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.

In response to the Notice of Preparation (NOP), SACOG received comments related to growth inducement from the Sierra Club (Placer County) and Delta Stewardship Council (DSC). The commenters expressed that the Draft EIR should consider the following:

- growth inducement from transportation projects,
- growth inducement in the Delta Secondary Zone, and
- growth inducement in areas designated to meet the Delta's ecosystem restoration needs.

SACOG also received a comment from the Sacramento Metropolitan Utility District requesting consideration of cumulative electrical needs.

The CEQA Guidelines note that comments received during the NOP scoping process can be helpful in "identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important." (CEQA Guidelines Section 15083.) Neither the CEQA Guidelines nor Statutes require a lead agency to respond directly to comments received in response to the NOP, but they do require they be considered. Consistent with these requirements, these comments have been carefully reviewed and considered by SACOG and are reflected in the analysis of impacts in this chapter. Appendix PD-1 includes all NOP comments received.

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 Senate Bill (SB) 375, and importantly to achieve the greenhouse gas (GHG) emissions reduction targets for passenger vehicles and light-duty trucks established by the California Air Resources Board (CARB).

The SACOG area consists of 28 jurisdictions and covers 3,863,373 acres. The plan area of the proposed MTP/SCS presently contains approximately 686,847 acres of developed land (2016), which represents just under 18 percent of the total land area. The plan area of the proposed MTP/SCS population is 2,376,311 (2016), with 921,123 housing units and 1,060,751 employees. The proposed MTP/SCS is described in detail in Chapter 2, Project Description, and the potential environmental impacts related to implementation of the proposed MTP/SCS are fully assessed in the topical sections of Chapters 3 through 17.

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 location and pattern of this growth is important because it influences travel behavior and provides a means for determining the impact of future vehicle emissions in the plan area of the proposed MTP/SCS. A compact growth pattern served by an efficient transportation system provides the foundation to reduce automotive travel and increase walking, bicycling, and transit use, behaviors that lower vehicle miles traveled (VMT), and reduce individual trips. The proposed 2020 MTP/SCS revisits the growth forecast, land use assumptions, and transportation investments that served as the foundation of both the 2012 and 2016 plans. The proposed 2020 MTP/SCS is the first of SACOG's plans to include roadway pricing strategies (tolling and mileage fees) to help manage traffic demand on the region's road and highway network.

The proposed MTP/SCS is an update of the 2016 MTP/SCS. The proposed MTP/SCS addresses projected changes in population growth, projected changes in funding for transportation projects, and further integrates Blueprint principles through the SCS. The 2040 forecast for the proposed MTP/SCS assumes that population in the plan area is expected to be 2.99 million in 2040. This forecast is 3 percent lower than the 2016 MTP/SCS. In addition to a lower population forecast, the proposed MTP/SCS accounts for lower projected funding from existing sources of revenue for transportation compared to the previous MTP/SCS. However, the proposed MTP/SCS assumes that roadway pricing, including tolls and mileage-based fees, will replace fuel taxes as a primary source of funding during the 20-year planning period covered by the proposed MTP/SCS. These fees will generate additional funding that will help pay for maintaining, operating, and preserving the transportation system, as well as serve as management strategies for managing traffic demand on the roadway system. The proposed MTP/SCS focuses on maximizing the efficiency of existing infrastructure and identifying investments that bring the most benefit to the regional transportation network.

Overall, the proposed MTP/SCS guides the Sacramento region toward a more sustainable future through continued integration of smart land use decisions with an efficient, well-managed, and

diverse transportation system. The updated SCS serves to implement SACOG's longstanding effort to integrate land use and transportation planning by tying the proposed MTP/SCS's performance to reduced automotive travel and increased walking, bicycling, and transit use based on Blueprint-influenced land use patterns. Table 19-1 demonstrates how projected growth in future population, employment, and housing under the proposed MTP/SCS will differ from the 2016 plan.

