

CHAPTER 6: OTHER CEQA CONSIDERATIONS

6.1 - Significant Unavoidable Impacts

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(a)(c) requires an Environmental Impact Report (EIR) to identify and focus on the significant environmental effects of the proposed project, including effects that cannot be avoided if the proposed project were implemented.

Based on the analyses contained in this Draft EIR, the City has determined that the proposed project would result in the following significant and unavoidable impacts:

- **Consistency With Air Quality Management Plan:** The proposed project would result in exceedances of regional emissions thresholds and, therefore, be inconsistent with the Bay Area Air Quality Management District regional air quality planning assumptions. Mitigation is proposed requiring the implementation of feasible emissions reduction measures; however, these measures would not reconcile this inconsistency. Therefore, the significance after mitigation is significant and unavoidable.
- **Cumulative Criteria Pollutant Emissions Impacts:** The proposed project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is nonattainment under an applicable federal or State ambient air quality standard. Mitigation is proposed requiring the implementation of air emissions reduction measures, but it would not fully reduce this impact to a level of less than significant. Therefore, the significance after mitigation 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 2.4 million square feet of new high-cube warehouse uses on an undeveloped site. The proposed project would employ an estimated 1,200 workers during construction and 3,643 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 builds out. As such, there would not be an "overnight" influx of new employment opportunities.

The California Employment Development Department estimated the combined Napa-Solano labor force at 273,500 in October 2021. As such, the local labor force is sufficiently large enough to allow the project's employment opportunities to be filled locally such that unplanned growth would not occur.

During the Notice of Preparation (NOP) review period, the County of Napa requested the Draft EIR evaluate whether there is sufficient housing for project employees. At the time of this writing, no prospective employees have been identified and, thus, it would be speculative to make any statements about where they would reside. Nonetheless, the City of American Canyon has more than 2,400 dwelling units in the pipeline (refer to Table 4-1 in Chapter 4, Cumulative Effects). For comparison purposes, American Canyon's population was estimated to be 20,837. Thus, the addition of more than 2,400 dwelling units to the City's housing inventory would more than offset the employment growth attributable to the proposed project.

The proposed project would be served by connections to existing water, wastewater, storm drainage, electricity, and natural gas lines that exist in Green Island Road or Devlin 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 - Energy Conservation

Note to Reader: Section 3.6, Greenhouse Gas Emissions and Energy, also addresses energy conservation.

Public Resources Code Section 21100(b)(3) and CEQA Guidelines Section 15126.4 require EIRs to describe, where relevant, the wasteful, inefficient, and unnecessary consumption of energy caused by a project. In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted AB 1575, which created the California Energy Commission (CEC). The statutory mission of the CEC is to forecast future energy needs, license thermal power plants of 50 megawatts or larger, develop energy technologies and renewable energy resources, plan for and direct State responses to energy emergencies, and—perhaps most importantly—promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code Section 21100(b)(3) to require EIRs to consider the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F of the CEQA Guidelines. Appendix F assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. Appendix F was substantially revised in 2010 to address greenhouse gas emissions and focus on reducing fossil fuel consumption. For the reasons set forth below, this Draft EIR concludes that the proposed project will not result in the wasteful, inefficient, and unnecessary consumption of energy, will not cause the need for additional natural gas or electrical energy-producing facilities, and, therefore, will not create a significant impact on energy resources.

6.3.1 - Regulatory Setting

Federal and state agencies regulate energy use and consumption through various means and programs. At the federal level, the United States Department of Transportation, the United States Department of Energy, and the United States Environmental Protection Agency are three federal agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. At the State level, the California Public Utilities Commission (CPUC) and the CEC are two agencies with authority over different aspects of energy. The CPUC regulates privately owned utilities in the energy, rail, telecommunications, and water fields. The CEC collects and analyzes energy-related data, prepares Statewide energy policy recommendations and plans, promotes and funds energy efficiency programs, and adopts and enforces appliance and building energy efficiency standards. California is exempt under federal law from the normal prohibition against states setting their own fuel economy standards for new on-road motor vehicles. Some of the more relevant federal and State energy-related laws and plans are discussed below.

Title 24, Energy Efficiency Standards

Title 24, which was promulgated by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption, provides energy efficiency standards for residential and nonresidential buildings. According to the CEC, since the energy efficiency standards went into effect in 1978, it is estimated that California residential and

nonresidential consumers have reduced their utility bills by at least \$15.8 billion. The latest Title 24 energy efficiency standards went into effect on January 1, 2020.

Pursuant to the California Building Standards Code and the Title 24 Energy Efficiency Standards, the City will review the design and construction components of the project's Title 24 compliance when specific building plans are submitted.

6.3.2 - Energy Requirements of the Proposed Project

Short-term construction and long-term operational energy consumption are discussed below.

