
CHAPTER 5 CEQA CONSIDERATIONS

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Introduction

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Further, the evaluation of significant impacts must consider direct and reasonably foreseeable indirect effects of the project over the short-term and long-term. As part of this analysis, the EIR must also identify (1) significant environmental effects of the Proposed Project, (2) significant environmental effects that cannot be avoided if the Proposed Project is implemented, (3) significant irreversible environmental changes that would result from implementation of the Proposed Project, (4) growth-inducing impacts of the Proposed Project, (5) mitigation measures proposed to minimize significant effects, and (6) alternatives to the Proposed Project.

Chapter 2 of this EIR, Summary of Environmental Effects, and Sections 4.1 through 4.11 of this EIR provide a comprehensive presentation of the Proposed Project's environmental effects, proposed mitigation measures, and conclusions regarding the level of significance of each impact both before and after mitigation.

Significant Irreversible Environmental Effects

Under CEQA, an EIR must 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 [CEQA Guidelines section 15126.2(c); 15127]. 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;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project;

- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Implementation of the Proposed Project would result in the long-term commitment of resources of the project site to urban land use. The Proposed Project would likely result in or contribute to the following irreversible environmental changes:

- Conversion of existing undeveloped land, approximately 260 acres currently used for agricultural uses to urban land uses, thus precluding other alternate land uses in the future.
- Increased ambient noise associated with an increase in traffic (6.6 dBA increase).
- Conversion of existing habitat (approximately 260 acres) and irreversible loss of wildlife (foraging habitat for raptors).
- Irreversible consumption of goods and services associated with the future population.
- Degradation of air quality associated with project construction and operation (ROG – 305 lbs/day, NO_x - 409 lbs/day, PM₁₀ – 391 lbs/day, CO – 3,848 lbs/day).
- Irreversible consumption of energy and natural resources associated with the future employee and patron population.

Development of the Proposed Project would result in the continued commitment of the entire project site to urban development, thereby precluding any other uses for the lifespan of the project. Restoration of the site to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Resources that would be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources. With respect to operational activities, compliance with all applicable building codes, as well as mitigation measures, planning policies, and standard conservation features, would ensure that all natural resources are conserved to the maximum extent possible. It is also possible that new technologies or systems would emerge, or would become more cost-effective or user-friendly, to further reduce the reliance upon nonrenewable natural resources. For example, mobile emissions associated with automobiles and trucks are anticipated to be less polluting in the future due to new technology designed to improve the efficiency of engines. Nonetheless, construction activities related to the Proposed Project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the project. While the project would result in the use, transport, storage, and disposal of hazardous wastes, as described in Section 4.5 (Hazardous Materials and Public Safety), all activities would comply with applicable State and federal laws related to hazardous materials, which significantly reduces the likelihood and severity of accidents that could result in irreversible environmental damage. In addition, the project does not include any uniquely hazardous uses that would require any special handling or storage.

Implementation of the Proposed Project would result in the long-term commitment of resources to urban development. The most notable significant irreversible impacts are a reduction in natural vegetation and wildlife communities; increased generation of pollutants; and the short-term commitment of non-renewable and/or slowly renewable natural and energy resources, such as lumber and other forest products, mineral resources, and water resources during construction activities. Operations associated with future uses would also consume natural gas and electrical energy. These irreversible impacts, which are, as yet, unavoidable consequences of urban growth, are described in detail in the appropriate technical sections of this EIR (see Chapter 4).

Growth Inducing Impacts

An EIR must discuss the ways in which the Proposed Project would affect economic and commercial growth in the vicinity of the project and how that growth would, in turn, affect the surrounding environment [CEQA Guidelines Section 15126.2(d)]. As required by Section 15126.2(d), an EIR must discuss 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. Also, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth would be considered a significant impact if it can be demonstrated that the potential growth, directly or indirectly, significantly affects the environment.

