

4 CUMULATIVE IMPACTS

This section provides an analysis of the cumulative impacts of the proposed Project considered together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the CEQA Guidelines.

Cumulative impacts are defined in 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” (CEQA Guidelines Section 15355[b]).

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

The 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.

4.1 APPROACH

The CEQA Guidelines Section 15130(b)(1) identifies 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. For this SEIR, both the plan and the list approach have been combined.

As with the original 2019 SOIA EIR, past, present, and probable future plans and projects that are considered in this cumulative analysis are described by the Sacramento Area Council of Governments (SACOG) in the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The land use scenario included in the MTP/SCA for the Sacramento region includes anticipated past development and future development through 2040 (SACOG 2020). SACOG estimates that Elk Grove will grow by a total of 12,860 housing units between the baseline year for the MTP/SCS (2016) and 2040. This is a 24-percent increase. The MTP/SCS identifies a 35-percent increase in employment in Elk Grove by 2040 (15,750 new jobs). In addition, the City separately commissioned a study of employment trends in Elk Grove (City of Elk Grove 2016). According to this study, in 2013, Elk Grove had approximately 44,806 jobs, which would be a jobs-to-housing ratio of approximately 0.86, using California Department of Finance (DOF) estimates of dwelling units in 2013 (DOF 2017).

Because the Project site is located in unincorporated Sacramento County, the land uses included in the Sacramento County General Plan, which was adopted in 2011 and updated in 2017, are also considered in this

cumulative analysis. The land use assumptions embodied in the Sacramento County General Plan include not only new development, but also existing development and development currently in entitlement review by the County (Sacramento County 2017).

Past, present, and probable future plans and projects that are considered in this cumulative analysis also include buildout of the City of Elk Grove's General Plan (updated in 2019), and future development outside of the City limits, including the Kammerer Road/Highway 99 SOIA and Bilby Ridge SOIA (City of Elk Grove 2019a).

4.2 CUMULATIVE IMPACT ANALYSIS

The following sections contain a discussion of the cumulative effects anticipated from Project implementation along with the related projects for each of the environmental topic areas evaluated in this SEIR.

The cumulative analysis conforms with Section 15130 of the CEQA Guidelines, which specifies that the “discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great a detail as is provided of the effects attributable to the project alone.”

4.2.1 AESTHETICS

The geographic scope for the aesthetics cumulative impact analysis includes the immediate, publicly accessible area, including the area along Grant Line Road, as well as areas that could be affected by site lighting. The geographical setting for lighting impacts includes the area directly affected by site lighting, as well as the areas of southern Elk Grove affected by major area lighting sources, including commercial developments on State Route 99 (SR 99) and Elk Grove Boulevard, including the Elk Grove Auto Mall and Suburban Propane, which are well lit at night.

VISUAL CHARACTER AND QUALITY

As the southern areas of Elk Grove are developed (e.g., Southeast Policy Area [SEPA], Lent Ranch Marketplace, Kammerer Road SOIA, Bilby Ridge SOIA, Laguna Ridge Specific Plan, Sterling Meadows, the Wilton Rancheria Resort project), these projects all contribute to a cumulative impact on the scenic character visible along the southern edge of the City. The Lent Ranch Marketplace (Elk Grove Promenade) was approved and construction began but was halted due to economic conditions. The Sterling Meadows development is under construction. The proposed Kammerer Road/Highway 99 SOIA is located west of SR 99 and represents the potential for future development south of Kammerer Road. Other projects affecting this view include the Florin Vineyard Community Plan in Sacramento County and the Sunrise-Douglas Community Plan in Rancho Cordova. Furthermore, development is occurring on 3,585 acres in Folsom south of Highway 50. Many of these projects occur along the planned Capital Southeast Connector project, a 35-mile parkway that would span from I-5 to Highway 50. All these projects would affect the visual character and quality of the area south of Grant Line Road. As described in Chapter 3, “Environmental Impact Analysis,” of this SEIR, this includes views of Elk Grove's traditional agricultural areas with croplands, pastures, oaks, and distant views of the Cosumnes River/Deer Creek floodplain and related riparian vegetation. These views are available along the southern edges of Elk Grove, including along Grant Line Road. Further to the northeast, views from Grant Line Road include vineyards, grasslands, and the Sierra Nevada foothills.

The potential for cumulative impacts on visual character was evaluated in the City's General Plan EIR (Impact 5.1.4), which determined that further conversion of the region's rural landscape to urban development would result in a significant cumulative impact (City of Elk Grove 2018). The General Plan evaluation included the developments of Waterman 75 and Laguna Ridge, as well as the SEPA and other developments (including the proposed parks/open space and commercial and industrial land uses at the Project site).

The Project site is in a transitional zone between developed areas of Elk Grove and agricultural uses in Sacramento County east of SR 99 and south of Grant Line Road. Views to the south of Grant Line Road, including the Project site, are of moderate visual quality and the area's visual character is representative of Elk Grove's agricultural heritage. The aesthetic and visual quality of the Project site has been affected by past projects, including commercial uses along Grant Line Road, industrial uses along the UPRR tracks, including Suburban Propane, and residential developments to the north. There are several residential developments to the south of Grant Line Road near the Project site, along with a plant nursery and the now-closed Sunrise Sky ranch Airport.

Proposed development at the Project site would have frontage on Grant Line Road and would introduce structural elements into the landscape that would detract from the visual qualities of the existing agricultural open space. Foreground views of the project's entrance, landscaping, and signage would be available as motorists approach the intersection of Grant Line Road and Waterman Road and drive northeast. There are no public views of the off-site improvements except for the northern end of the drainage ditch that is adjacent to the Union Pacific Railroad (UPRR) tracks. This ditch is proposed for widening and deepening, but would have a visually similar appearance from Grant Line Road as compared to existing conditions. Public views toward the proposed on-site development from Grant Line Road would change substantially and this impact would be a significant cumulative impact.

These impacts would occur in an area that provides expansive background views of farmland, the Deer Creek and Cosumnes River floodplain, and the foothills, including from the UPRR overpass. Views of the proposed commercial and industrial development would be prominent and could detract from views. However, views of the foothills are primarily to the northeast down the Grant Line corridor, and these views would not be impeded. However, because of the overall area's agricultural heritage, the Project's incremental contribution to cumulative impacts on the area's visual character would be **cumulatively considerable**. All the projects in Elk Grove (and other Sacramento County communities) would be required to comply with conditions of approval, zoning regulations, and design guidelines for road frontage and landscaping. However, these measures would not reduce the Project's impacts on views of this pastoral landscape and this impact would be **cumulatively significant and unavoidable**.

LOSS OF TREES OF LOCAL IMPORTANCE

Development in the City could lead to the removal of trees of local importance, as defined in the Elk Grove Municipal Code, Title 19, "Trees," Chapter 19.12, "Tree Preservation and Protection." However, the City requires mitigation for these trees. Mitigation would provide 1 new inch diameter at breast height (dbh) of tree for each inch dbh lost (1:1 ratio). Developers must prepare a mitigation plan to provide on-site or off-site replacement, payment of an in-lieu fee, preservation of existing trees, or on-site or off-site relocation. Thus, there is no significant cumulative impact.

Future project applicants would be required to implement Mitigation Measure 3.2-2, which requires establishment of a tree mitigation plan that including planting replacement trees to compensate for the removal of trees of local

importance, as defined in the Elk Grove Municipal Code, Title 19, “Trees,” Chapter 19.12, “Tree Preservation and Protection.” Therefore, the proposed Project would result in a **less-than-significant cumulative impact**.

