

## 4 CUMULATIVE IMPACTS

### 4.1 INTRODUCTION TO THE CUMULATIVE ANALYSIS

This Draft SEIR provides an analysis of cumulative impacts of the proposed General Plan Amendments and Update of VMT Standards (Project), as required by Section 15130 of the State CEQA Guidelines. The goal of such an exercise is twofold: first, to determine whether the overall long-term impacts of all such projects would be cumulatively significant, and second, to determine whether the incremental contribution to any such cumulatively significant impacts of the Project would be “cumulatively considerable” (and thus significant). (See State CEQA Guidelines Sections 15130[a]–[b], Section 15355[b], Section 15064[h], and Section 15065[c]; and *Communities for a Better Environment v. California Resources Agency* [2002] 103 Cal. App. 4th 98, 120.) In other words, the required analysis intends first to create a broad context in which to assess cumulative impacts, viewed on a geographic scale beyond the Project site itself, and then to determine whether the Project’s incremental contribution to any significant cumulative impacts from all projects is itself significant (i.e., “cumulatively considerable”).

Cumulative impacts are defined in State CEQA Guidelines Section 15355 as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” A cumulative impact occurs from “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.” Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time” (State CEQA Guidelines Section 15355[b]).

### 4.2 CUMULATIVE IMPACT ANALYSIS METHODOLOGY

Consistent with State CEQA Guidelines Section 15130, the discussion of cumulative impacts in this Draft SEIR focuses on significant and potentially significant cumulative impacts. Section 15130(b) of the State CEQA Guidelines provides, in part, the following:

[t]he discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

A proposed project is considered to have a significant cumulative effect if:

- ▶ the cumulative effects of development without the project are not significant and the project’s additional impact is substantial enough, when added to the cumulative effects, to result in a significant impact, or
- ▶ the cumulative effects of development without the project are already significant and the project contributes measurably to the effect.

The term “measurably” is subject to interpretation. The standards used herein to determine measurability are that the impact must be noticeable to a reasonable person or must exceed an established threshold of significance (defined throughout the resource sections in Chapter 3 of this Draft SEIR). This cumulative analysis also assumes that all mitigation measures identified in Chapter 3 to mitigate Project impacts are adopted and implemented and that all elements of the design-build performance criteria that would minimize environmental effects are implemented.

The State CEQA Guidelines (Section 15130) identify two basic methods for establishing the cumulative environment in which the project is to be considered: the use of a list of past, present, and probable future projects, or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. This analysis uses a combination of the list and planning document approach, as described further below.

The cumulative impact analysis provided in this chapter evaluates whether the Project could result in potentially new cumulatively considerable impacts or an increase in the severity of previously identified cumulative impacts that were identified in the General Plan EIR pursuant to State CEQA Guidelines Section 15162(b).

### 4.3 CUMULATIVE SETTING

The 2019 *City of Elk Grove General Plan* is a broad framework for planning the future of the City. It is the official policy statement of the City Council that is used to guide the private and public development of the City in a manner to gain the maximum social and economic benefit to the citizens. The Planning Area for the General Plan includes both land within City boundaries (42 square miles, or 34,956 acres) and lands outside the City in unincorporated Sacramento County to the south and east (12.2 square miles, or 8,008 acres) in four study areas.

Development within the current City limits is anticipated to generate a maximum of 72,262 dwelling units, 233,406 residents, and 81,784 jobs from buildout of the 2019 General Plan. Assuming future annexation and development of the study areas, buildout under the 2019 General Plan would result in a maximum of 102,865 dwelling units, 332,254 residents, and 122,155 jobs (City of Elk Grove 2019:Table 3-2). The EIR for the General Plan analyzes the full development potential of the General Plan Land Use Diagram, including the study areas, compared to existing (2015) conditions (City of Elk Grove 2018).

The General Plan Land Use Diagram was amended in January 2021 as part of the adoption of the Southeast Industrial Area Specific Plan associated with annexation. The Southeast Industrial Area includes 561 acres south of Grant Line Road and east of the Union Pacific Railroad tracks and State Route 99 within the City's sphere of influence. The Southeast Industrial Area was designated as Public Open Space/Recreation in the General Plan, which was amended to a designation of Light Industrial uses, resulting in reduction of recreation and mixed General Commercial and Office uses. The SEIR prepared for the Southeast Industrial Area Specific Plan considered impacts associated with annexation and buildout of the Southeast Industrial Area.

The adoption of the 2021 Housing Element Update in May 2021 also amended the General Plan Land Use Diagram to allow for an additional 2,745 dwelling units and an increase in population of 8,773 persons above what was assumed in the General Plan EIR.

### 4.4 ANALYSIS OF CUMULATIVE IMPACTS

Because the General Plan is essentially a set of guidelines for projects that could occur within the timeframe of the General Plan, the Plan itself represents the cumulative development scenario for the reasonably foreseeable future in the City. Therefore, the analysis presented in this Draft SEIR generally represents a cumulative analysis of Elk Grove as a whole over the General Plan planning horizon (updated as noted above) described above. In instances where other cumulative development in neighboring jurisdictions or within the region as a whole could contribute to impacts generated by the proposed General Plan, those impacts, as well as the context, are discussed in the cumulative impact discussion that follows the project-specific impacts in each section.

