

Chapter 19—Other CEQA Considerations

19.1 Growth-Inducing Impacts

State CEQA Guidelines section 15126.2(d) requires an EIR to evaluate the potential growth-inducing impacts of a proposed project. Specifically, an EIR must 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. Growth can be induced in a number of ways, including the elimination of obstacles to growth, or by encouraging and/or facilitating other activities that could induce growth. Examples of projects likely to have growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or office complexes in areas that are currently only sparsely developed or are undeveloped.

The CEQA Guidelines are clear that while an analysis of growth-inducing effects is required, it should not be assumed that induced growth is necessarily significant or adverse. The analysis below examines these issues relative to the adoption and implementation of the proposed MTP/SCS.

19.1.1 Project Overview

SACOG’s mission is to “provide leadership and a dynamic, collaborative public forum for achieving an efficient regional transportation system, innovative and integrated regional planning, and a high quality of life within the greater Sacramento region.” SACOG’s purpose in proposing the MTP/SCS is to provide a strategy to approach the many challenges faced by the Sacramento region as the population grows and the region expands over the next few decades.

The proposed MTP/SCS seeks to guide the Sacramento region toward a more sustainable future through better integration of smart land use decisions with a well-managed transportation system, as reflected in the Blueprint Vision, which many jurisdictions in the region implement voluntarily. The proposed MTP/SCS identifies a growth pattern that will accommodate forecasted population and employment growth, a transportation system that is appropriate for the growth pattern, and supporting policies and strategies to implement the plan. It reflects a number of smart planning, market, policy, regulatory, and funding considerations and realities; however it was specifically developed to meet all the requirements of SB 375, and importantly to achieve the greenhouse gas (GHG) emissions reduction targets for passenger vehicles and light duty trucks set by the California Air Resources Board (CARB).

The SACOG area consists of 28 jurisdictions and covers 3,863,323 acres. The plan area presently contains approximately 718,356 acres of developed land (2012), which represents 19 percent of the total land area. The plan area population is 2,268,138 (2012), with 903,451 housing units and 887,965 employees. The proposed MTP/SCS is described in detail in Chapter 2, Project Description, and the potential environmental impacts related to implementation of the plan are fully assessed in the topical sections of Chapters 3 through 18.

As discussed in Chapter 2 – Project Description, the proposed 2016 MTP/SCS reflects a similar regional growth pattern, as compared to the 2012 MTP/SCS, of compact growth directed to centers

and corridors and established communities. The employment, population, and housing projections were not changed, however the horizon year was adjusted from 2035 to 2036. Between 2008 and 2012, the region gained about 61,000 in population and 11,100 dwelling units, and lost about 78,000 jobs. While growth in population, jobs, and dwelling units was adjusted to reflect recovery of the economy since the prior base year of 2008, the focus of the plan update is on operational improvements to transportation system productivity rather than capacity increasing projects. Table 19.1 demonstrates how projected growth in future population, employment and housing under the proposed MTP/SCS will differ from the adopted 2012 plan.

**Table 19.1
Population, Employees, and Housing Unit Forecasts for the 2012 MTP and the
Proposed MTP/SCS**

Projection	2012MTP/SCS (2035)	Proposed MTP/SCS (2036)
Population	3,086,000	3,079,000
Employees	1,327,000	1,327,000
Housing Units	1,188,000	1,188,000

¹Due to different protocols among GIS models for tallying spatial data, housing unit numbers in this DEIR differ marginally (less than 0.3 percent) from those reported in the proposed MTP/SCS.
Source: SACOG and CCSCE, 2011 and SACOG, 2015

Table 19.2 compares change in projected growth between the 2012 MTP/SCS and the proposed MTP/SCS:

**Table 19.2
Comparison of Change in Growth for the 2012 MTP/SCS and the
Proposed MTP/SCS**

Projection	2012 MTP/SCS (2035)	Proposed MTP/SCS (2036)
Population	871,169	810,634
Employees	361,138	439,354
Housing Units	303,019	284,896

¹Due to different protocols among GIS models for tallying spatial data, housing unit numbers in this DEIR differ marginally (less than 0.3 percent) from those reported in the proposed MTP/SCS.
Source: SACOG and CCSCE, 2011 and SACOG, 2015

To accommodate this growth, the proposed MTP/SCS forecasts the need for an additional 47,563 acres of land as compared to 53,266 acres of land for the 2012 plan. Table 19.3 below shows changes in projected growth by community type.

Table 19.3
Changes in projected Population, Employment and Housing Units, 2012 MTP/SCS and
Proposed 2016 MTP/SCS

Community Type	Housing Units		Employment		Acres Converted	
	2012 MTP/SCS	Proposed MTP/SCS	2012 MTP/SCS	Proposed MTP/SCS	2012 MTP/SCS	Proposed MTP/SCS
Centers and Corridors	91,748	86,167	104,104	152,097	4,446	3,825
Established	79,445	78,750	187,491	215,116	19,756	16,619
Developing	126,629	114,836	65,466	68,885	23,994	22,153
Rural Residential	5,300	5,143	4,056	3,260	5,070	4,966
Totals	303,122	284,896	361,117	439,358	53,266	47,563

Source: SACOG, 2015

The proposed plan includes the addition of three new developing communities all in Placer County, and removal of four developing communities (one each in Placer and Yuba counties, two in Yolo County). Overall, approximately two percent of the housing growth moves from Developing Communities to Established, and Center and Corridor Communities.

The proposed MTP/SCS includes 167 fewer lane miles of new major roads, deferral of approximately 100 road/highway projects, 338 more daily vehicle service hours, and 60 new road/highway projects added.

In comparison to the 2012 MTP/SCS, investments through the plan have been decreased slightly (from \$35.2 billion to \$35 billion) and shifted into road and transit maintenance. Over \$2 billion more will be directed to “fix-it first” needs, approximately \$600 million less will be directed to road and highway expansion, and some capital intensive transit expansions projects will be delayed.

The result is that the proposed plan is similar to the 2012 plan and has similar environmental impacts. Vehicle miles traveled (VMT) and congested VMT (C-VMT) decrease over time, and more jobs are created closer to homes. However trips by alternative modes (transit, bike and walk) increase by a smaller amount, due primarily to lower growth in forecasted fuel and auto operating costs compared to the prior plan.

At the policy level, the MTP/SCS includes refinements to emphasize the commitment towards investment in transportation system maintenance and rehabilitation; commit SACOG to further development of project level decision-support tools; acknowledge and address the unique issues in the range of communities in the SACOG region – suburban, rural, urban and small towns, address climate adaptation; identify strategies for complete streets improvements and road rehabilitation; and reflect completed or new research, as appropriate.

As demonstrated in this Draft EIR, in comparison to existing conditions, the proposed MTP/SCS will result in the following beneficial outcomes:

- an absolute reduction in the amount of heavy congestion typical residents will experience in their daily lives;
- significant increases in the productivity of the transit system, evidenced by more riders and a higher percentage of total costs coming from user fares;

- greater levels of investment in a multi-modal transportation system, including complete streets, and bicycle and pedestrian facilities;
- better integration of future land use patterns, transportation investments and air quality impacts, including higher levels of development near current and future transit;
- reductions in per capita passenger vehicle GHG emissions and total GHG emissions that meet or exceed the minimum targets established for the SACOG region by CARB and achieve the goals of AB 32; and
- lower vehicle miles travelled per capita for the region’s residents.

The content of the proposed MTP/SCS is heavily influenced by a variety of realities and requirements. From the local perspective, the power and authority to plan for and approve development throughout the region rests solely with SACOG’s member cities and counties. At the regional level, the plan must reflect a realistic forecast of the likely land use pattern for the region, considering the regulatory authority of its members, market conditions, and the market-based regional growth forecasts.

From the state perspective, the plan must: identify areas within the region sufficient to house an eight-year projection of the regional housing need; identify a transportation network to serve the regional transportation needs; and demonstrate how the region can coordinate land use and transportation planning to meet the GHG emissions reduction targets established pursuant to SB 375.

From the federal perspective, the plan must comply with the federal Clean Air Act and with federal laws relating to metropolitan transportation plans, which require, among other things, that the plan identify a transportation network that will serve projected land uses in the region. It must also realistically reflect that funding for all modes of transportation is constrained. As a result, the proposed MTP/SCS focuses on maximizing the efficiency of existing infrastructure and looking for investments that yield maximum benefits.

Furthermore, the proposed project reflects SACOG protocols related to transparency in modeling, model sharing and collaboration, and extensive agency and public input and involvement. As such, it reflects a regional collaboration and vision that individual jurisdictions are more likely to actively implement. This practical aspect of the plan is critical since SACOG has no independent authority to implement directly the land use elements of the proposed MTP/SCS.

Finally, while the plan has a required long-term focus due to a mandatory 20-year planning horizon, it also has an integrated short-term adjustment process in the requirement that it be updated every four years.

19.1.2 Analysis of Growth-Inducement

This analysis examines the following potential growth-inducing impacts related to implementation of the proposed MTP/SCS and assesses whether these effects are significant and adverse:

- 1.Foster population growth and construction of housing.
- 2.Eliminate obstacles to population growth.

3. Foster economic growth.
4. Affect service levels, facility capacity, or infrastructure demand.
5. Encourage or facilitate other activities that could significantly affect the environment.