Table 19-1
Population, Employees, and Housing Unit Forecasts
for the 2016 MTP/SCS and the Proposed 2020 MTP/SCS

Projection	2016 MTP/SCS (by 2036)	Proposed 2020 MTP/ SCS (by 2040)
Population	2,903,090	2,996,832
Employees	1,279,016	1,330,813
Housing Units	1,144,694	1,181,251

[1]Due to different protocols among GIS models for tallying spatial data, housing unit numbers in this DEIR differ marginally from those reported in the proposed MTP/SCS.
Source: SACOG and CCSCE 2017, and SACOG 2018

Table 19-2 compares change in projected growth between the 2016 MTP/SCS and the proposed MTP/SCS:

Table 19-2
Comparison of Change in Growth for the 2016 MTP/SCS
and the Proposed 2020 MTP/SCS

Projection	2016 MTP/SCS (by 2036)	Proposed 2020 MTP/ SCS (by 2040)
Population	810,634	620,521
Employees	439,354	270,062
Housing Units	284,896	260,128

[1]Due to different protocols among GIS models for tallying spatial data, housing unit numbers in this DEIR differ marginally from those reported in the proposed MTP/SCS.
Source: SACOG and CCSCE 2017, and SACOG 2018

To accommodate this growth, the proposed MTP/SCS forecasts the need for an additional 56,810 acres of land (for proposed land use pattern and planned transportation improvements combined). Table 19-3 below shows acres converted by Community Type as a result of the projected land use pattern. Table 19-4 shows acres converted by Community Type as a result of planned transportation improvements alone. As noted previously, because of overlap these numbers are not additive.

Table 19-3
Changes in New Housing Units, Employment, and Acres Comparing the 2016 MTP/SCS and Proposed 2020 MTP/SCS

Community Type	Housing Units		Employment		Acres Converted	
	2016 MTP/SCS	Proposed MTP/SCS	2016 MTP/SCS	Proposed MTP/SCS	2016 MTP/SCS	Proposed MTP/SCS
Centers and Corridors Communities	86,167	86,661	152,097	82,850	3,825	3,886
Established Communities	78,750	89,313	215,116	39,754	16,619	15,963
Developing Communities	114,836	81,365	68,885	146,053	22,153	16,573
Rural Residential Communities	5,143	2,789	3,260	1,405	4,966	10,251[1]
Region Total	284,896	260,128	439,358	270,062	47,563	46,673

[1] The Rural Residential Community Type acreage likely overstates in the proposed MTP/SCS as a result of changes to land use modeling methodology use during this plan update.
Source: Data compiled by SACOG in 2019

Table 19-4
Planned Transportation Improvements in the Proposed MTP/SCS

Community Type	Improvements (100 foot buffer)
Centers and Corridors Communities	1,350
Established Communities	5,145
Developing Communities	3,312
Rural Residential Communities	244
Lands Not Identified for Development	1,580
Region Total	11,730

[1]Due to different protocols among GIS models for tallying spatial data, housing unit numbers in this DEIR differ marginally from those reported in the proposed MTP/SCS.
Source: SACOG and CCSCE 2017, and SACOG 2018

The proposed MTP/SCS includes the addition of five new Developing Communities (one each in the City of Sacramento, Sacramento County, Woodland, and two in West Sacramento), and removal of six Developing Communities (one each in El Dorado County, Auburn, Sacramento County, Yuba City, and two in Sacramento County). Additionally, five Developing Communities are more than 50 percent built out at the time of preparation of the Draft EIR, so these communities were re-categorized from Developing Communities to Established Communities. Overall, approximately 9 percent of the housing growth moves from Developing Communities to Established, and Center and Corridor Communities. In total, 64 percent of housing growth in the proposed MTP/SCS is forecast to occur in Center and Corridor (33 percent) and Established Communities (31 percent). This is compared to 58 percent of the growth forecast for these communities in the 2016 MTP/SCS.

The proposed MTP/SCS includes 82 fewer lane miles of new major roads, 200 fewer daily transit vehicle service hours, and approximately 70 new road/highway projects including some projects that were split into separate phases.

