

## 4 CUMULATIVE IMPACTS

### 4.1 INTRODUCTION TO THE CUMULATIVE ANALYSIS

This Draft SEIR provides an analysis of cumulative impacts of the proposed City of Elk Grove Housing Element and Safety Element Update (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 Housing Element and Safety Element Update 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. 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 City is currently considering annexation of an approximately 390-acre site area on the southeast side of Grant Line Road at the intersection with Waterman Road. Proposed land uses in this area include industrial, commercial, mixed use, and parks and open space.

### 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 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 Housing Element and Safety Element Update, 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.

## 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, housing sites and emergency access improvements are located in areas planned for urban development surrounded primarily by commercial, office, residential, school, and park uses, or a combination of these uses. While three candidate housing sites (C-20, C-23, and C-25) are located in agricultural residential zoning, they are located adjacent to parcels zoned for RD-5 (low density residential), RD-20 (multiple family residential), and shopping center. 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**.

### Mitigation Measures

No additional mitigation is required beyond compliance with Municipal Code 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, Municipal Code 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 be cumulatively considerable and significant and unavoidable.

As identified in Impact 3.1-2 of this Draft SEIR, the proposed housing sites and emergency access improvements would create nighttime lighting within the City similar to conditions anticipated for the planned urban land uses for the City under the General Plan. While three candidate housing sites (C-20, C-23, and C-25) are located in agricultural residential zoning, they are located adjacent to parcels zoned for RD-5 (low density residential), RD-20 (multiple family residential), and shopping center. 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**.

### Mitigation Measures

No additional mitigation is required beyond Municipal Code Chapter 23.56 and Section 23.16.080.

## 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 3.2-4, the Housing Element and Safety Element Update could result in construction and operational air pollutant and TAC emissions similar to development and buildout conditions assumed in the General Plan EIR and its current land use designations. Emissions are expected to be similar because assumptions and buildout conditions would be similar, and all development would be required to comply with General Plan policies and standards and SMAQMD Basic Construction Emission Control Practices. These additional emissions would not result in a new or greater contribution to cumulative effects to air quality beyond what was identified in the General Plan EIR. The Project's contribution to the significant cumulative impact **would be less than cumulatively considerable**.

### Mitigation Measures

No additional mitigation is required beyond 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.

## 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 it 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. 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 be less than cumulatively considerable.

As identified in Impacts 3.3-1, 3.3-2, 3.3-3, and 3.3-4 of this Draft SEIR, the proposed housing sites and emergency access improvements under the Housing Element and Safety Element Update 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 may introduce more intensive development of sites than assumed in the General Plan EIR, development of all sites 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 adopted Mitigation Measures MM 5.5.1a and MM 5.5.1b 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 be less than cumulatively considerable**.

### 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.

## Biological Resources

The habitat within the region is highly developed with large areas of natural or agricultural lands. Developed areas have encroached into some natural habitat, particularly annual grasslands, and aquatic features. The natural communities and some agricultural communities provide suitable habitat for special-status species, including Sanford's arrowhead, valley elderberry hawk, burrowing owl, and tricolored blackbird. There is a higher level of protection for special-status species due to urban encroachment and development significantly impacting the species and their habitat. Because there has already been a large decline in available habitat for special-status species, there has been a significant cumulative impact on biological resources and the habitat.

### Impact 4-5: Cumulative Impacts to Biological Resources

General Plan EIR Impact 5.4.7 evaluated whether future development in the Planning Area, when considered together with other past, existing, and planned future projects, could result in a significant cumulative impact on biological resources in the region. The General Plan's contribution to this impact would be cumulatively considerable. As development occurs in the Planning Area and vicinity, habitat for biological resources will continue to be converted to urban development. More mobile species may survive this development by moving to other areas, but less mobile species would not. Natural habitat conversion will reduce the availability of habitat for special-status species. The natural areas remaining will likely be isolated and not support biological resources beyond their carrying capacity identified in the General Plan EIR. Buildout of the General Plan would result in the increase of urban buildout and contribute to the loss of habitat for special-status species, as well as common species. Therefore, the General Plan's contribution to the cumulative loss of habitat would be cumulatively considerable.