19.1.3 Foster Population Growth and Construction of Housing

Chapter 14 of this Draft EIR examines Population and Housing growth associated with the proposed MTP/SCS. As described in Chapter 2 (Project Description) and Chapter 14 (Population and Housing) of this Draft EIR, and in Chapter 3 (Summary of Growth and Land Use Forecast) of the proposed MTP/SCS, the process for developing the proposed MTP/SCS began with the development of a growth forecast for the region. To develop the growth forecast, SACOG used a method grounded in an economic forecast that considers a wide range of variables affecting the U.S., state, and regional economies. Detailed demographic information is prepared with this economic forecast that includes household types (e.g., age, income, ethnicity, and size) and numbers of households. The growth forecast of projected regional population, employment numbers, and households is then used to calculate the new building square footage required for different segments of the economy (e.g., retail, office, industrial, etc.) and the new housing units required to house the projected population of the region.

In other words, population growth was projected prior to preparation of the proposed MTP/SCS and was used as a basis for the housing and employment growth projections of the plan. In this regard, the SACOG MTP/SCS planning process significantly differs from the land use planning processes of its member agencies. Local government land use planning may be driven by a vision for a community that is not required to be constrained by specific economic or population forecasts, or by a mandated horizon date.

By law and by design, the proposed MTP/SCS provides a coordinated strategy for managing land use patterns and transportation investments to accommodate projected population growth. The plan is intended to help shape growth patterns in the region, leading to better efficiency, higher sustainability, and more compact and mixed patterns of land use that are better served by transit and other mode choice options. But, for the reasons summarized above, it would be inaccurate to conclude that the plan would induce that growth. First, SACOG wields no land use authority in this regard. All land use decisions remain at the local level with the 28 member cities and counties. Second, as required by law, the plan identifies areas within the region sufficient to house the population of the region; therefore, it is tailored to meet population growth, not to foster the construction of housing that has the potential to induce growth.

While population growth remains a factor generally outside of local control, cities and counties do control the provision of housing and employment opportunities for that population, and this ultimately determines densities, growth patterns, and resulting efficiencies in the use of land and resources. The proposed MTP/SCS reflects a concerted attempt of local governments to influence population growth in a beneficial manner. The proposed MTP/SCS represents the coordination of local land use policies with transportation investments that support mixed-use and compact development, transportation options, housing choice and diversity, conservation of agricultural land and natural resources, and use of existing assets. By accommodating efficient, sustainable, compact growth in existing developed areas and limited new areas, and not planning for anything more than

nominal or by-right growth in rural areas, regional development pressures are accommodated in a more sustainable pattern, resulting in overall beneficial effects for the region.

The proposed MTP/SCS is also a less consumptive plan comparatively. By 2036, the MTP/SCS plan area is projected to increase by approximately 810,634 people, 439,354 jobs, and 284,896 housing units. Implementation of the proposed MTP/SCS will convert approximately 47,600 acres of undeveloped land, which represents a seven percent increase in the amount of developed land over existing conditions. Comparatively, the projected population and housing unit growth represent 36 percent and 32 percent increases over existing conditions, respectively, indicating that implementation of the proposed MTP/SCS will result in more compact development than existing conditions.

Development consistent with the proposed MTP/SCS would result in additional commerce, industry, recreation, public services, and infrastructure throughout the region. However, as substantiated by the growth forecasts, this growth is projected to occur under any scenario. By influencing the location and nature of this growth, adverse outcomes are avoided or minimized, and regional opportunities are maximized. Therefore, rather than fostering population growth and the construction of housing, the plan accommodates and manages that growth.

19.1.4 Eliminate Obstacles to Population Growth

Impediments to growth may be physical, regulatory, or fiscal. A physical obstacle to growth typically involves the lack of public infrastructure or insufficient infrastructure capacity. The extension of public service infrastructure (e.g., roadways, water and sewer lines) into areas that are not currently provided with these services may be considered growth inducing. Similarly, the elimination of a regulatory obstacle, such as a service boundary or growth management policy, or a change in land use designation, can also result in new growth in a manner that might be considered growth inducing. In addition, resolution of infrastructure funding constraints or the identification of new sources of funding can facilitate growth by funding the construction of new infrastructure.

The proposed MTP/SCS would result in significant investments and improvements in the regional circulation system in support of planned growth. In theory, transportation improvements can remove impediments to growth by providing access and roadway capacity to new areas for development and, depending on location, creating roadway capacity that induces travel. Additionally, because community-serving infrastructure (e.g., roadways, water, and sewer lines) and services often are located within or adjoining road rights-of-way, the construction of roadways can facilitate the expansion and/or extension of infrastructure.

In this case, however, the transportation network is designed to fit to the land use plan. The transportation investments focus on maintaining the current system, right-sizing and/or value-engineering the expansion of roads, targeting cost-effective expansions of transit, and increasing the commitment to walking and bicycling investments. This is based on the policy objectives of the plan to increase investment in system maintenance and realize the high performance achieved by the 2012 MTP/SCS with regard to the six MTP/SCS guiding principles. It is also based on the overall policy objectives of SB 375 and thus the plan to, among other things, increase roadway optimization, increase modes of travel other than single occupancy automobile use, increase access to jobs and amenities, reduce VMT, and reduce GHG emissions. Among the strategies to meet these goals is a mix of land uses balanced to minimize VMT and maximize the ability for residents to conduct

everyday activities within their neighborhood without the need to travel by car. In other words, the plan’s roadway investments are located and sized to accommodate only the forecasted growth.

The proposed MTP/SCS does not forecast growth on Lands Not Identified for Development during the planning period, though there is existing development in these areas (primarily farm homes, agricultural- related uses, and public facilities such as wastewater treatment facilities, etc.).

Since growth is not assumed in the proposed MTP/SCS for this Community Type, there will be limited transportation investments in these areas by 2036. Primarily, these investments will go towards ongoing road maintenance and targeted operational improvements to support safer and more efficient agricultural goods movement. A limited number of new or expanded roads are planned, but they represent less than three percent of the total regional route miles in the proposed MTP/SCS. Each of these proposed roadway projects is intended to connect growth areas in Established or Developed Communities and not induce growth in Lands Not Identified for Development. Most of these projects are along the rural/urban edge of the proposed MTP/SCS and nearly all are expansions within an existing right-of-way.

One of the plan objectives for the proposed MTP/SCS is to more efficiently utilize the regional transportation system. More efficient utilization of roadways demonstrated in the proposed MTP/SCS indicates that projects are right-sized to match travel demand, without creating excess roadway capacity that increases VMT and induces growth. Moreover, the plan results in increasing transit productivity, increasing bicycling and walking mode share, decreasing auto mode share, and decreasing VMT per capita. This substantiates the conclusion that the strategic roadway expansions in the proposed MTP/SCS, in combination with other modal investments, support more compact development, more sustainable and more efficient development without inducing the type of population growth that would require development of more land for urban purposes.

The total revenues SACOG expects to be available for implementation of the proposed MTP/SCS are \$45.8 billion in escalated dollars (escalated), or \$35 billion in today’s dollars (current) allocated by category of project as follows:

**Table 19.4
Proposed MTP/SCS Expenditure Breakdown (in billions)**

Expenditure Category	Total Expenditures (escalated)	Total Expenditures (current)
Maintenance and Rehabilitation	\$16.3	\$12.6
Public Transit	\$13.8	\$10.6
Road and Highway	\$9.8	\$7.3
Bicycle and Pedestrian	\$3.6	\$2.8
Programs and Planning	\$2.3	\$1.7
TOTAL	\$45.8	\$35

Source: SACOG, 2015

Of the road and highway expenditures in Table 19.4, only \$5.8 billion or 17 percent of the total expenditures, goes to investments in new or expanded roads and highways. This investment, when compared to the plan’s investments in system maintenance, transit, and bicycle and pedestrian

facilities, demonstrates the careful adaptation of the plan to the forecasted population needs, and financial constraint, of the region.

As established above, by law and policy this transportation system investment is integrally linked to, and balanced with, the housing and employment needed to accommodate the projected population of the region. In other words, rather than eliminating obstacles to growth, the plan accommodates growth that is outside the regulatory control of SACOG.

19.1.5 Foster Economic Growth

As discussed above, the proposed MTP/SCS was developed to respond to forecasted population increases, employment opportunities, and housing needs within the region. Therefore, the MTP/SCS is designed to accommodate growth that would occur with or without the proposed MTP/SCS; it is not designed, nor is it anticipated to, drive further population growth beyond the levels forecasted. The plan supports the successful economic growth and prosperity of the region as required by law. Federal regulations governing the preparation of regional transportation plans require that they “support the economic vitality of the metropolitan area” (23 Code Fed. Regs., § 450.306). Moreover, economic growth is critical for the economic recovery of the region. But the population growth resulting from that economic recovery and vitality is accommodated by the plan—it is not a growth-inducing byproduct of the plan.

19.1.6 Affect Service Levels, Facility Capacity, or Infrastructure Demand

While growth that may occur consistent with the proposed MTP/SCS could result in increases in demand for public services and infrastructure in excess of the existing conditions, SACOG’s member agencies retain the authority to ensure the provision of appropriately timed and sized services and utilities to serve new urban development concurrent with growth. Chapters 15 and 17 of this Draft EIR address this impact.

19.1.7 Encourage or Facilitate Other Activities That Could Significantly Affect the Environment

This Draft EIR provides a comprehensive assessment of the potential for environmental impact associated with implementation of the proposed MTP/SCS. Please refer to Chapters 3 through 18, which comprehensively address the potential for impacts from land use changes and transportation projects resulting from implementation of the proposed MTP/SCS.