Introduction to Growth Inducement Issues

Growth can be induced in a number of ways, including through the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of the removal of obstacles to growth relates directly to the removal of infrastructure limitations (typically through the provision of additional capacity or supply) or the reduction or elimination of regulatory constraints on growth that could result in growth unforeseen at the time of project approval.

- *Elimination of Obstacles to 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.
- *Economic Effects:* This refers to the extent to which a proposed project could cause increased activity in the local or regional economy. Economic effects can include such effects as the Multiplier Effect. A “multiplier” is an economic term used to describe inter-relationships 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 on-site employment and population growth of each project is not the complete picture of growth caused by the project.

Elimination of Obstacles to Growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services would be expected to support new development.

Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

Removal of Infrastructure Limitations or Provision of Capacity

The elimination of physical obstacles to growth is considered a growth-inducing effect. A number of physical constraints to growth currently exist in the vicinity of the project. In summary, the primary growth obstacles in the area today include:

- Limited capacity of existing roadways and freeway ramps;
- Limited capacity of existing water and sewer infrastructure and wastewater treatment plant capacity;
- Limited capacity of existing drainage facilities to handle storm flows.

Solutions to the road capacity limitations are discussed in Section 4.10, Transportation and Circulation and the discussion of water and wastewater infrastructure and capacity of the treatment plant is included in Section 4.11, Utilities. Extension of water supply lines and acquisition of additional supply would make water available to the project site. Additional groundwater wells would provide redundancy within the project area, as well as to the rest of the City. Upgrading the City's existing WWTP to expand treatment capacity would provide additional capacity.

The construction of these infrastructure improvements would further extend urban infrastructure systems and could eliminate some of the infrastructure constraints that currently are obstacles to growth in the NQSP area.

Stimulation of Economic Activity/Multiplier Effects

The discussion of jobs created by the project is included in Chapter 3, Project Description, which provides an estimate of permanent jobs that would be generated by operation of Phase 1 of the project. These estimates are based upon information provided by the project applicant based on information gathered from similar racetrack facilities. The employment estimates are for Phase 1 only.

In addition to the employment generated by Proposed Project, additional local employment can be generated through what is commonly referred to as the "multiplier effect." The multiplier effect tends to be greater in regions with larger diverse economies due to a decrease in the requirement to import goods and services from outside the region. Two different types of additional employment are tracked through the multiplier effect. *Indirect* employment includes those additional jobs that are generated through the expenditure patterns of direct employment associated with the project. For example, workers associated with racetrack operations would spend money in the local economy, and the expenditure of that money would result in additional jobs. Indirect jobs tend to be in relatively close proximity to the places of employment and residence.

The multiplier effect also calculates *induced* employment. Induced employment follows the economic effect of employment beyond the expenditures of the employees within the project area to include jobs created by the stream of goods and services necessary to support businesses within the Proposed Project.

For example, when a manufacturer buys products or sells products, the employment associated with those inputs or outputs are considered *induced* employment.

For example, when an employee from the project goes out to lunch, the person who serves the project employee lunch holds a job that was *indirectly* caused by the Proposed Project. When the server then goes out and spends money in the economy, the jobs generated by this third-tier effect are considered *induced* employment.

The multiplier effect also considers the secondary effect of employee expenditures. Thus, it includes the economic effect of the dollars spent by those employees who support the employees of the project.

Increased future employment generated by employee spending ultimately results in physical development of space to accommodate those employees. It is the characteristics of this physical space and its specific location that will determine the type and magnitude of environmental impacts of this additional economic activity. Although the economic effect can be predicted, the actual environmental implications of this type of economic growth are too speculative to predict or evaluate since they can be spread throughout the City of Dixon and the larger Sacramento metropolitan region and beyond. Accordingly, no further assessment of environmental impacts is contained herein except as discussed in "Impacts of Induced Growth," which follows.

The "Multiplier" Effect

One way of measuring the economic effect is through consideration of the "multiplier" effect. "Multiplier" is an economic term used to describe interrelationships between various sectors of the economy. The multiplier effect provides a quantitative description of the direct employment effect of a project, plus the indirect and induced employment growth.