As discussed in Impacts 3.4-1 through 3.4-4 of this Draft EIR, implementation of the Project would include ground disturbance that would affect biological resources 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. For areas that would be rezoned to allow more intensive housing and may result in the construction of emergency access improvements, impacts would be similar to those evaluated in the General Plan EIR due to the relatively high level of disturbance from surrounding urban and rural development. For example, while housing site C-25 is zoned AR-5 (Agricultural Residential) and is within the ER (Estate Residential) land use designation, it is adjacent to sites zoned for commercial uses that have been developed and are currently used for commercial purposes. Compliance with existing regulations and General Plan policies and standards would ensure that the Project's contribution to the cumulative impacts are addressed in a manner consistent with the General Plan EIR analysis. Therefore, the Project would not result in a new

or greater contribution to cumulative effects to biological 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**.

### Mitigation Measures

No additional mitigation is required beyond compliance with City General Plan policies NR-1-2, NR-1-4, and standards NR-1.2b and NR-1.2c, City Municipal Code Chapter 16.130 and 19.13, and through permitting by CDFW and USFWS.

## 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 identified in Table 4-2 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 4-6: 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 CAP included policies and actions that would reduce energy consumption.

Implementation of the Housing Element and Safety Element 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 3.5, "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 Housing Element and 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 be less than cumulatively considerable**.

### 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.

## Geology and Soils

The impacts related to geology and soils are not cumulative in nature. For example, impacts related to seismic shaking, erosion and loss of topsoil, and expansive soils relate only to project structures or the individual project site. However, paleontological resources can be thought of as areawide resources, and their loss at multiple sites may result in a cumulative impact. The geographic setting for cumulative effects on paleontological resources is the flood terraces of the Sacramento River and its tributaries within the Riverbank and Modesto geologic formations. These formations consist of older quaternary alluvium and have produced significant paleontological finds. Although excavation and development have occurred across this formation, paleontological resources have been protected and preserved when found, and no existing adverse cumulative condition exists.

The City General Plan EIR identified cumulative paleontological resource impacts from buildout of the City and planning area as less than cumulatively considerable through the implementation of adopted mitigation measures (City of Elk Grove 2019).

### Impact 4-7: Contribute to Cumulative Disturbance to or Loss of Paleontological Resources

General Plan EIR Impact 5.6.7 identified that implementation of the General Plan would not contribute to cumulative impacts to paleontological resources through the implementation of Mitigation Measure 5.6.5. Grading and excavation activities resulting from implementation of the Housing Element and Safety Element Update would be required to comply with this mitigation measure and would not result in a new or substantially more severe impact to paleontological resources that what was addressed in the General Plan EIR as all future development would be subject to adopted General Plan EIR Mitigation Measure 5.6.5. Therefore, the Project would not result in a new or greater contribution to cumulative effects to paleontological 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**.

### Mitigation Measures

No additional mitigation is required beyond compliance with adopted General Plan EIR Mitigation Measure 5.6.5.

## 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 4-8: Contribute to Cumulative Impacts Related to Greenhouse Gas Emissions and Climate Change

As described in Section 3.7, "Greenhouse Gas Emissions and Climate Change," the discussion of GHG emissions associated with the Project in Impact 3.7-1 is inherently a cumulative impact analysis. 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. Although implementation of the Housing Element and Safety Element would result in both direct and indirect GHG emissions, the 2019 CAP and associated General Plan policies would reduce emissions 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. Therefore, the Project would not result in a new or greater contribution to cumulative effects to GHG emissions and climate change beyond what was identified in the General Plan EIR. The Project's contribution to the significant cumulative impact **would be less than cumulatively considerable**.

### Mitigation Measures

No additional mitigation is required 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.

## Hazardous Materials and Public Health

In the cumulative condition, development of the City may result in increased use of potentially hazardous materials. Facilities that use hazardous materials would be required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases. The storage, use, disposal, and transport of hazardous materials are extensively regulated by various federal, State, and local agencies; therefore, construction companies and businesses that would handle any hazardous substances would be required by law to implement and comply with these hazardous materials regulations. Development of the City would increase the extent of population that would need to be accommodated for emergency response and evacuation.

Hazardous materials contamination impacts, including remediation activities to protect public health and safety, are site-specific and do not combine with the effects on other sites to result in a cumulative effect. No further analysis of this impact is necessary.