19.1.8 Summary

In summary, the proposed MTP/SCS accommodates growth in a manner substantially consistent with local general plans, regional values and visions, and state and federal laws. The plan accounts for growth likely to occur during the 20-year planning horizon and makes assumptions about location and design that promote regional environmental benefits. While growth inducement can be considered an adverse impact under CEQA, the proposed MTP/SCS is growth accommodating not inducing, and results in environmentally beneficial outcomes. Therefore, the potential for adverse impact is considered less than significant (LS), and additional mitigation measures beyond those identified in Chapters 3 through 18 are not necessary.

19.2 Significant Irreversible Changes

Pursuant to § 15126.2(c) of the CEQA Guidelines, an EIR must identify any significant irreversible environmental outcomes that could result from the implementation of a proposed project. These may include current or future uses of nonrenewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses. CEQA requires that irretrievable commitments of resources be evaluated to ensure that such current consumption is justified.

For the purposes of this analysis, the required evaluation of this topic is addressed from three perspectives:

1. use of nonrenewable resources that would commit future generations;
2. irreversible damage from environmental accidents; and
3. irretrievable commitments of nonrenewable resources to justify current consumption.

Each of these is discussed below.

19.2.1 Use of Nonrenewable Resources That Would Commit Future Generations

Though not entirely irreversible, land use growth and growth patterns that would result from implementation of the proposed MTP/SCS would likely commit future generations to those uses. Once established, land use patterns can be difficult to change and/or significantly influence without considerable political, social, and economic cost. The development pattern reflected on the MTP/SCS map represents a commitment of these areas to urban uses for the foreseeable future. Under the proposed MTP/SCS, the majority (approximately 75 percent) of the SACOG region would remain designated for agricultural and open space uses, and the remainder (approximately 25 percent) would be designated for urban and development-supporting uses.

For the purposes of this particular analysis, it is important to evaluate the proposed MTP/SCS in the context of resource commitments that would occur absent the project. As compared to existing conditions, implementation of the proposed MTP/SCS will result in an improved and more efficient land use pattern, with more growth concentrated on less land and closer to existing infrastructure. The result will be better utilization of already developed land and better utilization of new land to be converted at the urban edge or in undeveloped areas of the region. As a secondary result, per-capita use of other nonrenewable resources decreases under this plan. These include: lower per-capita use of energy and fuels; less conversion of agricultural, open space, and habitat lands; and lower per-capita emissions of GHGs.

As an example, from 1988 to 2012, a period of 24 years, the region grew by approximately 750,000 people. In that same time, approximately 214,000 acres of farmland and open space were converted to urban and rural development. Consistent with the goals, objectives, and strategies of RUCS and the Blueprint to provide for orderly growth and development while preserving and conserving agricultural and open space land, the MTP/SCS was designed to reduce the rate of agricultural and open space land conversion to urban and rural development. For the same length of time (24 years, 2012-2036), the MTP/SCS forecasts greater population growth (871,000 people) and a lower rate of land conversion. Specifically, the proposed MTP/SCS forecasts the conversion of only 37,200 acres of farmland and open space by 2036. This acreage amounts to one percent of the total area

designated as agriculture and/or open space in the region. As demonstrated in this Draft EIR, only 15 percent of that impact comes from protected farmland (prime, unique, and statewide significant farmlands). This significantly lower rate of conversion is due largely to local and regional efforts to balance urban expansion with the protection of economically viable farmland.

Land use and development consistent with the proposed MTP/SCS would also result in irreversible changes by increasing densities and introducing development onto infill sites that are presently undeveloped. This would be considered a beneficial outcome because it improves the efficiency of land utilization in existing developed areas.

While use of nonrenewable energy and fuel; conversion of agriculture, open space, and habitat; release of pollutants emissions into the atmosphere; and climate change effects are in and of themselves generally irreversible resource commitments, the fact that the proposed MTP/SCS changes (slows) these rates is a beneficial outcome of this plan. It increases opportunities and options for the future. In the context of outcomes under the 2012 MTP/SCS, the expected results of implementation of this proposed MTP/SCS are better for the regional environment.

Overall, implementation of the proposed MTP/SCS would commit existing and future generations to a more efficient use of nonrenewable resources than under existing or presently planned conditions.

19.2.2 Irreversible Damage from Environmental Accidents

Any growth in the region includes the potential for irreversible damage from environmental accidents. For example, greater densities expose more people in the same area to unexpected environmental events such as fire, flood, and/or earthquake. Also, urban environments generally experience higher levels of noise, higher pollutant emissions, more vehicles, and increased people-to-people interactions. In addition, irreversible changes to the physical environment could occur from the accidental release of hazardous materials associated with transport on roadways and/or from some development activities such as certain industrial processes.

However, this exposure would exist under any growth scenario. Federal and state regulations require the proposed MTP/SCS to accommodate expected growth in the region based on market-based forecasts. The SCS minimizes the footprint of that growth. Implementation of the proposed MTP/SCS does not, in and of itself, result in greater potential of irreversible damage from an environmental accident. Chapter 10 addresses Hazards and Hazardous Materials.

19.2.3 Irretrievable Commitments of Nonrenewable Resources to Justify Current Consumption

The region has multiple nonrenewable resources including agricultural lands, open space, habitat areas, and mineral resources areas that contain aggregate and natural gas. Increased levels of development outside of already developed areas could result in permanent loss or other adverse impacts to these resource areas. In addition, increased levels of development throughout the region could result in greater use of nonrenewable resources during construction, including nonrenewable aggregates, or increased use of glass, plastic, and other petroleum products.

While approximately 47,600 acres of undeveloped land would be converted to urban land uses as a result of implementation of the proposed MTP/SCS, this area of potential impact is much smaller than would otherwise occur without regional efforts to encourage more compact growth following “smart growth” principles and direct as much growth as possible to existing developed areas. By increasing the density of development, and decreasing the footprint of growth, pressures to convert agricultural and open space lands outside areas planned for growth are decreased.

New growth generally results in additional demand for electricity, natural gas, and propane supplies and distribution. However, the proposed MTP/SCS, and other federal and state efforts, will result in lower per-capita demand by: encouraging higher density infill development; encouraging energy conservation in new construction and existing buildings; and reducing the infrastructure energy demands by encouraging alternative transportation such as bicycling, walking, and public transit. Furthermore, the proposed MTP/SCS will result in lower per-capita VMT through the horizon year. Chapter 8 of the DEIR further addresses Energy and Global Climate Change.

19.2.4 Summary

Any growth in the region will result in significant irreversible resource commitments. In evaluating the significance of a project’s irreversible resource commitments, CEQA requires a lead agency to consider whether such commitments are “justified” (CEQA Guidelines, § 15126.2(c)). As discussed above, and consistent with the project objectives for the proposed MTP/SCS, the proposed MTP/SCS is designed to minimize irreversible resource commitments, thus maximizing opportunities for future generations. While the proposed MTP/SCS will result in irreversible resource commitments, by encouraging higher density, less-consumptive development, as compared to the environmental baseline and forecasted conditions, the commitments are justified and beneficial. Therefore, these commitments are considered a less than significant (LS) impact under CEQA.

19.3 Cumulative Impacts

CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable, or which can compound or increase other environmental impacts.” Section 15130 of the CEQA Guidelines requires that an EIR evaluate potential environmental impacts that are individually limited but cumulatively considerable. These impacts can result from the proposed project alone, or together with other projects. The CEQA Guidelines state: “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects” (CEQA Guidelines, § 15355). A cumulative impact of concern under CEQA occurs when the net result of combined individual impacts compounds or increases other overall environmental impacts (CEQA Guidelines, § 15355). In other words, cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. CEQA does not require an analysis of incremental effects that are not cumulatively considerable nor is there a requirement to discuss impacts which do not result in part from the project evaluated in the EIR.

19.3.1 Methodology

The proposed MTP/SCS is a cumulative plan by definition. It is a transportation and land use plan for an entire region of the state that shares, or is connected by, common economic, social, and environmental characteristics. The SACOG region is comprised of 3,863,323 acres, which equates to 6,037 square miles and includes 6 counties and 22 cities, for a total of 28 jurisdictions. Together with the other three largest regional governments in the state (Southern California, San Diego, and San Francisco Bay Area) it is home to 90 percent of the state's population. As such, the environmental analysis of the proposed MTP/SCS is a cumulative analysis compliant with the requirements of CEQA and the CEQA Guidelines. Furthermore, this Draft EIR contains detailed analysis of Regional (cumulative) Impacts, as differentiated from Localized Impacts (by Community Type) for every identified impact area. Nevertheless, the following discussion examines impacts associated with implementation of the proposed MTP/SCS, plus implementation of planned growth for all jurisdictions adjoining the SACOG region, in order to assess the potential for cumulative impacts from growth extending beyond SACOG's jurisdictional boundaries.

When evaluating cumulative impacts, CEQA allows the use of either a list of past, present, and probable future projects, including projects outside the control of the lead agency, or a summary of projections in an adopted planning document, or a thoughtful combination of the two approaches. The cumulative analysis presented below uses a projections-based approach. Land use and growth projections for the SACOG region, which are the subject of analysis throughout this Draft EIR, are combined with the growth projections for all of the counties (and their cities) that adjoin the SACOG region. In other words, the geographic scope for the subject cumulative analysis covers the entire SACOG region plus the projected growth within each county (including both unincorporated and incorporated areas) that adjoins the SACOG regional boundary, as follows:

- Alpine County;
- Amador County;
- Butte County;
- Colusa County;
- Contra Costa County;
- El Dorado County (Tahoe portion);
- Lake County;
- Napa County;
- Nevada County;
- Placer County (Tahoe portion);
- Plumas County;
- San Joaquin County;
- Sierra County; and
- Solano County.