LIGHTING AND GLARE

The cumulative effects of recent and proposed projects, including Lent Ranch, Sterling Meadows, the Southeast Policy Area, the Grant Line Road widening, and other SOIAs to the west, combined with past projects such as the Auto Mall, Highway 99, and area park and high school stadium lighting, would result in significant cumulative impact from nighttime lighting that would intermittently (during evening use and events) reduce the darkness of the night sky. The potential for cumulative impacts on nighttime lighting and glare was evaluated in the City’s General Plan EIR (Impact 5.1.5), which determined that introduction of new sources of nighttime lighting and glare would result in a significant cumulative impact (City of Elk Grove 2018). The General Plan evaluation included the developments of Laguna Ridge, as well as the SEPA and other developments (including the proposed parks/open space [with a multi-sports park stadium] and commercial and industrial land uses at the Project site).

Under the proposed Project evaluated in this SEIR, nighttime lighting would be limited to security lighting for internal streets, commercial and industrial buildings, parking lots, and residences developed in the mixed-use area. The off-site drainage improvements would not require nighttime lighting.

To minimize on-site lighting effects, project applicant(s) would be required to comply with Title 23 of the Elk Grove Municipal Code, which contains standards for lighting that address shielding of light fixtures, photometric calculations to determine the allowed level of illumination, and fixture height. Furthermore, the City’s Design Guidelines encourage shielded and downward-pointing lighting. The citywide Design Guidelines include provisions for outdoor light fixtures to be directed/shielded downward. Development projects at the project site would be required to limit outdoor lighting, which would be directed downward and shielded to minimize light spillover and skyglow. Further, the City would require conditions of approval that minimize the use of reflective materials in building design. Compliance with City General Plan policies, zoning regulations, and Design Guidelines would minimize lighting and glare for development within the Project site. The off-site improvement areas would not require new lighting.

Notwithstanding City requirements, development of regional commercial, light and heavy industrial, and mixed uses would still contribute to the cumulative increase in nighttime lighting from new development, and therefore would result in a **cumulatively considerable and significant and unavoidable impact**.

4.2.2 AGRICULTURAL RESOURCES

The geographic scope for agricultural resources consists of Sacramento County.

Past, present, and future projects throughout the region have, and will continue to convert existing agricultural land to other uses – predominantly urban use. This includes plans and projects in Sacramento County, including the cities of Elk Grove, Sacramento, Rancho Cordova, Folsom, Citrus Heights, and all existing, approved, proposed, and reasonably foreseeable development projects within these jurisdictions. This includes the SEPA west of the Project site, the Lent Ranch Marketplace, and other large regional projects, including the potential casino west of the Project site. In addition to these local development projects, there are several urban development projects in Sacramento County and throughout the Central Valley that are contributing to the cumulative loss of agricultural resources, including Prime Farmland, Unique Farmland, or Farmland of Statewide

Importance and lands under Williamson Act Contract. Continued urbanization of the region in accordance with applicable land use plans, as well as those approved and proposed development projects described previously, would continue to convert agricultural and open space land to urban uses with residential and commercial buildings and associated roadways and other infrastructure. The continued conversion of farmland in the region is a significant cumulative impact.

There is no prime agricultural land within the Project site as defined by Government Code Section 56064 of the Cortese-Knox-Hertzberg Local Government Reorganization Act. Based on analysis of the Sacramento County Important Farmland map (DOC 2019), an estimated 409 acres of on-site Farmland of Statewide Importance could be directly and permanently converted to nonagricultural, urban use. The three new off-site improvement areas assessed as a part of this SEIR are not currently actively used for agricultural production, as they are existing channels that would be widened or deepened, or areas where drainage pipelines would be installed and where disturbance related to drainage improvements would be temporary. In 2016, an estimated 207,483 acres of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance existed in Sacramento County. A conversion of an estimated 129 acres of Farmland of Statewide Importance would account for less than 1 percent of this total.¹ The total conversion of Farmland of Statewide Importance would be relatively small in the context of the county's entire agricultural land base and would not likely cause a substantial reduction in the county's total agricultural production. However, the conversion of agricultural land would contribute to the incremental decline of Important Farmland in the county and would result in the irreversible conversion of this agricultural land. In addition, future development at the project site could affect nearby agricultural uses and result in the conversion of adjacent agricultural lands. According to the Elk Grove General Plan and EIR, the loss of agricultural productivity on lands designated for urban uses is a significant and unavoidable consequence of future development. Implementation of the proposed project would contribute to the incremental decline of Farmland of Statewide Importance Farmland in the county, region, and state and contribute to the irreversible conversion of this agricultural land. Implementation of Mitigation Measures 3.3-1 would help to preserve farmland. However, this would not create new farmland. There is no additional feasible mitigation. Therefore, the Project's impact would be **cumulatively significant and significant and unavoidable**.

Furthermore, 179 acres of land within the Project site is under Williamson Act contracts. Cancellation of these Williamson Act contracts before their expiration date would be required before construction within the area identified for mixed uses and a portion of the park/open space area. The off-site drainage improvements would not result in the cancellation of any Williamson Act contracts. The amount of land in Sacramento County under Williamson Act contract is decreasing. Between 2000 and 2015 (the most recent data year available), the area of Williamson Act contract lands in Sacramento County decreased from 187,102 to 174,656, or 7.1 percent. The cancellation of land under Williamson Act contracts within the Project site would be relatively small acreage in the context of the county's entire acreage of land under Williamson Act contracts. Furthermore, implementation of Mitigation Measure 3.3-1 would help to preserve farmland, including land held under Williams Act contracts. However, cancellation of Williamson Act contracts would contribute to the incremental decline of contract land in the county and would result in the irreversible conversion of this agricultural land on these contract lands. Therefore, the project's impact would be **cumulatively significant and significant and unavoidable**.

¹ Appendix G of the CEQA Guidelines focuses the analysis on conversion of agricultural land on Prime Farmland, Farmland of Statewide Importance, or Unique Farmland.

Implementation of Mitigation Measure 3.3-3 would reduce the Project’s potential for conflicts with ongoing off-site agricultural uses. In addition, the City of Elk Grove Municipal Code Chapter 14.05 (“Right to Farm Ordinance”) protects the rights of agricultural property owners and farmers to continue agricultural operations on their land. Therefore, the Project’s impact would be **less than cumulatively considerable**.

4.2.3 AIR QUALITY

The geographic scope for air quality consists of the Sacramento Valley Air Basin (SVAB).

GENERATION OF SHORT-TERM CONSTRUCTION AND LONG-TERM OPERATIONAL EMISSIONS OF CRITERIA AIR POLLUTANTS AND PRECURSORS, OR CONFLICT WITH OR OBSTRUCT AN AIR QUALITY PLAN

By its nature, air pollution is largely a cumulative impact. All new development that would result in an increase in air pollutant emissions would contribute to cumulative construction air quality impacts. In addition, operational emissions from all new development in the region also affect the attainment status of an air basin, particularly as a result of increased traffic and energy demands from additional development. The implementation of regional and local development within the Sacramento Valley Air Basin would generate increased short-term construction and long-term operational emissions that may cumulatively exceed regional thresholds and conflict with or obstruct implementation of the applicable air quality plan. This is a cumulatively significant impact.

Sacramento County’s attainment status for the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) has not changed since the 2019 SOIA EIR was prepared. Sacramento County currently meets NAAQS for all criteria air pollutants except ozone and the 24-hour particulate matter with an aerodynamic diameter less than 2.5 microns (PM_{2.5}) standard. Sacramento County meets the CAAQS for all criteria air pollutants except ozone and particulate matter with an aerodynamic diameter less than 10 microns (PM₁₀). As summarized in Tables 3.4-1 and 3.4-3 (Section 3.4-1, “Air Quality”) of this SEIR, short-term construction-related emissions (for on-site development and the off-site improvements) as well as long-term operational emissions would exceed both maximum daily and maximum annual Sacramento Metropolitan Air Quality Management District (SMAQMD) thresholds for criteria air pollutants and ozone precursors. Implementation of Mitigation Measures 3.4-1a and 3.4-1b would reduce the Project’s short-term construction emissions to a less-than-significant level. However, SMAQMD considers that if a project’s impacts would be significant at the project-level, it could also be considered significant on a cumulative level. Implementation of Mitigation Measure 3.4-2 would reduce the Project’s operational emissions, but it is not possible to determine at this time where such emissions would be reduced to a less-than-significant level. Operations of future development could result in air pollutant emissions that still exceed the SMAQMD thresholds. Even if emissions are reduced to levels that are below SMAQMD thresholds, the Project would still contribute to increased overall emissions throughout the SVAB. There is no additional feasible mitigation available that would avoid these impacts. The proposed Project could make a **cumulatively considerable contribution to significant cumulative** air quality impacts.