Short-Term Construction

The United States Environmental Protection Agency (EPA) regulates nonroad diesel engines that power both mobile equipment (bulldozers, scrapers, front-end loaders, etc.) and stationary equipment (generators, pumps, compressors, etc.). The EPA has no formal fuel economy standards for nonroad (e.g., construction) diesel engines but does regulate diesel emissions, which indirectly affects fuel economy. In 1994, EPA adopted the first set of emission standards ("Tier 1") for all new nonroad diesel engines greater than 37 kilowatts (kW) or 50 horsepower. The Tier 1 standards were phased in for different engine sizes between 1996 and 2000, reducing nitrogen oxide (NO_x) emissions from these engines by 30 percent. Subsequently, the EPA adopted more stringent emission standards for NO_x, hydrocarbons, and particulate matter for new nonroad diesel engines. This program included the first set of standards for nonroad diesel engines less than 37 kW. It also phased in more stringent "Tier 2" emission standards from 2001 to 2006 for all engine sizes and added yet more stringent "Tier 3" standards for engines between 37 and 560 kW (50 and 750 horsepower) from 2006 to 2008. These standards further reduced nonroad diesel engine emissions by 60 percent for NO_x and 40 percent for particulate matter (PM) from Tier 1 emission levels. In 2004, the EPA issued the Clean Air Nonroad Diesel Rule. This rule cut emissions from nonroad diesel engines by more than 90 percent, and was phased in between 2008 and 2014. These emission standards are intended to promote advanced clean technologies for nonroad diesel engines that improve fuel combustion, but they also result in slight decreases in fuel economy.

The project site is located within the nine-county San Francisco Bay metropolitan region. Construction equipment is widely available throughout the region and is subject to the aforementioned EPA emissions standards. There are no unusual project characteristics that would necessitate the use of construction equipment that would not meet EPA standards. Therefore, it is expected that construction fuel consumption associated with the project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region.

Long-term Operations

Transportation Energy Demand

Vehicle fuel efficiency is regulated at the federal level. Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards and for revising existing standards. NHTSA indicated that the fuel economy of passenger vehicles averaged 34.2 miles per gallon and light trucks averaged 26.2 miles per gallon. Heavy trucks and other heavy vehicles are not subject to fuel economy standards; however, they average 6.5 miles per gallon.

The proposed project would be well-positioned to serve the North Bay Counties of Napa, Solano, and Sonoma due to its proximity to State Route (SR) 29/SR-12 corridors. All three counties have adopted urban growth boundaries that limit the footprint of urban development. Thus, large footprint land use activities such as logistics centers are limited to very select sites in these three counties, with the Napa Valley Business Park and Green Island Business Park being the primary ones in Napa County.

Building Energy Demand

Marin Clean Energy (MCE) is the electricity provider and Pacific Gas and Electric Company (PG&E) is the natural gas provider to American Canyon.

Electricity

MCE offers its customers three options for energy: Light Green, Deep Green, and Local Sol. The Light Green option relies on 60 percent renewable (biomass/renewable, geothermal, eligible hydroelectric, solar and wind) and the balance from other sources (large hydroelectric, nuclear, open market purchases). Deep Green and Local Sol are 100 percent renewable, with the former 50:50 solar and wind and the latter 100 percent solar.

PG&E delivers electricity for MCE. PG&E operates approximately 18,000 circuit miles of transmission lines, approximately 107,000 circuit miles of distribution lines, 68 transmission switching stations, and 760 distribution substations. PG&E is interconnected with electric power systems in the western Electricity Coordinating Council, which includes 14 western states; Alberta and British Columbia, Canada; and parts of Mexico.

Natural Gas

PG&E provides natural gas to all or part of 39 counties in California comprising most of the northern and central portions of the State, including Solano County. PG&E charges connection and user fees for all new development and sliding use-based rates for natural gas service. PG&E operates approximately 43,300 miles of distribution pipelines and approximately 6,300 miles of backbone and local transmission pipelines, and three underground storage fields. In 2019, PG&E delivered 227 billion cubic feet of natural gas to its 4.5 million natural gas customers.

Energy Consumption

Using consumption figures provided by the United States Energy Information Administration, the proposed project’s estimated building electricity and natural gas consumption is summarized in Table 6-1.

Table 6-1: Energy Consumption Estimates

Energy Source	Square Feet	Annual Consumption Rate	Annual Consumption
Electricity	2,400,000	6.6 kWh/square foot	15.8 million kWh
Natural Gas		19.4 cubic feet/square foot	46.6 million cubic feet
Notes: ‘Warehouse and storage’ energy consumption rate used. Source: United States Energy Information Administration, 2016.			

As shown in the table, the proposed project would demand approximately 15.8 million kWh of electricity and 46.6 million cubic feet of natural gas at buildout. All new buildings would be subject to the latest adopted edition of the California Green Building Code and Title 24 energy efficiency standards, which are among the most stringent in the United States. As such, the proposed project would not result in the unnecessary, wasteful, or inefficient use of energy.