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# Chapter 6

## Other CEQA Required Considerations

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### 6.1 INTRODUCTION

Pursuant to CEQA Guidelines Section 15126.2, this chapter addresses additional requirements that must be considered when evaluating the Proposed Project's impact on the environment including planning, acquisition, construction, and operation. This chapter provides information on the following four topics:

- Significant Environmental Effects That Cannot be Avoided
- Significant Irreversible Environmental Changes
- Growth-Inducing Impacts
- Cumulative Impacts

### 6.2 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The environmental effects of the Proposed Project on various aspects of the environment are discussed in detail in Chapter 4 of this FEIR. Based on information contained in this FEIR, the following are the significant and unavoidable impacts of construction and implementation of the Proposed Project.

#### 6.2.1 Project-Level Significant and Unavoidable Impacts

- Impact 1-1: Potential to Alter the Project Sites' Visual Character (Section 4-1)
- Impact 2-1: Potential Loss of Prime Farmland (Section 4-2)
- Impact 3-1: Short-Term Construction Increases of Criteria Air Pollutants (Section 4-3)
- Impact 7-1: Short-Term Exposure to Onsite Construction Noise (Section 4-7)
- Impact 7-2: Short-Term Exposure to Construction Traffic Noise (Section 4-7)

## 6.2.2 Cumulative Significant and Unavoidable Impacts

- Impact 3-7: Cumulative Contribution to Regional Air Quality (Section 4-3)

## 6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the CEQA Guidelines requires that an EIR analyze the extent to which a project's primary and secondary effects would generally commit future generations to the allocation of nonrenewable resources and to irreversible environmental damage. Specifically, Section 15126.2(c) states:

“Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

Generally, a project would result in significant irreversible environmental changes if the:

- primary and secondary impacts would generally commit future generations to similar uses;
- project would involve a large commitment of nonrenewable resources;
- project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

The proposed detention basins would be constructed as permanent structures to provide long-term flood reduction for the City; therefore, the Proposed Project would result in a long-term commitment to the specified land uses and would have long-term visual and agricultural impacts.

Construction and implementation of the Proposed Project would require consumption of nonrenewable resources, such as fossil fuels, aggregate, cement, and steel; however, construction would not result in a substantial depletion of nonrenewable resources or represent a significant increase in the overall rate of resource consumption.

A construction-related accident on the Proposed Project site that results in the release of a substantial amount of hazardous materials (i.e., petroleum products) would have the potential to result in a significant long-term impact on water quality. Section 4-6 of this FEIR discusses the possibility of, as well as prevention of and mitigation for, any potential spills associated with construction of the Proposed Project.

Resources that would be permanently and continually consumed by project implementation may include water (irrigation for hay production on the basin floors) and fossil fuels (operation of maintenance vehicles and farm equipment); however, the amount and rate of consumption of these resources would not

result in the unnecessary, inefficient, or wasteful use of resources and would be less or equal to consumption levels if the properties remained in agricultural cultivation. Recent discussions of the issue of global warming (related to use of fossil fuels) within the scientific community have speculated that ozone depletion and resultant atmospheric warming could soon be irreversible. Although there continues to be considerable debate among experts and within our society at large, and although the relative contribution of the Proposed Project to global warming is not possible to determine, this issue is explored in Section 4-3 of this EIR.

## 6.4 GROWTH-INDUCING IMPACTS

Section 15126(d) of the State CEQA Guidelines requires that an EIR consider the growth-inducing impacts of a project. According to State CEQA Guidelines Section 15126.2(d), an EIR should “discuss the 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.”

Generally, a project would have a growth-inducing impact if it:

- **Removes Obstacles to Population Growth:** This refers to the extent to which a proposed project removes infrastructure limitations or provides infrastructure capacity, or removes regulatory constraints that could result in growth unforeseen at the time of project approval.
- **Promotes Economic Growth:** The extent to which a proposed project could cause increased activity in the local or regional economy. Economic impacts can include such direct effects as the Multiplier Effect. A “multiplier” is an economic term used to describe interrelationships among various sectors of the economy. The multiplier effect provides a quantitative description of the direct employment effect of a project, as well as indirect and induced employment growth. The multiplier effect acknowledges that the onsite employment and population growth of each project is not the complete picture of growth caused by the project.