EXPOSURE OF SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS

Exposure of sensitive receptors to substantial pollutant concentrations, such as toxic air contaminants (TACs) and carbon monoxide (CO) generally occurs on a localized rather than regional basis. As discussed in Section 3.4-1, “Air Quality” of this SEIR, development of the proposed Project would not expose sensitive receptors to

substantial concentrations of CO. Because site-specific details of development are not known at the present time and construction at the Project site could occur in phases adjacent to existing on-site rural residences, implementation of Mitigation Measures 3.4-1a and 3.4-3b are necessary to ensure the Project's impacts would be less than significant. Since there are no other known projects among those considered as part of this cumulative analysis that are both large enough and would involve construction in close enough proximity to these rural residences to result in TAC impacts, the proposed Project's cumulative contribution would be **less than significant**.

ODOR EMISSIONS

Odor impacts are generally localized and do not combine with odor impacts in nearby jurisdictions to increase the severity of impacts. The closest cumulative project is the Waterman 75 project, on the north side of Grant Line Road north of the project site. Even if this project were to be constructed at the same time as portion of the proposed Project, implementation of Mitigation Measure 3.4-6 would avoid conflicts between Project-generated odor emissions and sensitive receptors. Therefore, a **cumulatively significant impact would not occur**, and the proposed Project would **not result in a cumulatively significant incremental contribution** to odor impacts.

4.2.4 BIOLOGICAL RESOURCES

The geographic scope for biological resources includes the land surrounding the Project site and off-site improvements areas, as well as the greater Sacramento County region, including the cities of Elk Grove, Sacramento, Rancho Cordova, Folsom, Citrus Heights, and all existing, proposed, and reasonably foreseeable development projects within these jurisdictions.

Cumulative development in the vicinity of the Project site within the City of Elk Grove includes the Laguna Ridge Specific Plan, Southeast Policy Area (SEPA), Sterling Meadows, and the Lent Ranch Marketplace projects, which are anticipated to increase residential and commercial uses covering over 2,000 acres between these projects, along with the Kammerer Road/Highway 99 SOIA (City of Elk Grove 2019a). These planned development areas occur less than 5 miles away from the Project site and the off-site improvements areas, and Project-related activities could contribute to the cumulative loss of native plant communities, wildlife habitat values, special-status species and their potential habitat, and wetland/aquatic resources within the region.

Past and present actions by humans have substantially altered biological resources in the Central Valley region of California including Sacramento County, specifically, compared to historical conditions. Among the most important of these past actions have been conversion of natural vegetation and habitats to agricultural and developed land uses; fill and alteration of aquatic habitats; flood control and water supply projects; and the introduction of nonnative species, which in many cases have competed with, preyed upon, and degraded habitat for native species. More recently, the large-scale conversion of agricultural habitats to urban land uses has resulted in substantial loss of habitat for species such as State-listed Swainson's hawk that have adapted to use agricultural habitats in response to loss of their natural habitats. Past, present, and foreseeable future urbanization in the city of Elk Grove has contributed substantially to the loss of grassland, wetland, and agricultural habitats that are important to many species in the region, including listed species like Swainson's hawk and other raptors, and greater sandhill crane. Therefore, the impact of the cumulative projects is **significant**.

Climate change and associated sea-level rise may also contribute to human-caused impacts to these species in the future. The Central Valley is generally becoming hotter and drier as a result of climate change and the region has

been experiencing more frequent droughts with reduced precipitation and snowpack contributing to the system. With regards to the effects of sea-level rise, it should be noted that the Delta is surrounded by levees and is a highly regulated system, and it is likely that measures would be taken to compensate for rising levels within the Delta. It is difficult to predict with any certainty the degree to which climate change and sea-level rise may affect the local special-status plant and wildlife species. For Swainson's hawk, climate change is another human-induced factor that could substantially reduce the extent and quality of habitat for this species. The proposed Project could have a **cumulatively considerable** contribution to the **significant cumulative** impact on Swainson's hawk due the fact that a large area of suitable habitat would be converted to urban land uses. No feasible mitigation would avoid this impact on Swainson's hawk because there is a limited amount of suitable habitat land available and there would be a net loss of habitat regardless of the acreage preserved as compensatory mitigation.

Roosting and foraging habitat for a variety of special-status bird species in the Central Valley, such as wetland habitats in the off-site improvement areas, may also be adversely affected by climate change. The changes to these habitats that may occur as a result of climate change are uncertain and speculative, but it is likely that climate change will adversely affect at least some of these special-status species, such as the wintering population of greater sandhill cranes using the Cosumnes River floodplain. It is possible that development of the Project site and the off-site improvements may contribute in some way to the cumulative impact of climate change related to this and other special-status species. The SSCHP addresses the potential effects of climate change on greater sandhill crane and other covered species and has developed biological goals and measurable objectives focused on mitigating those potential future impacts (County of Sacramento et al. 2018).

As specified in the CEQA Guidelines (Section 15126.2), when evaluating the impacts of a proposed project, the lead agency should normally limit its examination to changes in the existing physical conditions at the time of the NOP or at the time the environmental analysis commenced (in this case, 2020). What specific changes to habitats and shifts in distribution of plants and animals in the region may occur as a result of climate change within the time frame of the development that could eventually occur as a result of the proposed Project is too speculative for meaningful evaluation.

These past and present actions have resulted in significant adverse effects on the extent, species composition, and functioning of natural habitats that occur in the region, and on the distribution and abundance of plant and wildlife species associated with these habitats. Large areas of freshwater marsh, riparian, valley oak woodland, grassland, and vernal pool vegetation have been lost or degraded in the region over the past 100 years. The increase in the distribution and abundance of invasive plant species and nonnative plant communities, the large number of plant and wildlife species listed as threatened or endangered or considered sensitive by the CDFW, and the dramatic reductions in the extent of aquatic habitats and natural vegetation in the Central Valley region are evidence of these overall significant adverse effects. These actions have altered habitats, biotic interactions, and physical processes that continue to affect species in the region today. Therefore, the impact of the cumulative projects is significant.

The Project site is primarily agricultural land that provides limited habitat values to most species; however, agricultural lands provide important foraging habitat for Swainson's hawk, white-tailed kite, northern harrier, greater sandhill crane, and loggerhead shrike. The Project site also contains burrow habitat for burrowing owl and American badger. The off-site improvement areas contain sensitive natural habitats including wetlands that support a wide variety of special-status plant and wildlife species. Although mitigation measures are proposed to

compensate for the loss of habitat from the Project site and for potentially small areas of lost habitat from the off-site drainage improvements, fully compensating for these impacts by preserving existing habitat in the vicinity is infeasible because there is a limited amount of suitable habitat land available and there would be a net loss of habitat regardless of the acreage preserved as compensatory mitigation. Because there has been a substantial loss of natural and agricultural habitats for these species that has resulted in a notable decline in their regional population numbers, loss of habitat from the region is considered a significant cumulative impact. Therefore, the loss of cropland and irrigated pasture, and potentially a small amount of lost habitat from the required off-site drainage improvements, could have a **cumulatively considerable contribution** to this **significant cumulative impact**. Impacts on the sensitive biological resources resulting from future development of the Project site requires implementation of Mitigation Measures 3.5-1a, 3.5-1c, 3.5-1d, 3.5-2a, 3.5-2b, 3.5-3a, 3.5-3b, 3.5-3c, 3.5-4, 3.5-5, 3.5-6a, 3.5-6b, 3.5-8, 3.5-9a, 3.5-9b, and 3.5-13, Implementation of these mitigation measures would reduce impacts on sensitive biological resources resulting from future development of the Project site and the off-site improvement areas. However, no additional feasible mitigation is available that would avoid this impact. The impact is **significant and unavoidable**.