Estimated employment generated through the multiplier effect is presented in Table 5-1 for construction jobs along with the indirect and induced employment numbers. In total, Phase 1 of the project would accommodate land uses that would employ a total of 787 persons. Based on a report prepared by Goodwin Consulting Group, buildout of both Phase 1 and 2 (assumed to be a 15 year buildout) would generate an estimated 4,137 construction jobs for Phase 1 and 2 (see Table 5-1). It was estimated that the project would contribute to a total of 358 annual construction-related jobs for both Phase 1 and Phase 2 based on a 15-year buildout. Under the current zoning, a total of 162 construction jobs were estimated based on a 30-year buildout. During project operation, the Goodwin Consulting Group estimated the project would generate an annual estimate of 3,592 jobs for both Phase 1 and 2 while the creation of 5,640 jobs annually were estimated under the current zoning, as shown in Table 5-2.

The employment predicted through the multiplier effect is not all new to the region. Much of these employment effects would be absorbed into underutilized portions of the local economy. To the extent that goods and services are not available in the local and/or regional economy, portions of these economic effects would extend outside the local and regional economy. Thus, the magnitude of this impact is speculative and cannot be reasonably determined at this time. Nonetheless, examination of the multiplier effect highlights the nature of the economic stimulus that development, especially non-residential development, has within a local economy and the profound effects that economic growth can have on local development and growth patterns with concomitant physical environmental effects.

Table 5-1

**Generation of Construction-related Jobs
(over a 15-year period)**

Land Use	Direct (jobs)	Indirect	Induced	Total
Phase 1	2,062	280	346	2,688
Phase 2	2,076	270	343	2,689
Phases 1 and 2 combined	4,137	550	689	5,376
Current Zoning	3,884	356	631	4,871

Source: Goodwin Consulting Group, Inc. 2005.

Table 5-2

Generation of Jobs for Project Operation

Land Use	Direct	Indirect	Induced	Total
Phase 1				
Racetrack	787	112	102	1,001
Phase 2				
Retail	1,224	72	116	1,412
Theatre	70	20	6	96
Office	600	87	126	813
Hotel/Conference	240	11	11	262
Phases 1 and 2 Combined	2,921	302	361	3,584
Current Zoning				
Retail	510	39	42	591
Office	1,469	211	310	1,991
Light Industrial	1,929	409	478	2,816
Neighborhood Commercial	214	13	16	243
Total Current Zoning	4,122	672	846	5,641

Source: Goodwin Consulting Group, Inc. 2005.

Impacts of Induced Growth

The growth induced directly and indirectly by the Proposed Project would contribute to a number of environmental impacts in the City, as well as the greater regional area, including: traffic congestion; air quality deterioration; and loss of agricultural land and open space; and increased demand for housing.

Specifically, an increase in population-growth-induced housing demand in the region could cause significant environmental effects as new residential development would require governmental services, such as schools, libraries, and parks.

Indirect and induced employment and population growth would further contribute to the loss of open space because it would encourage conversion to urban uses for housing and infrastructure. The construction of more roadways and infrastructure within the NQSP area would help to promote growth in the NQSP; however, the City has identified this area as a future growth area and in doing so prepared the NQSP to provide a framework for future planned development. Development of the Proposed Project would not remove any obstacles to enable unplanned growth to occur. It is important to note that in the future once the Pedrick Road interchange is re-built it would remove an obstacle to future growth north of the project site in Solano County.

Cumulative Impacts

CEQA requires that an EIR contain an assessment of the cumulative impacts that could be associated with the Proposed Project. This assessment involves examining project-related effects on the environment in the context of similar effects that have been caused by past or existing projects, and the anticipated effects of future projects. Although project-related impacts may be individually minor, the cumulative effects of these impacts, in combination with the impacts of other projects, could be significant under CEQA and must be addressed [CEQA Guidelines, §15130(a)]. Where a lead agency concludes that the cumulative effects of a project, taken together with the impacts of past, present, and probable future projects, are significant, the lead agency then must determine whether the project's incremental contribution to such significant cumulative impact is "cumulatively considerable" (and thus significant in and of itself).