The area will be referred to in this analysis as the “cumulative impact analysis area.” The general plans for the surrounding jurisdictions were used to compile a table of planned land uses for the cumulative impact analysis area (Table 19.5). As shown in Table 19.6, the population for the cumulative impact analysis area is projected to grow from just over 5.1 million people to 6.7 million by 2036.

As demonstrated in Table 19.6, the SACOG region comprises a little over 44 percent of the existing population, over 44 percent of the existing number of housing units, and about 49 percent of the existing number of employees in the cumulative impact analysis area. By 2036, this proportion is expected to drop slightly in all three categories. Nevertheless, under both current and forecasted future conditions, the SACOG region represents a substantial portion of the growth in the cumulative analysis impact area, and for employees it represents a slim majority. The implications of this for this analysis are that the contributions of the region are, and will continue over time to be, a large proportion of the activity in many environmental impact categories. This general assumption is reflected in the discussion below.

Table 19.5
Estimated Cumulative Land Uses for the SACOG Region and Surrounding Counties

Jurisdiction	Open Space	Agriculture	Parks/ Recreation	Other (undeveloped lands) ¹⁵	Residential	Office and Commercial	Industrial	Public	Mixed Use/ Spec Plan	Total
SACOG Region¹	230,468	1,665,398	32,517	1,202,916	592,794	26,331	33,841	64,851	539	3,849,655
Alpine ²	461,482	0	5,852	96312	4,228	169	295	163	2,419	475,572
Amador ³	117,006	216,942	6158	15,674	17,494	3,366	2,264	2,357	3,184	384,445
Butte ⁴	42,884	823,912	2104	617	134,715	4,689	6,342	34,564	4,155	1,053,983
Colusa ⁵	130,206	574,786	458	6686	6,279	1,222	9,425	961	29	730,052
Contra Costa ⁶	109,300	114,600	94813	11,611	101,255	8,141	14,178	25149.2	7,255	486,302
El Dorado (TRPA Portion) ⁷	87,118	0	4326	0	9,212	281	0	0	1415	102,352
Lake ⁸	64,770	52,864	194	246,332	325,565	4,786	653	115,417	5	810,586
Napa ⁹	425,855	53,252	75	14	17,282	1,190	4,272	4,587	409	506,936
Nevada ¹⁰	361,585	1	2,763	1,056	207,636	2,349	1,031	7,022	30,601	614,044
Placer (TRPA Portion) ⁷	37,901	0	5,354	0	5,174	232	0	0	597	49,258
Plumas ¹¹	39,787	1,521,483	9,257	3,698	93,377	1,979	2,489	83	74	1,672,227
San Joaquin ¹²	83,622	679,331	3635	923	70,229	11,230	20,510	21,579	4841	895,900
Sierra ¹³	520,478	56,464	1298	417	6,118	257.52	531.72	539.86	449.84	586,554
Solano ¹⁴	67,742	330,925	7,103	80,014	46,310	6,456	20,060	9,198	819	568,627
Total	2,780,204	6,089,958	175,907	1,666,269	1,637,668	72,679	115,892	286,471	56,791	12,786,493
SACOG (Percent of Total)	8.29%	27.35%	18.49%	72.19%	36.20%	36.23%	29.20%	22.64%	0.95%	30.11%

Notes and Sources: Due to different protocols among GIS models for tallying spatial data and rounding, acreages in this DEIR differ marginally (less than 0.3 percent) from those reported in the proposed MTP/SCS.

¹Developed footprint includes residential, office and commercial, industrial, and mixed-use categories. Mixed use is vertical mixed-use only, specific plans are included in the other developed categories (residential, office & commercial, industrial). El Dorado County does not have a Parks & Recreation designation, and Yuba County combines open space and parks and recreation with agriculture designations. SACOG region wide data, 2013 (includes General Plan Land Use files as sourced, revised up to 2013). City of Auburn, GIS Data, 2002; City of Citrus Heights, GIS Data, 2011; City of Colfax, GIS Data, 1993; City of Davis, GIS Data, 2001; El Dorado County, GIS Data, 2008; City of Live Oak, GIS Data, 2009; City of Loomis, GIS Data, 2001; City of Marysville, GIS Data, 1985; Placer

County, GIS Data, 1994; City of Placerville, GIS Data, 2013; City of Rancho Cordova, GIS Data, 2010; City of Rocklin, GIS Data, 2012; City of Roseville, GIS Data, 2010; City of Sacramento, GIS Data, 2009; Sacramento County, GIS Data, 2011; Sutter County, GIS Data, 2011; City of West Sacramento, GIS Data, 2000; City of Wheatland, GIS Data, 2006; City of Winters, GIS Data, 1992; City of Woodland, GIS Data, 2002; Yolo County, GIS Data, 2009; City of Yuba City, GIS Data, 2004; Yuba County, GIS Data, 2011.

² Alpine County, GIS data, 2009 (revised up to 2015)

³ Open space designation for the City of Jackson includes parks and recreation. No data for the City of Plymouth. Amador County, GIS Data, 2012. Amador County Preliminary Draft General Plan, 2011; City of Lone, General Plan, 2009; City of Jackson, General Plan, 2008; City of Sutter Creek, GIS Data, 1994 (revised up to 2015)..

⁴ Butte County Association of Governments, GIS Data, 2015).

⁵ For the City of Colusa, the Cal-Atlas data combines parks and recreation, public, and open space designations. Cal-Atlas Geospatial Clearinghouse, GIS Data, 2006; County of Colusa, GIS Data, 2014; City of Williams, GIS Data, 2012.

⁶ For the cities of Antioch, Clayton, El Cerrito, Hercules, Lafayette, Martinez, Town of Moraga, Orinda, Pinole, Pittsburg, Pleasant Hill, Richmond, and Walnut Creek, the Cal-Atlas data combines parks and recreation, public, and open space designations. Cal-Atlas Geospatial Clearinghouse, GIS Data, 2006; City of Brentwood, GIS Data, 2014; City of Concord, GIS Data, 2012 (revised up to 2015); Contra Costa County, GIS Data, 2012 (revised up to 2015); Town of Danville, General Plan, 2013; City of Oakley, General Plan, 2010; City of San Pablo, General Plan, 2011; City of San Ramon, General Plan, 2011.

⁷ Tahoe Regional Planning Agency, Personal Communication 2015, 2012.

⁸ For Lake County and the City of Lakeport, the open space designation includes parks and recreation. For the City of Clearlake, the open space designation includes agriculture. City of Clearlake, General Plan, 2014; Lake County, GIS Data, 2008 (revised up to 2015); City of Lakeport, GIS Data, 2009 (revised up to 2014).

⁹ For the cities of American Canyon, Napa, and Yountville, the Cal-Atlas data combines parks and recreation, public, and open space designations. For the City of Calistoga, agriculture and parks and recreation are included in the open space designation. Cal-Atlas Geospatial Clearinghouse, GIS Data, 2006; City of Calistoga, GIS Data, 2012 (revised up to 2015); County of Napa, GIS Data, 2008 (revised up to 2015); City of St. Helena, 2010. St. Helena General Plan Update 2030.

¹⁰ For the City of Nevada City, the Cal-Atlas data combines parks and recreation, public, and open space designations. Cal-Atlas Geospatial Clearinghouse, GIS Data, 2006; County of Nevada, GIS Data, 2014 (revised up to 2015).; City of Grass Valley, Grass Valley General Plan Background Report, 1998;; Town of Truckee, GIS Data, 2004 (revised up to 2015).

¹¹ County of Plumas, GIS Data, 2012 (revised up to 2015). City of Portola, Personal Communication, 2015.

¹² For the cities of Ripon, Stockton, and Escalon, parks and recreation is included in the open space designation. For the cities of Escalon and Lodi, agriculture is included in the open space designation. City of Lathrop, GIS Data, 2011 (revised up to 2015); City of Manteca, GIS Data, 2003 (revised up to 2015); San Joaquin County, GIS Data, 2014; San Joaquin Council of Governments, GIS Data, 2015; City of Stockton, GIS Data, 2013 (revised up to 2015).

¹³ For the City of Loyalton, the Cal-Atlas data combines parks and recreation, public, and open space designations. Cal-Atlas Geospatial Clearinghouse, GIS Data, 2006; County of Sierra, Sierra County General Plan, 2012.

¹⁴ For the cities of Benicia, Dixon, Fairfield, Rio Vista, and Vallejo, the Cal-Atlas data combines parks and recreation, public, and open space designations. Cal-Atlas Geospatial Clearinghouse, GIS Data, 2006; County of Solano, GIS Data, 2008; City of Suisun City, GIS Data, 2009 (revised up to 2015); City of Vacaville, GIS Data, 2008 (revised up to 2015).

¹⁵ For counties outside of the SACOG region, "Other" category includes water, roads, right of ways, hazardous waste, urban reserve, and undesignated and unmapped areas. Specific plans include open space and parks and recreation designations.

