

6 CEQA-REQUIRED ASSESSMENT CONCLUSIONS

This chapter provides an overview of the impacts of the Cordes Ranch Specific Plan (the Project) based on the analyses presented in Chapters 4 and 5 of this Draft EIR. The topics covered in this Chapter include growth inducement, unavoidable significant impacts, and significant irreversible changes. A more detailed analysis of the effects the proposed Project would have on the environment and proposed mitigation measures to minimize significant impacts is provided in Sections 4.1 through 4.15.

A. Growth Inducement

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical growth inducing factors might be the extension of urban services or transportation infrastructure to a previously unserved or under-served area, or the removal of major barriers to development. This section evaluates the Project's potential to create such growth inducements. Not all aspects of growth inducement are negative; rather, negative impacts associated with growth inducement occur only where the growth would cause adverse environmental impacts.

Implementation of the Project is not expected to directly induce growth because it does not include housing, although it would provide substantial employment opportunities compared to what is currently available in the Specific Plan Area. However, employment growth for the area is anticipated by the Tracy General Plan, which identifies Cordes Ranch as an area suitable for industrial, office-flex, and commercial uses (General Plan Objective LU-2.3, Policy P3). Further, the Project has been contemplated by the City's various infrastructure master plans.

While development of the Project would not add any housing, it would add non-residential, employment-generating uses which could indirectly increase the demand for housing not only within the Specific Plan Area but throughout Tracy by increasing the number of employees in the area that

may want to live near work. However, it is unknown whether future employees of the Specific Plan Area would already be Tracy residents, whether they would relocate to Tracy from other places, or whether they would already be people who live elsewhere and commute to the site. The City's Growth Management Ordinance would help reduce the potential adverse impacts to Tracy from future development by setting controls on development and managing growth in a manner that is commensurate with available services and utilities. Hence, potential household growth indirectly induced by implementation of the proposed Project would not exceed the City's planned level. Although full buildout of the proposed Project would result in the extension of infrastructure to a previously unserved area, this growth, including the additional infrastructure, was planned for and envisioned under the Tracy General Plan as well as the City's various infrastructure master plans.

Development of the Project would involve construction activities that could generate some temporary employment opportunities. Given the number of workers with applicable skills in Tracy and surrounding communities, it is unlikely that construction workers would relocate to Tracy as a result of implementing the Project. Thus, the development of the Project would not be considered growth-inducing from an employment perspective.

B. Unavoidable Significant Impacts

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. This section lists the impacts for the proposed project that were found to be significant and unavoidable. More information on these impacts is found in Chapter 4 of this Draft EIR.

Impact AES-1: The Project would change the visual aspect of and views from, to, and across the Specific Plan Area, resulting in a *significant* impact to scenic vistas.

Impact AES-2: The Project would add new development to the viewsheds, with the potential to adversely affect a State-designated route, which would be a *significant* impact.

Impact AES-3: The Project would bring urban development to a rural and an agricultural area, thereby changing its character and resulting in a *significant* impact.

Impact AES-CUM-1: The Project would change the visual aspect of and views from, to, and across the Specific Plan Area, add new development to viewsheds, bring urban development to a rural and agricultural area, resulting in cumulatively considerable contributions to *significant* impacts on scenic vistas, scenic resources within a State scenic highway, and visual character.

Impact AG-1: Implementation of the Project would result in the conversion of Prime Farmland and other Important Farmland. The loss of farmland would be considered *significant*.

Impact AG-3: Development of the Project, together with other cumulative projects, would result in an incremental reduction in agricultural resources. The loss of farmland would be considered *significant*.

Impact AQ-1: While the Project is consistent with the City of Tracy General Plan's growth projections and would implement a number of transportation control measures as set forth in the Specific Plan, as identified above, the Project would exceed the regional significance thresholds and the Project's cumulative contribution to criteria air pollutants and TACs. For this reason and to ensure a conservative analysis, this evaluation treats this as an inconsistency with SJVAPCD's air quality plans. Mitigation Measures AQ-2a and AQ-2b and Mitigation Measures GHG-1b through 1d would reduce emissions, to the extent feasible. Because the Project's emissions cannot be reduced to a less than significant level, the impact in this regard would be considered *significant*.