Implementation of the Proposed Project will set aside land that cannot be developed for housing and will provide open-space lands for stormwater detention, passive recreational use, wetlands, and wildlife.

The Proposed Project is unlikely to remove an obstacle to growth since the areas for which downstream flooding would be reduced are subject to existing land use policies. The purpose of the Proposed Project is to reduce urban flooding in areas of the City that are already developed. The Proposed Project is not intended to allow building on an existing flood-prone area.

The Proposed Project could result in direct beneficial economic impacts on the County through construction-related employment and local purchase of some construction materials, as well as secondary beneficial impacts from the purchases of goods and services by those employed by the Proposed Project. These economic benefits would be short term (during the duration of construction, approximately 790 working days) and would not directly or indirectly promote sufficient economic growth to result in an increase in urban development and population growth.

In addition, reduced flooding incidences within urban areas downstream of the Proposed Project site could reduce costs to federal disaster relief organizations (i.e., Red Cross, FEMA) and local public and

private organizations (i.e., schools, churches, community centers). This economic benefit would not be sufficient to promote overall economic growth within the City or County.

## 6.5 CUMULATIVE IMPACTS

CEQA Guidelines Section 15130 requires the consideration of cumulative impacts within an EIR when a project's incremental effect is cumulatively considerable. Cumulatively considerable means that "the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." In identifying projects that may contribute to cumulative impacts, the CEQA Guidelines allow one of two options:

1. The "list approach"—a list of past, present, and reasonably foreseeable future projects, producing related or cumulative impacts, including those that are outside of the control of the lead agency; or
2. The "summary of projections" method—a summary of projections contained in an adopted general plan or related planning document, which is designed to evaluate regional or areawide conditions.

In accordance with CEQA Guidelines Section 15130(b), "the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, 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 that do not contribute to the cumulative impact.

For the purposes of this EIR, the cumulative setting is defined as the unincorporated Solano County region. The unincorporated area of the County includes approximately 494,437 acres, with over 329,000 acres of this land in agricultural use (approximately 70 percent of the unincorporated land area) (Solano County 2008b). With respect to the Proposed Project, the Solano County General Plan (Solano County 2008b) identifies land uses and proposed development for the Solano County General Plan area. The Solano County Draft General Plan Draft EIR (General Plan EIR) (State Clearinghouse Number 2007122069) (Solano County 2008a) analyzes the impacts associated with implementation of the Solano County General Plan. The Proposed Project was not specifically identified in the Solano County General Plan; however, Chapter 4.5 of the General Plan EIR addresses the potential for exposure of people or structures to flood hazards and determined that implementation of the Solano County General Plan policies and programs would minimize the exposure of people or structures to flood hazards resulting from development of the Solano County General Plan.

A detailed discussion of cumulative impacts is provided in Chapter 4 for each resource section (Sections 4-1 through 4-9). A summary of cumulative impacts of the Proposed Project is provided below.

### 6.5.1 Aesthetics and Visual Resources

The cumulative context for aesthetics and visual resources is buildout in the City and the unincorporated area of the County in the vicinity of the Proposed Project. Implementation of the Proposed Project, in combination with other projects in the region, would alter the visual character of the Alamo and Ulatis sites, and vicinity, from surrounding land uses. The Proposed Project would result in the construction of two detention basins in an unincorporated area of the County to the west of the City. The Proposed Project would result in revegetated detention basins and associated inlet and outlet structures. The Alamo basin would result in a berm of up to 25 feet above existing grade along the eastern edge. The Ulatis basin would result in a berm of up to 14 feet above existing grade along the eastern corner. The Proposed Project would alter existing views of agricultural land from nearby rural residences along Bucktown and Rogers Lanes and from residences on the western edge of development off Fruitvale Road. Because of the height of the berms, long-range views from these residences could be obstructed. However, the development of detention basins will preclude any future urban development on the sites and, for aesthetic purposes, will allow the land to remain as open space with the potential for agricultural use on the basin floors. The cumulative buildout in the area of the detention basins is minor given the agricultural designation. The development of the basins will not convert land to developed urban uses and therefore will not alter the visual character of the County by converting agricultural lands and open space to developed urban uses. This cumulative impact is considered *less than significant*.

