

6.0 OTHER CEQA CONSIDERATIONS

6.1 INTRODUCTION

This section provides a discussion of the potential cumulative and growth-inducing impacts associated with the proposed project.

6.2 CUMULATIVE IMPACTS

Cumulative impacts are defined as two or more individual effects which, when considered together, are considerable, or which compound or increase other environmental effects. Section 15130(a) of the CEQA Guidelines states that:

An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable..Where a lead agency is examining a project with an incremental effect that is not 'cumulatively considerable', a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

Section 15130 (b) of the *State CEQA Guidelines* includes the methodology for preparing a cumulative impact analysis. The discussion of cumulative impacts reflects their severity and likelihood of occurrence but does not need to be described in as great detail as is provided for the effects attributable to the proposed project alone. The discussion is brief and guided by reasonableness and practicality. This section of the *State CEQA Guidelines* states that a cumulative impact analysis must be based on:

(1) *Either:*

- (A) *A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or*
- (B) *A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.*

The County does not maintain a list of past, present, and probable future projects. Therefore, this section of the Draft EIR utilizes the summary of projections methodology under Section 15130 (b)(1)(B). Table 4 of the Alameda County East County Area Plan (ECAP) outlines the County's growth projections for lands covered by that plan. For the "Remainder Unincorporated" subarea of the ECAP, which includes the project site and surrounding lands, the ECAP projects a residential dwelling unit buildout of 470 units, and a buildout total of 100 jobs.

6.2.1 Non-Potential Cumulative Impacts

Section 4.0, Environmental Impact Analysis, of this Draft EIR identified four resource areas that would not be impacted by the proposed project:

- Agricultural Resources
- Mineral Resources
- Population and Housing
- Recreation

There is no evidence in the record that suggests that these resource areas would be impacted when considered cumulatively with other resources areas, or with other past, present, or probable future projects. No further analysis is necessary.

6.2.2 Potential Cumulative Impacts

Section 4.0, Environmental Impact Analysis, of this Draft EIR identified twelve resource areas for which the proposed project could result in significant, yet predominantly mitigable impacts. The following presents a discussion of the proposed project's impacts when considered cumulatively with other resources areas, and with other past, present, or probable future projects.

6.2.2.1 Aesthetics

The two proposed freeway signs would result in a significant and unavoidable impact, as identified in **Section 4.1, Aesthetics**. The impact would stem from the signs' significant intrusion into the viewshed of that portion of I-580 that is a designated as a state scenic highway. The other proposed improvements, including the grandstand roof and caretaker residences would not be visible from the designated portion of I-580.

The visual impact of the proposed signs would be cumulatively considerable if there were other similarly sized signs or similar structures under construction, approved and not yet under construction, or under review in the immediate vicinity of the project site that would be visible from the designated portion of I-580. There are no known such projects. The development potential of lands adjacent to the project site is generally limited to farming, large-lot rural residential development, and wind farming due to ECAP policies, the Alameda County General Ordinance Code, and the existing wind farms that dominate the area. These potential future land uses are not typically associated with large-scale signs.

While the proposed project would result in a significant and unavoidable aesthetic impact as described in **Section 4.1, Aesthetics**, there is no evidence that would indicate that the proposed project would result in a cumulatively considerable impact.

6.2.2.2 Air Quality and Global Climate Change

A complete discussion of air quality and global climate change project and cumulative impacts is presented in **Section 4.3, Air Quality and Global Climate Change**.

The proposed project would not be consistent with all of the criteria used to determine consistency with the *2005 Ozone Strategy*. However, the proposed project would not induce population growth in the area and would not cause an individually significant impact. Furthermore, all appropriate control measures would be implemented during construction to minimize the generation of fugitive dust. Nevertheless, the proposed project would not be consistent with the *2005 Ozone Strategy*. Accordingly, the proposed project would have a cumulatively considerable impact on air quality in the region. This impact is considered significant. There is no feasible mitigation.

With regard to the proposed project's contribution to greenhouse gas emissions, the net increase would stem from added spectator vehicles associated with the increase in the site's temporary and recurring population from 6,150 to 8,000 people. Measures have been identified in **Section 4.3, Air Quality and Global Climate Change** to mitigate to some extent the added emissions, however, as noted therein, implementation of those measures is not expected to substantially reduce the project's GHG emissions.

The proposed project would result in a significant and unavoidable cumulatively considerable impact with regard to factors associated with consistency with the *2005 Ozone Strategy* as well as global climate change.

6.2.2.3 Biological Resources

The proposed project would have a potentially substantial adverse effect on species identified as candidate, sensitive, or special status, could have a potentially substantial adverse effect on a riparian habitat, and could potentially interfere with the movement of native resident or migratory wildlife species, as outlined in **Section 4.4, Biological Resources**. All of these potentially significant effects can be mitigated at the project specific level to less than significant.