4.2.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

The geographic scope for cultural resources consists of the greater Sacramento County region, including the cities of Elk Grove, Sacramento, Rancho Cordova, Folsom, Citrus Heights, and all existing, approved, proposed, and reasonably foreseeable development projects within these jurisdictions.

Cumulative development in the vicinity of the Project site within the City of Elk Grove includes the Southeast Policy Area (SEPA) west of the SOIA Area, the Lent Ranch Marketplace, and other large regional projects, including the Wilton Rancheria Resort project site. Continued urbanization of the region in accordance with applicable land use plans as well as those approved and proposed development projects described previously, could result in the disturbance of cultural resources, which includes archaeological and historic-period built environment resources. Regulations protecting cultural resources have substantially reduced the rate and intensity of these impacts. However, even with these regulations, cultural resources are still degraded or destroyed as cumulative development in proceeds. Therefore, the impact of the cumulative projects is significant.

As discussed in Section 3.6, “Cultural and Tribal Cultural Resources,” the on-site structures and features have not yet been evaluated for historic significance. Additionally, development of the off-site drainage improvements has a potential to affect off-site Tribal Cultural Resources. Development in the Project site and the off-site improvement areas would involve earth-moving activities and grading during construction. The potential to encounter previously unknown cultural materials on the Project site is moderate, and the potential to encounter unknown materials in the off-site improvement areas is high, thus the proposed Project has the potential to adversely affect previously unknown significant cultural resources. Because all significant cultural resources are unique and non-renewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. The loss of any one archaeological site or historic-period built environment property has the potential to affect all others in a region since these resources are best understood in the context of the entirety of the cultural system of which they are a part. The proposed Project, in combination with other development in the region, could contribute to the loss of significant cultural resources.

Compliance with California law, City of Elk Grove policies, and implementation of the Mitigation Measures 3.6-2a, 3.6-2b, and 3.6-2c will ensure that any cultural resources encountered during construction, including

archaeological features or potential human remains, would be treated in an appropriate manner under CEQA and other applicable laws and regulations. This would reduce the potential for a significant impact resulting from inadvertent damage or destruction of presently undocumented cultural resources. If an inadvertent discovery of cultural materials (including human remains) is made during Project-related construction activities, disturbances in the area of the find must be halted and appropriate treatment and protection measures must be implemented, all in consultation with a professional archaeologist and in accordance with CEQA Guidelines Section 15126.4 if the resource is an historical resource of an archaeological nature and/or with CEQA Section 21083.2 if the resource is a unique archaeological resource. Implementation of Mitigation Measures 3.6-2a, 3.6-2b, and 3.6-2c would also help to protect tribal cultural resources, because these measures require preparation of site-specific archaeological surveys, consultation with culturally affiliated California Native American tribes (including potential monitoring during construction of the off-site improvements by a Native American tribal member), proper treatment of materials encountered during construction activities, incorporation of measures to protect archaeological resources, and preservation/avoidance of archaeological resources as feasible. If human remains are discovered during construction activities, implementation of Mitigation Measure 3.6-4 requires compliance with Health and Safety Code Section 7050 et seq. and Public Resources Code Section 5097.9 et seq.. Although compliance with California law, City of Elk Grove policies, and Mitigation Measures 3.6-2a, 3.6-2b, 3.6-2c, and 3.6-4 contained in this SEIR would reduce the potential for adverse effects, impacts to archaeological and historical resources, including Tribal Cultural Resources, are considered **cumulatively considerable** due to the cumulative loss of resources in the region. No additional feasible mitigation is available. These impacts are **cumulatively significant and unavoidable**.

4.2.6 GEOLOGY, SOILS, MINERALS, AND PALEONTOLOGICAL RESOURCES

The geographic scope for geology and soils consists of Sacramento County, and the geographic scope for paleontological resources consists of the greater Sacramento Valley region.

Geology, Soils, and Seismicity

The geologic formations, soil types, and seismic hazards of each project considered in this cumulative analysis vary depending on project location, and therefore are site-specific. Therefore, the geology, soils, and seismic impacts are site specific and generally do not combine to result in cumulative impacts. Furthermore, as with the proposed Project, development projects considered in the cumulative analysis would be required to comply with applicable State and local building codes and regulations, including the California Building Standards Code (CBC), which requires a site-specific geotechnical report that includes design and engineering requirements specifically intended to reduce hazards from geologic, soils, and seismic hazards. Therefore, **no additive effect would result and no cumulatively significant impact** related to geologic, soils, or seismic hazards would occur.

Paleontological Resources

Fossil discoveries resulting from excavation and earth-moving activities associated with development are occurring with increasing frequency throughout the state. The value or importance of different fossil groups varies depending on the age and depositional environment of the rock unit that contains the fossils, their rarity, the extent to which they have already been identified and documented, and the ability to recover similar materials under more controlled conditions (such as for a research project). Unique, scientifically-important fossil discoveries are relatively rare, and the likelihood of encountering them is site-specific and is based on the type of specific geologic rock formations found underground. These geologic formations vary from location to location.

Some of the projects considered in this cumulative analysis could encounter Pleistocene-age or older deposits that have yielded unique paleontological resources in the past and therefore are considered paleontologically sensitive. Therefore, the cumulative projects could result in damage to or destruction of unique paleontological resources, which would be a significant cumulative impact.

The Project site and the off-site improvement areas are located in the Riverbank Formation, which is considered to be of high paleontological sensitivity. Implementation of Mitigation Measure 3.7-6 would result in the Project avoiding damage to or destruction of unique paleontological resources. Therefore, the Project's contribution to this cumulatively significant impact would be **less than cumulatively considerable**.

4.2.7 GREENHOUSE GAS EMISSIONS

Greenhouse gases (GHGs) typically persist in the atmosphere for extensive periods time—long enough to be dispersed throughout the globe and result in long-term global impacts that contribute to climate change. As such, the proposed Project will not, by itself, contribute significantly to climate change; however, cumulative emissions from many projects and plans all contribute to global GHG concentrations and the climate system. Accordingly, GHG emissions are inherently cumulative. Please see Section 3.8, “Greenhouse Gas Emissions,” of this SEIR for the analysis of the proposed Project's contribution to the significant cumulative impact of climate change.

4.2.8 HAZARDS, HAZARDOUS MATERIALS AND WILDFIRE

The geographic scope for hazards and hazardous materials consists of the City of Elk Grove's General Plan Planning Area, which includes the Project site.

Development associated with the cumulative projects and the proposed Project would involve the storage, use, disposal, and transport of hazardous materials (such as asphalt, fuel, lubricants, and solvents) to varying degrees during demolition, construction, and operation. Facilities that use hazardous materials during operation are required to obtain applicable local and state 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, and therefore construction companies and businesses (during the operational phase) that would handle any hazardous substances are required by law to implement and comply with these existing hazardous-materials regulations. These health and safety impacts usually occur on a project-by-project basis, rather than cumulatively.

Some of the past, present, and future cumulative project sites could contain existing hazards materials (e.g., underground or aboveground storage tanks, septic systems, stained soils [indicating potential contamination], lead-based paints, asbestos-containing materials, or contaminated groundwater plumes). However, if hazardous materials are encountered on site during construction of the proposed Project and the cumulative projects, the associated impacts would be localized to the individual project sites and would not be additive to other hazardous materials-related impacts at the Project site or other individual cumulative project sites. Therefore, no additive effect would result and **no cumulatively significant impact** related to hazards or hazardous materials would occur.