Impact AQ-2: Construction of the Project could emit significant levels of ROG, NO_x, and PM₁₀, and would cumulatively contribute to the ozone and particulate matter non-attainment designations of the SJVAB. While feasible mitigation measures would be imposed (as set forth below), due to the nature and scope of the Project along with its anticipated buildout horizon, construction period emissions would be considered *significant*.

Impact AQ-3: Operation of the Project could emit significant levels of ROG, NO_x, CO, and PM₁₀, and would cumulatively contribute to the ozone and particulate matter non-attainment designations of the SJVAB. Due to the operational emissions, this would remain *significant* with mitigation.

Impact AQ-4: Emissions of ozone precursors and particulate matter caused by construction and operation of the Project are considered significant.

Impact AQ-5: Operation of the Project would emit TACs, primarily from DPM emitted by trucks, that would cause increased cancer risk, that exceeds 10 excess cancer cases per million, at residents on-site (Phase 1 only) and off-site. While individual, site-specific development projects under the Specific Plan may not individually result in excess cancer risk above the SJVAPCD threshold, the cumulative contribution of diesel truck traffic from Project developments would significantly contribute to a substantial increase in concentrations of TACs at sensitive receptors in the Project vicinity. This is a *significant* impact of the Project.

Impact BIO-4: Mitigation Measure BIO-1 would address the loss of suitable habitat for special-status species, and provide adequate compensatory mitigation for these species. However, no feasible measures are available to mitigate adverse impacts on wildlife movement opportunities without a substantial reduction in the extent of development and retention of existing grassland and agricultural cover on the Specific Plan Area. This would be a *significant* impact.

Impact GHG-1: Despite the incorporation of numerous sustainability measures, GHG emissions generated by the proposed Project (both construction and operational-related) would exceed the applicable threshold set forth in SJVAPCD's guidance because the Project's GHG emissions cannot feasibly be reduced to 29 percent below BAU. This would be a *significant* impact.

Impact NOISE-1: Regarding land use compatibility with respect to the City of Tracy General Plan Noise Element, exterior noise levels at areas designated for some Specific Plan Area site-specific developments could potentially reach the Noise Element's 'unacceptable' noise level thresholds due to future traffic noise. Thus, future noise levels at Specific Plan Area developments may result in *significant* impacts for buildings close to heavily-traveled roadways.

Impact NOISE-3: Implementation of the proposed Project would result in substantial traffic noise level increases on several on-site and off-site roadway segments around the Specific Plan Area, as discussed in detail above. These increases would start with the initial implementation of the Project and would continue to grow as the Project approached full buildout. The traffic noise assessment above focused on the full buildout conditions and followed the general development timeline assessed in the Project's traffic analysis. As such, the exact time at which each segment would be expected to cross the impact threshold is dependent on how fast the Specific Plan is implemented and on when each specific parcel was developed. This would be a *significant* impact.

Impact NOISE-5: For the purpose of this analysis, a cumulative impact would occur when an overall increase over 5 dBA occurs, and the project contribution is greater than 3 dBA. As shown on Tables 4.11-13 and 4.11-14, cumulative traffic noise impacts with this cumulative impact threshold would occur at several segments in the Specific Plan Area and vicinity. This would be a *significant* impact.

Impact TRANS-2: Construction of Phase 1 of the Project would cause a significant impact on one freeway segment – I-205 Eastbound between Mountain House Parkway and Tracy Boulevard, which would fall from LOS D to LOS E in the PM peak hour (refer to Table 4.14-13). This is a *significant* impact.

Impact TRANS-7: Project Buildout would cause over-capacity conditions on the existing roadway and freeway network. This is a *significant* impact.

Impact TRANS-8: Construction of Phase 1 of the Project results in significant impacts at four intersections (#1, #4, #18, and #20), based on 2035 conditions with the Tracy Roadway and Transportation Master Plan roadway network in place. This is a *significant* impact.

