

## 7 OTHER CEQA-REQUIRED ANALYSES

### 7.1 GROWTH INDUCING IMPACTS

#### 7.1.1 INTRODUCTION

According to Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines, an environmental impact report (EIR) must discuss the growth-inducing impacts of the project. Specifically, CEQA states that the EIR shall:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Growth-inducing impacts can result from development that directly or indirectly induces additional growth. Examples of growth inducement include:

- ▶ redesignation of property from agricultural to urban uses within an agricultural area, thus increasing the potential for adjacent farmland to also be redesignated to urban uses;
- ▶ the development of new housing or job-generating uses that would be sufficient in quantity to create a substantial demand for new jobs and housing, respectively;
- ▶ the development of new schools as part of a proposed project with excess capacity to serve adjacent currently undeveloped areas;
- ▶ the extension of roads and utilities to an area not currently served by such infrastructure; and
- ▶ the oversizing of new utility lines to a project site which may have additional capacity to serve currently undeveloped areas nearby.

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. These environmental effects may include increased demand on other community and public services and infrastructure, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, or conversion of agricultural and open space land to urban uses.

#### 7.1.2 CITY/COUNTY NORTH NATOMAS JOINT VISION PLAN

The project site is currently located outside the City of Sacramento (City) and outside the City's sphere of influence (SOI). The land use maps in the *City of Sacramento General Plan* (City General Plan) and the *County of Sacramento General Plan* (County General Plan) designate the project site for agricultural land uses. As such, based on current land use designations the project site is not identified for future urban development. Development of the project as proposed would be inconsistent with land uses envisioned in the City and County General Plans.

In 2001, the City and the County of Sacramento (County) embarked upon a long-term agreement to collaboratively manage growth and preservation of open space and habitat in unincorporated areas of the Natomas Basin within Sacramento County. The agreement resulted in the preparation of the City/County North Natomas Joint Vision Plan (Joint Vision). This vision indicated that a substantial portion of the Natomas Basin would become urbanized, including the project site. Both jurisdictions determined that it would be mutually beneficial to cooperatively plan for the urbanization of the area because the City and County would share revenues that result from development of the area and any future development would be in accordance with smart growth principles. The City Council and County Board of Supervisors approved a Memorandum of Understanding (MOU) that outlined a joint vision for land use and revenue sharing principles for Natomas and recognized the City as the agent of development and the County as the agent of permanent open space protection, including farmlands and habitat. The project as proposed would be consistent with urban development patterns and densities envisioned for the Joint Vision area, and is the first property in the area being considered for development since adoption of the MOU.

### **7.1.3 GROWTH INDUCING IMPACTS OF THE PROJECT**

The project site is located outside the City of Sacramento city limit boundaries and outside its SOI boundaries. Project approval would require annexation of the project site into the City of Sacramento and amendment of the City's SOI boundary. Additionally, the proposed project would be served by the Sacramento Regional County Sanitation District (SRCSD) and County Sanitation District-1 (CSD-1). SRCSD and CSD-1 would be required to amend their SOI boundary as the project site currently lies outside SRCSD's and CSD-1's existing SOI boundary. As discussed above, the City and County General Plans identify agricultural land uses for the project site and proposed land uses would be different than what is currently envisioned.

The Joint Vision plan identifies high-density mixed residential uses for the majority of the project site along with single-family small-lot uses in the southeastern-most portion of the site. Although the proposed project would be consistent with the Joint Vision plan, this plan is conceptual and does not enable or entitle any land uses. The overall development proposed for the project site is similar to urban development envisioned by the City and County, as discussed below. Through development of the project site as envisioned by the Joint Vision (see Section 7.2 "Cumulative Impacts"), the project would be growth inducing because the increased population associated with development would increase demand for goods and services, thereby fostering population and economic growth in the City of Sacramento and nearby communities. More importantly, it would set a precedent for allowing development north of the current City boundaries; this is discussed further below.

Regarding growth inducement, the 1986 NNCP EIR and the 1993 NNCP EIR Supplement found that the development of the NNCP area would have growth-inducing effects. Development of the North Natomas area will continue to have growth-inducing effects on the adjacent areas surrounding the plan area (City of Sacramento 1993). The project is a reflection of that anticipated growth inducing effect of the NNCP. The 1986 NNCP EIR and the 1993 NNCP EIR Supplement stated that the magnitude of the growth-inducing effect identified for the NNCP area would be moderated by planning for a realistic jobs-to-housing balance. Although this balance has not yet been realized in the North Natomas community, the land use designations provided by the NNCP are intended to achieve a balance as residential neighborhoods mature and the establishment of commercial services becomes increasingly viable. Whether this balance mutes pressure for growth outside the NNCP, however, remains to be seen.

Development of the project would not substantially contribute to an overall growth inducing effect because of its specific location and the nature of the proposed development. The project would be located between residential development occurring in the NNCP area and commercial and industrial development approved for the future Metro Air Park. Because of its adjacency to the NNCP area, the project would extend the North Natomas community to the west. Further, proposed land uses (e.g., residential, commercial, open spaces, school) would complement existing and proposed adjacent land uses.

Roadways providing access to and within the project site would consist of existing roads, improved roads along existing roadway alignments, and new roads. The project would develop and/or improve the road network in the Greenbriar area including Elkhorn Boulevard, Lone Tree Road, and the State Route (SR) 99/Elkhorn Boulevard interchange. The proposed project would also construct a new east-west roadway, Meister Way, through the center of the project site to provide access to and from the NNCP area to the east and Metro Air Park to the west. Because of the project site's location (i.e., adjacent to Interstate 5 [I-5] and SR 70/99), the proposed roadway would not provide new or substantially enhanced access to currently undeveloped areas to the south and east. Further, no roadways are proposed to be extended to the north. The proposed Meister Way would only provide connectivity between the approved Metro Air Park development and the existing North Natomas community. Therefore, the Greenbriar roadway network would not be considered growth-inducing.

Currently, there are no public storm drain facilities that serve the project site or any properties to the north and west. Properties located to the east and south are currently served by a storm drain system operated by the Reclamation District (RD) 1000. A formal storm water management system is proposed for the project site that would include a series of pipes and detention facilities that would be operated by the City. Proposed storm water conveyance facilities would not serve (i.e., they would not be sized to handle additional flows) other development projects outside the plan area, and therefore would not be growth inducing.

The City currently does not provide water service to the project site. The proposed project includes plans for extension of the City's infrastructure from the existing water mains located to the east and south of the site. The extension of water infrastructure to the project site would allow for extending water service to the Metro Air Park development located to the west. However, the Metro Air Park development is an approved development project, and provision of water to Metro Air Park would not be dependent upon water infrastructure constructed to serve the project. Extension of water services to the Greenbriar and Metro Air Park project sites is designed to serve these projects alone and would not induce further growth beyond these projects.

Municipal wastewater treatment service is not currently available to the project site. However, a trunk sewer line, part of SRCSD's wastewater conveyance pipeline system, currently extends across the project site in an east-west direction connecting with Sacramento International Airport and the NNCP area. This trunk line currently conveys wastewater from Sacramento International Airport and would also convey future wastewater generated by the Metro Air Park development to the east. The proposed project would connect to this wastewater trunk line at a point on the easternmost portion of the site. The proposed project would construct the necessary facilities on-site to serve development and connect to SRCSD's conveyance system.

The proposed project would involve a substantial construction effort over an extended period that would bring construction workers to the project site on a daily basis during peak periods. Because construction workers typically do not change where they live each time they are assigned to a new construction site, it is not anticipated that there would be any substantial relocation of construction workers to the City or County of Sacramento associated with the proposed project. The existing number of residents in the City and County of Sacramento who are employed in the construction industry would likely be sufficient to meet the demand for construction workers that would be generated by the proposed project. Between June and July 2005, the construction industry in Sacramento metropolitan area added 800 new jobs, which accounted for the sixth consecutive month of expansion in the construction industry and brought the construction industry's job total to a new record high (EDD 2005). As of July 2005, there were 73,400 jobs in the construction industry for the Sacramento metropolitan area (EDD 2005). Therefore, no substantial increase in demand for housing or goods and services would be created by project construction workers, and thus no growth inducement associated with these workers would be expected.

In addition, employees would be hired for the proposed elementary school. No employment assumptions for elementary schools in the City of Sacramento were available; based on average school enrollments and average school sizes, Economic & Planning Systems estimated the number of employees per acre for elementary schools at 5.0 employees per acre (Ross, pers. comm., 2005). Based on this estimate, construction of an elementary school on 10 net acres on the project site would result in the creation of 50 full-time equivalent positions employed by

the school district. Approximately 850 additional full-time positions would be created by commercial land uses on the project site. It is expected that the proposed project's employment needs would be largely filled by existing Sacramento County or regional residents. Therefore, the proposed project would not be expected to directly induce population growth by bringing substantial numbers of new employees to the project vicinity.

The proposed project would include the development of up to 3,473 residential units with an estimated population of 8,926. Although the proposed project includes the provision of commercial services, on-site services would meet only some of the needs of the project population. The additional population associated with the proposed project would spur an increase in demand for goods and services in the surrounding area and region, which could potentially result in additional development to satisfy this demand. In this respect, the proposed project would be growth inducing. It would be speculative, however, to try to predict exactly where any such new services would locate. The most logical assumption is that they would locate where the existing City and County General Plans currently anticipate them. The general plans have already undergone environmental review and any new individual projects requiring discretionary approvals would undergo their own environmental review if of a scale that warrants environmental review.

Fire, protection, law enforcement, and other City services would be expanded only as necessary to meet project demand. As discussed in Section 6.6, "Public Services," existing law enforcement services have sufficient capacity to serve the proposed project. The City of Sacramento Fire Department (SFD) is planning for the construction of an additional fire station that would serve the project site and surrounding Natomas area. The project would coordinate with the SFD and pay required fees to ensure adequate facilities are in place to meet project demands. The project would also provide space for the construction of an elementary school and would pay fees toward funding necessary school facilities. Because adequate public services are available to serve the project or the proposed project would provide or ensure that additional public services would be available to meet project demands (i.e., schools, police, fire), it would not facilitate additional development requiring public services.

The land directly north of the project site is outside the City's SOI boundary and is located in the jurisdiction of the County. This land is designated in the County General Plan for agricultural land uses. Because of this designation and its location outside the City's SOI, the intended long-term use of this property is for agriculture. As the proposed project develops, particularly along its northern edge, it would place urban development adjacent to agricultural land. Historically, this type of land use pattern has resulted in conflicts between the ongoing agricultural operations and the urban development uses. Further, economic returns from urban development are typically substantially higher than continued agricultural use of land, and encroaching urban uses typically make attractive the conversion of adjacent agricultural land to urban uses. Thus, it can be expected that the project would place pressure on agricultural land to the north of the site to convert to urban uses.