### Impact 4-9: Cumulative Transport, Use, Storage, and Disposal of Hazardous Materials

General Plan EIR Impact 5.8.6 evaluated the General Plan's impacts related to cumulative transport, use, storage, and disposal of hazardous materials. Future development under the General Plan would be required to comply with applicable hazardous materials management laws and regulations adopted at the federal, State, and local level including but not limited to Titles 10, 29, 40, and 49 of the CFR, which regulate the handling (including transportation), storage, and disposal of hazardous materials and wastes; and Titles 8, 22, and 26 of the CCR, which address the handling, storage, disposal and management (including workplace safety) of hazardous materials and wastes. Compliance with these regulations would be monitored during construction and occupancy of new projects through a variety of agencies. Therefore, implementation of the General Plan would not combine with other related projects to create cumulative impacts related to the transport, use, storage, and disposal of hazardous materials.

As identified in Impacts 3.8-1 and 3.8-2 of this Draft SEIR, future projects under the Housing Element and Safety Element would be required to comply with applicable federal, State, and local regulations and policies regarding hazardous materials and waste. There is no new significant effect, and the impact is not more severe than the cumulative impact identified in the General Plan EIR. Therefore, the Project would not result in a new or greater contribution to cumulative effects related to hazardous materials beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to hazardous materials **would be less than cumulatively considerable**.

### Mitigation Measures

No additional mitigation is required beyond compliance with General Plan Policies ER-1-1 through ER-1-4 and State regulations including CCR Title 19, Division 2, Chapter 4.5.



#### **Impact 4-10: Contribute to Cumulative Impacts Related to Impairment of or Physical Interference with an Adopted Emergency Response or Emergency Evacuation Plan.**

General Plan EIR Impact 5.8.7 evaluated whether cumulative development would result in construction activities that could temporarily affect roadways and increase the number of people who may need to evacuate the region in the event of an emergency. Similar to the General Plan, these activities could result in the need for lane closures or narrowing. Such impacts tend to be localized, would be short-term, and would not combine to produce a significant cumulative effect. Construction traffic control plans are typically used to mitigate potential effects. Thus, the cumulative impact would not be significant.

As identified in Impact 3.8-4 of this Draft SEIR, future development under the Housing Element Update would be located on existing parcels within the City and is not anticipated to encroach on or obstruct any existing evacuation routes. All new development would be required to comply with existing fire codes and ordinance regarding emergency access. As noted in Impact 3.8-4, the Housing Element and Safety Element Update would not propose any policies or programs that would conflict with the City's Emergency Operations Plan (EOP) or Sacramento County's Local Hazard Mitigation Plan (LHMP). Implementation of potential emergency access and evacuation improvements under the Safety Element Update would provide beneficial impacts. Therefore, the Project would not result in a new or greater contribution to cumulative effects related to hazardous materials beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to hazardous materials **would be less than cumulatively considerable.**

#### **Mitigation Measures**

No additional mitigation is required beyond compliance with Sacramento County LHMP and the City's EOP.

## **Hydrology and Water Quality**

The cumulative setting for drainage and water quality impacts in the Sacramento River watershed, which receives drainage from the portions of the Morrison Creek Stream Group, and the American River, which flows through El Dorado and Sacramento Counties, as well as the Cosumnes River watershed in El Dorado County. The cumulative setting for groundwater impacts is the area that pumps groundwater from the Central Basin portion of the South American Subbasin, which includes the Cities of Elk Grove, Sacramento, and Folsom as well as areas of unincorporated Sacramento County.

#### **Impact 4-11: Cumulative Drainage and Water Quality Impacts**

General Plan EIR Impact 5.9.5 evaluated whether development of the Planning Area, in combination with cumulative development in the Sacramento River and Cosumnes River watersheds, would increase the potential for pollutants to be discharged to surface water and groundwater. Construction activities in the creek watersheds that drain to the Cosumnes and American Rivers could cumulatively affect water quality if measures are not implemented to control the type and amount of pollutants potentially carried to waterways. Post-construction cumulative water quality effects could be expected from continued development in the creek subwatersheds that drain to the Sacramento and Cosumnes Rivers. Cumulative development would result in increased impervious surfaces that increase the rate and amount of runoff which, in turn, could increase urban contaminant loading, which could adversely affect existing water quality. Because all development in the Sacramento River watershed would be required to apply for coverage and comply with the various federal, State, and local permits, the cumulative impact would not be significant.