As indicated above, CEQA requires that an EIR include an assessment of the cumulative impacts that could be associated with project implementation. This assessment involves examining project-related effects on the environment in the context of similar effects that have been caused by past or existing projects, as well as the anticipated effects of future projects. An EIR must discuss the cumulative impacts of a project when its incremental effect will be cumulatively considerable. Although project-related impacts may be individually minor, the cumulative effects of these impacts, in combination with the impacts of other projects, could be significant under CEQA and must be addressed (CEQA Guidelines, Section 15130[a]). Section 15130(a)(3) states that an EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable, and thus not significant, if a project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. Section 15130(b) indicates that the level of detail of the cumulative analysis need not be as great as for the project impact analyses; that it should reflect the severity of the impacts and their likelihood of occurrence; and that it should be focused, practical, and reasonable.

The following sections contain a discussion of the cumulative effects anticipated from implementation of the Project, together with related projects and planned development, for each of the environmental issue areas evaluated in this Draft SEIR. The analysis herein analyzes whether, after implementation of Project-specific mitigation that minimize environmental effects, the residual impacts of the Project would cause a cumulatively significant impact or would contribute considerably to existing or anticipated (without the Project) cumulatively significant effects that were identified in General Plan EIR. Where the Project would so contribute, additional mitigation is recommended where feasible.

#### 4.4.1 Aesthetics

General Plan EIR Impact 5.1.4 evaluated whether implementation of the General Plan, in addition to other reasonably foreseeable projects in the region, would introduce new development into undeveloped agricultural and rural areas that would have a cumulatively considerable contribution to impacts on visual character. The analysis noted that although individual development projects would be responsible for incorporating mitigation to minimize their visual impacts, the net result would be a general conversion of areas with an open, rural character to a more urban and developed character. The change in character associated with that development would be a significant cumulative impact. The General Plan would be a continuation of the overall urbanization of the City and would extend the City's developed area along the urban edge. Therefore, the General Plan's contribution to the change in character is cumulatively considerable and significant and unavoidable.

##### Impact 4-1: Cumulative Visual Resource Impacts

As identified in Impact 3.1-1 of this Draft SEIR, the LEA Community Plan Area is in an area planned for urban development in the General Plan EIR. Development proposed as part of the Project would be similar to development analyzed in the General Plan EIR. Proposed General Plan amendments, specifically in Old Town Policy Area, would result in improved conditions as well as features compatible with the historical and visual character of the City, including Old Town, which is surrounded by existing development. Development proposed in the South and West Study Areas would convert the rural visual character to an urban/suburban developed character as envisioned and analyzed in the General Plan EIR. Land use district designations would be adjusted to increase industrial development in the South and West Study Areas that would be compatible with proposed future development. Proposed changes to Grant Line Road would not impact the overall aesthetic quality or existing visual resources in that area. There is no new significant effect, and the impact is not more severe than the impact identified in the General Plan EIR. Therefore, the Project would not result in a new or greater contribution to cumulative effects to visual resources beyond what was identified in the General Plan EIR. The Project's contribution to the significant cumulative impact would be less than cumulatively considerable, though the impact would remain **cumulatively considerable** and **significant and unavoidable** as identified in the General Plan EIR.

##### Mitigation Measures

No additional mitigation is required beyond compliance with EGMC Chapter 19.12 and Section 23.16.080.

##### Impact 4-2: Cumulative Light and Glare Impacts

General Plan EIR Impact 5.1.5 evaluated whether implementation of the General Plan, in addition to other reasonably foreseeable projects in the region, would introduce new development into undeveloped agricultural and rural areas, increasing nighttime lighting and daytime glare and contributing to regional skyglow. The General Plan EIR concluded that this would be a cumulatively considerable impact. While future development projects in the City would be required to comply with the design guidelines, EGMC Chapter 23.56 for lighting standards, and General Plan policies and standards, the adverse effects of adding new light and glare sources to areas that currently have little to no on-site lighting would substantially contribute to the cumulative impact. These impacts cannot be mitigated to less than significant, and the impact would remain **cumulatively considerable** and **significant and unavoidable** as identified in the General Plan EIR.

As identified in Impact 3.1-2 of this Draft SEIR, the proposed development within the LEA Community Plan Area and the Old Town Policy Area would create nighttime lighting within the City similar to conditions anticipated for the planned urban land uses for the City under the General Plan. Proposed development within the South and West Study Areas would introduce nighttime lighting currently located within a rural setting. However, changes to land use designations and zoning, as a result of the Project, would allow nighttime lighting within the South and West Study Areas that would be consistent with future development and was analyzed as such in the General Plan EIR. Minimal nighttime lighting would result from the improvements proposed to Grant Line Road. Future development of sites identified by the Project would be required to comply with applicable requirements regarding light and glare. There is no new significant effect, and the impact is not more severe than the impact identified in the General Plan EIR. Therefore, the Project would not result in a new or greater contribution to cumulative effects to visual resources beyond what was identified in the General Plan EIR. The Project's contribution to the significant cumulative impact would be less than cumulatively considerable, though the impact would remain **cumulatively considerable and significant and unavoidable** as identified in the General Plan EIR.