Conversion of adjacent agricultural lands to urban uses is not consistent with existing and adopted long-term plans for the area. This potential conversion of agricultural land to an urban use and the related loss of agricultural land, loss of biological habitat, additional traffic generation, and air and noise impacts are potential growth-inducing impacts of the project. Development in this area would also require the extension of unplanned infrastructure (i.e., water, storm drainage, wastewater). Because development of these agricultural lands would require the County to amend its general plan and/or the City to expand its corporate limits and SOI boundary, such a land use conversion is not assured. Although development of the project, despite not providing any direct infrastructure linkages to the area, may contribute to possible long-term economic pressure for the eventual filing of applications for general plan amendments and/or other discretionary approvals in the area north of the project site, the responses of future elected bodies to such applications cannot be predicted. It is therefore impossible to conclude that the long-term urbanization of this northern area would be a reasonably foreseeable indirect effect of the project. (See State CEQA Guidelines Section 15358 [which defines "effects" for purposes of CEQA as including "[i]ndirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still *reasonably foreseeable*"] [emphasis added].) This said, however, the project's potential for setting a precedent for growth and extension of the NNCP boundaries is an important consideration. As the

NNCP is built out, substantial pressure has been placed to consider development of the area to the north, including the project site. Recent proposals have included consideration of developing the area and using revenues from development to help fund a new sports arena. This proposal did not result in formal application to the City or County, but it suggests that interest in the area is high. Further, under the Joint Vision and the SACOG Blueprint, much of the area is identified as future urban development.

Approval of the project would require the City to expand its sphere of influence to cover the site, which also requires approval of LAFCo. This approval could set precedent for future considerations of growth in the area, but it would also potentially mute such considerations in that LAFCo would not be apt to consider multiple sphere-of-influence changes in rapid succession. Further, ultimate development of the site would require agreement with the U.S. Fish and Wildlife Service (USFWS), because the site, and the rest of the Joint Vision area, is not permitted for development in the Natomas Basin Habitat Conservation Plan (NBHCP). Thus additional requests for development would be closely scrutinized by USFWS. In short, the precedent-setting nature of the project itself may make other development requests more difficult to process.

Overall, the proposed project would be growth inducing because the increased population associated with the proposed project would increase demand for goods and services, thereby fostering population and economic growth in the City of Sacramento and nearby communities. It can be expected that a successful project would place pressure on adjacent areas to the north to seek development entitlements. As explained above, however, it would be speculative to assume that these areas would in fact develop with urban uses, and numerous discretionary actions subject to environmental review and political considerations would have to be granted before any such urban uses could materialize. In summary, much of the growth that the proposed project would induce has been evaluated and provided for in the City General Plan, County General Plan, and other relevant planning documents.

## 7.2 CUMULATIVE IMPACTS

This draft environmental impact report (DEIR) provides an analysis of overall cumulative impacts of the project taken together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the California Environmental Quality Act Guidelines (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 Greenbriar itself would cause a “cumulatively considerable” (and thus significant) incremental contribution to any such cumulatively significant impacts. (See State CEQA Guidelines Sections 15130[a]-[b], Section 15355[b], Section 15064[h], Section 15065[c]; *Communities for a Better Environment v. California Resources Agency* [2002] 103 Cal.App.4th 98, 120.) In other words, the required analysis intends to first create a broad context in which to assess the project’s incremental contribution to anticipated cumulative impacts, viewed on a geographic scale well 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” in CEQA parlance).

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]).

Consistent with State CEQA Guidelines Section 15130(a), the discussion of cumulative impacts in this DEIR focuses on significant and potentially significant cumulative impacts. State 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.

## **7.2.1 PROJECTS CONTRIBUTING TO POTENTIAL CUMULATIVE IMPACTS**

The State CEQA Guidelines 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. For this DEIR, both the list and the plan approach have been combined to generate the most reliable future projections possible. A list approach is used to define specific projects that are currently proposed, but are not necessarily considered within an approved planning document. The plan approach is used to consider development consistent with an adopted plan. The plan approach is also used to consider the potential cumulative impacts of long-term development of the Joint Vision area, because specific development proposals for this overall area are not yet formed, and the best source for consideration of this area is the SACOG Blueprint, as will be discussed below.

### **CUMULATIVE CONTEXT**

The City of Sacramento has developed over the past 150-plus years beginning in the late 1840's immediately following the discovery of gold. Over this time the City, and the Sacramento region, has shifted largely, though not entirely, from natural habitat to agriculture and urban development. Overall, population in Sacramento County has increased dramatically over the past 65 years, based on US Census data, from approximately 170,000 in 1940 to 500,000 in 1960, 780,000 in 1980, and 1,230,000 in 2000 (California Department of Finance 2005). Over this same period, the City of Sacramento grew from approximately 105,000 people in 1940 to 192,000 in 1960, 276,000 in 1980, and 407,000 in 2000 (California Department of Finance 2005). According to the California Department of Conservation, Sacramento County comprises 636,083 acres, and the amount of urbanized land increased from 131,321 acres in 1988 to 159,903 acres in 2002, a change of 28,582 acres (4.5% of total County acreage) over the reporting period (California Department of Conservation Farmland Mapping and Monitoring Program, 1988–2002 Land Use Summary). The population growth and the related development has changed the environment of the Sacramento region, and this change has resulted in the environmental baseline for many of the issues discussed in Chapter 6, such as adverse air quality, diminishing biological habitat, increased traffic, etc.

The North Natomas area of the City of Sacramento is another important indicator of past development. Greenbriar, if approved, would amend the boundary of the NNCP and would be a Special Planning Area (SPA) within the NNCP subject to its own Planned Unit Development (PUD) guidelines and finance plan. As described further below the NNCP is an approximately 9,000-acre area of the City that began developing in 1999 and is expected to reach buildout in 2016. The cumulative effects of this build out are described in the cumulative impact analysis.

### **RELATED PROJECTS CONTRIBUTING TO CUMULATIVE IMPACTS**

#### **CURRENTLY PLANNED AND PROPOSED PROJECTS**

##### **North Natomas Community Plan**

Development projects in the North Natomas community that have been approved but are yet to be fully built out have been identified and evaluated by the NNCP and the associated environmental review documents. For this reason, the cumulative analysis contained in this EIR focuses on the overall development anticipated in the North

Natomas community as projected by the NNCP. Using this approach, this cumulative assessment provides the most conservative and inclusive analysis of past, present, and potential future projects.

The North Natomas community is bounded by Elkhorn Boulevard to the north, I-80 to the south, the Natomas East Main Drainage Canal to the east, and the West Main Drain Canal to the west, covering more than 9,000 acres in the northwest portion of the city (see Exhibit 3-2 in Chapter 3) that was predominantly in agricultural use before development. The NNCP provides a long-term vision for the development of the North Natomas community. The environmental consequences from implementation of the NNCP were addressed in the 1986 NNCP EIR (certified by the Sacramento City Council in May 1986) as well as the 1993 Supplement to the 1986 NNCP EIR. Development within the NNCP started in 1999.

There are several development projects that have been approved in the North Natomas community. Some of these projects are fully built-out and occupied at this juncture, while others are still in development phases. These projects are generally located to the south and east of the project site and include: the Westborough project, Cambay West, Natomas Crossing, Natomas Town Center, Panhandle, and Natomas Creek.

The development projects in the North Natomas community that have been approved but are yet to be fully built out have been identified and anticipated by the NNCP and the associated environmental review documents. For this reason, the cumulative analysis contained in this EIR focuses on the overall development anticipated in the North Natomas community as projected by the NNCP. Using this approach, this cumulative assessment provides the most conservative and inclusive analysis of past, present, and potential future projects.

In 2000, the estimated population for the North Natomas area was 2,002 people, occupying 740 housing units (SACOG 2001). At buildout (year 2016), the NNCP estimates a population of 66,495 in the North Natomas community occupying 33,257 housing units on approximately 9,038 acres, and 72,016 employees; the NNCP area is projected to account for approximately 35% of new housing and 30% of the new jobs in the City of Sacramento at buildout (City of Sacramento 1994). According to the City of Sacramento, development within the NNCP area as of September 14, 2005, includes approval of 12,162 lots for development of residential, commercial, and industrial land uses; approval of 10,801 building permits; approval of 11,599 single-family residential special permits; and approval of 6,003 multifamily residential special permits (City of Sacramento 2005).

According to SACOG projections, there were 14,865 persons living in the NNCP area and 5,368 housing units in the year 2005. SACOG projects 45,040 persons occupying 17,230 housing units in the year 2025 (SACOG 2005). Using these numbers, SACOG projects a growth of 30,175 persons, or 203% increase, and an increase of 11,862 housing units, or 221% increase, by the year 2025.

## **Metro Air Park**

In addition to development anticipated within the North Natomas community, the Metro Air Park development is a newly developing project located adjacent to the Sacramento International Airport and along the westerly edge of the Greenbriar site. The Metro Air Park totals 1,983 acres and has been approved for development of approximately 20 million square feet of office space, light industrial projects, retail and hotel developments, and a golf course on land east of the airport and north of I-5. The project is located in an area that has historically been dominated by agricultural uses. Construction of the Metro Air Park began in September 2003.

## **West Lakeside**

As detailed in the MOU for the City/County Joint Vision for Natomas, the City has been identified as the appropriate agent for planning new growth in Natomas (City of Sacramento and County of Sacramento 2002). An application for development within the Joint Vision area is on file for the West Lakeside project. No other applications for the Joint Vision area have been filed and its future development potential is in its early consideration stage by the City and County. As such, development of the Joint Vision is considered separately in this analysis. The West Lakeside project is a proposal located approximately 0.25 mile south of the project site adjacent to the eastern

border of West Main Drain Canal. This project includes the development of 524 residential units, a 10-acre elementary school, and approximately 33 acres of open space land uses (e.g., parks and detention basins).

**Habitat Conservation Plan-Related Development Considerations**

Several regional habitat conservation planning efforts are also underway that allow for development, while setting aside, enhancing, and protecting habitat for sensitive species found in the region. The Natomas Basin HCP (NBHCP) would include the protection, management, and monitoring of conservation lands to reconcile the needs of 22 special-status species with planned development in the Natomas Basin, including lands within the City of Sacramento and Sutter County. Implementation of the NBHCP would provide a comprehensive program for the preservation and protection of habitat for threatened and endangered species potentially found on approximately 53,537 acres of undeveloped and agricultural land in northwestern Sacramento County and southern Sutter County. In addition, a habitat conservation plan (HCP) was developed and adopted for the Metro Air Park (described above).

The land that would be authorized for development under the take permits associated with the NBHCP would be 15,517 acres, of which approximately 4,000 acres are currently undeveloped lands within the City of Sacramento, within the NNCP. In combination with the Metro Air Park, this total would reach 17,500 acres allocated among the City, Metro Air Park, and Sutter County. (Although the Metro Air Park is not part of the NBHCP, it was evaluated in the EIR/EIS for the NBHCP). Authorized development would include projects sponsored by either private developers or public entities that occur within the permitted area.

**SUMMARY OF CURRENTLY PLANNED AND PROPOSED PROJECTS**

Table 7-1 provides a summary of the projects considered in the cumulative analysis. Exhibit 7-1 presents the general location of cumulative projects.