As identified in Impacts 3.9-1 and 3.9-2 of this Draft SEIR, subsequent projects under the Housing Element and Safety Element would be required to adhere to all applicable requirements, including Chapter 16.44 of the Elk Grove Municipal Code, the State's Construction General NPDES permit, the City's MS4 permit, General Plan, and Municipal Code. Adherence to these requirements would ensure that future development activities would not increase site runoff volumes or degrade water quality, thereby preventing a cumulative effect. Therefore, the Project would not result in a new or greater contribution to cumulative effects related to water quality beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to water quality **would be less than cumulatively considerable.**

## Mitigation Measures

No additional mitigation is required beyond compliance with the City's MS4 permit, General Plan Policies NR-3-2, NR-3-3, and LU-5-12, and Municipal Code Chapter 15.12 and 16.44, and the Construction General NPDES Permit.

### Impact 4-12: Cumulative Flood Hazard Impacts

General Plan EIR Impact 5.9.6 evaluated whether development of the Planning Area, in combination with cumulative development in the Sacramento River watershed, including its American River and Cosumnes River tributaries, could be located in areas subject to 100-year and/or 200-year flood hazard. Areas of 100-year and 200-year flood hazard risk are present throughout Sacramento County. Cumulative development could result in placement of housing or structures in floodplains. Cumulative urbanization in the region would continue to increase drainage flows through the creation of impervious surfaces, including roads, parking lots, and rooftops, which could generate stormwater runoff. Increased drainage flows could exceed existing and/or planned drainage or stormwater management facilities, causing new flooding, or exacerbating existing flooding. The General Plan EIR concluded that this would be a significant cumulative impact.

As identified in Impacts 3.9-4 and 3.9-5 of this Draft SEIR, subsequent projects under the Housing Element and Safety Element would be required to comply with the City's Storm Drainage Master Plan (SDMP), the City's NPDES MS4 requirements, and the City's Municipal Code. Compliance with these requirements ensures that future projects would not create flood hazards. Therefore, the Project would not result in a new or greater contribution to cumulative effects related to flood hazards beyond what was identified in the General Plan EIR. Thus, the Project's contribution to substantial effects related to flood hazards **would be less than cumulatively considerable**.

## Mitigation Measures

No additional mitigation is required beyond the City's SDMP, the City's NPDES MS4 requirements, and Municipal Code Chapter 16.44 and Section 23.42.040.

### Impact 4-13: 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 3.9-3 of this Draft SEIR, the additional water demand from implementation of the Project would not be likely to require SCWA to seek additional groundwater supply to meet its demands. 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**.

## Mitigation Measures

No mitigation is required.

## Land Use, Planning, Population, and Housing

The cumulative setting for population growth is the City. SACOG is the lead agency for developing the RHNA for the Sacramento region, which includes Sacramento County and the City. The Project would ensure that the City has adequate sites to accommodate the RHNA and also provides additional sites to ensure that over the long-term, beyond the 2021-2029 RHNA period, that the City continues to have adequate sites to accommodate a range of housing needs. The Project has been developed to accommodate the growth projections in the RHNA and is consistent with long-term regional growth projections. Therefore, implementation of the Housing Element would

assist the City in accommodating its fair-share of growth and housing needs under cumulative conditions. The Project would not induce population growth. Thus, the cumulative impact would not be significant.

The cumulative setting for land use and planning impacts includes the City's Planning Area. Cumulative land use and planning impacts, such as the potential for conflicts with adjacent land uses and consistency with adopted plans and regulations, are typically site- and project-specific. Subsequent projects allowed by the General Plan may result in site-specific land use conflicts; however, these effects are not anticipated to be cumulatively significant.

#### **Impact 4-14: Cumulative Population Growth**

As identified in Impact 3.10-1 of this Draft SEIR, the Housing Element and Safety Element Update would not induce substantial population growth above that which is already anticipated for the City and region. Therefore, 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 be less than cumulatively considerable**.

#### **Mitigation Measures**

No mitigation is required.

#### **Impact 4-15: Cumulative Land Use Impacts**

As set forth by state law, the General Plan serves as the primary planning document for the City and the Housing Element is a component of the General Plan. Subordinate documents and plans are required to be consistent with the General Plan. The Project would update the Housing Element of the General Plan, amend the General Plan land use map, revise the Zoning Code, and revise the Safety Element, as described in Chapter 2, "Project Description." The Housing Element identifies the City's approach to accommodating its housing needs. The majority of the City's housing needs would be accommodated on sites currently designated for housing development; however, there is a shortfall of sites to accommodate the City's fair share RHNA of very low and low income housing as described in Chapter 2, "Project Description,"

As identified in Impact 3.10-2 of this Draft SEIR, the Project would not result in conflicts with applicable land use plans, policies, or regulations. Therefore, the Project would not result in a new or greater contribution to cumulative land use impacts beyond what was identified in the General Plan EIR. Thus, the Project's contribution to cumulative land use impacts **would be less than cumulatively considerable**.