The basis of the cumulative analysis varies by technical area. For example, traffic and traffic-related air emissions and noise analyses assume development that is planned and/or anticipated in the City of Dixon and other jurisdictions, including Davis and Vacaville, because each of these jurisdictions contribute to traffic on local and regional roadways. Air quality impacts are evaluated against conditions in the Sacramento air basin. Similarly, the hydrology and water quality cumulative analysis considers the watersheds that receive runoff from the project site. The public services and utilities analysis is primarily based on the City's development assumptions and expansion plans (e.g., expansion of the City's wastewater treatment plant and the extension of conveyance infrastructure), because the City would provide the majority of services and utilities to serve the Proposed Project. Other cumulative analyses, such as biological resources, consider the potential loss of resources in a broader, more regional context. The cumulative analysis in each technical section evaluates the Proposed Project's contribution to the cumulative scenario.

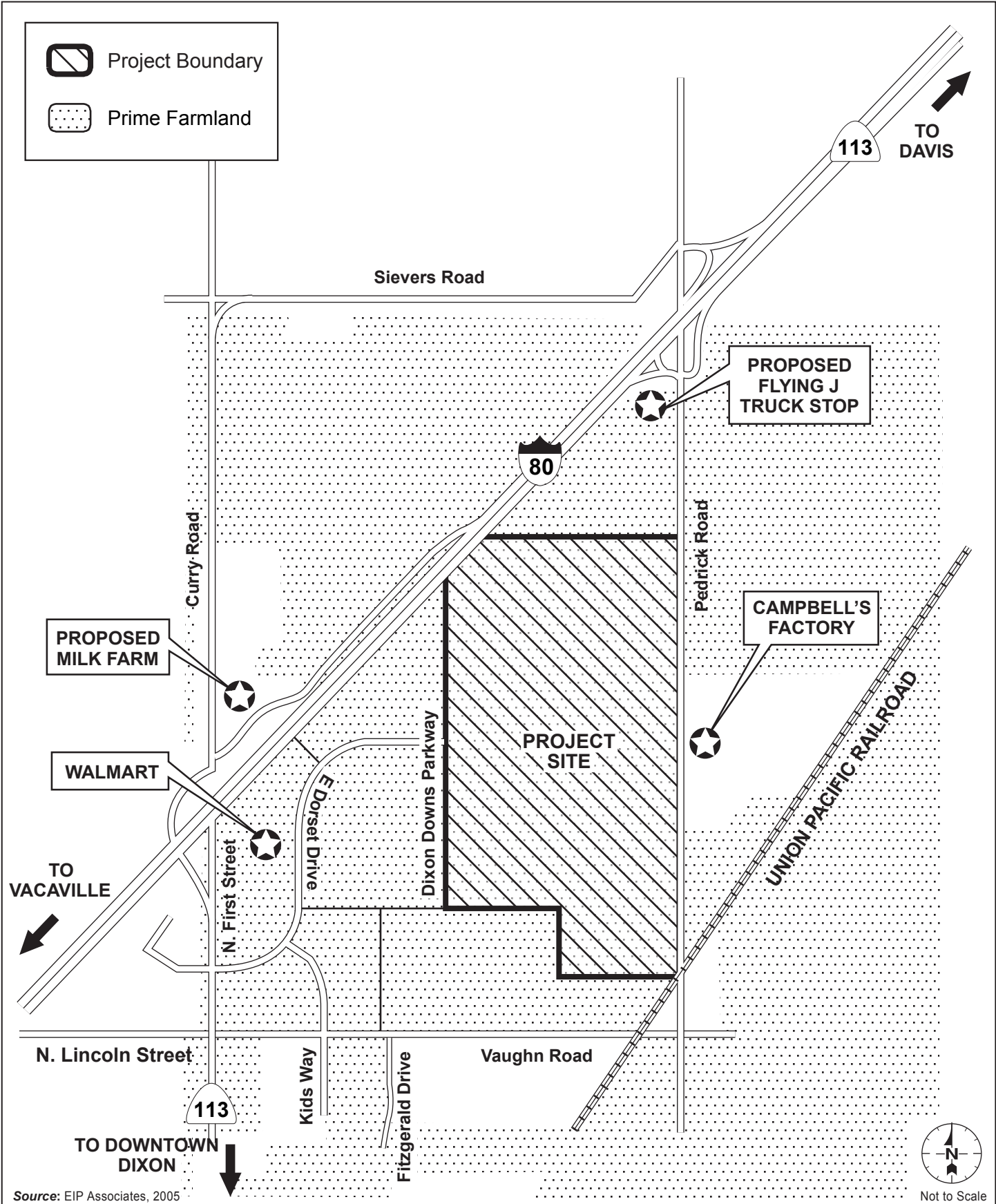
To assess cumulative impacts associated with the project, traffic forecasts were developed using the City of Dixon Travel Demand Model. This model was calibrated to Year 2001 travel conditions, and produces traffic forecasts for Year 2015 and 2025 conditions based on anticipated land use absorption