In comparison to the 2016 MTP/SCS, plan investments have been decreased slightly (from $35.0 billion to $34.9 billion). The proposed MTP/SCS maintains the same amount of spending on system maintenance and reflects some cost increases for both transit and road expansion projects. The

reduction in spending generally comes from a small reduction in total spending on transit operations reflective of a lower revenue forecast for transit specific investments.

The result is that the proposed plan is similar to the 2016 plan and has similar environmental impacts. VMT decreases over time and more jobs are created closer to homes. Trips by alternative modes (transit, bike, and walk) increase slightly as compared to the 2016 plan.

At the policy level, the proposed MTP/SCS includes refinements to emphasize the commitment towards investment in transportation system maintenance and rehabilitation; commits SACOG to further development of project level decision-support tools; acknowledges and addresses the unique issues in the range of communities in the SACOG region – suburban, rural, urban, and small towns; addresses climate adaptation; commits SACOG to pursue roadway pricing strategies, including tolling and mileage-based fees through pilot testing, outreach, and analysis in partnership with local, state, and federal partners; and reflects 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:

- significant increases in the productivity of the transit system, evidenced by more riders and improved transit access to homes and jobs;
- 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 targets established for the SACOG region by CARB and contribute to achieving the goals of SB 32; and
- lower VMT 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 proposed MTP/SCS must: identify areas within the region sufficient to house all the projected population for the 20-year plan, an eight-year projection of the regional housing need, and consider the state's housing goals; identify a transportation network to serve the regional transportation needs; and demonstrate how the region can coordinate land use and transportation planning to meet, if feasible, the GHG emissions reduction targets established pursuant to SB 375.

From the federal perspective, the proposed MTP/SCS must comply with the federal Clean Air Act and federal laws relating to regional transportation plans (RTPs), 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 MTP/SCS 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 proposed MTP/SCS is critical since SACOG has no independent authority to directly implement the projected land use pattern of the proposed MTP/SCS.

Finally, while the proposed MTP/SCS 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 4 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, the process for developing the proposed MTP/SCS began with the development of a new 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 proposed MTP/SCS. 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 improvements to accommodate projected population growth. The proposed MTP/SCS 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 proposed MTP/SCS 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 proposed MTP/SCS 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 2040, the plan area of the proposed MTP/SCS is projected to increase by approximately 620,521 people, 270,060 jobs, and 260,128 housing units. Implementation of the proposed MTP/SCS will convert approximately 56,810 acres of undeveloped land, which represents a 7 percent increase in the amount of developed land over existing conditions. Comparatively, the projected population and housing unit growth represent 21 percent and 28 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 transportation system in support of planned growth. 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 improvements 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 guided by the performance-based objectives of the proposed MTP/SCS and by the overall policy objectives of SB 375, which collectively seek to, among other things, increase roadway optimization, increase modes of travel other than SOV 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 proposed MTP/SCS'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 improvements in these areas by 2040. 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 3 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 proposed MTP/SCS 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 $46.3 billion in escalated dollars (escalated), or $34.9 billion in today's dollars (current) allocated by category of project. Table 19-5 summarizes the total expenditures under the proposed MTP/SCS.

Table 19-5
Proposed MTP/SCS Expenditure Breakdown (in billions)

Expenditure Category	Total Expenditures (escalated)	Total Expenditures (current)
Maintenance and Rehabilitation	$16.7	$12.6
Public Transit	$13.4	$10.1
Road and Highway	$9.0	$6.8
Bicycle and Pedestrian	$3.3	$2.5
Programs and Planning	$4.1	$3.1
TOTAL	**$46.3**	**$34.9**

Source: Data compiled by SACOG in 2019

The road and highway expenditures in Table 19-4 include $6.8 billion or 19 percent of the total expenditures in the proposed MTP/SCS for expanding the region's road and highway system. Roughly two-thirds of the road and highway expansion budget is for projects that expand existing roads. This investment, when compared to the proposed MTP/SCS'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 proposed MTP/SCS 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 proposed 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 proposed MTP/SCS 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. Regulations [CFR] Section 450.306). Moreover, economic growth is critical for the success of the region. But the population growth resulting from that economic growth and vitality is accommodated by the proposed MTP/SCS—it is not a growth-inducing byproduct of the proposed MTP/SCS.