4.2.9 HYDROLOGY AND WATER QUALITY

The geographic scope for surface water hydrology and water quality consists of the City of Elk Grove. The cumulative context for groundwater consists of the Sacramento Valley – South American Subbasin.

GROUNDWATER

Development of the cumulative projects within the South American Subbasin will increase the need for groundwater. The South American Subbasin has been designated by the California Department of Water Resources (DWR) as a high priority basin, but is not in a condition of critical overdraft. As a signatory to the Water Forum Agreement, the Sacramento County Water Agency (SCWA) is committed to adhering to the long-term average sustainable yield of the basin. The Water Forum estimated that the long-term average annual sustainable yield of the basin was 273,000 afy, while extractions were estimated at 217,000 afy in 2015. The Sacramento Central Groundwater Authority (SCGA) submitted an Alternative Groundwater Sustainability Plan (GSP) in 2016 (Sacramento Central Groundwater Authority 2016), which consisted of SCGA’s Central Sacramento County Groundwater Management Plan that was originally prepared in 2006. DWR has since required SCGA to prepare a standard GSP, which is in process as of the time of preparation of this SEIR. DWR requires annual reporting of subbasin conditions every five years to demonstrate how subbasin operations have stayed below the sustainable yield. The Alternative GSP identified provisions to maintain groundwater pumping levels within the sustainable yield, including reducing demand, conjunctive use, and aquifer storage and recovery projects, that would apply to all signatories of the Water Forum Agreement, including SCWA and SCGA. Because water supply for the proposed Project has been included in SCWA’s Zone 40 Water Supply Master Plan Amendment (Brown and Caldwell 2020) indicating that sufficient water supplies are available, and because the Project’s water supply is included in the Elk Grove General Plan (City of Elk Grove 2019a) and therefore is part of the SCGA’s GSP for the South American Subbasin, a cumulatively significant impact would not occur, and the proposed Project would have a **less than cumulatively considerable** impact.

EROSION, SILTATION, POLLUTED RUNOFF, AND FLOOD HAZARDS

Development of the cumulative projects and the proposed Project would include on-site and off-site excavation and grading activities that could result in erosion; result in increased impervious surfaces that would generate increased stormwater runoff that could result in increased pollutant transport and exceedance of existing drainage systems; and construction of buildings, homes, and other structures that could be constructed in a floodplain, which could affect hydrology and water quality in the cumulative study area. However, compliance with the National Pollutant Discharge Elimination System permitting requirements (i.e., both the Statewide Construction General Permit and the local operational Municipal Separate Storm System [MS4] Permits), Clean Water Act permitting requirements, and applicable local regulations such as flood control ordinances and grading permits, would ensure that the cumulative projects would not result in a significant cumulative impact, and the proposed Project would result in a **less-than-significant cumulative contribution**.

4.2.10 LAND USE, POPULATION, HOUSING, EMPLOYMENT, ENVIRONMENTAL JUSTICE, AND UNINCORPORATED DISADVANTAGED COMMUNITIES

The geographic scope for land use, population, housing, employment, environmental justice, and unincorporated disadvantaged communities consists of the Sacramento County region, including the cities of Elk Grove, Sacramento, Rancho Cordova, Folsom, and Citrus Heights.

CONSISTENCY WITH LAND USE

Cumulative development within the region would result in a significant change in land use, and individual projects would need to be considered in context of their compliance with adopted land use plans. Plans with which compliance may be analyzed include general plans, habitat conservation plans, and regional transportation plans. For the proposed Project, appropriate plans to consider include the SACOG 2020 MTP/SCS and the City's General Plan. Land use inconsistencies are not physical effects in and of themselves and combinations of policy inconsistencies would not rise to the level of a physical effect. Cumulative effects of the physical changes related to the Project are discussed in the other topics in this section. **No cumulatively considerable** impacts would occur.

POPULATION, HOUSING, AND EMPLOYMENT

Like land use policy inconsistency, population growth is not considered a significant cumulative effect because it is not a physical environmental impact. However, the direct and indirect effects, such as housing and infrastructure needs that are related to population growth, can lead to physical environmental effects.

Incorporated cities, including Elk Grove, Sacramento, Rancho Cordova, Folsom, and Citrus Heights, and Sacramento County implement general plans and specific or master plans that could potentially accommodate substantially greater population and employment growth compared to regional forecasts and planning efforts. Increased population and employment in the region could generate the need for additional housing and infrastructure, which could lead to conversion of undeveloped land and associated adverse physical environmental impacts. Considering the indirect effects from past, present, and future development under the cumulative plans, the potential for population growth in the county is a **significant cumulative** impact.

Assumed industrial and commercial land uses within the Project site could generate approximately 7,788 new jobs in the City at full buildout. In addition, future development of mixed uses on the Project site could add an assumed 713 housing units, or 2,304 residents for a total service population (population plus employment) of 10,092. As stated previously, the Project site is within the East Study Area. The City estimated as a part of the General Plan that the East Study Area could accommodate 4,806 housing units that would accommodate a population of 15,523 persons and employment-generating uses could result in 3,875 new jobs for a total service population of 19,398 (City of Elk Grove 2019). The total service population anticipated under the proposed Project (10,092) is less than the total assumed under the City's General Plan (19,398), but the employment estimate is substantially higher and the residential population substantially lower.

SACOG estimated that, by 2035, continued development of the Laguna Ridge Specific Plan, Lent Ranch Market Place, the Southeast Policy Area, and the Triangle Special Plan, as well as other planned development (not including the Project site, which was not anticipated in the MTP/SCS) could increase the City's jobs to 57,640 by 2035 and 60,070 by 2040 (SACOG 2019). Because development of the Project site is not included in SACOG's future employment projections, the jobs generated by the proposed Project (7,788 jobs) are not accounted for in SACOG's employment projections for the City.

As discussed in Section 3.11, "Land Use, Population, Housing, Employment, Environmental Justice, and Unincorporated Disadvantaged Communities," if the proposed Project's level of job growth is realized during the City General Plan planning horizon and MTP/SCS 2040 horizon, it is possible that development of employment-generating land uses in other areas of the City or County would occur at a slower pace. The regional demographic

and economic forecasts for SACOG use Board-adopted regional-level projections, which serve as control totals for the entire region (SACOG 2020). If residential or employment growth is higher for a particular jurisdiction, using the control totals, this would mean that residential or employment growth would need to be proportionally reduced in one or more areas.

Specific indirect impacts associated with increased population, such as traffic congestion, air quality degradation, and noise generation, are addressed in each section of this SEIR and this chapter, as appropriate. These sections provide a detailed analysis of other relevant environmental effects as a result of development of the proposed Project.

Physical impacts associated with development of the Project site, such as traffic, greenhouse gas emission, air quality degradation, and noise generation and impacts related to increased demand for public services and utilities, are evaluated throughout this SEIR because the Proposed project's future land uses are considered to be part of buildout of the Project site. Mitigation presented throughout this SEIR addresses environmental impacts associated with future development of the Project site. There is no significant impact that is not addressed comprehensively throughout this SEIR.

One of the objectives of the proposed Project is to provide employment and possibly housing opportunities. No feasible mitigation is available to reduce the population growth at the Project site to a less-than-significant level, while still meeting Project objectives. Therefore, the proposed Project would indirectly result in a **cumulatively considerable** contribution to a significant cumulative impact. Impacts associated with inducement of population, housing, and employment would be **significant and unavoidable**.

4.2.11 NOISE AND VIBRATION

The geographic scope for noise and vibration consists of the City of Elk Grove planning area.