Table 19.6
Estimated Existing and Projected Growth for Adjacent Planning Areas (2012 to 2036)

Jurisdiction	Population			Housing Units			Employees		
	2012	2036	Annual Percent Change	2012	2036	Annual Percent Change	2012	2036	Annual Percent Change
SACOG region	2,268,138	3,078,772	1.49%	903,451	1,188,347	1.31%	887,911	1,327,265	2.06%
Alpine	1,126	1,287	0.59%	1,763	1,957	0.46%	710	880	1.00%
Amador	36,731	43,381 ¹	0.75%	18,111	21,767	0.84%	10,900	12,984 ¹	0.80%
Butte ²	228,868	338,937	2.00%	99,661	146,706	1.97%	74,644	114,430	2.22%
Colusa	21,540	28,784	1.40%	7,910	11,399	1.84%	8,430	10,130	0.84%
Contra Costa ³	1,068,324	1,299,852	0.90%	405,682	470,746	0.67%	353,085	451,061	1.16%
El Dorado (Tahoe Portion) ⁴	32,713	36,326	0.46%	24,285	27,102	0.48%	7,938	8,335	0.21%
Lake	64,304	84,153	1.29%	35,631	48,506	1.51%	14,570	17,960	0.97%
Napa ³	138,293	160,053	0.66%	55,165	60,021	0.37%	71,909	87,021	0.88%
Nevada	97,637	110,556	0.55%	52,766	64,679	0.94%	28,530	33,070	0.66%
Placer (Tahoe Portion) ⁴	8,932	9,778	0.39%	11,247	12,383	0.42%	3,633	4,145	0.59%
Plumas	19,854	18,827	-0.22%	15,643	15,321	-0.09%	6,190	6,340	0.10%
San Joaquin ⁵	704,794	1,017,171	1.85%	238,923	332,707	1.64%	206,881	285,792	1.59%
Sierra	3,170	2,900	-0.35%	2,329	2,187	-0.25%	639	579	-0.39%
Solano ³	419,891	498,499	0.78%	154,225	172,521	0.49%	135,522	173,586	1.17%
Total	5,114,315	6,729,276	1.32%	2,026,792	2,576,349	1.13%	1,811,493	2,533,577	1.66%
SACOG as Percent of Total	44.35%	45.75%		44.58%	46.13%		49.02%	52.39%	

Note: Interpolated population and housing units for 2012 and population for 2036 based on California DOF estimates (2015) and projections (2014, 2035 plus annual average growth between 2035 and 2040 to get 2036 estimate); housing units calculated based on California DOF household projections (2015) and 2014 California DOF vacancy rates applied to households; and 2012 and 2036 employees estimates are from the Caltrans Long-Term Socioeconomic Forecasts by County (2014) unless otherwise noted.

¹ Draft 2015 Amador County Regional Transportation Plan 2035 projection interpolated using the annual average growth rate for 2036.

³ *Metropolitan Transportation Commission 2013 Plan Bay Area 2010 estimate and 2040 projection interpolated using the annual average growth rate for 2012 and 2036.*

⁴ *Tahoe Regional Planning Agency 2012 Regional Plan Update for the Lake Tahoe Region 2010 estimates and 2035 projections interpolated for 2012 and 2036 using the average annual growth rate.*

⁵ *San Joaquin Council of Governments 2014-2040 Regional Transportation Plan/Sustainable Communities Strategy for San Joaquin County 2012 and 2036 population and employment estimates. Households calculated using the household projections and DOF 2014 vacancy rate.*

Sources: Amador County Transportation Commission, 2015, Draft 2015 Amador County Regional Transportation Plan; Butte County Association of Governments, 2011, 2012 Metropolitan Transportation Plan; California Department of Finance, 2014, State and County Population Projections: July 1, 2010-2060; California Department of Finance, 2015, P-4: Projected Households, Household Population, Group Quarters and Persons per Household for the Counties and State of California; California Department of Finance, 2015, E-5 Population and Housing Estimates for Cities, Counties and the State, 2001-2010; Metropolitan Transportation Commission, 2013, Plan Bay Area; San Joaquin Council of Governments, 2014, 2014-2040 Regional Transportation Plan/Sustainable Communities Strategy for San Joaquin County; Tahoe Regional Planning Agency, 2011, 2012 Regional Plan Update for the Lake Tahoe Region.

19.4 Cumulative Effects of the Proposed MTP/SCS

The following analysis examines the cumulative effects of the proposed MTP/SCS. The potential cumulative effects of the proposed MTP/SCS are summarized qualitatively below for each of the topics analyzed in Chapters 3 through 18 of this Draft EIR.

19.3.2 Aesthetics

Aesthetic impacts associated with implementation of the proposed MTP/SCS are analyzed in Chapter 3 of this Draft EIR. Many of the aesthetic resources experienced in the cumulative impact analysis area are similar to those experienced regionally in the SACOG plan area: agricultural lands and open space, skylines and mountain views, historic downtowns and landmarks, forests and habitat areas, parks and recreation areas, and rivers and waterways.

Some types of impacts to aesthetic resources are localized and not cumulative in nature. For example, the creation of glare or shadows at one location is not worsened by glare or shadows created at another location. Rather these effects are independent, and the determination as to whether they are adverse is specific to the project and location where they are created. Projects that block a view or affect the visual quality of a site also result in localized impacts. The impact occurs specific to a site or area and remains independent from another project elsewhere that may block a view or degrade the visual environment of a specific site.

There are two types of aesthetic impact that may be additive in nature and thus cumulative, night sky lighting and overall changes in the visual environment as the result of increasing urbanization of large areas. As development in one area, such as a regional urban center like downtown Sacramento, increases and possibly expands over time and meets or connects with development in an adjoining ex-urban area, the effect of night sky lighting experienced outside of the region may increase in the form of larger and/or more intense nighttime glow in the viewshed. Although growth in the proposed MTP/SCS is primarily focused on Centers and Corridors and Established Communities, development outside of those geographies with long-distance views, may result in nighttime lighting becoming more visible, covering a larger area, and/or appearing in new areas as a result of projected development under the proposed MTP/SCS.

With regard to the visual environment experienced throughout the cumulative impact analysis area, as planned cumulative development occurs over time the overall visual environmental will change. Whether this overall change in land use is experienced as an adverse or beneficial outcome is highly subjective. However, the combination of forecasted development in the SACOG region and planned development in neighboring counties will result in a different visual environment than currently exists. For the purposes of this analysis, the cumulative impacts associated with night sky lighting and changes in the visual environment are considered potentially significant (PS) and the contribution of the region to these impacts may be cumulative considerable.

Implementation of mitigation measures in Chapter 3 would minimize the contribution of the proposed MTP/SCS to cumulative aesthetic impacts. While impacts within the cumulative impact analysis area may remain potentially significant, impacts associated with the regional contribution to this impact would be mitigated to less than significant (LS).

IMPACT CUM-1: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE AESTHETIC IMPACTS IN THE FORM OF NIGHT SKY LIGHTING AND CUMULATIVE CHANGES IN THE VISUAL ENVIRONMENT MAY BE CUMULATIVELY CONSIDERABLE. THIS IS CONSIDERED A POTENTIALLY SIGNIFICANT IMPACT (PS).

Mitigation Measure CUM-1: Implement Mitigation Measures in Chapter 3. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts on the visual environment to less-than-significant (LS). Projects taking advantage of CEQA Streamlining provisions of SB 375 (Pub. Resources Code § 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above to address site-specific conditions, resulting in impacts that are less than significant (LS). However, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation. Therefore, the regional contribution to this cumulative impact is potentially significant and unavoidable (SU).

19.3.3 Agriculture and Forestry Resources

Loss of agriculture and forest resources associated with implementation of the proposed MTP/SCS is analyzed in Chapter 4 of this Draft EIR. The following discussion addresses cumulative impacts to agriculture and forestry resources.

Implementation of the proposed MTP/SCS would result in conversion of approximately 5,454 acres of agriculture to urban use. While this represents total agricultural land lost in the SACOG region, neighboring counties would also continue to convert agricultural land due to development outside of the SACOG region. Collectively this adds to the overall conversion of agricultural lands in the cumulative impact analysis area. As such, the cumulative loss of agricultural lands may be potentially significant (PS).

The amount of designated forest resources that would be impacted or lost as a result of implementation of the proposed MTP/SCS through 2036 is 5,404 acres. While loss of forest resources would not extend beyond this amount within the SACOG region, neighboring counties could also convert forest resources due to development, which would add to the overall conversion of forest resources in the cumulative impact analysis area. As such, the cumulative loss of forest resources may be potentially significant (PS).

Implementation of mitigation measures in Chapter 4 would minimize the contribution of the proposed MTP/SCS to cumulative agricultural and forest land impacts, but would not reduce them to less-than-significant levels. Furthermore, as the cumulative impact analysis area develops, land use conflicts between agricultural and forest land, and urban uses could intensify particularly at the edge of existing cities and communities. Consequently, cumulative impacts to agricultural and forest resources, and the regional contribution to them, remain significant and unavoidable (SU).

IMPACT CUM-2: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE LOSS OF AGRICULTURAL AND FOREST LAND WOULD BE CUMULATIVELY CONSIDERABLE. THIS IS CONSIDERED A POTENTIALLY SIGNIFICANT IMPACT (PS).

Mitigation Measure CUM-2: Implement Mitigation Measures in Chapter 4. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts on agriculture and forest resources. However, the mitigation measures are

not sufficient to reduce impacts to less than significant levels, since any impact to agriculture or forest land is potentially significant. Additionally, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt mitigation. Therefore, the regional contribution to this cumulative impact remains significant and unavoidable (SU) for purposes of this program-level review. The CEQA streamlining provisions of SB 375 are not available for projects that result in these impacts (Pub. Resources Code, § 21155.1, 21155.2, and 21159.28).