### Mitigation Measures

No additional mitigation is required for this impact.

## 4.4.2 Air Quality

The geographic context for cumulative impacts related to air quality is regional for criteria air pollutant and ozone precursors and includes the Sacramento Valley Air Basin and Sacramento County within the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD), and the context is local for toxic air contaminants and odors. Cumulative development in the region will continue to increase the concentration of pollutants from construction activities, traffic, natural gas combustion in buildings, area sources, and stationary sources, but this increase would be partially offset by State and federal policies that set emissions standards for mobile and nonmobile sources.

The City General Plan EIR identified cumulative air quality impacts from buildout of the City and Planning Area as cumulatively considerable and significant and unavoidable (City of Elk Grove 2019).

### Impact 4-3: Cumulative Air Quality Impacts

The General Plan EIR Impact 5.3.7 identified that implementation of the General Plan would exacerbate existing regional problems with criteria air pollutants and ozone precursors that would result in a significant and unavoidable cumulative impact.

As identified in Impacts 3.2-1, through 3.2-3, the Project could result in construction and operational air pollutant emissions in exceedance of development and buildout conditions assumed in the General Plan EIR and its current land use designations. Air quality emissions are expected to be slightly greater than the General Plan because the Project would result in additional residential development and an increase in population. However, all development under the Project would be required to comply with General Plan policies and standards and SMAQMD Basic Construction Emission Control Practices. These additional emissions would still result in greater contribution to cumulative effects to air quality beyond what was identified in the General Plan EIR. As a result, Project's contribution to the significant cumulative impact **would be cumulatively considerable and significant and unavoidable**.

As identified in Impact 3.2-4 the Project would generate mobile source TACs similar to what was anticipated under buildout conditions as described in the General Plan EIR. Transportation impacts associated with the Project are inherently a cumulative impact analysis as it compares the Project to City General Plan VMT standards associated with buildout of the City. Therefore, TAC emissions from the Project **would not be cumulatively considerable**.

## Mitigation Measures

No additional mitigation is available to address this impact beyond implementation of Mitigation Measures 3.2-1 and 3.2-2 and compliance with General Plan policies NR-4-1, MOB-1-1, and Standard MOB-3-2a, Municipal Code Sections 16.07.200 through 16.07.500 and 23.58.120, and SMAQMD Basic Construction Emission Control Practices.

### 4.4.3 Archaeological, Historical, and Tribal Cultural Resources

The cumulative context associated with the Project includes proposed, planned, reasonably foreseeable, and approved projects in the Planning Area and surrounding region. Much development has occurred in the region prior to protections for historic and prehistoric resources. This past urban development in the region has likely resulted in adverse impacts to historical and prehistoric resources, and there is potential for present and future development activities to affect as-yet undiscovered cultural resources, tribal cultural resources, and human remains. Federal, State, and local laws provide protections for historical resources, but protection may not always be feasible. For these reasons, the cumulative effects of future development on cultural resources, tribal cultural resources, and human remains are considered significant.

#### Impact 4-4: Historic Resources, Archaeological Resources, Tribal Cultural Resources, and Human Remains

General Plan EIR Impact 5.5.2 evaluated whether implementation of the General Plan would have the potential to contribute to cumulative impacts on cultural resources, including archaeological and historic resources, as well as interred human remains, and determined that the impact was less than cumulatively considerable. The past, present, and foreseeable projects have affected, or will affect, cultural resources throughout the region despite the federal, State, and local laws designed to protect them. These laws have led to the discovery, recording, preservation, and curation of artifacts and historic structures; however, more have been destroyed in the period before preservation efforts began or are inadvertently destroyed during grading and excavation for construction. For these reasons, cumulative impacts on cultural resources in the region are significant. The analysis noted that implementation of mitigation measures MM 5.5.1a and MM 5.5.1b would ensure that the General Plan's contribution to the cumulative impact would remain **less than cumulatively considerable** as identified in the General Plan EIR.

As identified in Impacts 3.3-1, 3.3-2, 3.3-3, and 3.3-4 of this Draft SEIR, development facilitated by the Project would include development of previously disturbed areas where undiscovered subsurface resources may exist similar in extent to the General Plan because the extent of assumed land disturbance would not change from what was evaluated in the General Plan EIR. While the Project would increase the density of development compared to what was assumed in the General Plan EIR, development facilitated by the Project would be required to comply with adopted mitigation measures requiring a cultural resources study and handling of discoveries. Adherence to applicable codes and regulations as well as implementation of Mitigation Measures MM 5.5.1a and MM 5.5.1b, as revised for the Project, would ensure that the Project's contribution to the cumulative impact are offset. Therefore, the Project would not result in a new or greater contribution to cumulative effects to historic resources, archaeological resources, tribal cultural resources, and human remains beyond what was identified in the General Plan EIR. The Project's contribution to the significant cumulative impact **would remain less than cumulatively considerable** as identified in the General Plan EIR.