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 – Public

Services and Recreation and 17 – Utilities and Service Systems of this Draft EIR address these impacts.

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 17, which comprehensively address the potential for impacts from the projected land use pattern and planned transportation improvements 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 proposed MTP/SCS 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 17 are not necessary.

19.2 Significant Irreversible Changes

Pursuant to Section 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 the proposed MTP/SCS. 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 associated with reduced per-capita VMT.

As an example, from 1992 to 2016, a period of 24 years, the region grew by approximately 761,500 people. In that same time, approximately 184,600 acres of farmland was converted to urban and rural development. Consistent with the goals, objectives, and strategies of Rural-Urban Connections Strategy (RUCS) and the Blueprint to provide for orderly growth and development while preserving and conserving agricultural and open space land, the proposed 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 (i.e., 24 years, 2016-2040), the proposed MTP/SCS forecasts a little less population growth (620,500 people) but a significantly a lower rate of land conversion. Specifically, the proposed MTP/SCS forecasts the conversion of only 10,860 acres of farmland (in all FMMP categories combined) by 2040. As demonstrated in Chapter 4 – Agriculture and Forestry Resources of this Draft EIR, only 27 percent of that impact is protected farmland (prime, unique, and statewide significant farmlands). This significantly lower rate of conversion is due in part 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 pollutant 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 the proposed MTP/SCS. It increases opportunities and options for the future. In the context of outcomes under the 2016 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, Hazardous Materials, and Wildfire.

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 aggregates 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 56,810 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 to 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 (2040). 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 Section 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 Section 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 Section 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 comprises 3,863,373 acres, which equates to 6,037 square miles and includes six counties and 22 cities. Together with the other three largest regional governments in the state (Southern California, San Diego, and San Francisco Bay Area), it is home to more than 85 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, Localized Impacts (by Community Type), and within High Frequency Transit Areas (HFTAs) 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." As shown in Table 19-6, the population for the cumulative impact analysis area is projected to grow from 5.8 million people to 7.4 million by 2040.

As demonstrated in Table 19-6, the SACOG region comprises approximately 41 percent of the existing population, approximately 42 percent of the existing number of housing units, and about 41 percent of the existing number of employees in the cumulative impact analysis area. By 2040, this proportion is expected to be generally the same. This demonstrates that under both current and forecasted future conditions, the SACOG region represents a substantial portion of the growth in the cumulative analysis impact area. 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 19-6
Estimated Existing and Projected Growth for Adjacent Planning Areas (2016 to 2040)

Jurisdiction	Population			Housing Units			Employees		
	2016	2040	Annual Percent Change	2016	2040	Annual Percent Change	2016	2040	Annual Percent Change
SACOG region	2,376,311	2,990,000	1.00%	921,142	1,181,142	1.09%	1,060,742	1,330,742	0.99%
Alpine	1,150	1,027	-0.49%	1,832	1,799	-0.08%	820	840	0.10%
Amador[1]	37,612	44,602	0.74%	1,832	1,799	-0.08%	12,080	14,310	0.74%
Butte[2]	230,536	319,342	1.43%	100,554	138,716	1.41%	76,723	108,198	1.51%
Colusa[3]	22,361	28,501	1.06%	4,478	6,472	1.61%	8,720	10,040	0.61%
Contra Costa[4]	1,068,324	1,387,290	1.14%	390,333	475,380	0.86%	582,544	665,875	0.58%
Tahoe Basin[5]	42,798	46,014	0.32%	18,144	39,485	3.44%	16,601	12,480	-1.23%
Lake	64,584	70,213	0.36%	36,836	44,180	0.79%	16,340	75,570	6.89%
Napa[4]	134,863	154,525	0.59%	48,979	54,625	0.48%	73,749	34,970	-3.19%
Nevada	98,300	97,888	-0.02%	44,965	49,533	0.42%	31,530	34,970	0.45%
Plumas[6]	20,428	22,741	0.47%	16,732	21,623	1.12%	6,450	6,240	-0.14%
San Joaquin[7]	737,869	1,020,862	1.42%	241,943	321,379	1.24%	294,275	337,448	0.60%
Sierra	3,147	2,993	-0.22%	2,328	2,484	0.28%	620	560	-0.44%
Solano[4]	416,563	508,365	0.87%	142,197	168,370	0.74%	222,555	242,490	0.37%
Total	5,254,846	6,694,363	1.06%	1,972,295	2,506,987	1.05%	2,403,749	2,874,733	0.78%
SACOG as Percent of Total	45.22%	44.66%		46.70%	47.11%		44.13%	46.29%	