Impact TRANS-9: In 2035, the addition of Phase 1 Project traffic to the 2035 No Project volumes causes the following *significant* freeway impacts:

- “ In the AM peak hour, the Project adds more than 5 percent to the total 2035 Plus Phase 1 Project volume on I-205 westbound east of Tracy Boulevard, which is projected to operate at LOS E without the Project.
- “ In the PM peak hour, the LOS falls from D (2035 No Project) to E (2035 Plus Phase 1 Project) on I-205 eastbound between I-580 and Mountain House Parkway.

Impact TRANS-10: Project Buildout would cause over-capacity conditions on the 2035 roadway and freeway network. This is a *significant* impact.

Impact TRANS-14: Full Buildout of the Project may result in inadequate emergency access. This is a *significant* impact.

Impact UTIL-2: The Project would require new or expanded wastewater facilities to serve full buildout, in accordance with the WWMP. This is a *significant* impact.

Impact UTIL-3: Construction of the Project's stormwater drainage facilities may result in *significant* impacts without mitigation.

C. Significant Irreversible Changes

Section 15126.2(c) of the CEQA Guidelines requires an EIR to discuss the extent to which implementation of the proposed Project would commit nonrenewable resources to uses that future generations would probably be unable to reverse. The three CEQA-required categories of irreversible changes are discussed below.

1. Changes in Land Use that Commit Future Generations

Full buildout of the Plan would result in the conversion of some high quality agricultural land currently used for growing crops to developed area for business, commercial, and industrial uses. The change is irreversible as the mature soils found in Prime Farmland (such as that occurring in the Specific Plan Area) take many years to develop. However, as the Specific Plan Area has already been planned for future growth and is adjacent to a developed area, implementation of the Project is not expected to result in any land use changes that would commit future generations to uses that are not already prevalent and/or planned for in the Specific Plan Area and its immediate vicinity.

2. Irreversible Damage from Environmental Accidents

Potential environmental accidents of concern include those that would have adverse effects on the environment or public health due to the nature or quantity of material released during an accident and the receptors exposed to that release. Demolition and construction activities associated with development of the proposed Project would involve some risk for environmental accidents. However, these activities would be monitored by City of Tracy, State, and federal agencies, and would follow professional industry standards for safety and construction. Additionally, although the land uses proposed by the Project may include some uses or activities that could contribute to or be the cause of significant environmental accident,

existing regulations at the City, State and federal levels would limit the potential for accidents and related adverse effects. As a result, the Project would not pose a substantial risk of environmental accidents.

3. Large Commitment of Nonrenewable Resources

Consumption of nonrenewable resources includes issues related to increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. Development of the proposed Project would require water, electric, and gas service, and resources for construction, and the ongoing operation of the Project would involve the use of nonrenewable resources. Construction of the Project would irreversibly commit some nonrenewable and limited materials and energy resources, such as oil, gasoline, sand and gravel, asphalt, and steel. These materials and energy resources would be used for infrastructure development, transportation of people and goods, utilities. During the operational phase of the Project (post-construction), energy sources including oil and gasoline would be used for lighting, heating, and cooling of businesses, transportation of people to and from the Project Area, and ongoing maintenance.

Implementation of the proposed Project, however, would include several features that would help offset or reduce the need for nonrenewable resources. The Project would be required to comply with all applicable building and design requirements, including those set forth in Title 24 relating to energy conservation. In compliance with CALGreen, the State's Green Building Standards Code, the Project would be required to reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials. The Project would encourage and promote alternative modes of transportation and includes transit-supportive measures and design features including bicycle facilities and pedestrian improvements. Additionally, the proposed Specific Plan anticipates that Project developers will take a phased approach to providing public transportation, working collaboratively with the City to provide public transportation to the Project Area, and calls for businesses within the

Project Area to work with the City to modify and expand bus routes to accommodate demand.

The Specific Plan Area contains agricultural land, including, as mentioned above, Prime Farmland (approximately 100 acres). Its proposed future non-agricultural use represents a commitment of non-renewable resources.

The Specific Plan Area does not contain a mining reserve.

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