## Mitigation Measures

No additional mitigation is required beyond compliance with General Plan policies HR-2-1, adopted Mitigation Measures 5.5-1a and 5.5-1b, compliance with California PRC Section 5097 et seq. and 21081.3, and California Health and Safety Code Section 7050.5.

### 4.4.4 Energy

The geographic area considered for cumulative impacts related to energy use includes the Sacramento Municipal Utility District (SMUD) and Pacific Gas and Electric Company (PG&E) service areas. SMUD and PG&E employ various

programs and mechanisms to support the provision of electricity and natural gas services to new development and recoup costs of new infrastructure. Connection fees are typically charged through standard billing for services.

Several other currently planned and approved projects would also receive electricity service from SMUD and natural gas service from PG&E. These projects would also consume energy related to transportation (i.e., gasoline and diesel consumption for passenger vehicles, trucks, buses, and other vehicles) and construction. These projects would be required to implement energy efficiency measures in accordance with the California Energy Code to reduce energy demand from buildings and would likely implement transportation demand management considerations to reduce vehicle trips and miles traveled, which would reduce fuel consumption. There is no evidence to suggest that implementation of development would result in a significant cumulative energy impact related to the wasteful or inefficient use of energy.

The City General Plan EIR identified less than cumulatively considerable energy impacts from buildout of the City and Planning Area (City of Elk Grove 2019).

### Impact 4-5: Cumulative Impacts Related to Energy

Impact 5.7.3 of the General Plan EIR evaluated whether implementation of the proposed land uses under the General Plan would result in the wasteful, inefficient, or unnecessary consumption of energy. The General Plan EIR concluded that construction-related energy expenditures would be less than significant due to the inherent short-term nature of construction. The General Plan EIR also determined that operational energy usage would be less than significant because future development would comply with applicable future versions of the California Energy Code. Also, the General Plan and Climate Action Plan (CAP) included policies and actions that would reduce energy consumption.

Implementation of the Project would also be subject to the energy efficiency actions of the California Energy Code and CAP and would not result in a substantial increase in energy use or wasteful energy use beyond what was anticipated in the General Plan EIR. As noted in Section 3.4, "Energy," of this Draft SEIR, more densely operated land uses would improve the energy efficiency of the City's residences on a per capita basis as compared to the less dense land uses currently included in the existing General Plan. Therefore, the Project would not result in a new or greater contribution to cumulative effects to energy use beyond what was identified in the General Plan EIR. The Project's contribution to the significant cumulative impact **would remain less than cumulatively considerable** as identified in the General Plan EIR.

### Mitigation Measures

No additional mitigation is required beyond compliance with the City's CAP, including measures BE-1, BE-5, BE-6, BE-7, BE-8, and ACM-5, and Municipal Code Chapter 16.07 and Section 23.58.120.

## 4.4.5 Greenhouse Gas Emissions and Climate Change

Climate change is a global problem. Greenhouse gases (GHGs) are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas most pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately 1 day), GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any GHG molecule depends on multiple variables and cannot be determined with any certainty, it is understood that more carbon dioxide (CO<sub>2</sub>) is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. Of the total annual human-caused CO<sub>2</sub> emissions, approximately 55 percent are estimated to be sequestered through ocean and land uptake every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO<sub>2</sub> emissions remain stored in the atmosphere (IPCC 2013:467).

No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

The City General Plan EIR identified cumulative GHG impacts from buildout of the City and Planning Area as cumulatively considerable and significant and unavoidable by 2050 (City of Elk Grove 2019).

#### **Impact 4-6: Contribute to Cumulative Impacts Related to Greenhouse Gas Emissions and Climate Change**

As described in Section 3.5, “Greenhouse Gas Emissions and Climate Change,” the discussion of GHG emissions associated with the Project is inherently a cumulative impact analysis. As identified in Impact 3.5-1 the Project would result in a substantially more severe impact than what was addressed in the General Plan EIR, and impacts would be significant and unavoidable. GHG emissions from one project cannot, on their own, result in changes in climatic conditions; therefore, the emissions from one project must be considered in the context of their contribution to cumulative global emissions.

Implementation of the Project would result in both direct and indirect GHG emissions. Emission would be reduced during Project compliance with the 2019 CAP and associated General Plan policies consistent with local GHG emissions reduction targets that were developed in consideration of the statewide 2030 reduction target established by SB 32 and the 2017 Scoping Plan. However, since adoption of the General Plan and current CAP the state has adopted more stringent reduction targets for carbon neutrality. The regulatory landscape during the preparation General Plan EIR changed to include reduction of GHG emission 85 percent below 1990 levels by 2045 (AB 1279), and carbon neutrality by 2045 (AB 1279). The City is currently in the process of updating the existing CAP to align with long-term GHG reduction goals set forth by AB 1279. The new CAP intends to include policies that will extend beyond 2030 to 2045.