and planned roadway improvements. All Year 2015 analysis scenarios assume buildout of the residential component of the City in accordance with the current General Plan and 2015 market levels of non-residential land absorption (with the exception of the NQSP which was assumed to be fully developed). In addition, the Milk Farm property was assumed to be redeveloped based on the most recent application submitted to the City. These assumptions reflect the land use absorption rates ongoing and expected to occur in the City.

There are other projects in the region that are proposed and would contribute to the cumulative increase in traffic along I-80 and potentially some roadways in the City of Dixon. These projects include the proposed UC Davis West Village Plan located on SR 113, the approved, but not yet constructed, Lagoon Valley mixed use residential and commercial development located in the City of Vacaville, and the Nut Tree commercial project also located in Vacaville along I-80. Within the City of Dixon approximately 600 acres of commercial development and 500 acres of residential development has either been constructed, approved or is proposed for development. Projects within the City of Dixon include the 60-acre Milk Farm Property proposed for annexation to the City. The Milk Farm project includes 520,000 sf of highway commercial and specialty retail uses along with a hotel, recreational facilities and a 30-acre agricultural demonstration area. Proposed or approved development in the NQSP area includes the Flying J Travel Plaza with a gas station, restaurant and other amenities for long-haul truckers; 149+/- acres proposed for Highway Commercial uses, and over 150,000 sf of commercial development. Within the SWDSP 120 acres are proposed for highway commercial, business and light industrial park and residential uses along with over 290 acres of residential development. Figure 5-1 shows the location of projects within the City of Dixon.

Cumulative impacts are identified at the end of each technical section (see Chapter 4, Sections 4.1 through 4.11). A list of the less than cumulatively considerable impacts is included below. Cumulatively considerable impacts are listed on page 5-12, under the heading “Cumulative Significant and Unavoidable Impacts”.

- **The Proposed Project, in combination with other development, could substantially, adversely alter the visual character of the project site and could be visually incompatible with the surrounding land uses** (Impact 4.1-4, Phase 1, Phases 1 and 2). This impact would be less than cumulatively considerable.
- **The Proposed Project, in combination with other new development, could create a substantial new source of light or glare, which could create an adverse effect for uses of the surrounding area** (Impact 4.1-5, Phase 1, Phases 1 and 2). This impact would be less than cumulatively considerable.
- **Cumulative development within the Solano, Yolo, and San Joaquin County portion of the Central Valley, including the Proposed Project, would contribute to the cumulative loss of foraging habitat for Swainson’s hawk and other raptors** (Impact 4.3-4, Phase 1, Phases 1 and 2). This impact would be less than cumulatively considerable.
- **Cumulative development within the City of Dixon, including the Proposed Project, could contribute to the cumulative loss of jurisdictional wetlands or waters of the State** (Impact 4.3-5, Phase 1, Phases 1 and 2). This impact would be less than cumulatively considerable.