Note: Interpolated population and housing units for2016 and population for 2040 were based on regional transportation plans or general plan. Where population and household data from plans was not available, Caltrans County-Level Economic Forecasts by County (2018) were used. Housing units calculated based on Caltrans household projects and 2016 California Department of Finance vacancy rates applies to households. Employees estimate for 2016 and 2040 are form the Caltrans County-Level Economic Forecasts by Count (2018) unless otherwise noted.

[1] Draft 2015 Amador County Regional Transportation Plan 2016 estimates interpolated using the annual percent change for 2013 for population and housing units. 2040 projection interpolated using the annual average growth rate for 2035 for population and housing units.

[2] Butte 2016 RTP/SCS population and housing estimates for 2016 interpolated using annual percent change for 2014.
[3] Colusa County 2013 General Plan population and housing estimates were interpolating using the annual percent change for 2011. 2040 population and housing projections were interpolated using 2030 projections.
[4] Metropolitan Transportation Commission 2018 Plan Bay Area 2015 estimate and 2040 projection interpolated using the annual average growth rate for 2015.
[5] Tahoe Regional Planning Agency 2012 Regional Plan Update for the Lake Tahoe Region 2010 estimates and 2035 projections interpolated for 2016 and 2040 using the average annual growth rate.
[6] Plumas County General Plan housing and population estimates were interpolated using 2015 estimates and 2035 projections.
[7] San Joaquin Council of Governments 2018 Regional Transportation Plan/Sustainable Communities Strategy for San Joaquin County 2015 and 2040 population, household and employment estimates. 2016 population, household and employment projections interpolated using the annual percent change.
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, 2019, E-5 Population and Housing Estimates for Cities, Counties and the State, 2010-2019; Caltrans County-Level Economic Forecasts by County, 2018; Metropolitan Transportation Commission, 2019, Plan Bay Area Projections 2040; San Joaquin Council of Governments, 2018, 2018 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 17 of this Draft EIR.

19.4.1 Aesthetics

Aesthetic impacts associated with implementation of the proposed MTP/SCS are analyzed in Chapter 3 – Aesthetics of this Draft EIR. Many of the aesthetic resources experienced in the cumulative impact analysis area are similar to those experienced regionally in the plan area of the proposed MTP/SCS: 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 light, glare, or shadows at one location is not worsened by light, 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 characteristics of the project and location of the site where they would occur. 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 would 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 would 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 would 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 (Public Resources Code [PRC] Sections 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).

19.4.2 Agriculture and Forestry Resources

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

Based on data in the state's Farmland Mapping and Monitoring Program (FMMP), implementation of the proposed MTP/SCS would result in conversion of approximately 2,897 acres of prime, unique, and statewide important farmland to urban use. Based on local zoning, approximately 5,206 acres of land zoned for agricultural use would be lost. There is an unknown overlap between these acreage totals, they are not additive. 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).

Based on local general plan land use mapping, the amount of designated forestry resources that would be impacted or lost as a result of implementation of the proposed MTP/SCS is 259 acres. Additionally, as defined by the California Forest Legacy Act, the proposed MTP/SCS would overlap with 7,120 acres of "forest land." While loss of forestry resources and forest lands would not extend beyond this amount within the SACOG region, neighboring counties could also convert forestry resources and forest lands due to development, which would add to the overall conversion of forestry resources and forest lands in the cumulative impact analysis area. As such, the cumulative loss of forestry resources and forest lands 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 would reduce the contribution of the proposed MTP/SCS to cumulative impacts on agriculture and forest resources but not to a less-than-significant level. 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 would reduce the impact to 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 mitigation. Therefore, the regional contribution to this cumulative impact remains significant and unavoidable (SU) for purposes of this program-level review.