SHORT-TERM CONSTRUCTION NOISE

Construction activities associated with development of the projects considered in this cumulative analysis may result in significant increases in ambient noise levels. Construction noise impacts are typically highly localized and therefore multiple projects would have to occur in close proximity to one another for a cumulative increase in ambient noise levels to occur. Implementation of Mitigation Measure 3.12-1 in Section 3.12, "Noise and Vibration," of this SEIR would reduce the Project's short-term construction noise impacts. However, even with implementation of this mitigation measure, it may not be possible to fully reduce all of the Project's construction noise impacts to a less-than-significant level. In accordance with City General Plan requirements, other planned and/or approved projects in the area would also be required to evaluate construction noise impacts and implement noise-reduction measures. The Waterman 75 project would be developed on the north side of Grant Line Road, across from the Project site. Because the exact nature and timing of development of both the proposed Project and the Waterman 75 project are not known at this time, there is a potential that construction noise could be generated from both projects at the same time. If that were to occur, the Project's construction noise impacts would be considered **cumulatively significant and unavoidable**.

LONG-TERM OPERATIONAL TRAFFIC NOISE

Development forecast under the City's General Plan would generate and attract vehicular travel along roadways, which would combine with traffic associated with development of the Project site to increase vehicular traffic noise in areas directly adjacent to roadways. This is a cumulatively significant impact.

Under future cumulative conditions, predicted traffic noise levels along off-site roadways in the Project vicinity would increase. As discussed in Impact 3.12-4, development at the Project site would result in significant increases in existing traffic noise levels. Under future cumulative conditions, predicted traffic noise levels along all studied roadway segments would further increase. However, there are no existing noise-sensitive uses located along Grant Line Road between SR 99 SB Ramps to SR 99 NB Ramps, Grant Line Road between East Stockton Boulevard to Waterman Road, and Waterman Road between Mosher Road to Grant Line Road.

Elk Grove Policy MOB-1-1 establishes vehicle miles traveled (VMT) limits for the City's Planning Area, including locations for new growth, such as the East Study Area. The implementation of this policy would reduce travel demand by incorporating density mixing of uses, pedestrian and bike infrastructure, and transit services. Reducing travel demand would reduce traffic volumes and therefore traffic noise levels. Based on direction included in the General Plan, development in the Project site would be designed to minimize potential impacts. However, it is not possible to determine at this time whether this program would avoid all potentially significant impacts. Significant traffic noise impacts at existing and future noise-sensitive areas can be difficult to feasibly mitigate. Some noise-sensitive areas may have noise barriers that are constructed to reduce noise levels that, once these barriers are constructed, increase noise levels experienced on the other side of the roadway once noise is reflected off the newly constructed noise barriers to the other side of the roadway. New noise barriers may have limited effectiveness for traffic noise mitigation, since openings are often required for pedestrian, bicycle, vehicle, and emergency access and visual access for safety. Quiet pavement may be infeasible due to cost.

Given that detailed development plans are not currently available, it is conceivable that traffic noise levels at some land uses may continue to exceed applicable noise impact criteria. In addition, commonly employed traffic noise mitigation measures, such as sound barriers, may not be feasible at some land uses, particularly existing residential land uses that front major roadways. As a result, the Project's contribution to this cumulatively significant impact is considered **cumulatively significant and unavoidable**.

LONG-TERM OPERATIONAL STATIONARY SOURCE NOISE

Noise sources associated with development projects in the City's planning area include landscape and building maintenance activities, mechanical equipment, solid waste collection, parking lots, commercial, office, and industrial activities, agricultural machinery and equipment, and residential, school, and recreation activities and events. Ambient noise is increasing in urbanized areas over time as a result of increased development, and noise sources that are adjacent to one another could combine to create a cumulatively significant impact.

Implementation of Mitigation Measure 3.12-6, along with compliance with the City's Noise regulations, contained in City Municipal Code Chapter 6.32, would reduce the Project's non-transportation source noise levels at on-site sensitive receptors. However, even with implementation of this mitigation measure, the Project's long-term stationary-source noise levels may not be reduced to a less-than-significant level. Furthermore, off-site agricultural noise would continue on parcels to the northeast and southeast, immediately adjacent to the development that is proposed on the Project site. Because cumulative noise increases could occur where site-

specific projects are in close proximity to one another, along with ongoing agricultural noise, the proposed Project could result in a **cumulatively significant and unavoidable contribution** to this significant cumulative impact.

GROUNDBORNE VIBRATION

Construction activities associated with the cumulative projects would result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and activities involved. Although detailed information is not currently available, construction would generally be anticipated to result in maximum groundborne vibration levels associated with bulldozing (although unlikely, in some cases pile-driving could be necessary). Sensitive receptors could be located within the threshold distances established by the Federal Transit Administration; therefore, the cumulative projects could result in a significant cumulative impact.

Implementation of Mitigation Measure 3.12-3 would reduce the Project's vibration impacts. However, even with implementation of this mitigation measure it may not be possible to fully reduce these impacts to a less-than-significant level. Operation of the UPRR generates groundborne vibration at the Project site and in the immediate Project vicinity. Furthermore, construction of the Waterman 75 development project, on the north side of Grant Line Road across from the Project site, could occur simultaneously with development of the proposed Project. Therefore, the proposed Project could result in a **cumulatively significant and unavoidable contribution** to this significant cumulative impact.

4.2.12 PUBLIC SERVICES AND RECREATION

The geographic scope for public services and recreation consists of the City of Elk Grove planning area.

FIRE PROTECTION SERVICES

The Cosumnes Community Service District (CCSD), currently provides fire protection services for the City of Elk Grove. New development within the CCSD service area would increase demand for fire protection services and facilities, potentially resulting in the need for additional staff members, facilities, and equipment. Individual development projects would be required to assess impacts related to fire protection services during the environmental review process to ensure that the CCSD has sufficient facilities and equipment to meet demand.

The project applicant(s) would provide funding for additional fire facilities and equipment necessary to serve the Project through payment of development impact fees. Similarly, all individual development projects within the CCSD service area would be required to pay development impact fees. In addition, the proposed Project and individual development projects would incorporate California Fire Code and City standards into project designs. Therefore, a **cumulatively significant** impact would not occur, and the proposed Project would not result in a cumulatively significant incremental contribution to impacts related to increased fire protection services and facilities.

The CCSD Fire Department may need to build one or more of the three predesignated new fire stations (i.e., Station 77, Station 78, or Station 79) and need to hire additional firefighters, prevention, and emergency medical personnel to accommodate the increased demand for services. The construction and operation of new off-site facilities and expansion of existing off-site facilities by CCSD could also be required to maintain service ratios. If construction and operation of CCSD facilities are required to serve future development within its service area, the Project and other individual projects could indirectly contribute to cumulative impacts. CCSD would prepare

separate CEQA documentation in the future to evaluate the cumulative environmental impacts and those cumulative impacts are not knowable at this time. It is speculative to gauge the extent to which this would create any indirect cumulative impact that is distinct from the analysis of direct Project impacts.

LAW ENFORCEMENT SERVICES

The Police Department provides law enforcement services to the City of Elk Grove. The Police Department currently has a staffing ratio of 0.80 officers per 1,000 residents. With the assumed addition of up to 2,304 persons, an estimated two (rounded up) officers could be needed. New development within the Police Department service area would increase demand for fire protection services and facilities, potentially resulting in the need for additional staff members, facilities, and equipment. Individual development projects would be required to assess impacts related to police protection services during the environmental review process to ensure that the Police Department has sufficient facilities and equipment to meet demand.

New staff, equipment, and facilities that would be necessary to provide additional law enforcement services is funded by property taxes, development impact fees, and potentially other mechanisms. The City reviews development impact fees yearly and adjusts as necessary to adequately fund police protection services. Therefore, development of the project site and other individual development projects in the Police Department's service area would not affect Police Department response times or other performance objectives because project applicants for future projects would pay development impact fees to ensure police protection personnel and equipment is provided to meet increased demand for police protection services. Therefore, a **cumulatively significant impact would not occur**, and the proposed Project would **not result in a cumulatively significant incremental contribution** to impacts related to increased police protection services and facilities.