Source: EIP Associates, 2005

Not to Scale



**FIGURE 5-1
Proposed Future Projects in the Project Vicinity**

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City of Dixon

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- **Cumulative development within the City of Dixon, including the Proposed Project, could adversely contribute to the cumulative loss of non-sensitive nesting birds that are protected by the California Department of Fish and Game or the Migratory Bird Treaty Act (Impact 4.3-6, Phase 1, Phases 1 and 2).** This impact would be less than cumulatively considerable.
 - **The Proposed Project, in combination with surrounding development, could disturb or destroy unidentified subsurface archeological resources during construction pursuant to Section 15064.5 or the CEQA Guidelines (Impact 4.4-2, Phase 1, Phases 1 and 2).** This impact would be less than cumulatively considerable.
 - **Cumulative development, including the Proposed Project, could expose people and the environment to hazards and hazardous materials through reasonable foreseeable upset and accident conditions (Impact 4.5-5, Phase 1, Phases 1 and 2).** This impact would be less than cumulatively considerable.
 - **Cumulative development, including the Proposed Project, could expose people to hazards associated with soil or groundwater contamination (Impact 4.5-6, Phase 1, Phases 1 and 2).** This impact would be less than cumulatively considerable.
 - **Cumulative development, including the Proposed Project, could overwhelm emergency response services or affect evacuation routes under a worst-case, simultaneous events scenario (Impact 4.5-7, Phase 1, Phases 1 and 2).** This impact would be less than cumulatively considerable.
 - **The Proposed Project, in combination with other development, would exceed existing and planned drainage system capacities (Impact 4.6-8, Phase 1, Phases 1 and 2).** This impact would be less than cumulatively considerable.
 - **The Proposed Project, in combination with other development, would contribute sediment and other pollution to downstream receiving waters (Impact 4.6-9, Phase 1, Phases 1 and 2).** This impact would be less than cumulatively considerable.
 - **The Proposed Project, in addition to existing and future water demands in the Solano groundwater basin, would increase pumping of groundwater which could degrade local groundwater quality (Impact 4.6-10, Phase 1, Phases 1 and 2).** This impact would be less than cumulatively considerable.
 - **The Proposed Project, in combination with other development in the City of Dixon, could result in the need for new or physically altered law enforcement facilities (Impact 4.9-3, Phase 1, Phases 1 and 2).** This impact would be less than cumulatively considerable.
 - **The Proposed Project, in combination with other development, could result in the need for new or physically altered fire protection facilities (Impact 4.9-6, Phase 1, Phases 1 and 2).** This impact would be less than cumulatively considerable.

- **The Proposed Project, in combination with other development, would generate solid waste that could exceed the capacity of existing facilities** (Impact 4.9-8, Phase 1, Phases 1 and 2). This impact would be less than cumulatively considerable.
- **The Proposed Project, in combination with other development, could result in the construction of new or physically altered school facilities** (Impact 4.9-10, Phase 1, Phases 1 and 2). This impact would be less than cumulatively considerable.
- **The Proposed Project, in combination with other development in the City, could include recreational facilities or require the construction or expansion of existing recreational facilities, which might have an adverse physical effect on the environment** (Impact 4.9-12, Phase 1, Phases 1 and 2). This impact would be less than cumulatively considerable.
- **Development of the Proposed Project, in combination with development in the Solano groundwater basin, would result in a decline in groundwater levels** (Impact 4.11-4, Phase 1, Phases 1 and 2). This impact would be less than cumulatively considerable.
- **The Proposed Project, in combination with other development in the City of Dixon, could result in the need for new or physically altered wastewater collection facilities that could result in significant environmental effects** (Impact 4.11-8, Phase 1, Phases 1 and 2). This impact would be less than cumulatively considerable.
- **The Proposed Project, in combination with other non-residential development in the City of Dixon, would discharge wastewater to the sewer that could contain constituents that could affect the quality of wastewater treated and disposed of at the City's wastewater treatment plant** (Impact 4.11-10, Phase 1, Phases 1 and 2). This impact would be less than cumulatively considerable.