19.4.3 Air Quality

Chapter 5 – Air Quality 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, CARB has identified criteria air 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 nonattainment 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 would 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.

19.4.4 Biological Resources

The effect of implementation of the proposed MTP/SCS on regional biological resources is analyzed in Chapter 6 – Biological Resource 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 2040 is 40,633 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

within the cumulative impact analysis area 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 the cumulative contribution 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 would 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.

19.4.5 Cultural, Paleontological, and Tribal Cultural Resources

The effect of implementation of the proposed MTP/SCS on cultural, paleontological, and tribal cultural resources is analyzed in Chapter 7 – Cultural, Paleontological, and Tribal Cultural Resources of this Draft EIR. While some of these 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, paleontological, and tribal 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 would reduce the contribution of the proposed MTP/SCS to cumulative impacts on cultural, paleontological, and tribal cultural resources, but not to less-than-significant (LS). Projects taking advantage of CEQA Streamlining provisions of SB 375 (Pub. Resources Code Section 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).

19.4.6 Energy and Global Climate Change

Energy consumption related to implementation of the proposed MTP/SCS is analyzed in Chapter 8 – Energy and Global Climate Change 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 projected land use pattern and planned transportation improvements 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 is not cumulatively considerable and 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 – Energy and Global Climate Change also analyzes climate change impacts associated with implementation of the proposed MTP/SCS. Climate change is considered an inherently global, cumulative issue due to the nature of associated environmental changes and atmospheric science. GHGs are pollutants are varying heat trapping potential and atmospheric lifespans spanning from 1 to several hundred year. Construction emissions would occur from implementation of the proposed MTP/SCS and, although short-term in nature, these emissions would contribute and potentially exacerbate the greenhouse effect for a prolonged time.

As demonstrated in Chapter 8, implementation of the proposed MTP/SCS would achieve the regional target for future year emissions reductions required under SB 375. However, as discussed under Impact GHG-2, CARB has concluded that greater reductions will be needed statewide in order to meet statewide goals for GHG emissions reduction in future years. CARB has identified that a reduction of 25 percent below 2005 statewide per-capita passenger and light duty vehicle GHG emissions is needed by 2035 to attain state climate goals but that adjusting MPO targets to achieve that would be infeasible with currently available resources. Regional planning agencies like SACOG lack the authority and funding to take additional steps at the time of writing this Draft EIR. Additionally, CARB notes the necessary programs and strategies to achieve the 25 percent target do not yet exist.

Collectively, CARB had projected that all the adopted SCSs will achieve approximately 19percent of the 25 percent. CARB has acknowledged that the remaining unallocated gap of 6 percent must be achieved through additional statewide programs. SACOG's regional share of that unallocated statewide gap is unknown. SACOG's currently assigned 2035 share is a reduction of 19 percent below 2005 regional per-capita passenger and light-duty vehicle GHG emissions for the region. Although SACOG has demonstrated that the proposed MTP/SCS will achieve the assigned regional GHG reduction target for 2035, there is an unmet gap in achieving the statewide goals for GHG reduction. For this reason, the contribution of the proposed MTP/SCS to this cumulative impact is cumulatively considerable and would be potentially significant (PS).

Implementation of mitigation measures in Chapter 8 would minimize the contribution of the proposed MTP/SCS to cumulative GHG emissions and global climate change, but would not reduce them to less-than-significant levels. Until the state identifies a program for further GHG reductions, and regional planning agencies have funding and authorization to achieve them, cumulative GHG emissions and the regional contribution to them, remain significant and unavoidable (SU).

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

Mitigation Measure CUM-7: Implement Mitigation Measures in Chapter 8.