#### **Mitigation Measures**

No mitigation is required.

## **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 4-16: Contribute to Cumulative Traffic Noise**

As shown in Table 3.11-11, additional housing from implementation of Housing Element Update would not generate a substantial increase in traffic noise levels above those anticipated under the General Plan buildout because traffic noise level increases (less than 1 dB increase) would not be perceptible to the human ear (see Section 3.11, "Noise and Vibration"). There is no new significant effect, and the impact is not substantially more severe than the impact identified in the EIR. Thus, the Project's contribution to cumulative traffic noise impacts **would be less than cumulatively considerable**.

#### **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.

### Impact 4-17: 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 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 3.11-1, 3.11-3, and 3.11-4, several 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**.

#### Mitigation Measures

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

## 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 4-18: 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 3.12-1 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. 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 be less than cumulatively considerable**.

#### Mitigation Measures

No additional mitigation is required beyond compliance with Municipal Code 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 in the Planning Area, which is the area served by the Elk Grove Police Department (EGPD).

### Impact 4-19: 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 3.12-2 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. 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 be less than cumulatively considerable**.

#### 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 4-20: 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 3.12-3 of this Draft SEIR, implementation of the Project would result in a substantial increase in student generation that 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 measures to reduce physical environmental effects of school development, the EGUSD is not subject to mitigation adopted by the City. No enforceable measures are available. Therefore, the Project's contribution **would be 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 4-21: 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 3.12-4 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 be less than cumulatively considerable**.

## 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 City Municipal Code Chapter 22.40.

## 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 travel 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 4-22: Cumulative Impacts on Vehicle Miles Traveled

The discussion of vehicle miles traveled (VMT) impacts associated with the Project for Impact 3.13-1 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 3.13-1, the addition of Project-generated total daily VMT within the City would result in an exceedance of the established Citywide limit of 6,367,833 VMT as well as exceed VMT by land use designation for some proposed housing sites that would be rezoned. Therefore, the Project's contribution to substantial effects related to VMT **would be cumulatively considerable and significant and unavoidable**.

## Mitigation Measures

Implementation of Mitigation Measure 3.13-1 would reduce Project VMT. However, the Project's contribution would remain **cumulatively considerable and significant and unavoidable**.

### Impact 4-23: 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. 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 be less than cumulatively considerable**.

## 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 4-24: 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 Housing Element and Safety Element Update 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 be less than cumulatively considerable**.

## Mitigation Measures

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

# Utilities and Service Systems

## WATER SUPPLY

The cumulative setting for water supply is the boundary of the SCWA, which includes the entire City as well as portions of the cities of Sacramento and Rancho Cordova.

### Impact 4-25: 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 3.14-1 of this Draft SEIR, the proposed housing sites under the Housing Element Update would result in an increase in water demand but the increase is 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. Thus, the Project's contribution to substantial effects related to water service **would be less than cumulatively considerable**.

### Mitigation Measures

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

## WASTEWATER

The cumulative setting for wastewater impacts would be the Regional San service area, which 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 4-26: 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 3.14-2 of this Draft SEIR, the proposed housing sites under the Housing Element Update could generate approximately 0.04 million gallons per day (mgd) of wastewater beyond the amount anticipated under the adopted General Plan. This represents an 0.2 percent increase over the amount of wastewater assumed in the General Plan EIR. Because the Sacramento Regional Wastewater Treatment Plant (SRWTP) has been master planned to accommodate additional growth, 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**.

### Mitigation Measures

No mitigation is required.

## SOLID WASTE

The cumulative setting for solid waste impacts the service areas of the landfills that serve the City.

### Impact 4-27: 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 3.14-3 of this Draft SEIR, proposed housing sites under the Housing Element Update could result in increased solid waste generation associated with proposed housing sites that would require redesignation of General Plan land uses. 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. Also, all future projects associated with the Housing Element and Safety Element Update would be required to comply with all 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 be less than cumulatively considerable.**

### Mitigation Measures

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