Significant and Unavoidable Impacts

The significant and unavoidable project-specific and cumulative impacts are listed below.

Project-Specific Significant Unavoidable Impacts

Project-specific significant and unavoidable impacts identified for the Proposed Project include:

- **Construction activities associated with the Proposed Project would generate emissions of criteria pollutants** (Impact 4.2-1, Phase 1, Phases 1 and 2).
- **Operation of the Phase 1 combined with construction of Phase 2, and operation of Phases 1 and 2 combined would generate emissions of ROG and NO_x** (Impact 4.2-2, Phase 1, Phases 1 and 2).
- **Development of the Proposed Project would result in the conversion of Prime Farmland to non-agricultural uses** (Impact 4.7-2, Phase 1, Phases 1 and 2).

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- **Large events could increase noise levels in the vicinity of the project site** (Impact 4.8-4, Phase 1, Phases 1 and 2).
 - **Implementation of the Proposed Project (Tier 1 event) could cause existing operations at study intersections to worsen from acceptable to unacceptable levels** (Impact 4.10-1, Phase 2 only).
 - **Implementation of the Proposed Project (Tier 1 event) could cause existing operations on I-80 to worsen from acceptable to unacceptable levels** (Impact 4.10-3, Phase 1, Phases 1 and 2).
 - **Implementation of the Proposed Project (Tier 1 event) could cause existing operations on roadways of regional significance to worsen from acceptable to unacceptable levels** (Impact 4.10-4, Phase 1 only).
 - **Implementation of the Proposed Project (Tier 2 and 3 events) could cause existing operations at study intersections and freeway segments to worsen from acceptable to unacceptable levels** (Impact 4.10-5, Phase 1, Phases 1 and 2).
 - **Implementation of the Proposed Project could reduce safety on Pedrick Road by creating potential conflicts with farm equipment and vehicles** (Impact 4.10-6, Phase 1, Phases 1 and 2).
 - **Implementation of the Proposed Project could increase the number of vehicles that cross at-grade railroad tracks** (Impact 4.10-8, Phase 1, Phases 1 and 2).
 - **Implementation of the Proposed Project could provide an inadequate number of on-site parking spaces** (Impact 4.10-11, Phases 1 and 2 only).
 - **The Proposed Project would result in the need for expansion of the City's wastewater treatment plant facilities** (Impact 4.11-6, Phases 1 and 2 only).

Cumulative Significant and Unavoidable Impacts

Cumulative significant and unavoidable impacts identified for the Proposed Project include:

- **Combined Phase 1 operation and Phase 2 construction and operation, in combination with other existing and future development within the SVAB could generate emission of ROG and NO_x contributing to a cumulative impact** (Impact 4.2-6, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.
- **Construction activities associated with of the Proposed Project, in combination with other existing and future development, could generate emissions of PM₁₀ contributing to a significant impact** (Impact 4.2-7, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.

- **The Proposed Project, in combination with other development, would result in the loss of Prime Farmland** (Impact 4.7-4, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.
- **Implementation of the Proposed Project could result in a cumulatively considerable noise increase in the project vicinity** (Impact 4.8-5, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.
- **Implementation of the Proposed Project could exacerbate cumulatively unacceptable operations at study intersections** (Impact 4.10-13, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.
- **Implementation of the Proposed Project, in conjunction with other cumulative development, could exacerbate unacceptable operations on Interstate 80** (Impact 4.10-14, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.
- **The Proposed Project, in combination with other development in the City of Dixon, could result in the need for new or physically altered wastewater treatment facilities that could result in significant environmental effects** (Impact 4.11-9, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.