If the implementing agency adopts these mitigation measures, it would reduce the contribution of the proposed MTP/SCS to cumulative impacts from GHG emissions and global climate change. However, the mitigation measures may not be sufficient to reduce impacts to less than significant levels and there are no known additional feasible mitigation measures available at this time. For projects proposing to streamline environmental review, lead agencies must comply with state guidance on VMT reduction and conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would reduce the VMT impact to less than significant. Therefore, the regional contribution to this cumulative impact remains significant and unavoidable (SU) for purposes of this program-level review.

19.4.7 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 – Geology, Soils, Seismicity, and Mineral Resources 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.

19.4.8 Hazards, Hazardous Materials, and Wildfire

Impacts associated with hazards, hazardous materials, and wildfire related to implementation of the proposed MTP/SCS are analyzed in Chapter 10 – Hazards, Hazardous Material, and Wildfire 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).

Impacts associated with exposure to significant risk from wildfire, interference with emergency plans in defined fire prone areas, and development and related activities that might exacerbate the risk of fire including various adverse outcomes, are analyzed in Chapter 10 – Hazards, Hazardous Material, and Wildfire of this Draft EIR. Wildfire impacts may be site-specific, community specific, or larger within the region, and therefore may be cumulative in nature. Successful minimization of wildfire risk and minimization of exposure to wildfire impacts occurs at the site specific, community and regional level. Impacts from and after a wildfire typically affect large areas and/or entire communities. As documented in Chapter 10, implementation of the proposed MTP/SCS would be generally beneficial with respect to wildfire impacts because the plan focuses growth within existing communities and infill areas, and because the planned transportation improvements would generally improve regional accessibility. Nevertheless, impacts from implementation of the proposed MTP/SCS are conservatively identified as potentially significant and mitigation measures are identified that would reduce these impacts to a less-than-significant level. Given the increasing frequency and severity wildfires regionally due to drought and changing climate associated with

global climate change, this impact is conservatively considered cumulatively significant for the cumulative impact analysis area, and the contribution of the proposed MTP/SCS is conservatively cumulatively considerable.

Implementation of mitigation measures in Chapter 10 would minimize the contribution of the proposed MTP/SCS to cumulative impacts associated with exposure to significant risk from wildfire, interference with emergency plans in defined fire prone areas, and development and related activities that might exacerbate the risk of fire including various adverse outcomes.

IMPACT CUM-10: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE IMPACTS ASSOCIATED WITH WILDFIRE IS CONSIDERED TO BE POTENTIALLY SIGNIFICANT IMPACT (PS).

Mitigation Measure CUM-9: Implement Mitigation Measures in Chapter 10.

If the implementing agency adopts these mitigation measures, it would reduce the contribution of the proposed MTP/SCS to cumulative wildfire impacts to less-than-significant (LS). Projects taking advantage of CEQA Streamlining provisions of SB 375 (Pub. Resources Code Section 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).

19.4.9 Hydrology and Water Quality

Impacts associated with hydrology and water quality related to implementation of the proposed MTP/SCS are analyzed in Chapter 11 – Hydrology and Water Quality 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 would 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 Section 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).

19.4.10 Land Use and Planning

Impacts associated with land use and planning related to implementation of the proposed MTP/SCS are analyzed in Chapter 12 – Land Use and Planning of this Draft EIR. Impacts related to physically dividing a community are not experienced at the regional level and would not be exacerbated by conditions across the region.

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. This impact is primarily programmatic and does not manifest itself physically. Consistency with the legal requirements are analyzed for the entire proposed MTP/SCS and do not extent beyond the region into the cumulative impact analysis area.

Growth outside of the region could affect consistency with the Land Use and Resource Management Plan (LURMP) adopted by the Delta Protection Commission (DPC) 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 PRC 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 LURMP 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.

19.4.11 Noise and Vibration

Impacts associated with noise and vibration related to implementation of the proposed MTP/SCS are analyzed in Chapter 13 – Noise and Vibration 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 that comprise the cumulative impact analysis area 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).

19.4.12 Population and Housing

Impacts associated with population and housing related to implementation of the proposed MTP/SCS are analyzed in Chapter 14 – Population and Housing of this Draft EIR. Through 2040, an additional 620,521 people and 260,128 housing units are forecasted to be added in the region. As

noted above, this will represent about 41 percent of the population and 42 percent of the housing expected to be added overall in the cumulative impact analysis area by 2040.