While the City is in the process of updating their CAP, anticipated to be complete in 2024, to meet the most recent regulatory requirements development facilitated by the Project may conflict with statewide reduction goals for 2045 and 2050 until the CAP is adopted. Therefore, with the change in the regulatory landscape the Project would result in a greater contribution to cumulative effects to GHG emissions and climate change beyond what was identified in the General Plan EIR. Thus, the Project’s contribution to the significant cumulative impact would be **cumulatively considerable and significant and unavoidable**.

#### **Mitigation Measures**

No additional mitigation is available beyond compliance with Measures BE-1, BE-4, BE-5, BE-6, BE-7, BE-8, and ACM-5 from the 2019 CAP and Municipal Code Chapter 16.07 and Section 23.58.120.

### **4.4.6 Noise**

The City General Plan EIR identified traffic noise impacts from buildout of the City and Planning Area as cumulatively considerable and significant and unavoidable (City of Elk Grove 2019).

#### **Impact 4-7: Contribute to Cumulative Traffic Noise**

As shown in Table 3.6-11, implementation of the Project would result in the exceedance of City incremental increase standards as detailed in General Plan Policy N-2-2. The Project would generate a substantial increase in traffic noise levels above those anticipated under the General Plan buildout because the Project would result in new trips on area roadways. The discussion of traffic noise impacts associated with the Project is inherently a cumulative impact analysis as it compares the Project to City General Plan trips associated with buildout of the City and surrounding areas. This could contribute to adverse health effects to humans from sleep disturbance. Therefore, the Project would in a greater contribution to traffic noise impacts beyond what was identified in the General Plan EIR. Therefore, the Project’s contribution to substantial effects related to traffic noise would be **cumulatively considerable and significant and unavoidable**.

#### **Mitigation Measures**

No mitigation is required beyond compliance with General Plan policies N-1-1, N-1-4, N-1-5, and N-2-3, and Mitigation Measure 3.6-2.

### Impact 4-8: Contribute to Cumulative Construction and Development Noise and Vibration

Because construction noise and vibration are localized effects, only construction projects that occur close to one another could combine to result in a cumulative noise or vibration effect. Therefore, noise and vibration from construction projects outside of the City's Planning Area would not contribute to noise and vibration impacts in the City. This would be a less than cumulatively considerable impact. Construction activities in the City associated with future development projects may result in increases in noise levels surrounding individual project sites and may expose noise-sensitive land uses to intermittent vibration and noise levels above the City's applicable standards. As discussed previously, this construction activity would be intermittent and highly localized in nature. This cumulative impact was identified in General Plan EIR Impact 5.10.6. As discussed under Impacts 3.6-1, 3.6-3, and 3.6-4, subsequent development under the Project would in similar construction and operational noise impacts as current land uses under the General Plan and policies and the City's Municipal Code would reduce the severity of noise and vibration impacts. Because General Plan Impacts 5.10.3 and 5.10.4 note that operational noise and vibration, respectively, from buildout of the General Plan would be less than significant, cumulative impacts would also be less than significant. There is no new significant effect, and the impact is not substantially more severe than the impact identified in the EIR. As a result, this impact would be less than cumulatively considerable, though the impact would remain **cumulatively considerable** and **significant and unavoidable** as identified in the General Plan EIR.

#### Mitigation Measures

No additional mitigation is required beyond compliance with General Plan Policy N-1-8, Municipal Code Section 6.32.100, the Elk Grove Construction Specifications Manual, and Mitigation Measure 3.6-1.

## 4.4.7 Population and Housing

The cumulative setting for population growth is the City Planning Area. The Project would amend the General Plan to accommodate anticipated changes in the City. As set forth by state law, the General Plan serves as the primary planning document for the City. Subordinate documents and plans are required to be consistent with the General Plan. The Project would amend the General Plan land use map and policies as described in Chapter 2, "Project Description." The Project has been developed to accommodate growth projections for the City and would assist the region in addressing the State housing crisis under cumulative conditions. The Project would not induce unplanned population growth. Thus, the cumulative impact would not be significant.

### Impact 4-9: Cumulative Population Growth

As identified in Impact 3.7-1 of this Draft SEIR, the Project would increase development capacity in the City through amendments to the land use designations in the City's General Plan. Changes in population anticipated for the Project would result in the need for construction of new housing, infrastructure, and services above what was anticipated in the General Plan to accommodate increases in population. However, development of proposed housing associated with the Project is anticipated to meet population needs and would occur over Project buildout (30 years or more). Future development under the Project would be dispersed throughout the Planning Area to specific growth areas, such as the LEA Community Plan Area. Therefore, the Project would not induce unplanned population growth or residential development throughout the region. The Project would not result in a new or greater contribution to cumulative population growth beyond what was identified in the General Plan EIR. Thus, the Project's contribution to cumulative population growth would remain **less than cumulatively considerable** as identified in the General Plan EIR.