If construction and operation of Police Department facilities are required to serve future development within its service area, the Project and other individual projects could indirectly contribute to cumulative impacts. The Police Department would prepare separate CEQA documentation in the future to evaluate the cumulative environmental impacts and those cumulative impacts are not knowable at this time. It is speculative to gauge the extent to which this would create any cumulative impact that is distinct from the analysis of direct Project impacts.

SCHOOLS

The Elk Grove Unified School District (EGUSD) provides K–12 education to the City of Elk Grove and the Project site. Development within the EGUSD service area could increase the demand for school facilities. The Project site is currently in the Elk Grove Elementary School, Joseph Kerr Middle School, and Elk Grove High School district boundaries but it should be noted that school attendance boundaries may change, so other schools may eventually provide school services. All three schools are currently operating at below design capacity. However, these schools will be used to house future students from the already approved Laguna Ridge Specific Plan (7,400 homes), Sterling Meadows (1,184 homes), and the Southeast Policy Area (4,000 homes). It is anticipated that Elk Grove Elementary School will exceed its design capacity by 2021 and Joseph Kerr Middle School and Elk Grove High School will exceed design capacity by 2025; therefore, these schools and may not have capacity to accommodate the students who may reside in the mixed-use portion of the project site. The EGUSD's School Facilities Needs Analysis indicates that the Laguna Ridge South Elementary School, which would be located along Poppy Ridge Road, approximately 2.5 miles west of the Project site, and Crooked Creek Estates Elementary School, which would be located on Wyman Drive approximately 0.5 mile north of the Project

site, are anticipated to be designed and constructed in the next 5 to 6 years (ODELL Planning and Research 2020), and therefore would have capacity to serve students from the mixed-use portion of the project site.

City General Plan Policy CIF-4-2 requires developments to incorporate new schools in their overall designs, which would render any impacts to school facilities created by the increase in residential population resulting from potential future development less than significant by assuring that adequate school facilities are provided for current and future residents. The City supports state legislative efforts to secure additional state funding for school construction and ensure maintenance of local district priorities for funds in the State school bond program (City General Plan Policy CIF-4-3). In addition, City General Plan Policy IFP-1-7 requires new development to fund its fair share portion of its impacts to all public facilities as provided for in State law. Pursuant to SB 50, new development would be required to pay all applicable State-mandated school impact fees to EGUSD. The California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA (California Government Code Section 65996). Therefore, a **cumulatively significant impact would not occur**, and the proposed Specific Plan **would not result in a cumulatively significant incremental contribution** to impacts related to increased demand for school facilities and services.

It is possible that future residential development within the mixed-use portion of the Project site would generate demand for school facilities that are not met by existing elementary, middle, and high school facilities. Future students could potentially be bused or driven to schools within the EGUSD boundaries, resulting in indirect cumulative impacts related to transportation, such as air pollutant emissions, greenhouse gas emissions, and transportation noise. Off-site impacts associated with possible school facility development are not knowable at this time. It is speculative to gauge the extent to which this would create any cumulative impact that is distinct from the analysis of direct Project impacts.

PARKS AND RECREATION

The CCSD provides parks and recreation facilities for residents of the city of Elk Grove, as well as portions of Sacramento County. CCSD serves an area of roughly 157 square miles, including the city limits of the City of Elk Grove, plus unincorporated areas of Sacramento County.

New development, including future development within the Project site, would generate demand for new and existing recreational facilities in Elk Grove and the unincorporated county. Future development within the Project site could add an assumed 713 housing units, or 2,304 residents to the CCSD service area. This amount of residential development would require the development of an estimated 11.5 acres of parkland, using standards maintained by the City and CCSD. Payment of the development impact fees would provide financing for public facilities, including parks and recreational facilities, which are required to serve new development. Similarly, individual development projects would be required to assess impacts related to parks and recreational facilities during the environmental review process to ensure sufficient facilities to meet demand and Individual development projects would be required to dedicate park and recreation facilities or pay applicable impact fees, per California Government Code Section 66477 (Quimby Act), the City of Elk Grove Municipal Code Chapter 22.40, and City General Plan Policy PT-1-3, or contribute to other fair share funding mechanisms required by the City as stated in General Plan Policy PT-1-5. Therefore, a **cumulatively significant impact would not occur**, and the proposed Project would **not result in a cumulatively significant incremental contribution** to impacts related to parks and recreation facilities.

4.2.13 TRANSPORTATION AND TRAFFIC

Please see Section 3.14, “Transportation,” for a discussion of the proposed Project’s cumulative traffic impacts.

4.2.14 UTILITIES

The geographic scope for utilities consists of future development that would occur within each utility provider’s service area. Utilities and service systems would be provided to future development by the Sacramento County Water Agency (SCWA), the Sacramento Area Sewer District (SASD), and the Sacramento Regional County Sanitation District (SRCSD). The related projects discussed in this section include future development that would occur within each provider’s service area.

WATER SUPPLY AND WATER SYSTEMS

Water supply for the Project site would be provided by the SCWA’s Zone 40. Zone 40 provides water supply through a conjunctive-use water supply system consisting of surface water, groundwater, and recycled water. SCWA prepared a Water Supply Master Plan (WSMP) Amendment that addresses water supply and water infrastructure for the Project site (Brown and Caldwell 2020). The amended WSMP indicates that water supplies and demands within SCWA Zone 40 would be the same during normal, single-dry, and multiple-dry years; however, the year-to-year mix of surface and groundwater would be adjusted, as necessary, to meet the demands as part of its conjunctive use water supply program. As shown on Table 3.15-3 in Section 3.11, “Utilities and Service Systems,” SCWA would have water supplies that exceed demands in all water years.

SCWA’s Zone 40 water-demand factors were applied to the acreage for each future land use designation that generates water use within the Project site (Wood Rogers 2020a, Brown and Caldwell 2020). As shown on Table 3.15-5 in Section 3.11, the estimated water demand assuming development of the sports complex, commercial, industrial, and mixed uses has been conservatively estimated as 1,383 acre-feet per year (afy).^{2, 3} The water supply demands for the proposed Project (1,383 afy) were added to water demand projections contained in the amended WSMP and shown in Table 3.15-3 in Section 3.11. As shown in Tables 8-12, 8-13, and 8-14 of the amended WSMP, water supply is projected to be sufficient to meet demands of the proposed Project and existing and planned development in Zone 40 in normal, single-dry, and multiple dry years. Therefore, a **cumulatively significant impact would not occur**, and the proposed Project would **not result in a cumulatively significant incremental contribution** to impacts related to water supply demand.

The amended WSMP evaluated the capacity for SCWA’s existing off-site water supply infrastructure to serve the Project site. The WSMP determined that the existing Grant Line Road transmission main and Elk Grove GWTP and East Park GWTP have capacity to meet the demands of the proposed Project and existing and future development (Brown and Caldwell 2020). Therefore, **no significant cumulative** impact would occur.

2 The water supply demand for development of the City-owned property with industrial land uses is estimated as 1,333 afy (Brown and Caldwell).

3 The water supply demand for development of the City-owned property with industrial land uses is estimated as 1,333 afy (Brown and Caldwell).

WASTEWATER COLLECTION, CONVEYANCE, AND TREATMENT FACILITIES

Wastewater collection and conveyance facilities would be provided by SASD and wastewater treatment would be provided by SRCSD.

As shown in Table 3.16 in Section 3.11, buildout of the proposed Project would generate an estimated 1.05 million gallons per day (mgd) of average dry-weather flow. The SRWTP has a design capacity of 181 mgd with the potential to expand to 218 mgd. As of 2019, the SRWTP receives and treats an average of 115 mgd each day (SRCSD 2019). When proposed Project -related wastewater flows (1.05 mgd) are combined with the current average dry-weather flows (115 mgd), implementation of the proposed Project would not result in an increase in wastewater flows that exceed the current disposal capacity of 181 mgd average dry-weather flow. The SRCSD anticipates conservation measures implemented throughout the service area would result in the existing 181 mgd average dry-weather flow capacity to be adequate for at least 40 more years (SRCSD 2014). Therefore, the SRWTP would have adequate capacity to treat wastewater flows generated by future development within the Project site in addition its existing commitments. A **significant cumulative impact would not occur**, and the proposed Project **would not result in a cumulatively significant incremental contribution** to impacts related to wastewater treatment.