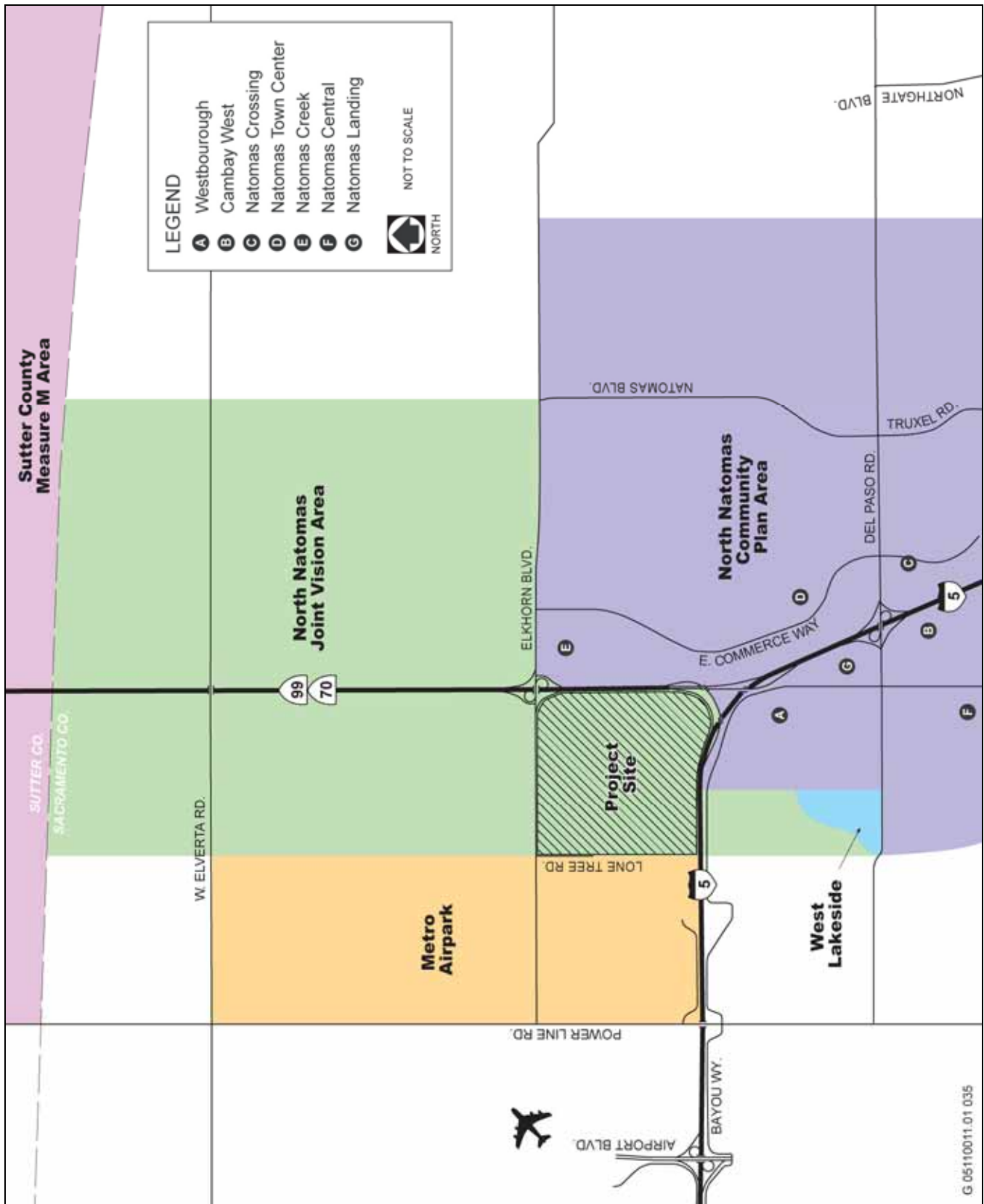
<b>Table 7-1 Cumulative Projects</b>				
<b>Cumulative Project</b>	<b>Total Acres</b>	<b>Residential Land Uses (acres/units)</b>	<b>Commercial/Industrial Land Uses (acres)</b>	<b>Population (persons)</b>
North Natomas Community Plan	9,038	3,160/33,257	2,195	66,495
Metro Air Park Development	1,983	0/0	1,983	0
West Lakeside Development	133.4	70/524	0	1,215
Greenbriar Development Project	577	390/3,473	27.5	8,926
<b>Total</b>		<b>3,620/37,254</b>	<b>4,205.5</b>	<b>76,636</b>

**FUTURE POTENTIAL CUMULATIVE PROJECT: CITY/COUNTY JOINT VISION AND SUTTER COUNTY MEASURE M**

**Joint Vision**

As discussed in Section 3.7.2, “North Natomas Joint Vision Area,” the Joint Vision Plan is a collaborative effort between the City and County of Sacramento to develop a vision for the 10,000-acre area of the County between the northern city limits and Sutter County. Concepts for development have been considered and include a mixture of residential densities, an industrial park (in addition to Metro Airpark), and open spaces throughout, including most extensively in the northern extent separating development from the Sutter County boundary. In fact, a large amount of open space is anticipated to be dedicated (for habitat preservation and farmland retention) in this area. To date, no land use plans have been adopted, and all considerations to date have been conceptual.





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**Project's Contribution to Potential Cumulative Impacts**

**Exhibit 7-1**

The City and County’s conceptual vision for growth within this area is generally compatible with the principles outlined in Sacramento Area Council of Government’s (SACOG) Blueprint (discussed in Section 3.8.3, “Sacramento Region Blueprint”). The preferred vision for growth and development within this area could result in the development of a range of development densities, depending on the development scenario ultimately selected. Under the preferred scenario, two development options are under consideration: 1) No Development in Floodplain areas; 2) Up to 50% of Floodplain areas if sufficiently protected. The difference between the options would depend upon whether areas within the existing floodplain are brought under 100-year flood protection through the construction of measures (e.g., improved levees, set-back levees, elevated building pads) to remove flood hazards. Table 7-2 presents the range of development densities for the options under consideration.

Land Use Category	No Development in Floodplain				Up to 50% of Floodplain is Reclaimed			
	Net Acres	Units	Commercial Square Feet	Jobs	Net Acres	Units	Commercial Square Feet	Jobs
Residential Mixed Use	2,154	38,759	--	--	2,656	47,801	--	--
Commercial/ Employment	186	--	3,255,709	11,772	233	--	4,656,698	16,837
Open Space/ Public	1,453	--	--	--	1,794	--	--	--

Source: City of Sacramento, 2005

The Greenbriar site is in the area being considered under the Joint Vision. For comparison purposes and to demonstrate the magnitude of the proposal, development of the Joint Vision would occur over an area approximately 6.5 to 8.0 times larger than the project site, would develop 10 to 13 times more houses, and would develop 11 to 16 times the commercial space proposed by the project.

The ultimate development scenario that would be proposed for the Joint Vision area is not known and likely will not be known within the time this EIR and development are being considered. However, because the development potential of the area is large and it is being actively studied, this EIR includes disclosure of the plan to the extent it can be known. It is considered as future potential cumulative development, and because this is a speculative development proposal at this time, it is considered separately and less extensively than the cumulative development that is currently planned and proposed (i.e., specific development proposals have been submitted). The Joint Vision plan would be the subject of extensive CEQA review and consideration by the City and County, neighboring jurisdictions, regulatory agencies including DFG and USFWS, local service providers and LAFCo, and its likely implementation is best described as unknown.

### **Measure M**

In 2004, Sutter County voters passed Measure M, an advisory measure intended to provide the Board of Supervisors with an indication of how the citizens of Sutter County feel about the types and level of development in the 7,500-acre area of the South Sutter County Industrial / Commercial Reserve. The southern boundary of the Measure M area forms the Sutter/Sacramento county line, approximately 4 miles north of Greenbriar. The vote did not approve any specific development proposals, but did provide guidance on how development may be viewed in the future. Measure M parameters for the South Sutter area are:

- ▶ at least 3,600 acres for commercial/industrial development;
- ▶ at least 1,000 acres for schools, parks, other public uses, and retail; and

- ▶ no more than 2,900 acres for residential development, with a population cap of 39,000.

An application for the Measure M area has not been submitted to Sutter County, as of December 2005 (well after the date of the NOP for this EIR), so the specifics of any development proposal are not known beyond the parameters outlined above.

## **7.2.2 CUMULATIVE IMPACT ANALYSIS**

### **TRAFFIC AND CIRCULATION**

#### **PLANNED AND PROPOSED DEVELOPMENT IMPACTS**

##### **Year 2025 Cumulative Conditions**

The analysis of cumulative traffic impacts is presented in Section 6.1, “Transportation and Circulation,” of this EIR. Please refer to that section. As shown, cumulative development would cause a number of roadways, including freeway segments, to operate above capacity levels, which is a significant cumulative impact. In the year 2025 (without project), the following 8 intersections are expected to operate unacceptably:

- ▶ SR 70/99 Southbound Ramps and Elverta Road (LOS F during the a.m. peak)
- ▶ SR 70/99 Northbound Ramps and Elverta Road (LOS F during the a.m. peak)
- ▶ Elkhorn Boulevard and Lone Tree Road (LOS D and LOS F during the a.m. and p.m. peaks, respectively)
- ▶ SR 70/99 Northbound Ramps and Elkhorn Boulevard (LOS F during the a.m. peak)
- ▶ Metro Air Parkway and I-5 Northbound Ramps (LOS F during the a.m. and p.m. peaks)
- ▶ Elverta Road and Lone Tree Road (LOS E and LOS F during the a.m. and p.m. peak, respectively)
- ▶ Meister Way and Metro Air Parkway (LOS F during the p.m. peak)
- ▶ Metro Air Parkway and Bayou Road (LOS F during the a.m. and p.m. peaks)

The following 2 roadway segments are expected to operate unacceptably under Cumulative (2025) Conditions:

- ▶ Elkhorn Boulevard west of SR 70/99 Interchange – LOS E
- ▶ Metro Air Parkway north of I-5 Interchange – LOS F

The following 5 freeway ramps are expected to operate unacceptably under Cumulative (2025) Conditions:

- ▶ SR 70/99 northbound to Elkhorn Boulevard off-ramp – LOS E during the a.m. peak hour
- ▶ I-5 northbound to SR 70/99 northbound off-ramp – LOS E during the a.m. peak hour
- ▶ I-5 northbound to Metro Air Parkway off-ramp – LOS F during the a.m. peak hour
- ▶ I-5 southbound to Metro Air Parkway off-ramp – LOS F during the a.m. peak hour
- ▶ Metro Air Parkway to I-5 southbound loop on-ramp – LOS F during the p.m. peak hour

The following 3 freeway segments are expected to operate unacceptably under Cumulative (2025) Conditions:

- ▶ I-5 East of Powerline Road – LOS F for the northbound approach during the a.m. peak hour and the southbound approach during the p.m. peak hour
- ▶ I-5 north of Del Paso Road – LOS F for the northbound approach during the a.m. peak hour and the southbound approach during the p.m. peak hour
- ▶ I-5 north of I-5/I-80 Interchange between I-80 and Arena Boulevard Exit – LOS F for the northbound approach during the a.m. peak hour and the southbound approach during the p.m. peak hour

## Cumulative Plus Project

Under Cumulative plus Project conditions, the following 14 intersections would operate unacceptably:

- ▶ SR 70/99 Southbound Ramps and Elverta Road (LOS F during the a.m. peak)
- ▶ SR 70/99 Northbound Ramps and Elverta Road (LOS F during the a.m. peak)
- ▶ Elkhorn Boulevard and Lone Tree Road (LOS D and LOS F during the a.m. and p.m. peaks, respectively)
- ▶ SR 70/99 Southbound Ramps and Elkhorn Boulevard (LOS E during the a.m. peak)
- ▶ SR 70/99 Northbound Ramps and Elkhorn Boulevard (LOS F during the a.m. peak)
- ▶ Metro Air Parkway and I-5 Northbound Ramps (LOS F during the a.m. and p.m. peaks)
- ▶ Elverta Road and Lone Tree Road (LOS E and LOS F during the a.m. and p.m. peaks, respectively)
- ▶ Meister Way and Metro Air Parkway (LOS E and LOS F during the a.m. and p.m. peaks, respectively)
- ▶ Meister Way and Lone Tree Road (LOS D and LOS F during both the a.m. and p.m. peaks, respectively)
- ▶ Meister Way and E. Commerce Way (LOS D and LOS F during the a.m. and p.m. peaks, respectively)
- ▶ Metro Air Parkway and Bayou Road (LOS F during the a.m. and p.m. peaks)
- ▶ Elkhorn Boulevard and Project Street 1 (LOS D and LOS F during the a.m. and p.m. peaks, respectively)
- ▶ Elkhorn Boulevard and Project Street 2 (LOS D and LOS F during the a.m. and p.m. peaks, respectively)
- ▶ Elkhorn Boulevard and Project Street 3 (LOS D and LOS F during the a.m. and p.m. peaks, respectively)

The following three roadway segments are expected to operate unacceptably under Cumulative plus Project conditions:

- ▶ Elkhorn Boulevard west of SR 70/99 Interchange – LOS F
- ▶ Metro Air Parkway north of I-5 Interchange – LOS F
- ▶ Meister Way west of SR 70/99 – LOS E

The following 6 freeway ramps are expected to operate unacceptably under Cumulative plus Project conditions:

- ▶ SR 70/99 northbound to Elkhorn Boulevard off-ramp – LOS F during the a.m. peak hour
- ▶ Elkhorn Boulevard to SR 70/99 southbound slip on ramp – LOS E during the p.m. peak hour
- ▶ I-5 northbound to SR 70/99 northbound off-ramp - LOS E during the a.m. peak hour
- ▶ I-5 northbound to Metro Air Parkway off-ramp – LOS F during the a.m. peak hour
- ▶ I-5 southbound to Metro Air Parkway off-ramp – LOS F during the a.m. peak hour
- ▶ Metro Air Parkway to I-5 southbound loop on-ramp – LOS F during the p.m. peak hour

The following three freeway segments are expected to operate unacceptably under Cumulative plus Project conditions:

- ▶ I-5 East of Powerline Road – LOS F for the northbound approach during the a.m. peak hour and the southbound approach during the p.m. peak hour
- ▶ I-5 north of Del Paso Road – LOS F for the northbound approach during the a.m. peak hour and the southbound approach during the p.m. peak hour
- ▶ I-5 north of I-5/I-80 Interchange between I-80 and Arena Boulevard Exit – LOS F for the northbound approach during the a.m. peak hour and the southbound approach during the p.m. peak hour

As shown, the project would contribute considerably to cumulative traffic impacts, increasing the number of intersections, roadway segments, and freeway ramps that operate unacceptably, and exacerbating adverse operating conditions on 3 freeway segments that would already operate poorly.

The ability to mitigate these impacts is tied to fair share contributions to regional transportation funds, but these programs are not currently available and, therefore, implementation of the improvements can not be guaranteed. Further, in some instances, freeway widening would be required, and this is likely not financially feasible or would require right-of-way acquisition that is not available. Please see Section 6.1, "Transportation and Circulation." Therefore, these impacts are considered cumulatively *significant and unavoidable*.

## **JOINT VISION AND SUTTER COUNTY MEASURE M CUMULATIVE IMPACTS**

As described above, cumulative development would result in significant impacts to a number of roadways, intersections, and freeway segments, which would operate above capacity. Because the land uses are imprecisely defined for the Joint Vision area, traffic impacts can only be roughly estimated. Using trip generation rates that reflect a relative mid-point generation level, it is assumed residential uses would generate 7 daily and 0.7 p.m. peak hour trips; commercial would generate 50 daily and 5 peak hour trips per 1,000 square feet; and employment would generate 4 daily and 0.5 p.m. peak hour trips per job. At these rates, the Joint Vision would generate between 480,000 and 635,000 daily, and between 50,000 and 65,000 p.m. peak hour trips. By comparison, the project would generate 41,119 daily and 4,467 p.m. peak hour trips. This would be a substantial addition of traffic to the regional roadway system, and would further exacerbate cumulative traffic impacts. Because, as described above, the addition of Greenbriar traffic would be considerable, it would also contribute considerably to cumulative impacts associated with development of the Joint Vision, if approved.

The land uses for the Measure M area of South Sutter County have only been discussed within basic parameters. The ultimate land uses and how they are configured will largely influence trip generation and distribution patterns for Measure M and until plans are proposed it would be speculative to forecast traffic impacts. Given the magnitude of potential development, which is similar to the Joint Vision, it is likely that substantial additional traffic would be placed on I-5 and SR 70/99, and that traffic impacts would be further exacerbated.

The ability of the project to reduce its contribution to this impact is tied to fair share contributions to regional transportation funds, but these programs are not currently available. Further, in some instances, freeway widening would be required, and this is likely not financially feasible or would require right-of-way acquisition that is not available. It is expected to contribute considerably to a cumulatively significant unavoidable impact. However, an analysis of traffic from the Joint Vision project would need to be conducted, along with the development of mitigation programs, to determine what the actual cumulative impact would be after mitigation. It is suggested that the City of Sacramento and the County consider a regional transportation fee program to fund regional improvements to the degree feasible.

## **AIR QUALITY**

### **PLANNED AND PROPOSED DEVELOPMENT IMPACTS**

Past development in the Sacramento Valley Air Basin combined with meteorological conditions has resulted in significant cumulative impacts to air quality. As described in Section 6.2, "Air Quality," the SVAB is in non-attainment status for ozone and small particulate matter (less than 10 microns in diameter, or PM<sub>10</sub>).

The Sacramento Metropolitan Air Quality Management District (SMAQMD) has established a significance threshold of 85 lbs/day for oxides of nitrogen (NO<sub>x</sub>), an ozone precursor, during construction. For PM<sub>10</sub>, SMAQMD defines a substantial contribution as any project that would add a concentration of 2.5 micrograms (µg) per cubic meter. Modeling by the District has shown that projects that generally disturb more than 15 acres in any one day, even when fully mitigated by the use of dust control, could add 2.5 µg per cubic meter of PM<sub>10</sub> to sensitive receptors near a project site.

The proposed project would result in significant and unavoidable construction-related air quality impacts associated with generation of NO<sub>x</sub> and PM<sub>10</sub>, even with implementation of mitigation measures identified in

section 6.2, “Air Quality.” Assuming all related projects also implement all feasible construction emission control measures consistent with SMAQMD guidelines, construction emissions on some of the related projects may be less than significant, although it is likely that larger projects, such as the Metro Air Park development, would result in significant and unavoidable air quality impacts on their own. This impact cannot be more precisely determined because related projects would develop on their own schedules, some of which are not known. It would, thus, be speculative to try to add together the various projects with their differing and changing schedules. However, given the large scale of development that would occur with the related projects (over 10 times the size of Greenbriar), taken in total and combined with the nonattainment status of the SVAB for ozone and PM<sub>10</sub> and other development that would occur in the SVAB, would result in a significant and unavoidable cumulative construction-related air quality impact. Because the project would result in a significant impact from the generation of NO<sub>x</sub> and PM<sub>10</sub>, it would also be expected to contribute considerably to the **significant and unavoidable** cumulative air quality impact.

Long-term emissions from related projects, considered in light of the non-attainment status of the air basin, would also be cumulatively significant. As described in Section 6.2, “Air Quality,” the SMAQMD has established thresholds of significance for project operations: 65 lbs/day of reactive organic gases (ROG) and NO<sub>x</sub>, and a substantial contribution to PM<sub>10</sub> (see discussion above). The proposed project would result in significant and unavoidable long-term regional (operational)-related air quality impacts and would exceed the SMAQMD thresholds. It would, therefore, contribute considerably to the cumulative air quality impact. Related projects would similarly contribute, although to a much greater degree. Emissions attributable to the proposed project, cumulative development listed on Table 7-1, and emissions from other reasonably foreseeable future projects in SVAB as a whole, would continue to contribute to long-term increases in emissions that would exacerbate existing and projected nonattainment conditions. Thus, the proposed project would contribute to a **significant and unavoidable** cumulative air quality impact and the project’s contribution would be considerable.

Given that compliance with applicable rules and regulations would be required for the control of stationary source TAC emissions, both on-site and off-site, the project’s contribution to long-term cumulative increases in stationary source TAC concentrations would be minor and **less than significant**. Further, exposure to TAC emissions is a site-specific issue.

As described in Section 6.2, “Air Quality,” implementation of the proposed project would result in less-than-significant local mobile source CO-related air quality impacts. Carbon monoxide emissions from mobile sources would be anticipated to further decrease under cumulative conditions because of implementation of emissions control technology, thus, 1- and 8-hour CO concentrations for the 2025 cumulative conditions would not be anticipated to exceed the significance thresholds of 20 ppm and 9 ppm. Consequently, the cumulative impact of the project’s contribution to traffic volumes on the local roadway network relative to CO concentrations would be **less than significant**.

With respect to mitigation, the EIR includes all available feasible mitigation to reduce the project’s contribution to cumulative construction-related and long-term emission air quality impacts; see Section 6.2, “Air Quality,” Mitigation Measures 6.2-1 and 6.2-2. However, while this mitigation would substantially reduce emissions from the project, it is not sufficient to reduce the project’s cumulative contribution to below a level that is not considerable. Therefore, the project would contribute considerably to cumulatively **significant and unavoidable** air quality impacts associated with ozone precursors and PM<sub>10</sub> during construction and operations.

## **JOINT VISION AND SUTTER COUNTY MEASURE M CUMULATIVE IMPACTS**

Given that the Joint Vision could result in development at a magnitude of more than 10 times the project and the Measure M development could be similar in magnitude as the Joint Vision, they would be expected to further contribute to cumulative significant adverse air quality conditions, especially associated with ozone precursors and PM<sub>10</sub> during construction and operations. The Joint Vision and Measure M would, therefore, exacerbate

future cumulative conditions, and the project would contribute considerably to these conditions, because it would exceed significance thresholds as described above.

### 7.2.3 NOISE

#### PLANNED AND PROPOSED DEVELOPMENT IMPACTS

Construction activities occurring during the daytime hours are exempt from the provisions of the noise ordinance, provided, however, that all construction equipment is required to be fitted with factory installed muffling devices and maintained in good working order. For the proposed project, it was determined that adherence to these noise regulations would be sufficient to avoid significant construction noise impacts. Because daytime construction is required under the noise ordinance, it can be reasonably assumed that related projects would include such restrictions. Hence, cumulative noise impacts associated with construction noise sources would be expected to be *less than significant*. Further, construction noise is localized. Thus, if construction activities occur simultaneously, they would likely not result in cumulative impacts unless sites are being developed in close proximity to one another and expose sensitive receptors to significant noise levels at the same time. Because the proposed project would comply with the noise ordinance and because it is not anticipated that the proposed project would combine with any others to produce construction noise at sensitive receptors, it would not contribute to any such significant cumulative noise impacts. This would be a *less-than-significant* cumulative impact.

Likewise, stationary noise (i.e., noise generated by stationary on site uses), would be localized to those areas of the site where the noise would be detectable, and would not combine with other projects in the region to produce cumulative noise, and this would be a *less-than-significant* cumulative stationary noise impact.