#### Mitigation Measures

No mitigation is required.



## 4.4.8 Public Services and Recreation

### FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES

The cumulative setting for fire and emergency medical services includes all approved, proposed, and reasonably foreseeable development projects in the service area of the Cosumnes Community Services District (CCSD) Fire Department.

#### Impact 4-10: Cumulative Impacts to Fire Protection and Emergency Medical Services

General Plan EIR Impact 5.11.1.2 evaluated whether Implementation of the General Plan, in combination with other development within the CCSD's service area, would increase demand for fire protection and emergency medical services. The analysis noted that funding from property taxes, development impact fees, and other sources of funding would provide sufficient resources to expand the department's staff, equipment, and facilities to accommodate future growth within the CCSD service area. The analysis concluded that the impact would not be cumulatively significant.

As identified in Impact 3.8-1 of this Draft SEIR, compliance with General Plan policies would ensure new fire station siting and resources are available and that required environmental review would be conducted as specific fire protection facilities are proposed. Development facilitated by the Project would be required to pay development fees and property taxes that would fund fire protection services. Impacts associated with the construction of needed fire protection facilities would not exceed construction impacts disclosed in the technical sections of the General Plan EIR. Therefore, the Project would not result in a new or greater contribution to cumulative effects related to fire protection and emergency medical services beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to fire protection and emergency medical services would remain **less than cumulatively considerable** as identified in the General Plan EIR.

#### Mitigation Measures

No additional mitigation is required beyond compliance with EGMC Chapter 16.85 and 17.04 and General Plan policies ER-4-1, ER-4-2, SAF-1-3, and SAF-1-4.

### LAW ENFORCEMENT

The cumulative setting for law enforcement services includes all approved, proposed, and reasonably foreseeable development projects located in the LEA Community Plan Area and in Old Town Elk Grove, which are served by the Elk Grove Police Department (EGPD). The South and West Study Areas are located outside of the EGPD's existing service area.

#### Impact 4-11: Cumulative Law Enforcement Impacts

General Plan EIR Impact 5.11.2.2 evaluated whether Implementation of the General Plan, in combination with other development would increase demand for law enforcement services. The analysis noted that because additional police services to accommodate development can be accomplished through additional personnel and equipment, the impact would not be cumulatively significant.

As identified in Impact 3.8-2 of this Draft SEIR, the addition of new officers to serve future development would not require a new or expanded police facility because EGPD operations would continue within the centralized facility at the City Hall complex. The City collects fees that provides fair share funding towards the construction of new police facilities and acquires new (not replacement) police equipment to serve growth. Although the South and West Study Areas are located outside of the EGPD's existing service, these study areas would be subject to General Plan policies and mitigation measures identified in the General Plan EIR, which would subsequently reduce physical environmental effects and provide additional police protection services as the study areas develop. Therefore, the Project would not result in a new or greater contribution to cumulative effects related to law enforcement beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to law enforcement would remain **less than cumulatively considerable** as identified in the General Plan EIR.

## Mitigation Measures

No additional mitigation is required beyond compliance with General Plan Policy SAF-1-1.

## PUBLIC SCHOOLS

The cumulative setting for public schools is the service area of the Elk Grove Unified School District (EGUSD).

### Impact 4-12: Cumulative Public School Impacts

General Plan EIR Impact 5.11.3.2 evaluated whether implementation of the General Plan, in combination with other development in the EGUSD service area, would result in the increase of school-aged children, which would require the construction of new public school facilities, which could have impacts on the environment. The analysis noted that given EGUSD's current shortage of classroom space and the potential for additional development to further increase demand for school space, and thus school construction, the cumulative impact would be significant.

As identified in Impact 3.8-3 of this Draft SEIR, implementation of the Project could result in an additional 763 students to be enrolled at EGUSD schools, which could require additional school facility needs beyond current General Plan buildout. The analysis noted that no additional feasible mitigation is available beyond compliance with existing laws and General Plan policies. While the EGUSD could and should implement mitigation measures to reduce physical environmental effects of new school development, the EGUSD is not subject to mitigation adopted by the City. No enforceable measures are available. Therefore, the Project's contribution would remain **cumulatively considerable and significant and unavoidable** as determined in the General Plan EIR.

## Mitigation Measures

No new mitigation is available to reduce Project contributions.

### Impact 4-13: Cumulative Impacts to Parks and Recreation Facilities

General Plan EIR Impact 5.11.4.2 evaluated whether the General Plan would result in a cumulative increase in demand for parkland and recreational facilities, the construction of which could impact the physical environment. The analysis concluded that the is impact would not be cumulatively significant.