19.3.4 Air Quality

Chapter 5 includes a detailed analysis of the air quality conditions related to implementation of the proposed MTP/SCS, including an analysis of regional and localized air quality impacts from air emissions during construction and operation, exposure to TACs, and odor impacts. The discussion below addresses cumulative air quality impacts beyond the region.

California is divided geographically into 15 air basins for the purpose of managing the air resources of the state on a regional basis. An air basin generally has similar meteorological and geographic conditions throughout. The SACOG region falls primarily within the Sacramento Valley Air Basin with portions of Placer and El Dorado counties within the Mountain Counties Air Basin. The counties outside of the SACOG region, within the cumulative analysis impact area, lie within the following adjoining air basins:

- Alpine County – Great Basin Valleys;
- Amador County – Mountain Counties;
- Butte County – Sacramento Valley;
- Colusa County – Sacramento Valley;
- Contra Costa County – San Francisco Bay Area;
- El Dorado County (Tahoe portion) – Lake Tahoe;
- Lake County – Lake County;
- Napa County – San Francisco Bay Area;
- Nevada County – Mountain Counties;
- Placer County (Tahoe portion) – Lake Tahoe;
- Plumas County – Mountain Counties;
- San Joaquin County – San Joaquin;
- Sierra County – Mountain Counties; and
- Solano County – Sacramento Valley and San Francisco Bay Area.

In each of these basins, the state has identified specific pollutants for which emissions levels have exceeded applicable federal and state pollutant standards. These pollutants are identified as “nonattainment” for the basin. Growth in the cumulative impact analysis area would exacerbate the non-attainment status of these basins by adding criteria pollutants emitted from various planned land uses. Growth within a specific region can exacerbate pollution levels within the basin in which

it lies but it can also potentially exacerbate pollution levels within neighboring basins when pollutant “transport” occurs. Pollutant transport is a result of a variety of topographical and atmospheric conditions that cause pollution generated in one location to be moved (transported) to another location outside of the air basin in which it originated.

Projected growth within the cumulative impact analysis area will result in a potentially significant (PS) cumulative impact from air emissions adversely affecting a number of air basins. The regional contribution to these cumulative air quality impacts may also be potentially significant (PS). Implementation of mitigation measures in Chapter 5 would minimize the contribution of the proposed MTP/SCS to cumulative air quality impacts, but would not reduce them to less-than-significant levels. Consequently, cumulative impacts to air quality, and the regional contribution to them, remain significant and unavoidable (SU).

IMPACT CUM-3: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE AIR QUALITY IMPACTS IN THE REGION WOULD BE CUMULATIVELY CONSIDERABLE. THIS IS CONSIDERED A POTENTIALLY SIGNIFICANT IMPACT (PS).

Mitigation Measure CUM-3: Implement Mitigation Measures in Chapter 5. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts on air quality. However, the mitigation measures may not be sufficient to reduce impacts to less than significant levels in all cases. For projects proposing to streamline environmental review, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation will reduce the impact to less than significant. Additionally, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation. Therefore, the regional contribution to this cumulative impact remains significant and unavoidable (SU) for purposes of this program-level review.

19.3.5 Biological Resources

The effect of implementation of the proposed MTP/SCS on regional biological resources is analyzed in Chapter 6 of this Draft EIR. The discussion below addresses the project contributions to cumulative impacts to biological resources.

The amount of habitat, both wildland and agricultural, for special-status species and other important natural communities (including riparian habitat, oak woodlands, and wetlands) that would be impacted or lost as a result of development in the SACOG region through 2036 is 42,398 acres. While this represents total acres of special status species and important natural communities habitat lost at the regional level due to implementation of the proposed MTP/SCS, adjoining counties may also convert habitat land for development outside of the SACOG region.

Implementation of the proposed MTP/SCS and cumulative development would also result in disruption of movement corridors and nursery sites. Actions by neighboring counties may further impact these biological resources. Collectively, this adds to the overall impacts to biological resources in the cumulative impact analysis area.

Projected growth within the cumulative impact analysis area will result in a potentially significant (PS) cumulative impact to biological resources. The regional contribution to these cumulative

impacts to biological resources may also be potentially significant (PS). Implementation of mitigation measures in Chapter 6 would minimize the contribution of the proposed MTP/SCS to cumulative impacts to biological resources, but would not reduce them to less-than-significant levels. Consequently, cumulative impacts to biological resources, and the regional contribution to them, remain significant and unavoidable (SU).

IMPACT CUM-4: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE IMPACTS TO BIOLOGICAL RESOURCES MAY BE CUMULATIVELY CONSIDERABLE. THIS IS CONSIDERED A POTENTIALLY SIGNIFICANT IMPACT (PS).

Mitigation Measure CUM-4: Implement Mitigation Measures in Chapter 6. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts on biological resources. However, the mitigation measures may not be sufficient to reduce impacts to less than significant levels in all cases. For projects proposing to streamline environmental review, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation will reduce the impact to less than significant. Additionally, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt mitigation. Therefore, the regional contribution to this cumulative impact remains significant and unavoidable (SU) for purposes of this program-level review.

19.3.6 Cultural Resources

The effect of implementation of the proposed MTP/SCS on cultural resources is analyzed in Chapter 7 of this Draft EIR. While some cultural resources may have regional significance, the resources themselves are site-specific, and impacts to them are project-specific. For example, impacts to a subsurface archeological find at one project site are generally not made worse by impacts from another project to a cultural resource at another site. Rather the resources and the effects upon them are generally independent. A possible exception to this would be a cultural resource that represents the last known example of its kind. For such a resource, cumulative impacts, and the contribution of the proposed MTP/SCS to them, may be potentially significant (PS).

Implementation of mitigation measures in Chapter 7 would minimize the contribution of the proposed MTP/SCS to cumulative impacts to cultural resources. While impacts within the cumulative impact analysis area may remain potentially significant, impacts associated with the regional contribution to this impact would be mitigated to less than significant (LS).

IMPACT CUM-5: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE IMPACTS TO CULTURAL RESOURCES MAY BE CUMULATIVELY CONSIDERABLE. THIS IS CONSIDERED A POTENTIALLY SIGNIFICANT IMPACT (PS).

Mitigation Measure CUM-5: Implement Mitigation Measures in Chapter 7. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts on cultural resources to less-than-significant (LS). Projects taking advantage of CEQA Streamlining provisions of SB 375 (Pub. Resources Code § 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above to address site-specific conditions, resulting in impacts that are less than significant (LS). However, SACOG cannot require

implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation. Therefore, the regional contribution to this cumulative impact is potentially significant and unavoidable (SU).

19.3.7 Energy and Global Climate Change

Energy consumption related to implementation of the proposed MTP/SCS is analyzed in Chapter 8 of this Draft EIR. Demand for electrical power and natural gas has the potential to affect an area larger than the SACOG region in a cumulative manner, because energy systems are interconnected over large areas that may even crossover into other states and countries. If growth of area-wide supplies does not keep pace with area-wide demand, the effects of growth and development in the cumulative impact analysis area have the potential to create shortages, resulting in a potentially significant (PS) cumulative impact.

To reduce the consumption of energy and maintain consistency with smart growth principals, the proposed MTP/SCS includes a proposed land use plan and transportation system focused on mixed uses, compact development, and transportation choices. As a result, as documented in Chapter 8, implementation of the proposed MTP/SCS is anticipated to result in a per-capita and total reduction in energy use in the SACOG region. As such, despite other growth and development in the cumulative impact analysis area that could result in increases in the demand for energy, the contribution of the proposed MTP/SCS to cumulative energy impacts would be less than significant (LS).

IMPACT CUM-6: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE ENERGY CONSUMPTION IS CONSIDERED A LESS THAN SIGNIFICANT IMPACT (LS).

Mitigation Measure CUM-6: None required.

Chapter 8 also analyzes climate change impacts associated with implementation of the proposed MTP/SCS. Climate change is considered a global cumulative issue due to the nature of associated environmental changes. As demonstrated in Chapter 8, implementation of the proposed MTP/SCS would be consistent with statewide and regional plans and would achieve the statewide target for future year emissions reductions required under SB 375 and AB 32. Therefore, although growth and development in the cumulative impact analysis area is likely to result in increases in cumulative GHG emissions and contributions to global climate change, the MTP/SCS's contribution to this cumulative impact is not cumulatively considerable and would be less than significant (LS).

IMPACT CUM-7: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE GHG EMISSIONS AND GLOBAL CLIMATE CHANGE IS CONSIDERED A LESS THAN SIGNIFICANT IMPACT (LS).

Mitigation Measure CUM-7: None required.

19.3.8 Geology, Soils, Seismicity, and Mineral Resources

Impacts to geology, soils, seismicity, and mineral resources, related to implementation of the proposed MTP/SCS are analyzed in Chapter 9 of this Draft EIR. While some geologic features may affect regional construction practices, such as seismicity or soil elasticity, impacts and mitigation measures are site-specific and project-specific. For example, impacts resulting from development on

expansive soils at one project site are not worsened by impacts from development on expansive soils at another project site. Rather the soil conditions, and the implications of those conditions for each project, are independent.

Mineral resources are similar in that impacts resulting from development over sub-surface mineral resources at one project site are generally not worsened by impacts from development over mineral resources at another project site. The exception would be where a particular resource deposit is rare and/or unique.

As such, the potential for cumulative impacts related to geology, soils, seismicity and mineral resources, to which implementation of the proposed MTP/SCS might contribute, is less than significant (LS).