The potentially significant biological resource impacts, with mitigation, could be cumulatively considerable if there were other development activity on lands utilized by the various species. Such projects would include those that could hamper the free movement of species, those that could alter water courses, or those that could interfere with the natural food chain through the removal of foraging habitat. This could involve

lands immediately adjacent to the project site or lands that are a mile or more distant, and would vary with each species and its range. Species of particular concern with regard to the proposed project include the Burrowing owl, the San Joaquin kit fox, the California Tiger Salamander, and the California Red-Legged Frog. As noted earlier, there is limited future development potential on lands immediately surrounding the project site. While the limited potential could include potential harm to biological species, all such development would be required to consider the effects on biological resources prior to receiving entitlement; that process would ensure that any potential harm to species on-site or off-site of those adjacent lands was considered and mitigated to a less than significant level.

Examination of development potential beyond those immediately adjacent lands finds that there is potential in San Joaquin County on lands that could be shared by species found or believed to frequent the Altamont Motorsports Park site. However, like the immediately adjacent lands, those lands would also be evaluated for the potential effects of new development on biological resources, a process that would ensure the appropriate protection of species. Therefore, the project would not contribute to a cumulatively considerable biological resource impact.

6.2.2.4 Cultural Resources

Construction of the proposed project has a low potential to unearth previously undiscovered and unexpected cultural resources during earth moving activities, however, as described in **Section 4.5, Cultural Resources**, the accidental destruction of such resources would be a significant impact. Mitigation measures are identified that would reduce that impact to a less than significant level.

A cumulative impact to cultural resources would occur if on-site resources were destroyed and those resources were part of a larger resource site, the value of which would be diminished by the incremental destruction of resources. Measures outlined in **Section 4.5, Cultural Resources**, would serve to protect against the accidental destruction of resources associated with implementation of the proposed project. However, discovered resources that were removed from the site without knowledge of the potential association of those resources with other nearby undiscovered resources could affect the value of those adjacent resources. The potential for the discovery of cultural resources lands adjacent to the project site has a similarly low potential, which is further diminished by the fact that lands on three sides of the project site have been previously developed. Based on a review of cultural resources information maintained by the California Historical Resources Information System's Northwest Information Center, no resources have been found on those lands. The land to the east of the project site has not been previously developed, and reflects the only probable source of added and associated resources.

Based on the low probability of discovering resources on the project site and on adjacent lands, the likelihood of a cumulative effect on resources is considered extremely low. Therefore, the project would not contribute to a cumulatively considerable cultural resource impact

6.2.2.5 Geology and Soils

Construction of the proposed project has the potential to expose people and structures to substantial adverse effects involving seismic-related ground failure, expansive soil, and other geologic factors that could lead to the failure of the proposed grandstand roof and freeway signs. Measures have been identified in **Section 4.6, Geology and Soils**, that would reduce those potential impacts to less than significant levels.

None of the earthwork associated with the proposed project would extend onto adjacent lands, nor affect slopes or other natural features in a manner that would alter or destabilize off-site geologic conditions, and in turn, affect existing or future uses of adjacent lands. Therefore, the proposed project would not make a considerable contribution to significant cumulative geology, soils, or seismic impacts.

6.2.2.6 Hazards and Hazardous Materials

Operation of the proposed project would create an incremental increase in a potentially significant hazard resulting from an incremental increase in the exposure of people and structures to a significant risk of loss, injury, and death involving wildland fires. The catalyst of this increase would be the added temporary population at the site and the incremental increased potential for wildland fire due to added vehicles parked on grass-covered hillsides and the incremental opportunity for the careless discarding of smoking materials. Measures outlined in **Section 4.7, Hazards and Hazardous Materials** would reduce the potential impact to a less than significant level.

The potential effect would be considerably cumulative if other development activity in the project area were to increase off-site opportunities for the initiation of wildland fires. It has been documented that the potential for new or expanded development on lands immediately adjoining the project site is low, as is the potential to significantly add to the permanent population in the immediate project area. The addition of a limited number of rural residential units in the general project area would not be expected to significantly or cumulatively increase the risk of wildland fire to an unacceptable level.

The only anticipated increase in hazard materials associated with the proposed project is associated with the added generation of vehicular traffic moving to and from the site, as well as the accidental release of automotive-related hazardous materials from vehicles parked on grass-covered hillsides. Measures outlined in **Section 4.7, Hazards and Hazardous Materials** would reduce this potential incremental impact to a less

than significant level. Development activities on adjacent properties, due to institutional constraints, would not raise the risk associated with hazardous materials to a level of significance.

Therefore, the proposed project would not make a considerable contribution to significant cumulative hazard or hazardous materials impacts.

6.2.2.7 Hydrology and Water Quality

The proposed project has the potential to cause construction-related erosion, to introduce transportation related pollutants to downstream waters, and to decrease the carrying capacity of project area drainage systems. **Section 4.8, Hydrology and Water Quality**, identifies mitigation measures that would reduce those impacts to less than significant levels.

Most adjacent properties have previously been developed and no further improvements or land form modifications are expected or anticipated that could combine with the proposed project to increase the potential impact to hydrology or water quality. Future develop of the property immediately east of the project site would require the review of grading and drainage plans as part of the entitlement process, and that would be expected to include the evaluation and if necessary mitigation of designs to avoid hydrologic and water quality impacts. Therefore, the proposed project would not make a considerable contribution to significant cumulative hydrology or water quality impacts.