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.

19.4.13 Public Services and Recreation

Impacts to public services and recreation related to implementation of the proposed MTP/SCS are analyzed in Chapter 15 – Public Services and Recreation of this Draft EIR. This assessment includes an analysis of law enforcement, fire protection, emergency response, 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 and fire protection 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.

Social services are generally provided by counties, and not provided on a regional basis. Public schools are provided by school districts to areas within their jurisdictions. While districts may have cross-jurisdictional boundaries, school services are 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. 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 would 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).

19.4.14 Transportation

Impacts to transportation related to implementation of the proposed MTP/SCS are analyzed in Chapter 16 of this Draft EIR. With the exception of VMT which is discussed separately below, and impacts related to the movement of agricultural products in certain community types and construction impacts, transportation impacts associated with implementation of the proposed MTP/SCS are less than significant, which reflects the success of the proposed MTP in: 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.

As described in Chapters 2 – Project Description, 12 – Land Use and Planning, and 14 – Population and Housing, 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; rather, 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.

As discussed in Impact TRN-1 in Chapter 16, although per-capita VMT within the region is forecast to continue to decline by 2040, total household-generated VMT as a result of the proposed MTP/SCS is forecast to increase largely due to adding about 620,500 new residents. The VMT per-capita decline indicates that the projected land use pattern and planned transportation improvements assumed in the proposed MTP/SCS would effectively work together to improve system efficiency and minimize increases in VMT. However, at a statewide level, CARB has reported that the state has

not gone far enough in making changes in how communities are designed to meet state climate goals. While implementation of the proposed MTP/SCS will achieve VMT reductions per capita, they are not enough to help the state successfully achieve desired statewide goals. See detailed discussion in Chapter 16 – Transportation.

CARB has explicitly recognized that MPOs could not achieve reductions without additional state policies and funding. However, at the time of writing this Draft EIR, it is unknown how CARB through statewide programs or coordination with local governments would meet the higher percent VMT reduction target by 2035 as identified in the 2017 Scoping Plan and other supporting documents. Therefore, the gap in VMT reductions needed to achieve the state's 2030 and 2050 GHG reduction targets remains. The contribution of the proposed MTP/SCS to this cumulative impact is cumulatively considerable and would be potentially significant (PS).

Implementation of mitigation measures in Chapter 16 would minimize the contribution of the proposed MTP/SCS to cumulative VMT, but would not reduce this impact to less-than-significant levels. Until the state identifies a program for further VMT reductions, and regional planning agencies have funding and authorization to achieve the reductions, cumulative VMT and SACOG's regional contribution, remain significant and unavoidable (SU).

IMPACT CUM-15: THE CONTRIBUTION OF THE PROPOSED MTP/SCS TO CUMULATIVE VMT IS CONSIDERED A POTENTIALLY SIGNIFICANT IMPACT (PS).

Mitigation Measure CUM-15: Implement Mitigation Measures in Chapter 16.

If the implementing agency adopts these mitigation measures, it will reduce the contribution of the proposed MTP/SCS to cumulative VMT. However, the mitigation measures may not be sufficient to reduce impacts to less than significant levels and there are no known additional feasible mitigation measures available at this time. For projects proposing to streamline environmental review, lead agencies must comply with state guidance on VMT reduction and conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation will reduce the VMT impact to less than significant. Therefore, the regional contribution to this cumulative impact remains significant and unavoidable (SU) for purposes of this program-level review.

19.4.15 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, energy services, 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 11-4, 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 (PRC Sections 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 accept and/or export their solid waste. For example, Yolo County accepts waste from other jurisdictions in the region, and Placer County exports waste to the Lockwood Regional Landfill in 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 (PRC Sections 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).

ENERGY SERVICES 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 ENERGY SERVICES OR TELECOMMUNICATIONS SERVICES IS CONSIDERED A LESS THAN SIGNIFICANT IMPACT (LS).

Mitigation Measure CUM-20: None required.

This page intentionally left blank.