that remove physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure projects cannot be considered isolated from the development they facilitate and serve. Projects that physically remove obstacles to growth, or projects that indirectly induce growth may provide a catalyst for future unrelated development in an area such as a new residential community that requires additional commercial uses to support residents.

The proposed project does not include residential uses and therefore would not directly induce population growth. The proposed project would develop approximately 2.1 million square feet of new high-cube warehouse uses on a site currently used as grazing land. The proposed project would employ an estimated 910 workers during construction and 2,059 workers when fully operational at buildout. The proposed project's warehouses would likely be built incrementally over a period of years and, thus, jobs would be added in blocks as the project site builds out.

The California Employment Development Department estimated Solano County's labor force at 200,700 in December 2022. Of this figure, 193,100 persons were employed and 7,700 were unemployed. As such, the local labor force is robust enough to allow the project's employment opportunities to be filled locally such that unplanned growth would not occur. Additionally, the

proposed project is located in proximity to residential areas to the north and south and would provide new employment opportunities for current residents in the City. It would employ an estimated 910 workers during construction and an estimated 2,059 workers at buildout. Consequently, some of the City's existing residents could find employment as part of the proposed project. A more balanced jobs-to-housing ratio can reduce environmental impacts by limiting commute vehicle miles traveled during peak periods in areas where congestion is growing.

The proposed project would be served by connections to existing water, wastewater, storm drainage, electricity, and natural gas lines that exist in Walters Road or Petersen Road. No extension of infrastructure into unserved areas would be required and, therefore, no removal of physical barriers to growth would occur.

As such, the proposed project would not indirectly induce substantial population growth. No impacts would occur.

6.3 - Significant Irreversible Environmental Changes

The environmental effects of the proposed projects are summarized in Section ES, Executive Summary and are analyzed in detail in Section 3, Environmental Impact Analysis of this EIR.

As mandated by the CEQA Guidelines, the EIR must address any significant irreversible environmental change that would result from implementation of the proposed project. Specifically, pursuant to the CEQA Guidelines (Section 15126.2(c)), such an impact would occur if:

- The project would involve a large commitment of nonrenewable resources;
- Irreversible damage can result from environmental accidents associated with the project; and
- The proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

The proposed project consists of the development of new industrial and commercial buildings on a site adjacent to and that would be annexed into the Suisun City limits. Construction and demolition debris recycling practices would be expected to allow for the recovery and reuse of building materials such as concrete, lumber, and steel and would limit disposal of these materials, some of which are nonrenewable.

Day-to-day activities would involve the use of nonrenewable resources such as petroleum and natural gas during operations. The new buildings uses would be required to adhere to the latest adopted edition of the California Building Standards Code (CBC), which includes a number of standards that would reduce energy demand, water consumption, wastewater generation, and solid waste generation that would collectively reduce the demand for resources. This would result in the emission and generation of less pollution and effluent and would lessen the severity of corresponding environmental effects. Although the proposed project would result in an irretrievable commitment of nonrenewable resources, the commitment of these resources would not be significantly inefficient, unnecessary, or wasteful.

Lastly, the proposed project is intended to meet regional market demand for new high-cube warehouse square footage. Thus, the project is justified in that there is market demand for it and it is appropriate for the City of Suisun City to expand its limits to encompass the project site.