The one source of noise that would be expected to result in potential cumulative noise impacts is traffic noise. As described in Section 6.3, "Noise," implementation of the proposed project would result in significant long-term traffic-generated noise impacts under existing plus project conditions, with several homes being exposed to substantial increases in noise. These impacts would occur at selected off-site sensitive receptors within the County, generally at homes located on Lone Tree Road (south of Elkhorn), Elverta Road (east of Power Line), Power Line Road (between Elkhorn and Del Paso), and Elkhorn Boulevard (between Power Line and Lone Tree), where noise from the project was modeled to increase by more than 4 dB CNEL, which exceeds the County's threshold of significance. Given the relative size of related projects and the fact that they would use the same roadways, it is likely that cumulative development would likewise result in similar significant impacts at these sensitive receptors. The project's contribution to the noise levels at these areas would be considerable and, as described in Section 6.3, "Noise," mitigation is not feasible. Therefore the project would contribute considerably to this *significant and unavoidable* cumulative impact.

Further, buildout of the area would result in a noticeable increase in traffic noise on major roadways. For instance, under current conditions, the 65 dB CNEL extends 798 feet from I-5 (west of the SR 70/99 split) (see Table 6.3-1). Under cumulative (with project) conditions, the noise contour would extend an additional 326 feet from I-5 (Table 6.3-13). The 65 dB CNEL from Elkhorn Boulevard, between Lone Tree and SR 70/99, does not extend outside of the roadway under current conditions; under cumulative plus project conditions the 65dB CNEL contour would extend 404 feet (modeled) from the roadway. Thus, the combined cumulative increase in traffic from future growth would extend the 65 dBA CNEL contour (and all other traffic noise contours) considerably, and this would affect sensitive land uses in the area. This is considered a significant cumulative traffic noise impact, and the project would contribute considerably to it. Mitigation for this impact would be developed primarily as new development proceeds, resulting in construction of noise walls, berms, etc. Areas that are already developed and do not have these noise attenuation features would be the most vulnerable to increased noise.

Because cumulative noise would be generated by several projects, it may require a regional program to sufficiently fund sound walls, berms, etc. It is not known if such a program would be feasible to implement. Because mitigation to sufficiently reduce noise at every existing and proposed sensitive receptor may be infeasible, this cumulative traffic noise impact is considered *significant and unavoidable* and the project contribution would be considerable.

## **JOINT VISION AND SUTTER COUNTY MEASURE M CUMULATIVE IMPACTS**

Given that the Joint Vision could result in development at a magnitude of more than 10 times the project and it would contribute substantial new traffic to regional roadways, it would be expected to further contribute to cumulative significant adverse noise generation at sensitive land uses. The Joint Vision would, therefore, exacerbate future cumulative conditions, and the project would contribute considerably to these conditions, because it would exceed significance thresholds as described above. Because potential Measure M development in south Sutter County would be similar in magnitude as the Joint Vision (although traffic patterns would be different), it is likely to contribute even further to cumulative noise impacts. Mitigation would need to be considered once the magnitude of noise impacts is better understood, but may or may not be feasible. The project's contribution to cumulative noise would be considerable, and the impact is assumed to be significant and unavoidable.

### **7.2.4 UTILITIES**

#### **PLANNED AND PROPOSED DEVELOPMENT IMPACTS**

Cumulative development throughout the City of Sacramento is expected to increase demand for water from 135,576 acre-feet/year (AFY) in 2005, to 242,877 AFY in 2030. Entitled surface water supply would increase from 205,000 AFY in 2005 to 310,800 AFY in 2030 (see Table 6.4-2 in Section 6.4, "Utilities"). Ample surplus water is available over the foreseeable future. Further, no additional water treatment or conveyance facilities would be needed to serve the project. The project would result in a *less-than-significant* cumulative water supply impact.

Regarding wastewater conveyance, Section 6.4, "Utilities," identified that sufficient capacity is available to convey wastewater to the SRWTP. Further, Sacramento Regional County Sanitation District has indicated that capacity would be available to treat project-related wastewater flows (Hedges, pers. comm., 2006). Cumulative development in the Sacramento Regional Wastewater Treatment Plant (SRWTP) service area (most of Sacramento County and part of Yolo County) would result in the need to expand the treatment plant, and this expansion is planned and has undergone CEQA review and approval (the legal adequacy of the EIR is being challenged). The expansion would be timed to proceed before its capacity constraining development. The proposed project would contribute considerably to the need to expand the plant, and the expansion would result in significant air quality impacts from ozone precursors during construction. No other unmitigated significant impacts from plant expansion were identified in the EIR prepared for the plant expansion. However, the project would contribute considerably to a *significant and unavoidable* cumulative impact.

With implementation of the project, no increase in the discharge rate of stormwater runoff from the site from the project would be expected, so the project would not contribute cumulatively to any stormwater runoff impacts from related development. This would be a *less-than-significant* cumulative impact.

On a cumulative basis, adequate electrical and natural gas facilities and services are available to meet project demands because staffs of SMUD and PG&E have indicated that they would expand their operations on an as-needed basis to meet new demands (Hager, pers. comm., 2005; Schlaht, pers. comm., 2005). No expansion of existing facilities would be required for the project. As a result, the project would not contribute to a significant cumulative electricity and natural gas impact. This would be a *less-than-significant* cumulative impact.



## JOINT VISION AND SUTTER COUNTY MEASURE M CUMULATIVE IMPACTS

Development in the Joint Vision area would increase demands for water. Given the availability of water in the City, it is not expected that Joint Vision development would result in significant cumulative water supply impacts. Sutter County has its own water supply system and would not cumulatively affect the availability of entitled water for the City of Sacramento.

Joint Vision development would add to the need for additional wastewater treatment services, which would require expansion as a result of cumulative development (see discussion above). It is unknown if Measure M development would seek connection to the SRWTP, or if it would provide for a different means of treatment, so its contribution to the need to provide expanded local wastewater treatment facilities is not known.

### 7.2.5 PUBLIC SERVICES

As described in Section 6.5, “Public Services,” of the EIR, the project applicant would prepare a separate financing plan that would establish the necessary funding mechanisms to provide services to the project. A summary of the elements and performance standards of the finance plan is included in Appendix C. The proposed project would fully provide for its increment of necessary public services and would not result in a contribution to any cumulative impacts. As stated in Section 6.5, “Public Services,” of this EIR, no new police, fire, or solid waste facilities would be required that are not already planned for; sufficient capacity has been determined to exist at proposed on-site and off-site schools, and no long-term shortfall of school services and facilities would result; and the project proponent would pay development impact fees sufficient to mitigate school impacts. For these reasons, the proposed project would result in less-than-significant public services impacts and would not contribute to a cumulative public services impact. This would be a *less-than-significant* cumulative impact.

## JOINT VISION AND SUTTER COUNTY MEASURE M CUMULATIVE IMPACTS

Proposed cumulative development, and additionally the Joint Vision and Sutter County Measure M projects, may result in cumulative impacts to various public services, but because the project would not result in an incremental contribution to these impacts, no further analysis is needed under CEQA.

### 7.2.6 PARKS AND OPEN SPACE

The proposed project would not result in significant impacts on parks and open space. Similarly, development of the cumulative projects would not be expected to result in impacts related to parks and open space because each development would be required to comply with the City’s standards for provision of park facilities. The City does, however, have a citywide deficit of neighborhood/community parkland acreage of less than 20 acres (City of Sacramento 2004a). This deficit is a baseline effect and is considered a significant cumulative impact because it has resulted from past development in the City. However, the proposed project would meet the City’s Quimby Act parkland dedication requirements (see Section 6.6, “Parks and Open Space”) and it would satisfy the proposed project’s overall park needs. Because of this, it would not contribute to the cumulative parkland deficit and would, therefore, not contribute considerably to any park impacts. However, conversion of the project site from predominantly agricultural and open space uses to urban development would result in a significant open space impact. The applicant would provide land for in a permanent conservation easement for open space to offset the project’s impact to open space resources. While the permanent conservation easement would lessen significant effects, it would only partially offset proposed conversion and no new open space would be made available. As a result, the project would result in a considerable contribution to a *significant and unavoidable* cumulative open space impact.

## JOINT VISION AND SUTTER COUNTY MEASURE M CUMULATIVE IMPACTS

Proposed cumulative development, and additionally the Joint Vision and Sutter County Measure M projects, may result in cumulative impacts to parks, but because the project would not contribute to these impacts, no further analysis is needed under CEQA. Further, it is likely that these new projects would meet parkland dedication requirements that would cover their contribution to parkland demand, given that they would be subject to Quimby Act requirements. Development of the Joint Vision and Sutter County M projects would result in the permanent conversion of open space resources. Although, open space resources would be permanently conserved as part of those projects, no new open space areas would be created and conserved lands would only partially offset open space impacts. The project in combination with the Joint Vision and Sutter County M projects would result in a considerable contribution to a *significant and unavoidable* cumulative open space impact and the project's contribution would be considerable.

### 7.2.7 AESTHETICS

#### PLANNED AND PROPOSED DEVELOPMENT IMPACTS

Implementation of the proposed project would substantially alter the visual character of the project site through conversion of agricultural land to developed urban uses, resulting in a significant aesthetic impact related to degradation of visual character. Because of the scale and location of the proposed project, there is no feasible mitigation available to address aesthetic resource impacts associated with the conversion of agricultural land to urban development. However, the area to the south and east of the site has been undergoing a visual transformation over the last 10 years, as the NNCP area has converted from predominantly agriculture to a suburbanized setting. The project would result in the extension of this suburban setting. Although design, architectural, development, and landscaping standards are included to ensure that urban development on the project site conforms to certain aesthetic guidelines, there is no mechanism to allow implementation of the project while avoiding the conversion of the local viewshed from agricultural to urban development. Because development in the NNCP area and Metro Air Park has occurred on formerly agricultural land, as would be the case under the proposed project, and West Lakeside development, development of the NNCP would be expected to result in a similar aesthetic impact regardless of implementation of project design guidelines. Therefore, the proposed project would considerably contribute to a significant cumulative impact on aesthetics, and this impact would be *significant and unavoidable*.

#### JOINT VISION AND SUTTER COUNTY MEASURE M CUMULATIVE IMPACTS

Development in the Joint Vision area would result in the conversion of around half of the 10,000-acre open space between the current NNCP boundaries and the Sutter County line. This conversion would extend even further the change in the viewshed from open space to suburban. This sort of change would be perceived as a regional alteration of open space, and would lend to the overall aesthetic sense that a large part of the formerly rural area north of downtown Sacramento is irretrievably changing to suburban development. This is a cumulatively significant impact. The impact could be reduced by requiring that large areas of open space are retained along I-5 and SR 70/99, and by requiring design features that provide for visually diverse and high quality development. Further, a concept included in the Joint Vision MOU calls for a buffer between development in the Joint Vision area and the boundary with Sutter County. This would help maintain visual buffer so it does not appear that development in Sacramento County is merging with development in Sutter County and community separation would be somewhat maintained.

Development of the Measure M area of Sutter County would convert an additional 7,500 acres and add to the cumulative impact associated with this aesthetic impact. The buffer between Sacramento County and Sutter County would help reduce the sense of cumulative change in aesthetic character, but would not eliminate the overall visual sense of the conversion of the project area from agriculture to suburban development. This is a cumulatively *significant* impact.