As identified in Impact 3.8-4 of this Draft SEIR, the City and the CCSD have entered into a memorandum of understanding (MOU) regarding delivery of some parks and recreation facilities within the City's existing boundaries. Development projects outside of the MOU areas that include the construction of recreation facilities would be subject to General Plan policies and mitigation measures identified in the General Plan EIR to reduce physical environmental effects. The CCSD would be responsible for the construction of facilities in the MOU areas and would be required to comply with mitigation monitoring and reporting program (MMRP) from the relevant project-level CEQA document in which the park facilities would be located. Therefore, the construction of park facilities would be subject to policies, standards, and mitigation measures from the General Plan and this SEIR, or the mitigation identified in project specific MMRPs. The Project would not result in a new or greater contribution to cumulative effects related to parks and recreation facilities beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to parks and recreational facilities would remain **less than cumulatively considerable** as identified in the General Plan EIR.

## Mitigation Measures

No additional mitigation is required beyond compliance with General Plan policies PT-1-3, PT-1-5, PT-1-6, and PT-1-9, City and CCSD MOU, and EGMC Chapter 22.40.

## 4.4.9 Transportation

The geographic context for cumulative impacts related to transportation is the City and the Planning Area. While the City General Plan EIR identified no cumulatively considerable impacts related to transit, bicycle, pedestrian, and traffic safety, vehicle miles traveled (VMT) impacts from buildout of the City and Planning Area were identified cumulatively

considerable and significant and unavoidable because the effectiveness of VMT reductions strategies is not certain. In addition, disruptive changes occurring in transportation, such as transportation network companies (i.e., Uber, Lyft), autonomous vehicles, Mobility as a Service (i.e., ride-sharing, carsharing), Amazon (increased deliveries), may increase VMT (City of Elk Grove 2019:3.15-60).

#### **Impact 4-14: Cumulative Impacts on Vehicle Miles Traveled**

The discussion of VMT impacts associated with the Project in Impact 3.9-1 of this Draft SEIR is inherently a cumulative impact analysis as it compares the Project to City General Plan VMT standards associated with buildout of the City. As detailed under Impact 3.9-1 of this Draft SEIR, the addition of Project-generated total daily VMT within the City would increase and would exceed the established Citywide limit of 6,367,833 VMT similar what was identified in the General Plan EIR. Therefore, the Project would not result in a substantial contribution to cumulative VMT impacts beyond what was identified in the General Plan EIR and would continue to be **cumulatively considerable and significant and unavoidable** as identified in the General Plan EIR.

#### **Mitigation Measures**

Implementation of Mitigation Measure 3.13-1 would reduce Project VMT.

#### **Impact 4-15: Cumulative Impacts on Transit, Bicycle, and Pedestrian Facilities**

General Plan EIR Impact 5.13.7 identified that implementation of the General Plan would not result in conflicts with plans, policies, or programs for transit, bicycle, and pedestrian facilities. As described in Impact 3.14-2 of this Draft SEIR, implementation of the Project would be subject to and implement General Plan policies applicable to transit, bicycle, and pedestrian facilities and service. The intent of development within the LEA Community Plan Area would be to provide a walkable urban area in the City with a variety of mobility options and neighborhood streets and the Grant Line Road Precise Plan would include a multi-use path for alternative forms of transportation. Additionally, subsequent development projects under the Project would be subject to all applicable City guidelines, standards, and specifications related to transit, bicycle, or pedestrian facilities. Therefore, the Project would not result in a new or greater contribution to cumulative effects related to transit, bicycle, and pedestrian facilities beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to transit, bicycle, and pedestrian facilities would remain **less than cumulatively considerable** as identified in the General Plan EIR.

#### **Mitigation Measures**

No additional mitigation is required beyond compliance with the *Bicycle, Pedestrian, and Trails Master Plan* and General Plan Policies MOB-1-2, MOB-3-1, MOB-3-7, MOB-3-8, MOB-5-4, MOB-5-6, MOB-5-7, and H-1-3.

#### **Impact 4-16: Cumulative Hazards Due to a Design Feature or Incompatible Uses**

No significant design hazard impacts were identified in the General Plan EIR. Implementation of the Project would be subject to, and constructed in accordance with, applicable roadway design and safety guidelines and General Plan policies. Therefore, the Project would not result in a new or greater contribution to cumulative effects related to hazards due to a design feature or incompatible uses beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to design features or incompatible uses would remain **less than cumulatively considerable** as identified in the General Plan EIR.

#### **Mitigation Measures**

No additional mitigation is required beyond General Plan Policy MOB-3-10.

## 4.4.10 Utilities and Service Systems

### WATER SUPPLY

The cumulative setting for water supply is the boundary of the SCWA, EGWD, and the area south of Kammerer Road in the West and South Study Areas. The boundary of the SCWA includes the entire City as well as portions of the cities of Sacramento and Rancho Cordova. EGWD services an area of approximately 13 square miles in the City limits east of SR 99.

#### Impact 4-17: Cumulative Water Service Impacts

General Plan EIR Impact 5.12.1.3 evaluated whether Implementation of the General Plan, in combination with other development would contribute to cumulative demand for domestic water supply. While the demand associated with the General Plan could be accommodated in the short term by the surplus identified by the SCWA, in the long term, General Plan demand would be greater than this surplus. Therefore, this impact would be cumulatively significant and the General Plan's contribution would be cumulatively considerable.