### 6.5.2 Land Use and Agriculture

The cumulative context for land use and agriculture is unincorporated areas of Solano County. As part of the Proposed Project, the Alamo and Ulatis sites would remain as open-space habitat areas and have the potential for limited agricultural cultivation within the basin floor, new habitat creation, and passive public access use during non-storm months; however, there would be conversion of Prime Farmland in this process. This reduction in Prime Farmland would contribute incrementally to the projected loss of Prime Farmland from urban development identified in the Solano County General Plan (2.4% loss from 2006 conditions). Overall, the Proposed Project's contribution to cumulative loss of Prime Farmland in Solano County is very small; potentially 116 acres (0.08%) and would be event less with the cultivation of the basin floors, therefore this impact would be considered *less than significant*.

### 6.5.3 Air Quality and Greenhouse Gas Emissions

The cumulative setting for air quality includes existing, approved, proposed, and reasonably foreseeable development in the SVAB, including the Proposed Project and approved projects, as well as consideration of existing and future activities in the SVAB.

Implementation of the Proposed Project would not be anticipated to contribute to localized concentrations of CO that would exceed applicable ambient air quality standards. Implementation of the Proposed Project would not result in a cumulative contribution to existing TAC or odor concentrations in the Project area. As a result, the Proposed Project's contribution to cumulative local air quality conditions would not be considerable and would be considered *less than significant*.

As discussed in Impact 3-1 in the air quality section, predicted short-term construction emissions would exceed YSAQMD significance thresholds. As a result, the Proposed Project's cumulative contribution to regional air quality conditions would be cumulatively considerable and significant. Implementation of

Mitigation Measure 3-1 would reduce the severity of short-term increases of emissions attributable to the Proposed Project; however, short-term increases in emissions would still be anticipated to exceed YSAQMD significance thresholds. As a result, this impact would be considered *significant and unavoidable*.

Based on the modeling conducted, short-term construction activities would result in combined emissions of approximately 4,525 MT CO<sub>2</sub>e over an approximate 1.5-year period. Long-term operational emissions would total approximately 9 MT CO<sub>2</sub>e annually. While increased GHG emissions would contribute to overall increases in GHG emissions and potential global climate change, it is important to note that a majority of the project-generated GHG emissions would be limited to the initial construction period of approximately 1.5 years. Given that the Project as proposed does not include BAAQMD-recommended measures to reduce construction-generated GHG emissions, the Proposed Project may conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Mitigation measures have been included in this EIR to reduce short-term increases in GHG emissions during construction and reduce potential conflicts with plans, policies, or regulations for GHG emissions to a *less-than-significant level*.

#### 6.5.4 Biological Resources

The Proposed Project would convert up to 68 acres of non-native annual grassland (23.5 acres for the Alamo site and 44.5 acres for the Ulatis site) and 46.2 acres of orchard (for the Alamo site) to a combination of vegetation community types including annual grassland, seasonal wetland, and/or hay crop. Conversion of the existing upland habitat to these vegetation community types would not significantly reduce the quality and suitability of the habitat for special-status wildlife species that have the potential to occur or forage in uplands on the Alamo and Ulatis sites; therefore, the Proposed Project would not contribute incrementally to the loss of wildlife habitat in Solano County and this impact is considered *less than significant*.

In addition to conversion of orchard and non-native annual grassland, the Proposed Project would result in the temporary loss of approximately 0.05 acre and permanent loss of approximately 0.29 acre of riparian habitat (a sensitive natural community) along Alamo and Ulatis Creeks at the Alamo and Ulatis sites. Although the Proposed Project would add incrementally to riparian habitat loss, it would not result in a substantial reduction of riparian habitat in Solano County. Mitigation measures have been included in this EIR to mitigate potentially significant impacts on riparian habitat and would also mitigate the Proposed Project's contribution to cumulative impacts on riparian habitat; therefore, this impact is considered *less than significant*.