The project would contribute considerably to this cumulatively significant aesthetic impact, even though its impact would be substantially reduced through mitigation proposed for the project.

## **7.2.8 PUBLIC HEALTH AND HAZARDS**

### **PLANNED AND PROPOSED DEVELOPMENT IMPACTS**

The proposed project would result in a potentially significant public health and hazards impact related to the potential for health hazards from soils contaminated by previously unknown underground storage tanks (USTs) or by other sources at the former Two Jakes Park site (see Section 6.8, “Public Health and Hazards”). However, any USTs found would be removed and any contaminated soils would be excavated and treated according to County Environmental Management Department (EMD) procedures before the resumption of construction, thus reducing this impact to a less-than-significant level. Similarly, development of cumulative projects would not be expected to result in significant impacts related to public health and hazards that could not be addressed by standard mitigation and remediation measures (City of Sacramento 1993). This would be a *less-than-significant* cumulative impact.

Implementation of the project would place residents within the Sacramento International Airport’s overflight safety zone and would be inconsistent with the safety standards in the comprehensive Land Use Plan (CLUP) related to the proposed parks and lightrail station that fall within the overflight safety zone. Location of these facilities in the Airport’s overflight safety zone would increase safety risks associated with aircraft operations. It is important to note that locating a project within an Airport Safety Zone does not suggest that safety impacts would occur; rather, the Airport Safety Zone is an area of elevated safety risk. That is, in the highly unlikely circumstance of a forced landing not on airport property, the Airport Safety Zone is the area where such a forced landing has a greater probability of occurring. Therefore, development located within this area has an elevated risk of a safety hazard, although such a risk remains remote.

Other cumulative development proposed in and near the airport safety zone could add to this cumulative impact. The Metro Air Park project is located within the Airport Safety Zones. The project is the only other project currently being considered that is located within the overflight zone of the airport. These two projects, together, cumulatively increase safety risks from airport overflights. The West Lakeside project, located southeast of the airport, is outside of the Safety Zone even though it is subject to overflights from airport. Given that the overflight zone defines the maximum extent of defined significant safety risk, the fact that no other projects are within the overflight zone suggests that there are no other projects that contribute to this cumulative impact. As described in Section 6.8, “Public Health and Hazards,” the project’s airport safety hazard impacts would be reduced to a less-than-significant level through implementation of mitigation that requires a wildlife management plan for the on-site lake/detention basin. Therefore, this is a *less-than-significant* cumulative impact and the project’s contribution would be less than considerable.

### **JOINT VISION AND SUTTER COUNTY MEASURE M CUMULATIVE IMPACTS**

Much of the land that is located within the Joint Vision area is also located within the Sacramento International Airport safety zone. However, no specific development locations have been established within the Joint Vision area. Therefore, it is not known if development within the Joint Vision area would add to cumulative impacts associated with the airport overflights and the attendant safety risks. Similarly, the very southern edge of the Measure M area falls within the northern extent of the Airport Safety Zone. However, there is not a specific land use plan for the Measure M area, as yet, so it cannot be determined if any land uses would be located within the overflight safety area. To the extent of that land uses may be located within the Airport Safety Zone, such land uses would, in combination with Greenbriar and the Metro Air Park projects, add to cumulative impacts associated with airport safety. Because land uses for both the Joint Vision and Measure M areas have not yet been defined, it would be speculative to state that inconsistent land uses would be located within the airport safety

zone. Therefore, there is no conclusion that can be drawn regarding whether there would be increased cumulative impacts associated with development in these areas.

## 7.2.9 GEOLOGY AND SOILS

The proposed project would result in potentially significant impacts related to exposure of people and structures to seismic hazards, including ground shaking and liquefaction; subsidence or compression of unstable soils; and damage associated with expansive soils. However, these impacts would be reduced to a less-than-significant level with implementation of recommendations included in the preliminary geotechnical report and a comprehensive site-specific geotechnical report for the proposed project. Any residual less-than-significant impacts would be confined to the project site; it would not combine with any geotechnical effects associated with development in other areas. Similarly, development of cumulative projects would not be expected to result in geology and soils impacts that could not be addressed by standard engineering practices (City of Sacramento 1993). In combination, additional cumulative geology and soils impacts would not be anticipated because these effects are typically site-specific. Thus, the proposed project would result in a *less-than-significant* cumulative geology and soils impact.

## 7.2.10 HYDROLOGY, DRAINAGE, AND WATER QUALITY

### PLANNED AND PROPOSED DEVELOPMENT IMPACTS

The proposed project would not result in significant impacts related to hydrology, drainage, and water quality. At the time of publication of the 1993 NNCP EIR Supplement and the subsequent NNCP Update (City of Sacramento 1993, 1996), the NNCP area was located within the 100-year floodplain; thus, development of the NNCP area under the conditions described in the 1993 EIR Supplement and NNCP Update would be expected to result in a significant and unavoidable impact with regard to flooding hazards. However, the North Natomas area was granted 100-year flood protection in 1998 as a result of local flood protection projects, and the significant and unavoidable impact conclusion was no longer valid. As described in Section 6.10, “Hydrology, Drainage, and Water Quality,” of this EIR and because the project is not located within a designated 100-year floodplain, less-than-significant flooding impacts would occur and the project would not contribute to any cumulative flooding impacts. This would be a *less-than-significant* cumulative impact.

### JOINT VISION AND SUTTER COUNTY MEASURE M CUMULATIVE IMPACTS

As described above, there is adequate flood protection for development within the project area and the project would not contribute to cumulative impacts. It is not known, and it is beyond the scope of this EIR, to determine if development within the Joint Vision area and the Measure M area would be subject to flood risks. Because this issue is somewhat speculative (see discussion above and Section 15145 of the State CEQA Guidelines), no conclusion can be drawn with respect to whether the proposed project in combination with development of the Joint Vision and Measure M projects would result in significant cumulative effects to flooding.

## 7.2.11 AGRICULTURE

### PLANNED AND PROPOSED DEVELOPMENT IMPACTS

Approval of the NNCP required that the City of Sacramento adopt a Statement of Overriding Considerations for the significant impact of conversion of agricultural land. The City determined that conversion of farmlands that were once within the boundaries of the NNCP was an acceptable impact and that there were overriding reasons for approval of development of the NNCP. The NNCP, in combination with the proposed West Lakeside project and the Metro Air Park project, would convert a total of 11,100 acres of land, much of it in agriculture. A large amount of this land has already been converted within the NNCP. The proposed project would convert 518 additional acres of Important Farmland at the site (389 acres of Prime Farmland). While the EIR includes mitigation aimed at reducing the potential to cause adjacent land to convert from agriculture to urban uses, and

would preserve through permanent conservation easements open space and habitat lands, some of which may be used for agricultural operations, the impact of the conversion of 518 acres of on-site agricultural land is a significant and unavoidable impact. In combination, the proposed project would add to the cumulative loss of farmlands associated with other development in the NNCP, plus West Lakeside. This is considered a significant cumulative impact to which the project would contribute. Because additional feasible mitigation is not available to mitigate the loss of agricultural land, this impact would be *significant and unavoidable*.

## **JOINT VISION AND SUTTER COUNTY MEASURE M CUMULATIVE IMPACTS**

Development of the Joint Vision area would result in an estimated conversion of up to 4,683 acres of open space land to developed uses. Some of the developed uses would include parks, but also would result in a conversion of current land uses. The majority of this land is in agricultural use. Conversion of this amount of agricultural land would be a significant impact. Similarly, the Measure M area would result in the conversion of up to 7,500 acres of land, most of it in agricultural use. The combination of this conversion, in addition to the agricultural conversions described above, would result in substantial loss of agricultural land within the Natomas basin. This is a significant cumulative impact to agricultural land, and the proposed project would contribute considerably to this impact. There are no mitigation measures available to substantially lessen this cumulatively significant and unavoidable impact.

### **7.2.12 BIOLOGICAL RESOURCES**

Similar to the proposed project, additional development as proposed within the North Natomas community would result in impacts to Swainson's hawk, giant garter snake, riparian/wetland habitat, and agricultural lands/rice fields. The development of the NNCP area and the Metro Air Park in combination with the proposed project would continue to diminish the lands available for biotic resources. The undeveloped lands in this area, as well as South Sutter County, and West Yolo County, serve as prime habitat for a variety of wildlife and vegetation. The continued development of these lands would result to the incremental decline in the number and diversity of plant and animal species, including sensitive species. The project would contribute to this decline. This is a considerable contribution to this *significant* cumulative impact.

In consideration of these impacts, the Natomas Basin Habitat Conservation Plan (NBHCP) provides a comprehensive program for the preservation and protection of habitat for threatened and endangered species potentially found on approximately 53,537 acres of undeveloped and agricultural land in northwestern Sacramento County and southern Sutter County. The primary component of the conservation strategy for funding habitat reserve acquisition would be the use of mitigation fees to set aside 0.5 acre of habitat land for each acre of development that occurs in the Natomas Basin. Approximately 8,750 acres of land would be acquired or preserved through implementation of the NBHCP. Included within this area is development within the NNCP, which includes all the cumulative projects except for West Lakeside. West Lakeside would require its own habitat conservation strategy, possibly through preparation of a habitat conservation plan, or through some other similar means. In addition, a HCP was approved for the Metro Air Park. These conservation plans in combination with the mitigation recommended for the proposed project provide a comprehensive preservation, conservation, and minimization strategy, would reduce the severity of these cumulative biological impacts.

In addition to the projects considered for all resource areas in this EIR, other projects are considered in the cumulative impacts for biological resources. These projects are considered for biological resources only because they do not combine with other resource areas (e.g., traffic, agriculture, etc.) to produce cumulative effects, or they are already considered in other sections of this EIR (e.g., noise from the expanded airport operations is considered in Section 6.3, "Noise"). Other projects include:

## **SACRAMENTO INTERNATIONAL AIRPORT DEVELOPMENT PLAN**

The Airport Development Plan would include the major improvements that are needed at the Sacramento International Airport over a 20-year planning horizon. These improvements are safety, security, and capacity enhancement projects that would enable the Sacramento County Airport System to meet customer service goals at increased levels of activity in passengers, air cargo, and aircraft operations.

The plan is still under development; but, the Sacramento International Airport Master Plan Study (PB Aviation 2004) contains a recommended Airport Development Plan that illustrates the type, location, and scale of projects under consideration. Most projects would be within the existing Airport Operations Area (AOA). Outside of the APA, potential projects include approximately 400 acres of development (parking and commercial development) on adjacent land along I-5, and approximately 500 acres of development (aviation-related and commercial development) on adjacent land to the north of the AOA.

The recommended Airport Development Plan also would eliminate several waterways, including:

- ▶ 4.4 miles of the drainage ditch north of Elverta Road,
- ▶ 2.0 miles of the drainage ditch west of Power Line Road,
- ▶ 1.0 mile of the canal adjacent to the access road west of Power Line Road, and
- ▶ 0.5 mile of the drainage ditch along Bayou Road.

## **SACRAMENTO AREA FLOOD CONTROL LEVEE UPGRADE PROJECT**

To assess the risk of levee failure and to identify potential remedies, SAFCA commissioned the Natomas Levee Evaluation Study in 2005, discussed in more detail in Section 6.9, “Hydrology, Drainage, and Water Quality.” A variety of remedies were proposed for identified problems. Most of these remedies involve levee improvement and bank protection techniques, including construction of cutoff walls within existing levees, placement of toe rock, and revegetation of banks at locations along existing levees that pose erosion problems. The implementation of these remedies could temporarily disturb approximately 30 acres of habitat for covered species.