IMPACT CUM-8: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE IMPACTS TO GEOLOGY, SOILS, SEISMICITY, OR MINERAL RESOURCES IS CONSIDERED A LESS THAN SIGNIFICANT IMPACT (LS).

Mitigation Measure CUM-8: None required.

19.3.9 Hazards and Hazardous Materials

Impacts associated with hazards and hazardous materials related to implementation of the proposed MTP/SCS are analyzed in Chapter 10 of this Draft EIR. Hazardous materials and other public health and safety issues are generally site-specific and/or project-specific, and would not be significantly affected by other development outside of the region. For example an underground tank or residual pesticides on a project site at one location is not affected or cumulatively worsened by the same findings at another location. These are distinct, site-specific outcomes. Therefore, the contribution of the proposed MTP/SCS to cumulative impacts related to hazards and hazardous materials would be less than significant (LS).

IMPACT CUM-9: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE IMPACTS ASSOCIATED WITH HAZARDS AND HAZARDOUS MATERIALS WOULD NOT BE CUMULATIVELY CONSIDERABLE. THIS IS CONSIDERED A LESS THAN SIGNIFICANT IMPACT (LS).

Mitigation Measure CUM-9: None required.

19.3.10 Hydrology and Water Quality

Impacts associated with hydrology and water quality related to implementation of the proposed MTP/SCS are analyzed in Chapter 11 of this Draft EIR. Some types of impacts are localized and not cumulative in nature; for example, creating or contributing to runoff, exposure to risk from failure of a levee or dam, mudflow inundation, and violations of water quality and/or discharge standards. These effects occur independently of one another, related to site-specific and project-specific characteristics and conditions.

There are, however, hydrology and water quality impacts that may be additive in nature and thus cumulative, including for example, placing housing or other structures within a flood hazard area, alterations of the drainage pattern of an area that results in off-site flooding, land subsidence from groundwater overdraft, and general degradation of water quality.

Development within a flood hazard area results in incremental modifications over time that can have cumulative adverse effects during a flood event by impeding and displacing flows, and thereby potentially exacerbating flooding overall. With regard to alterations of the drainage pattern of an area, as development in one area contributes incrementally to surface drainage runoff or degrades water quality, and development in another area up- or down-stream does the same, the capacity of a drainage-way to carry flood flows and/or the overall quality of the water may be cumulatively affected. Similarly, depending on the aquifer characteristics, the effects of groundwater withdrawal in one area can be exacerbated by effects elsewhere and have a cumulative effect which manifests itself in the form of land subsidence. Moreover, new development and associated impervious cover, in areas of moderate and high potential for recharge, would have a significant cumulative impact on groundwater recharge. These impacts, and the contribution of the proposed MTP/SCS to them, could be potentially significant on a cumulative basis.

Implementation of mitigation measures identified in Chapter 11 will minimize the contribution of the proposed MTP/SCS to cumulative hydrology and water quality impacts. While impacts within the cumulative impact analysis area may remain potentially significant, impacts associated with the regional contribution to this impact would be mitigated to less than significant (LS).

IMPACT CUM-10: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE IMPACTS TO HYDROLOGY AND WATER QUALITY IN THE FORM OF OFF-SITE FLOODING, LAND SUBSIDENCE FROM GROUNDWATER OVERDRAFT, AND GENERAL DEGRADATION OF WATER QUALITY MAY BE CUMULATIVELY CONSIDERABLE. THIS IS CONSIDERED A POTENTIALLY SIGNIFICANT IMPACT (PS).

Mitigation Measure CUM-10: Implement Mitigation Measures in Chapter 11. If the implementing agency adopts these mitigation measures, it will reduce the impacts of the proposed MTP/SCS on hydrology and water quality to less than significant (LS). Projects taking advantage of CEQA Streamlining provisions of SB 375 (Pub. Resources Code § 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above to address site-specific conditions. However, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, the regional contribution to this cumulative impact remains significant and unavoidable (SU).

19.3.11 Land Use and Planning

Impacts associated with land use and planning related to implementation of the proposed MTP/SCS are analyzed in Chapter 11 of this Draft EIR. Consistency with SB 375 within the cumulative impact analysis area is potentially significant, however, the requirements of state and federal law, and CEQA requirements for these plan updates, provide mechanisms for public disclosure and consistency. The proposed MTP/SCS has been analyzed for consistency with SB 375 and found to be fully compliant.

Growth outside of the region could affect consistency with the Land Use and Resource Management Plan adopted by the Delta Protection Commission because development at the urban edge could adversely impact agriculture, natural resources, recreational land, and water quality in the Delta. However, jurisdictions with land in the Primary Zone are required by Public Resources Code Section 29763 to adopt general plans with land uses consistent with the goals and policies in the LURMP, subject to review by the DPC. Therefore, subsequent projects within the proposed

MTP/SCS that fall within the LURMP boundaries will be required to demonstrate consistency with the plan and satisfy mitigation requirements.

Therefore, the contribution of the proposed MTP/SCS to cumulative impacts related to land use and planning would be less than significant (LS).

IMPACT CUM-11: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE LAND USE AND PLANNING IMPACTS IS CONSIDERED A LESS THAN SIGNIFICANT IMPACT (LS).

Mitigation Measure CUM-11: None required.

19.3.12 Noise

Impacts associated with noise related to implementation of the proposed MTP/SCS are analyzed in Chapter 13 of this Draft EIR. Noise impacts are generally experienced locally and are not cumulative in nature. These effects occur independently of one another, related to site-specific and project-specific characteristics and conditions.

However, increased traffic from implementation of the proposed MTP/SCS could contribute to a significant increase in traffic noise levels on roadway segments throughout the cumulative impact analysis area, beyond accepted thresholds in various communities outside of the region. This impact could be potentially significant on a cumulative basis.

Implementation of mitigation measures identified in Chapter 13 would minimize the contribution of the proposed MTP/SCS to cumulative noise impacts. However, the combination of planned development in the SACOG region along with planned development in neighboring counties may result in cumulative noise impacts that are not fully mitigated. For this reason, the contribution of the proposed MTP/SCS to this cumulative impact is considered significant and unavoidable (SU).

IMPACT CUM-12: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE NOISE IMPACTS MAY BE CUMULATIVELY CONSIDERABLE. THIS IS CONSIDERED A POTENTIALLY SIGNIFICANT IMPACT (PS).

Mitigation Measure CUM-12: Implement Mitigation Measures in Chapter 13. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts related to noise. However, the mitigation measures may not be sufficient to reduce impacts to less than significant levels in all cases. For projects proposing to streamline environmental review, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation will reduce the impact to less than significant. Additionally, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation. Therefore, the regional contribution to this cumulative impact remains significant and unavoidable (SU).

19.3.13 Population and Housing

Impacts associated with population and housing related to implementation of the proposed MTP/SCS are analyzed in Chapter 14 of this Draft EIR. Through 2035, an additional 810,634 people and 284,896 housing units are forecasted to be added in the region. As noted above, this will

represent about 36 percent of the population and 32 percent of the housing expected to be added overall in the cumulative impact analysis area by 2036.

Environmental impacts associated with these increases in population and housing are addressed in the other chapters of this Draft EIR, and throughout this cumulative analysis discussion. Independently, the projected increases in population and housing will have no additional cumulative effects. Therefore, this impact is considered less than significant (LS).

IMPACT CUM-13: IMPLEMENTATION OF THE PROPOSED MTP/SCS IN CONJUNCTION WITH OTHER PLANNED DEVELOPMENT OUTSIDE OF THE REGION WOULD RESULT IN INCREASES IN POPULATION AND HOUSING. THE POTENTIAL CUMULATIVE ENVIRONMENTAL IMPACTS OF THIS ARE ADDRESSED IN OTHER IMPACT STATEMENTS IN THIS CHAPTER. THIS CHANGE, IN AND OF ITSELF, IS LESS THAN SIGNIFICANT (LS).

Mitigation Measure CUM-13: None required.

19.3.14 Public Services and Recreation

Impacts to public services and recreation related to implementation of the proposed MTP/SCS are analyzed in Chapter 15 of this Draft EIR. This assessment includes an analysis of law enforcement, fire protection, emergency services, schools, libraries, social services, and parks and recreation. These public services are generally provided by local governments for areas within their jurisdictions and are typically not provided on a regional or extra-regional basis. However, there are some exceptions, which are discussed below.

Law enforcement, fire protection, and emergency services are provided by local governments or fire protection districts for areas within their jurisdiction, although mutual aid agreements between agencies do help spread resources. The California Highway Patrol (CHP) has specific jurisdiction over all California state routes (including all freeways and expressways), US Highways, Interstate Highways, and all public roads in unincorporated parts of a county. The US Forest Service and State Department of Forestry and Fire Protection (CAL FIRE) provide fire protection services within many rural areas.

Public schools are provided by school districts to areas within their jurisdictions. While districts may have cross-jurisdictional boundaries, school services are still provided at the local, rather than regional, level.

Libraries are also generally provided by local governments for areas within their jurisdiction, and services are not provided on a regional basis, although there are often regional cooperation programs.

Social services are generally provided by counties, and not provided on a regional basis.

Neighborhood and city/county parks and recreational services are provided by local governments for areas within their jurisdiction. The SACOG area also includes numerous regional, state, and federal parks, open space, and recreational areas.

The potential for cumulative impacts related to most public services and local parks and recreation, to which implementation of the proposed MTP/SCS might contribute, is less than significant (LS).