6.2.2.8 Land Use and Planning

Section 4.9, Land Use and Planning, indicates that the proposed project is inconsistent with some policies of the ECAP with regard to aesthetic impacts. This specific impact is discussed in detail in **Section 4.1, Aesthetics**. The potential cumulative impact on aesthetic resources is discussed above in **Section 6.2.2.1, Aesthetics**. No further discussion or analysis of cumulatively considerable land use and planning impacts is warranted.

6.2.2.9 Noise

The proposed project would be required to adhere to noise levels established by the 1996 CUP, which would reduce a potentially significant impact to a less than significant level, as described in **Section 4.11, Noise**. Other existing significant sources of noise in the project area include vehicular traffic on I-205/580, winds coming off of the Altamont Pass, and wind turbines. These sources, combined with the raceway's motorsports events, are existing noise sources. No changes to on-site motorsports activities, other than the specific addition of drifting, is included as part of the proposed project. Drifting events, like all motorsports events at the raceway, would be required to adhere to the 1996 CUP maximum noise levels. Because there is

no increase in the principle source of noise on the project site (motorsports) the proposed project would not make a considerably significant contribution to existing cumulative noise levels in the project area.

6.2.2.10 Public Services

The proposed project would increase the general activity at the site, including the potential for the creation of increased hazards associated with wildland fire and the demand for fire protection services. **Section 4.13, Public Services**, indicates that the proposed project could generate demand for services in the absence of a fire and emergency plan developed to address fire risks and mitigation practices. Section 4.13, Public Services, identifies a mitigation measure in **Section 4.7, Hazards and Hazardous Materials**, that would reduce that potential impact to a less than significant level.

Development potential on lands surrounding the project site is relatively low due to institutional constraints, coupled with an existing development pattern that further constrains new development opportunities. While lands in the area could be developed, that development would largely be limited to a few rural residential units, which would not significantly alter or affect the demand for or delivery of public services to the raceway or to other lands in the area. Therefore, the proposed project would not make a considerable contribution to cumulative public service impacts.

6.2.2.11 Transportation and Traffic

A complete discussion of transportation and traffic cumulative impacts is presented in **Section 4.15, Transportation and Traffic**. In brief, the proposed project would generate significant transportation and traffic impacts, with a focus on intersection capacities. Those impacts would be compounded as planned development in the north and east of the project site (Mountain House Master Plan/Specific Plans) continues over time. That specific project, along with other similar projects that might be contemplated in San Joaquin County, will contribute to transportation and traffic impacts in the project area. The proposed project would add to those already anticipated impacts to create a considerably significant cumulative impact.

6.2.2.12 Utilities and Service Systems

The raceway currently relies in part on water produced from the area's aquifer for non-potable uses. The proposed project would result in a net increase in temporary on-site population, which would increase the demand for non-potable water. The potentially significant effect can be reduced to a less than significant level with the implementation of mitigation measures described in **Section 4.16, Utilities and Service Systems**. If other projects were to produce significant quantities of water from the aquifer, the sustainability of the aquifer could be jeopardized. However, due to institutional constraints, development opportunities on lands adjoining the project site and beyond that would be expected to rely on water produced from the

aquifer is low, and would generally be limited to a relatively few rural residential units. Therefore, the proposed project would not make a considerable contribution to significant cumulative utility and service impacts.

6.3 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the *State CEQA Guidelines* requires preparers of an EIR to consider the growth-inducing impacts of a proposed project. Section 15126.2(d) states that the 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.

The proposed project would provide for increased population on the site during race events, the construction of two freeway signs, two caretakers residences, and a roof over the existing grandstand. The Altamont Motorsports Park has been in operation since 1963. During the 45 years since the track's opening, there has been no growth in the area that can be attributed to the raceway. There is no evidence to suggest that the proposed project would foster economic or population growth in the area. Further, the proposed project would not remove barriers to population growth. As such, the proposed project is not expected to generate growth-inducing impacts.

6.4 SIGNIFICANT AND UNAVOIDABLE IMPACTS

As outlined in **Section 4.1, Aesthetics**, **Section 4.3, Air Quality and Global Climate Change**, **Section 4.9, Land Use and Planning**, and **Section 4.15, Transportation and Traffic**, the proposed project would result in the generation of significant and unavoidable impacts. The unavoidable aesthetic, and by policy, land use and planning impact is associated with the proposed freeway signs. The purpose of the signs is to be visible to passing motorists to advertise the raceway. Reduction of the size or number of the signs to a point where they did not intrude into the view shed from the portion of I-580 designated as a state scenic highway would defeat the intended purpose of the signs. The unavoidable air quality impact is associated with the proposed project's contribution to a net increase of criteria pollutants for which the region is non-attainment under ambient air quality standards. The unavoidable transportation and traffic impact is associated with increased traffic that would be generated by the proposed project and the lack of available capacity on project area roadways and intersections to accommodate the traffic.