As a potential remedy, the study also assessed a setback levee along the upper 5 miles of the east levee of the Sacramento River. This levee would be set back about 1,000 feet from the existing levee. Under this alternative the existing levee would continue to confine the river; the new levee would ensure safe containment of a 200-year flood if the existing levee were to fail. The construction of this levee could affect up to 150 acres of habitat for species covered by the NBHCP (EDAW 2005).

## **NATOMAS MUTUAL WATER COMPANY AMERICAN BASIN FISH SCREEN AND HABITAT IMPROVEMENT PROJECT (ABFSHIP)**

The Natomas Mutual Water Company (Natomas Mutual) annually diverts nearly 100,000 AF of water from the Sacramento River and the Natomas Cross Canal and distributes that water throughout the Natomas Basin. Natomas Mutual is currently planning and designing two new diversions to replace its existing five diversions. These pumps would be located along the Sacramento River near Sankey Road and between Elverta Road and Elkhorn Road, respectively. These new diversions would retain the same pumping capacity of the existing diversions (630 cubic feet per second [cfs]), plus an additional 14 cfs to accommodate the Bolen Ranch, which would then eliminate its existing, independent diversion. The new pumps, however, would be variable frequency drive pumps that would facilitate the management of water levels throughout the canal system. Other changes to the current infrastructure would include:

- ▶ Construction of a new highline canal between the proposed Sankey Diversion along the landside of the Natomas Cross Canal south Levee to the existing Northern Pumping Plant;

- ▶ Relocation and extension of the existing Vestal Drain adjacent to the new highline canal between RD 1000's Pumping Plant No. 4 and the new Sankey Diversion site;
- ▶ Decommissioning and removal of the existing Verona Diversion Dam and Lift Pumps;
- ▶ Additional capacity for the internal re-lift pumps at RD 1000 Pumping Plant No. 3 in place of the removed Riverside Pumping Plant;
- ▶ Re-grading the Riverside Main Highline Canal from RD 1000 pumping Plant No. 3 to the existing Riverside Pumping Plant;
- ▶ Upgrading of two control structures, the County Line Check and Lift Pump and the Elkhorn Check and Lift Pumps;
- ▶ Removing the five pumping plants (two along the Natomas Cross Canal and three along the Sacramento River);
- ▶ Re-grading the North Drainage Canal from the V Drain to Highway 99 in order to improve conveyance; and,
- ▶ Re-grading the Elkhorn Main Highline Canal between the existing Prichard Pumping Plant and the existing Elkhorn Pumping Plant.

## **SACRAMENTO RIVER WATER RELIABILITY STUDY**

The Sacramento River Water Reliability Study (SRWRS) was initiated in 2002 by the U.S. Bureau of Reclamation (Reclamation), Placer County Water Agency (PCWA), Sacramento Suburban Water District (SSWD), City of Roseville (Roseville), and City of Sacramento (Sacramento). Its goal is to develop a water supply plan that is consistent with the Water Forum Agreement (The Water Forum 2000). It would fulfill this goal by providing additional water supply to PCWA for planned urban growth, to SSWD for groundwater stabilization, to Roseville for planned urban growth and a local conjunctive use program, and to Sacramento for water supply reliability and wheeling services with neighboring water purveyors to meet their water supply demands and to reduce their reliance on groundwater. It also would increase the interconnectivity and source redundancy to the water supply system to maximize long-term water supply reliability.

An initial alternatives report has been prepared for this study (Reclamation 2005) that developed four alternatives. These alternatives are:

**SRWS Elverta Diversion Alternative.** This alternative would consist of a diversion on the Sacramento River with an associated pump station and water treatment plant, and treated water pipelines to water distribution systems of the SRWRS partners. Water pipelines would extend from the Sacramento River across the Natomas Basin along or adjacent to Elverta Road, and from Elverta Road south to the City of Sacramento. Total pipeline length would be approximately 9 miles.

**Joint SRWS-ABFSHIP Elverta Diversion Alternative.** This alternative would consist of a consolidated diversion on the Sacramento River and associated facilities to accommodate the needs of the SRWRS partners and the NMWC from the Elkhorn Diversion planned under the ABFSHIP. Water pipelines would extend from the Sacramento River across the Natomas Basin along or adjacent to Elverta Road, and from Elverta Road south to the City of Sacramento. Total pipeline length would be approximately 9 miles.

**ARPS-Elverta Diversion Alternative.** This alternative would consist of facility expansions by PCWA in Placer County, increased use of groundwater by Roseville, and construction of a diversion on the Sacramento River and of associated treatment and transmission facilities by Sacramento. (Under this alternative, NMWC would construct and operate its planned Elkhorn Diversion independent of the SRWRS, or continue to divert from its

existing diversion.) Water pipelines would extend from the Sacramento River along or adjacent to Elverta Road for approximately 5 miles, and from Elverta Road south to the City of Sacramento. Total pipeline length would be approximately 6.5 miles.

**ARPS-Joint Sacramento-ABFSHIP Elverta Diversion Alternative.** This alternative would include the same facilities as the ARPS-Elverta Alternative plus additional diversion capacity and facilities at the diversion if the ABFSHIP lead agencies select the Sankey/Elkhorn Diversions alternative for the ABFSHIP. Water pipelines would extend from the Sacramento River along or adjacent to Elverta Road for approximately 5 miles, and from Elverta Road south to the City of Sacramento. Total pipeline length would be approximately 6.5 miles.

Each of these projects could combine to result in disturbances to biological resources, particularly aquatic resources. Mitigation would be developed for each of these projects, and to the degree that endangered species are affected, mitigation would be required, by law, to fully mitigate impacts.

Similarly, the Greenbriar project would be required to comply with the federal Endangered Species Act (FESA) and the California Endangered Species Act (CESA). Both of these acts require that impacts to endangered species are minimized and fully mitigated. As described in Section 6.12, "Biological Resources," extensive mitigation is proposed, including the purchase and enhancement of two mitigation sites (Natomas 130 and Spangler), purchase of additional easements for Swainson's hawk habitat; along with establishment of a 250-foot linear open space/buffer along the western edge of the Greenbriar site. Additionally, the project applicant would consult with the USFWS and the CDFG on this mitigation plan, and would incorporate additional mitigation that arises through the consultation process. Taken together, it is expected that this mitigation would lessen the impact of the proposed project on biological resources to the extent that it is not considerable. The project, therefore, would not contribute considerably to a cumulatively significant impact on these biological resources and this would be a *less-than-significant* cumulative impact.

## **JOINT VISION AND SUTTER COUNTY MEASURE M CUMULATIVE IMPACTS**

Development within the Joint Vision area would result in the conversion of up to 4,683 additional acres of open space land that provides various levels of habitat for Swainson's hawk, giant garter snake, and other species that are currently protected by the NBHCP. This is nearly half the acreage within that Joint Vision area. Some of the land within this area has already been set aside as a habitat in compliance with the NBHCP. Additional development within the Joint Vision area would be expected to have adverse impacts on the various species covered by the NBHCP. It is very likely, and expected, that any development within this area would require a new habitat conservation plan, consistent with FESA and the CESA. As described above, compliance with these laws requires that impacts to endangered species are minimized and fully mitigated. However, it must be recognized that this level of additional development would be expected to have residual environmental impacts to the various species in the area. While the extent of potential mitigation for development within this area is not currently known, there is the real potential that cumulatively significant impacts to various of the species could occur. Because the project would result in adverse effects (which would be mitigated), it has the potential to combine with adverse effects from development in the Joint Vision area, and generate cumulatively significant impacts. However, a conclusion on this issue cannot be reached until development is actually proposed in the Joint Vision area.

The Measure M area is located on property that is covered by the incidental take permit issued under the NBHCP. While development of this 7,500 acre area could adversely affect the various species covered by the NBHCP, the impacts would be minimized and fully mitigated through necessary compliance with the terms of the NBHCP.

Overall, development of the project site, the NNCP area, West Lakeside, the Joint Vision area, and the Measure M area would result in development of several thousand acres of habitat and potential habitat. While this development would be subject to the terms and conditions of HCP's, which either are or would be in existence to guide development while minimizing impacts of biological resources, it is cumulative impacts could occur to



sensitive biological resources. That stated, it would be speculative to conclude, without the details of any HCP's, whether the residual impacts would be cumulatively significant.

### **7.2.13 CULTURAL RESOURCES**

Development of the cumulative projects have the potential to result in the discovery of undocumented subsurface cultural resources or unmarked historic-era and prehistoric Native American burials. However, these potential impacts would not increase in severity in consideration of cumulative projects. In addition, the incorporation of standard measures addressing the response when undocumented resources are discovered would address this potential impact. For these reasons, the proposed project would result in a *less-than-significant* cumulative impact on cultural resources.

## **7.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE CAUSED BY THE PROPOSED PROJECT**

CEQA (Public Resources Code Section 21100[b][2]) provides that an EIR shall include a detailed statement setting forth “[i]n a separate section...[a]ny significant effects on the environment that would be irreversible if the project is implemented.” State CEQA Guidelines Section 15126.2(c) provides the following guidelines for analyzing the significant irreversible environmental changes of a project:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irretrievable damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Although the proposed project would use minor amounts of both renewable and nonrenewable natural resources for project construction, this use would not increase the overall rate of use of any natural resource, or result in the substantial depletion of any nonrenewable resource.

The project includes the development of or creation of access to a previously inaccessible area. However, development of the project site would commit future generations to the significant irreversible change of converting the project site from agricultural, which supports both crops and habitat, and open-space use to an urbanized land use. Mitigation for habitat conversion is included in the project and considered in this EIR.

Lastly, the proposed project is not anticipated to result in irreversible damage from environmental accidents, such as an accidental spill or explosion of a hazardous material. During construction, equipment would be using various types of fuel and material classified as hazardous. In the State of California, the storage and use of hazardous substances are strictly regulated and enforced by various local, regional, and state agencies. The enforcement of these existing regulations would preclude credible significant project impacts related to environmental accidents.

## **7.4 SUMMARY OF SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS**

This section is prepared in accordance with Section 15126.2(b) of the State CEQA Guidelines, which requires the discussion of any significant environmental effects that cannot be avoided if a project is implemented. These include impacts that can be mitigated but cannot be reduced to a less-than-significant level.