The potential for cumulative impacts to: state routes, freeways, and other roads under the jurisdiction of the CHP; rural wildland fire areas protected by CAL FIRE; and regional, state, and federal parks, open space, and recreational areas is potentially significant (PS). As such, the contribution of the proposed MTP/SCS to those impacts is also potentially significant (PS).

Implementation of mitigation measures identified in Chapter 15 will minimize the contribution of the proposed MTP/SCS to cumulative public service impacts. While impacts within the cumulative impact analysis area may remain potentially significant, impacts associated with the regional contribution to this impact would be mitigated to less than significant (LS).

IMPACT CUM-14: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE PUBLIC SERVICE IMPACTS IN THE FORM OF STATE ROUTES, FREEWAYS, AND OTHER ROADS UNDER THE JURISDICTION OF THE CHP; RURAL WILDLAND FIRE AREAS PROTECTED BY CAL FIRE; AND REGIONAL, STATE, AND FEDERAL PARKS, OPEN SPACE, AND RECREATIONAL AREAS MAY BE CUMULATIVELY CONSIDERABLE. THIS IS CONSIDERED A POTENTIALLY SIGNIFICANT IMPACT (PS).

Mitigation Measure CUM-14: Implement Mitigation Measures in Chapter 15. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts on public services to less than significant (LS). Projects taking advantage of CEQA Streamlining provisions of SB 375 (Pub. Resources Code § 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above to address site-specific conditions, resulting in impacts that are less than significant (LS). However, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation. Therefore, the regional contribution to this cumulative impact is potentially significant and unavoidable (SU).

19.3.15 Transportation and Traffic

Impacts to transportation and traffic related to implementation of the proposed MTP/SCS are analyzed in Chapter 16 of this Draft EIR. At the regional level, all transportation and traffic impacts associated with implementation of the proposed MTP/SCS are less than significant, which reflects the success of this MTP in: decreasing per-capita VMT; increasing person trips by bicycle, walking, and transit; improving infrastructure and connectivity for pedestrians, bicycles, and transit; and minimizing impacts to the movement of goods and agriculture.

As described in Chapters 2, 12 and 14, the proposed MTP/SCS is explicitly designed to maintain and foster the balance between jobs and housing within the region. The additional population, housing, and job growth forecasted for the 20-year planning period is not a result of the proposed MTP/SCS; the proposed MTP/SCS provides a strategy to allocate growth in such a way as to achieve a more balanced jobs/housing ratio and to optimize transportation investments that support those land uses. By doing this, the proposed MTP/SCS results in lower VMT per capita and a greater mode share for non-motorized modes. The potential for cumulative impacts related to traffic generated within the MTP/SCS plan area, to which implementation of the proposed MTP/SCS might contribute, is less than significant (LS).

IMPACT CUM-15: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE TRANSPORTATION AND TRAFFIC IMPACTS IS CONSIDERED TO BE LESS THAN SIGNIFICANT (LS).

Mitigation Measure CUM-15: None required.

19.3.16 Utilities and Service Systems

Impacts to utilities and services related to implementation of the proposed MTP/SCS are analyzed in Chapter 17 of this Draft EIR. This analysis includes an examination of water supply, stormwater, wastewater, solid waste, natural gas, propane, electricity, and telecommunications. The utilities identified below are generally provided or delivered on a local level, but often originate from sources outside of the local jurisdiction and/or as part of a regional distribution system. The project's contribution to cumulative impacts associated with the provision of utilities is discussed below.

WATER SUPPLY AND INFRASTRUCTURE

Water supply and associated infrastructure have both local and regional aspects. The rivers that provide virtually all the surface water supplies in the SACOG region originate outside the region, and travel through the region and beyond, providing water supply to jurisdictions inside and outside of the SACOG region along the way.

An increase in demand and water consumption in one region has the potential to affect supplies throughout California, because the surface water supply systems are interconnected. Whereas, the groundwater upon which many parts of the SACOG region are dependent is generally local, based on aquifer characteristics. However, as shown in Figure 11.5, Groundwater Sub-Basins (Chapter 11 – Hydrology and Water Quality) portions of area groundwater sub-basins fall outside the SACOG region.

Development of future water supply and associated infrastructure regionally and beyond depends on several factors, such as surface water availability, groundwater recharge, land use density and land use type. Future urban growth (population, housing, and employees) will result in an increase in water supply needs and demand. Future growth in the cumulative impact analysis area could lead to potential future water shortages and depletion of existing water supplies. The potential effects of global climate change add further uncertainty. This impact, and the contribution of the proposed MTP/SCS to it, could be potentially significant on a cumulative basis.

Implementation of mitigation measures identified in Chapter 17 would minimize the contribution of the proposed MTP/SCS to cumulative water supply and infrastructure impacts. While impacts within the cumulative impact analysis area may remain potentially significant, impacts associated with the regional contribution to this impact would be mitigated to less than significant (LS).

IMPACT CUM-16: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE WATER SUPPLY AND INFRASTRUCTURE IMPACTS MAY BE CUMULATIVELY CONSIDERABLE. THIS IS CONSIDERED A POTENTIALLY SIGNIFICANT IMPACT (PS).

Mitigation Measure CUM-16: Implement Mitigation Measures in Chapter 17. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts on water supply and infrastructure to less-than-significant (LS). Projects taking advantage of CEQA Streamlining provisions of SB 375 (Pub. Resources Code § 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above to address site-specific conditions, resulting in impacts that are less than significant (LS). However, SACOG

cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation. Therefore, the regional contribution to this cumulative impact is potentially significant and unavoidable (SU).

STORMWATER AND INFRASTRUCTURE

Stormwater drainage systems in the SACOG region are generally provided by local governments for areas within their jurisdictions or for county/city areas combined, and are not typically provided on a regional or extra-regional basis. Stormwater drainage solutions typically depend on site-specific and project-specific characteristics and implementation. As such, stormwater drainage systems within the SACOG region would not be significantly affected by development outside of the region. Therefore, the potential for cumulative impacts related to stormwater and associated infrastructure, and the contribution of the proposed MTP/SCS to them, is considered to be less than significant (LS).

IMPACT CUM-17: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE IMPACTS TO STORMWATER AND ASSOCIATED INFRASTRUCTURE IS CONSIDERED A LESS THAN SIGNIFICANT IMPACT (LS).

Mitigation Measure CUM-17: None required.

WASTEWATER AND INFRASTRUCTURE

Wastewater service (sewer treatment) is generally a local or regional concern, as the wastewater treatment facilities and services are usually provided and regulated by local governments or special districts for areas within their jurisdiction. There are examples of service districts that have expanded their service area to include lands outside of the city or county of origin. For example, the Sacramento Regional County Sanitation District serves Sacramento County and its cities, as well as other adjoining areas. However, there are no examples of sewer systems or sewer service providers inside the SACOG region that serve areas outside of the SACOG region. As such, wastewater systems and associated infrastructure within the SACOG region would not be significantly affected by development outside of the region. The potential for cumulative impacts related to wastewater and associated infrastructure, and the contribution of the proposed MTP/SCS to them, would be less than significant (LS).

IMPACT CUM-18: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE IMPACTS TO WASTEWATER AND ASSOCIATED INFRASTRUCTURE IS CONSIDERED A LESS THAN SIGNIFICANT IMPACT (LS).

Mitigation Measure CUM-18: None required.

SOLID WASTE

Solid waste management is generally provided at the county level by the respective counties and not on a regional basis. However some jurisdictions have contracted with areas outside of the region to export their solid waste. For example, Yolo County accepts waste from other jurisdictions in the region, and Placer County exports waste to the State of Nevada.

Implementation of the proposed MTP/SCS, in conjunction with other development projected to occur in the cumulative impact analysis area, has the potential to exceed available local solid waste

capacity. Therefore, the potential for cumulative impact associated with solid waste could be potentially significant (PS) on a cumulative basis. Implementation of mitigation measures identified in Chapter 17 would minimize the contribution of the proposed MTP/SCS to impacts related to solid waste. While impacts within the cumulative impact analysis area may remain potentially significant, impacts associated with the regional contribution to this impact would be mitigated to less than significant (LS).

IMPACT CUM-19: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE IMPACTS ASSOCIATED WITH SOLID WASTE MANAGEMENT IS CONSIDERED POTENTIALLY SIGNIFICANT (PS).

Mitigation Measure CUM-19: Implement Mitigation Measures in Chapter 17. If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative impacts on solid waste management to less than significant (LS). Projects taking advantage of CEQA Streamlining provisions of SB 375 (Pub. Resources Code § 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above to address site-specific conditions, resulting in impacts that are less than significant (LS). However, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation. Therefore, the regional contribution to this cumulative impact is potentially significant and unavoidable (SU).

NATURAL GAS, PROPANE, ELECTRICITY, AND TELECOMMUNICATIONS

Natural gas, propane, electricity, and telecommunications services are provided by various public and private utility providers serving the region. Market competition ensures the provision of these services, and with the exception of propane service, regulatory oversight is provided by the State Public Utilities Commission. Infrastructure issues are generally site-specific and/or project-specific in nature, and would not be significantly affected by development outside of the region. Therefore, cumulative impacts related to natural gas, propane, electricity, and telecommunications, and the contribution of the proposed MTP/SCS to them, would be less than significant (LS).

IMPACT CUM-20: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE IMPACTS RELATED TO NATURAL GAS, PROPANE, ELECTRICITY, OR TELECOMMUNICATIONS SERVICES IS CONSIDERED A LESS THAN SIGNIFICANT IMPACT (LS).

Mitigation Measure CUM-20: None required.