SASD conducted an analysis and confirmed that the existing off-site conveyance system has adequate capacity to accommodate peak wet-weather flows generated by the project site at full build-out in addition to existing and future development (Wood Rogers 2020b). Therefore, **no significant cumulative impact** would occur.

SOLID WASTE

Residential solid waste in the City of Elk Grove is collected and hauled by Republic Services. Waste generated by proposed nonresidential uses could be hauled by any of a number of permitted haulers as selected by the individual developer, and wastes would be hauled to a variety of permitted landfills. Solid waste is collected by private franchised haulers and disposed of at various facilities, most of which have more than 70 percent capacity remaining, including Altamont Landfill & Resource Recovery, Recology Hay Road, Bakersfield Metropolitan Sanitary Landfill, Foothill Sanitary Landfill, Forward Landfill, Inc., Keller Canyon Landfill, L and D Landfill, North County Landfill, Potrero Hills Landfill, and Sacramento County Landfill (Kiefer) (City of Elk Grove 2020). The area of the Project site identified for development of mixed uses could generate approximately 3.8 tpd of solid waste.⁴ Future development of commercial and industrial uses could generate approximately 58.8 tpd of solid waste.⁵ Combined, these landfills have a large volume of landfill capacity (150 million cubic yards) available to serve future development. The closure dates of the Kiefer Landfill and L and D Landfill are anticipated to be approximately January 1, 2064 and January 1, 2031, respectively.

Future development would comply with all federal, State, and local solid waste statues and regulations, including Compliance with the CalGreen Code; the City's the Construction and Demolition Debris Reduction, Reuse, and Recycling Ordinance; Space Allocation and Enclosure Design Guidelines; Assembly Bill 1826 (mandatory

4 Based on CalRecycle's estimated 2018 annual per capita disposal rate of 3.3 pounds per resident per day, the estimated total population for the proposed project (2,304 persons) would generate approximately 7,600 pound per day of solid waste, which equates to 3.8 tpd (CalRecycle 2020).

5 Based on CalRecycle's estimated 2018 annual per capita disposal rate of 15.1 pounds per employee per day and an estimated 7,788 employees for the proposed project, approximately 117,600 pound per day of solid waste would be generated per day, which equates to 58.8 tpd (CalRecycle 2020).

commercial organics recycling); and other City recycling programs. The Kiefer Landfill, L and D Landfill, and Yolo County Central Landfill have sufficient landfill capacity available to accommodate solid-waste disposal needs for future development within the Project site. Therefore, **no significant cumulative** impact would occur.

4.2.15 ENERGY

ENERGY USE

The geographic scope for energy resources consists of the City of Elk Grove and the larger Sacramento County region.

Increased demand for electrical and natural gas supplies and infrastructure is a byproduct of all future land uses and development throughout the Sacramento region. Energy is consumed for heating, cooling, and electricity in homes and businesses; for public infrastructure and service operations; and for agriculture, industry, and commercial uses. Each service provider is responsible for ensuring adequate provision of these utilities within their jurisdictional boundaries and would be responsible for upgrading their existing electrical and natural gas distribution systems or constructing new distribution systems to meet the demands of individual projects.

As noted in Section 3.16 “Energy,” transportation is, by far, the largest energy consuming sector in California, accounting for approximately 40 percent of all energy use in the state (U.S. Energy Information Administration 2018). Since transportation accounts for more energy consumption than heating, cooling, and powering of buildings, powering industry, or any other use, the overall efficiency of energy use in the region will depend importantly on the ability of local lead agencies to plan in a way that reduces travel demand. SACOG’s 2016 MTP/SCS demonstrates an increase in energy efficiency through 2035 in relation to transportation energy use – household generated vehicle miles traveled (VMT) per capita is forecast to decrease by more than 8 percent; SACOG also estimates that total VMT will decrease by almost 7 percent during the 2016 MTP/SCS planning period (SACOG 2016, Chapter 5B, page 91).

Energy efficiency will also increase in relation to heating and cooling of buildings. The State of California adopted the California Green Building Standards Code (CALGreen Code), which establishes mandatory standards for all buildings in California, including for energy efficiency. This Code is updated over time and in each instance, the energy efficiency standards are increased.

The City of Elk Grove General Plan Update (City of Elk Grove 2019a) and Climate Action Plan Update (City of Elk Grove 2019b) include energy conservation strategies for land use, transportation, community design, public facilities and infrastructure, which also support the reductions in GHG emissions and increased emissions in criteria pollutants. However, the demand for energy and consumption of energy resources would still increase should the area become developed. Future land use patterns, new construction and building renovations, and commuting patterns would increase demand for energy in the City. This would result in a significant cumulative increase in the demand for energy and the need for construction and/or extension of additional facilities to generate and/or distribute electricity and natural gas to serve the Project site. Therefore, the increase in regional development would result in a significant cumulative impact.

Project development would increase energy demand. However, the City would require all discretionary projects to comply with the City’s General Plan and Climate Action Plan. Additionally, site-specific projects would also need to incorporate energy efficient design elements and energy conservation measures included in the City’s General

Plan, including those related to reducing VMT, as well as ongoing cooperation with SUMD and local agencies to support renewable energy production, in addition to the implementation of State building and energy efficiency standards. Development of the Project site would be subject to policies and standards designed to improve energy efficiency and avoid inefficient, excessive, and unnecessary consumption of energy due in construction and operations. Implementation of Mitigation Measures 3.16-1a and 3.16-1b, which include incorporation of energy conservation strategies in project designs, would reduce impacts associated with energy consumption. Mitigation measures would reduce energy demand and improve energy conservation by reducing energy associated with transportation of building materials, lighting, irrigation, and heating and cooling; require reductions in ozone precursors from operational emissions sources; and require implementation of GHG emission reduction strategies. However, given the scale of possible development that could be proposed in the future, the impact would be considered significant and unavoidable. Therefore, development of the Project site could result in a **cumulatively considerable contribution** to a significant cumulative impact related to the increased energy demand. There is no additional feasible mitigation. The impact is **cumulatively significant and unavoidable**.

ELECTRICITY AND NATURAL GAS

Development at the Project site would increase demand for electricity and natural gas services and require the development of new utility infrastructure to deliver services to future development. Electrical and natural gas service in the City of Elk Grove is provided by SMUD and PG&E, respectively.

Projects in the SMUD and PG&E service areas would vary in size and have different amounts of development. However, they would be expected to increase the demand for electricity and natural gas supplies and related infrastructure. Individual development projects in the region would be required to assess project impacts during the environmental review process to ensure that SMUD has sufficient electrical supplies and PG&E has sufficient natural gas supplies to meet demand. Therefore, **a cumulatively significant impact would not occur**, and the project **would not result in a cumulatively significant incremental contribution** to impacts related to the increased demand for electrical and natural gas services.

New or extensions of existing SMUD and PG&E off-site infrastructure could be required to serve development in the Project site and other future projects within the SMUD and PG&E service areas. If construction and operation of SMUD and PG&E facilities are required to serve future development within their service areas, the Project and other individual projects could indirectly contribute to cumulative impacts. Construction and operation of off-site electrical and natural gas facilities are the responsibility of SMUD and PG&E, respectively. SMUD and PG&E would prepare separate CEQA documentation in the future to evaluate the cumulative environmental impacts and those cumulative impacts are not knowable at this time. It is speculative to gauge the extent to which this would create any cumulative impact that is distinct from the analysis of direct Project impacts.