As identified in Impact 3.10-1 of this Draft SEIR, the development facilitated by the Project would result in an increase in water demand as compared to the General Plan. Similar to the General Plan the Project would result in water services south of the City in the South and West Study Areas. However, the increase in water demand in the Planning Area would be minor compared with existing and projected demand, supply, and surplus. The additional water demand from implementation of the Project would not result in a new or substantially more severe impacts regarding water supply than was addressed in the General Plan EIR. Therefore, the Project would not result in a new or greater contribution to cumulative effects related to water service beyond what was identified in the General Plan EIR. Water supply continue to be **cumulatively considerable and significant and unavoidable** as identified in the General Plan EIR.

#### Mitigation Measures

No additional mitigation is required beyond compliance General Plan Policy INF-1-1 and General Plan Mitigation Measure 5.12.1.1, which would address potential effects from water supply from SCWA outside the City limits.

### WASTEWATER

The cumulative setting for wastewater impacts would be the Regional San service area and the area south of Kammerer Road in the West and South Study Areas. Regional San service area includes portions of unincorporated Sacramento County as well as the Cities of Citrus Heights, Elk Grove, Folsom, Rancho Cordova, Sacramento, and West Sacramento and the communities of Courtland and Walnut Grove.

#### Impact 4-18: Cumulative Wastewater Impacts

General Plan EIR Impact 5.12.2.3 evaluated whether Implementation of the General Plan, in combination with other development in the Regional San service area, would generate new wastewater flows requiring conveyance and treatment. Future development in the Regional San service area would result in an incremental cumulative demand for wastewater and related services, and the construction of new and expanded wastewater facilities would provide additional capacity to accommodate current and future demand. The construction of these facilities would result in associated environmental impacts. This impact would be cumulatively significant.

As identified in Impact 3.10-2 of this Draft SEIR, the proposed development under the Project could generate approximately 3.12 million gallons per day (mgd) of wastewater. The Sacramento Regional Wastewater Treatment Plant (SRWTP) has been master planned to accommodate additional growth, including development that is anticipated in the South and West Study Areas. The Project would not result in a new or greater contribution to cumulative effects related to wastewater beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to wastewater would be less than cumulatively considerable, though the impact would remain **cumulatively considerable and significant** as identified in the General Plan EIR.

## Mitigation Measures

No mitigation is required.

## SOLID WASTE

The cumulative setting for solid waste impacts is the service areas of the landfills that serve the Planning Area.

### Impact 4-19: Cumulative Solid Waste Impacts

General Plan EIR Impact 5.12.3.2 evaluated whether implementation of the General Plan, in combination with other development in other jurisdictions that contribute to regional landfills, would generate solid waste, thereby increasing demand for hauling and disposal services. The analysis concluded that the cumulative impact would not be significant and the General Plan's contribution would not be cumulatively considerable.

As identified in Impact 3.10-3 of this Draft SEIR, proposed development as a result of the Project could result in increased solid waste generation associated with proposed development. The analysis noted that there is substantial remaining capacity in the landfills serving local waste haulers, with an average remaining capacity of more than 70 percent. Additionally, future development associated with the Project would be required to comply with applicable solid waste regulations, including the City's Space Allocation and Enclosure Design Guidelines for Trash and Recycling. Therefore, the Project would not result in a new or greater contribution to cumulative effects related to solid waste beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to solid waste would remain **less than cumulatively considerable** as identified in the General Plan EIR.

## Mitigation Measures

No additional mitigation is required beyond compliance with the City's existing recycling programs and associated regulations, as well as Municipal Code Section 30.70.030(C).

## GROUNDWATER

### Impact 4-20: Cumulative Groundwater Use

General Plan EIR Impact 5.9.7 evaluated whether development of the Planning Area, in combination with other development in the Central Basin, would increase demand for groundwater and could potentially interfere with recharge of the aquifer. The analysis noted that implementation of the General Plan would increase demand for water resources, a portion or all of which would be met with groundwater, at the discretion of the Sacramento County Water Agency (SCWA). Because additional groundwater could be needed to serve the Study Areas, the impact would be cumulatively significant and unavoidable.

As discussed in Impact 3.10-4 of this Draft SEIR, the additional water demand from implementation of the Project additional water demand is minor compared with existing and projected water demand and is not expected to result in the exceedance of the long-term average annual sustainable yield. The Project would also be subject applicable management actions to meet the groundwater sustainability goal of the South American Subbasin Groundwater Sustainability Plan. Therefore, the Project would not result in a new or greater contribution to cumulative effects related to groundwater beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to groundwater would be less than cumulatively considerable, though the impact would remain **cumulatively considerable** and **significant and unavoidable** as identified in the General Plan EIR.

## Mitigation Measures

No mitigation is required.

This page intentionally left blank.