An analysis of environmental impacts caused by the proposed project is provided in Chapter 6 of this EIR. The following is a summary of the impacts that have been determined to be significant and unavoidable:

► *Transportation*

- *Impacts to the Freeway Ramps.* The proposed project would increase traffic volumes on the freeway system and would cause three study freeway ramps (i.e., SR 70/99 NB/Elkhorn Boulevard off ramp, SR 70/99 SB/I-5 SB off ramp, and I-5 NB/SR 70/99 NB off ramp) to operate unacceptably under Baseline plus Project Conditions. With implementation of mitigation measures 6.1-3b, the SR 70/99 Northbound to Elkhorn Boulevard off ramp would operate at acceptable levels and this impact would be reduced to a less-than-significant level. However, this ramp is not under the jurisdiction of the City of Sacramento (i.e., subject to Caltrans jurisdiction). While the project would contribute funds that would implement measures that would fully mitigate impacts to this ramp to a less-than-significant level, it is unknown whether these measures would be implemented because they are not subject to the control of the City. As a result, for purposes of CEQA impacts to the SR 70/99 Northbound to Elkhorn Boulevard off ramp (Impact 6.1-3b) would remain ***significant and unavoidable***. Further, no feasible mitigation is available to reduce the project's impacts to the SR 70/99 Southbound to I-5 Southbound on ramp and the I-5 Northbound to SR 70/99 Northbound off ramp because recommended mitigation is beyond the control of the project applicant, outside the jurisdiction of the City, and there is no established funding mechanism available for contribution to recommended improvements. Therefore, impacts to these ramps would be ***significant and unavoidable***.
- *Freeway Mainline Segment Impacts.* The proposed project would increase traffic volumes on the freeway system and would cause four study freeway mainline segments (i.e., I-5 north of Del Paso Road, I-5 north of I-5/I-80 interchanges between I-80 and Arena Boulevard, SR 70-99 between Elverta Road and Elkhorn Boulevard, and SR 70/99 between Elkhorn Boulevard and I-5/SR 70/99 interchange) to operate unacceptably under Baseline plus Project Conditions. Because no feasible mitigation is available to reduce the project's impacts to study area freeway segments, impacts to these freeway segments would remain ***significant and unavoidable***.
- *Cumulative Traffic Impacts to Study Area Intersections.* Traffic volumes associated with the project in combination with other reasonably foreseeable cumulative projects would cause several study area intersections to operate unacceptably and exceed City and County thresholds of significance for intersection operations. The intersections of SR 70/99 Southbound Ramps and Elkhorn Boulevard, SR 70/99 Northbound Ramps and Elkhorn Boulevard, and Metro Air Parkway are not under the jurisdiction of the City of Sacramento (i.e., subject to Caltrans jurisdiction). While the project would contribute funds that would implement measures that would fully mitigate impacts to this intersection to a less-than-significant level, it is unknown whether these measures would be implemented because they are not subject to the control of the City. As a result, for purposes of CEQA, cumulative impacts to these intersections would be considered ***significant and unavoidable***.

Further, no feasible mitigation is available or implementation of feasible mitigation can not be guaranteed because it is not subject to the control of the City for the intersections of Elkhorn Boulevard and Lone Tree Road, Meister Way and Metro Air Parkway, Meister Way and Lone Tree Road, Elkhorn Boulevard and Project Street 1, Elkhorn Boulevard and Project Street 2, and Elkhorn Boulevard and Project Street 3. Therefore, the project's cumulative impacts to these intersections are considered ***significant and unavoidable***.

- *Cumulative Impacts to Study Area Roadway Segments.* The proposed project in combination with cumulative projects would increase traffic volumes along the Elkhorn Boulevard west of SR 70/99 interchange segment and would cause this segment to degrade from an acceptable operating condition (i.e., LOS A) to an unacceptable operating condition (i.e., LOS F). No feasible mitigation is available to reduce the project's cumulative impacts to this segment. Therefore, the project's cumulative impact to this intersection would be ***significant and unavoidable***.

- *Cumulative Impacts to Study Area Freeway Ramps* The proposed project in combination with cumulative projects would increase traffic volumes on the freeway system and would cause six study freeway ramps to operate unacceptably under Cumulative plus Project Conditions and exceed Caltrans thresholds of significance for freeway ramp operations. With implementation of recommended mitigation measures, SR 70/99 Northbound to Elkhorn Boulevard off ramp, I-5 Northbound to Metro Air Parkway off-ramp, I-5 Southbound to Metro Air Parkway off-ramp, and the Metro Air Parkway to I-5 Southbound loop on-ramp would operate at acceptable levels under cumulative conditions and the project's cumulative impact would be reduced to a less-than-significant level. However, these ramps are not under the jurisdiction of the City of Sacramento (i.e., subject to Caltrans jurisdiction). While the project would contribute funds that would implement measures that would fully mitigate impacts to this intersection to a less-than-significant level, it is unknown whether these measures would be implemented because they are not subject to the control of the City. As a result, for purposes of CEQA, cumulative impacts to these intersections would be **significant and unavoidable**.
- Further, no feasible mitigation is available or implementation of feasible mitigation can not be guaranteed because it is not subject to the control of the City for the Elkhorn Boulevard to SR 70/99, Southbound slip on ramp and the Northbound to SR 70/99 Northbound off ramp. Therefore, the project's cumulative impacts to these intersections are considered **significant and unavoidable**.
- *Cumulative Freeway Mainline Segment Impacts*. The proposed project in combination with cumulative projects would increase traffic volumes on the freeway system and would cause three study freeway mainline segments (i.e., I-5 east of Powerline Road, I-5 north of Del Paso Road, I-5 north of I-5/I-80 interchanges between I-80 and Arena Boulevard) to operate unacceptably under Cumulative plus Project Conditions. These intersections would operate unacceptably under Cumulative no Project conditions; however, the project would contribute additional trips to these intersections, which is unacceptable based on Caltrans standards. No feasible mitigation is available to reduce the project's cumulative mainline freeway segment impacts (Impacts 6.1-8a, b, and c) to a less-than-significant level. Therefore, the project's cumulative impacts to these mainline freeway segment impacts would be **significant and unavoidable**.

► *Short-term Construction Generated Emissions*

The proposed project would result in construction-generated emissions that would exceed SMAQMD's significance threshold for NO<sub>x</sub> and would contribute concentrations that would exceed ambient air quality standards. Mitigation recommended for the project would include measures to limit temporary construction emissions including use of late-model engines, low-emission diesel products, alternative fuels, payment of fees to SMAQMD's construction mitigation fund, and reduction of fugitive dust emissions. Implementation of the recommended mitigation would substantially reduce NO<sub>x</sub> and fugitive dust emissions; however, emissions would still exceed SMAQMD's significance thresholds. Therefore, the project would result in a **significant unavoidable** impact and would result in a substantial contribution to a **significant and unavoidable** cumulative impact.

► *Generation of Long-Term (Regional) Emissions of ROG, NO<sub>x</sub>, and PM<sub>10</sub>*

Long-term operation of the project would result in operations of ozone-precursor pollutants that would exceed SMAQMD's threshold. Furthermore, the project's operational emissions would conflict with or obstruct implementation of applicable air quality plans. Mitigation recommended for the project would include the redesign and incorporation of features into the project that would encourage bicycle, pedestrian, and transit use, would eliminate physical barriers between residential and nonresidential uses, and building to Title 24 energy standards. Implementation of the recommended mitigation would substantially reduce operational emissions; however, emissions would still exceed SMAQMD's significance thresholds. Therefore, the project

would result in a **significant unavoidable** regional emission impact and would result in a substantial contribution to a **significant and unavoidable** regional emission cumulative impact.

► *Long-Term Operational Traffic Noise*

Implementation of the project would result in increases in traffic noise levels greater than 4 dBA and would cause noise levels to exceed the County's 60 dBA L<sub>dn</sub>/CNEL exterior noise standards at sensitive receptors in unincorporated Sacramento County. No feasible mitigation is available to reduce exterior project-related traffic noise levels to a less-than-significant level. Therefore, the project would result in a **significant and unavoidable** long-term operational traffic noise impact and would result in a substantial contribution to a **significant and unavoidable** long-term operational traffic noise cumulative impact in the County.

► *Land Use Compatibility with On-site Noise Levels*

Implementation of the project would expose on-site sensitive receptors to future noise levels generated by area traffic and light rail operations that exceed applicable noise standards. Mitigation recommended for the project would require the construction of sound barriers, re-orientation of on-site land uses to protect outside areas from transportation noise, and preparation of site-specific acoustical analyses. Even with implementation of recommended mitigation, outdoor areas at proposed residential uses and the proposed school would exceed the City's noise standards. Therefore, the project would result in a **significant and unavoidable** land use compatibility impact and would result in a substantial contribution to a **significant and unavoidable** land use compatibility cumulative impact.

► *Environmental Impacts Associated with SRWTP Expansion*

The project would result in increased demand for wastewater treatment from the SRWTP. Although wastewater treatment capacity is currently available to serve the project, the project in combination with other cumulative development would result in the need to expand the capacity of the SRWTP. The SRCSD prepared and approved the SRWTP 2020 Master Plan Expansion Project in 2004, which would allow the incremental expansion of the SRTWP to meet projected wastewater demands over the next 15 to 20 years. An EIR was prepared and certified for that project and identified one significant and unavoidable impact related to construction-related air quality. Although wastewater treatment capacity is currently available to serve the project, the project in combination with other development would contribute to the need for and expanded SRWTP and would contribute to the **significant and unavoidable** construction-related air quality impact. Therefore, the project would contribute to a **significant and unavoidable** cumulative wastewater impact.

► *Increased Demand for Fire and Emergency Medical Services*

Implementation of the project would increase demand for fire protection services. Although the Sacramento Fire Department (SFD) is planning to construct a new fire station near the project site and with this facility SFD would provide fire and emergency services to the project site within acceptable standards, the timing of construction of this facility is currently unknown and could result in a potentially significant fire and emergency medical service impact. Mitigation recommended for the project would require that adequate fire and emergency medical services be in place before issuance of the project's first occupancy permit, which may require the construction of a new fire station facility. Construction of this facility could result in construction-related environmental effects some of which may be significant and unavoidable even with implementation of all feasible mitigation. Therefore, because the project would contribute the need for a new fire station facility the construction of which could result in significant and unavoidable environmental effects, this would be a **significant and unavoidable** impact.

► *Degradation of Visual Character*

Implementation of the proposed project would substantially alter the visual character of the project site through conversion of agricultural land to developed urban uses, resulting in a significant aesthetic impact related to degradation of visual character. Because of the scale and location of the proposed project, there is no feasible mitigation available to address aesthetic resource impacts associated with the conversion of agricultural land to urban development. Although design, architectural, development, and landscaping standards are included to ensure that urban development on the project site remains within certain aesthetic guidelines, there is no mechanism to allow implementation of the project while avoiding the conversion of the local viewshed from agricultural to urban development. Therefore, this impact would remain **significant and unavoidable** and would contribute to a **significant and unavoidable** cumulative impact.

► *Conversion of Open Space*

The proposed project would result in the conversion open space areas to urban land use. Because feasible mitigation is not available to completely mitigate the loss of open space, this impact would be **significant and unavoidable** and the project would contribute to a **significant and unavoidable** cumulative open space impact.

► *Potential for Safety Hazards from Proximity of Airport to Proposed Land Uses*

The project would result in the construction of seven neighborhood parks and a light rail station either partially or wholly within the safety zone as identified in the Sacramento International Airport Comprehensive Land Use Plan (CLUP). These land uses are prohibited from being located within the safety zone in order to minimize potential risks associated with aircraft hazards. Therefore, the project would result in a significant impact related to incompatibility with the Sacramento International Airport CLUP. Mitigation recommended for the project would require the City to issue an override to the Airport Land Use Commission's (ALUC) consistency determination. However, this mitigation would not eliminate the project's inconsistency with the CLUP; therefore, this would be a **significant and unavoidable** impact.

► *Conversion of Prime Farmland and Unique Farmland*

The proposed project would result in the conversion Prime and Unique Farmland to urban land use. Because feasible mitigation is not available to completely mitigate the loss of Prime Farmland and Unique Farmland, this impact would be significant and unavoidable and the project would contribute to a **significant and unavoidable** cumulative farmland impact.