#### 6.5.5 Cultural Resources

Buildout of the Proposed Project will not have any cumulative impacts on cultural resources because there are no significant historic resources within either the Alamo or Ulatis sites. Any other local projects and impacts on individual archaeological resources are, or will be, reduced to less than significant by proposed mitigation measures. Mitigation measures have been included in this EIR to mitigate for potential impacts on previously unidentified subsurface archaeological resources through the development and implementation of a treatment plan. Therefore, the Proposed Project would not result in cumulatively considerable impacts on cultural resources and this impact is considered *less-than-significant*.

### 6.5.6 Hydrology, Water Quality, and Hazardous Materials

Cumulative impacts of development on hydrology, water quality, and hazards and hazardous materials within Solano County, including the City, were evaluated in the General Plan EIR. The General Plan EIR examined impacts on hydrology, water quality, and hazards and hazardous materials from various development scenarios and included consideration of City and countywide stormwater management. The Proposed Project is being implemented consistent with plans and policies considered in the City of Vacaville General Plan (City of Vacaville 1990) and Solano County General Plan. The Proposed Project is consistent with and implements the SCWA Ulatis System Drainage study (West Yost Associates 2008), which was prepared to identify and evaluate flood control alternatives that will reduce or eliminate the flooding from moderate to large storms within the Ulatis Creek System, particularly within the City, and the City's Storm Drainage Master Plan (West Yost Associates 2000). The Proposed Project will comply with the stormwater, grading, and erosion control regulations of the City and the City's NPDES Permit and hazardous materials policies; therefore, the cumulative impacts on hydrology, water quality, and hazards and hazardous materials of the Proposed Project would be *less-than-significant*.

### 6.5.7 Noise

The Proposed Project's overall contribution to traffic noise levels in future years would be anticipated to continue to decrease as development of surrounding areas and associated vehicle trips increases. Long-term operation of the proposed detention basins would not result in a noticeable increase in ambient noise levels that would exceed applicable noise standards. As a result, the Proposed Project's contribution to cumulative noise conditions would not be considerable and would be considered a *less-than-significant* impact.

### 6.5.8 Public Services (Includes Recreation)

The General Plan EIR determined that buildout of the Solano County General Plan would create greater demands for protection by the Sheriff's Department and would lead to additional needs for Sheriff's Department facilities in the unincorporated area of the County (Solano County 2008a). The General Plan EIR also stated that buildout of the Solano County General Plan would lead to an increased risk of fire hazards in the unincorporated areas of the County. Additional growth in incorporated areas and in municipal service areas could increase demands for sheriff's protection and new fire facilities and create a need for new department facilities. The Proposed Project's contribution to law enforcement and fire protection demand would be less than considerable; therefore, this would be a *less-than-significant* cumulative impact on law enforcement services.

The General Plan EIR determined that population growth in the unincorporated area of the cities could create additional pressure on County parks (Solano County 2008b). The Proposed Project would not result in new development or growth in residential population that would increase demand for parks and recreational use. In addition, the Proposed Project would provide passive recreational uses. The Proposed Project's contribution to cumulative impacts on recreation within the County would not be considerable and this would be a *less-than-significant* cumulative impact.

### 6.5.9 Transportation/Traffic

Construction of the Proposed Project would cause a temporary increase in local traffic. Because there are currently no projects proposed or under review by Solano County along Pleasants Valley Road (where a majority of temporary, short-term traffic impacts would occur) that would contribute incrementally to cumulative impacts, the Proposed Project would not contribute to short-term cumulative construction traffic impacts. The Proposed project's contribution to this cumulative impact would be *less than significant*.

Following construction of the Proposed Project, operation would require about one truck trip per month and one tractor, backhoe, and mower about two times per year at each site. Public access/interpretive uses would be expected to generate an annualized average of about 15 trips per month during the non-storm season. Because the number of trips generated annually after construction are few, the cumulative impact is therefore *less than significant*.