

## 5 OTHER CEQA-MANDATED SECTIONS

This chapter summarizes the significant irreversible environmental changes, significant and unavoidable impacts, growth-inducing impacts, cumulative impacts, and impacts found not to be significant associated with the proposed Plan. These subject areas are evaluated based on the analysis in Sections 3.2 through 3.15 of this EIR.

### 5.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Pursuant to Section 15126.2(d) of the CEQA Guidelines, an EIR must identify any significant irreversible environmental outcomes that could result from the implementation of a proposed project. These may include current or future uses of nonrenewable resources and secondary or growth-inducing impacts that commit future generations to similar uses. CEQA requires that irretrievable commitments of resources be evaluated to ensure that such current consumption is justified.

The entire Plan area includes approximately 4.4 million land acres. The regional growth forecast projects the region's employment to grow by 1.4 million to just over 5.4 million total jobs between 2015 and 2050. Population is forecasted to grow by 2.7 million people to 10.3 million. This population will comprise over 4.0 million households, for an increase of nearly 1.4 million households from 2015. Total population, employment, households, and associated housing units are identified in **Table 2-16**.

As part of the proposed Plan, specific geographic areas—known as growth geographies—are designated and prioritized to accommodate the regional growth forecast. The proposed Plan's core strategy remains "focused growth" in existing communities along the existing transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. Though not entirely irreversible, the land use growth footprint and projected land use patterns that would result from implementation of the proposed Plan would be difficult to change once local governments have taken action to approve development consistent with the proposed Plan. The development pattern reflected in the proposed Plan represents a commitment of these areas to urban uses for the foreseeable future, if implemented. As noted in the Chapter 2, "Project Description," the region's cities and counties retain local land use authority and local jurisdictions would continue to determine where future development occurs.

For the purposes of this analysis, consideration of the proposed Plan in the context of resource commitment that would occur absent the proposed Plan is relevant. The proposed Plan uses the growth geographies and land use strategies to influence the forecasted development pattern by affecting the location, use, intensity, and density of forecasted development. Many of the land use strategies are intended to achieve the proposed Plan's focused growth strategy to comply with Senate Bill (SB) 375's greenhouse gas (GHG) emissions reduction mandate and SB 375's mandate to ensure that a mix of housing types are available to households of all income types across the region. As compared to existing conditions—as well as those future conditions under many of the existing general plans of Bay Area jurisdictions—implementation of the proposed Plan would result in a more densely and intensely developed land use pattern, with more growth concentrated on less land (see the discussion of the No Project Alternative in Chapter 4, "Alternatives"). The result would be improved utilization of already developed land and better utilization of new land to be converted at the urban edge or in undeveloped areas of the Plan area.

While use of nonrenewable energy and fuel; conversion of agriculture, open space, and habitat; release of pollutants emissions into the atmosphere; and climate change effects are in and of themselves generally irreversible resource commitments, the fact that the proposed Plan changes (slows) the rate of use of these resources is a beneficial outcome. Overall, implementation of the proposed Plan would commit existing and future generations to a more efficient use of nonrenewable resources than under presently planned conditions.

Irretrievable commitments of non-renewable resources associated with the projected change in land use, and with the sea level rise adaptation infrastructure and transportation projects in the proposed Plan, would include those described below. The following issues are addressed in various sections of Chapter 3, as noted:

- ▲ consumption of significant amounts of nonrenewable energy for construction, maintenance, and operation of new development, sea level rise adaptation infrastructure, or transportation projects (addressed in Section 3.6, “Climate Change, Greenhouse Gases, and Energy”);
- ▲ use of building materials, fossil fuels, and other resources for construction, maintenance, and operation of new development, sea level rise adaptation infrastructure, or transportation improvements (addressed in Section 3.6, “Climate Change, Greenhouse Gases, and Energy”);
- ▲ conversion of some resource lands, such as agricultural land, habitat areas, and other undeveloped lands into developed land, sea level rise adaptation infrastructure, or transportation uses (addressed in several sections, including Section 3.3, “Agriculture and Forestry Resources,” Section 3.6, “Climate Change, Greenhouse Gases, and Energy,” and Section 3.5, “Biological Resources”);
- ▲ degradation of ambient air quality through the increase of harmful particulate matter caused by a cumulative increase in vehicle exhaust (addressed in Section 3.4, “Air Quality”); and
- ▲ emission of GHGs that would contribute to global climate change (addressed in Section 3.6, “Climate Change, Greenhouse Gases, and Energy”).

## 5.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Significant and unavoidable impacts are those that cannot be mitigated to a less-than-significant level. Chapter 3 of this EIR identifies significant and unavoidable impacts of the proposed Plan. As stated in Chapter 3, many impacts identified as significant could be reduced to a less-than-significant level, but only with adoption of mitigation measures that are outside the control of MTC and ABAG. These measures would be adopted by local jurisdictions as they approve proposed development. Because MTC and ABAG cannot require local implementing agencies to adopt most of the mitigation measures, and it is ultimately the responsibility of the local lead agency to determine and adopt mitigation, some impacts have been identified as significant and unavoidable for purposes of this program-level review. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described in this EIR, where applicable, to address site-specific conditions. The following are the impacts identified as significant and unavoidable, listed by technical section and impact number.

### 5.2.1 Aesthetics and Visual Resources

- ▲ Impact AES-1: Have a substantial adverse effect on a scenic vista
- ▲ Impact AES-2: Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historical buildings within a state scenic highway
- ▲ Impact AES-3: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings and in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality
- ▲ Impact AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area

### 5.2.2 Agriculture and Forestry Resources

- ▲ Impact AGF-1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, or conflict with existing zoning for agricultural use, or a Williamson Act contract
- ▲ Impact AGF-2: Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))
- ▲ Impact AGF-3: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use

### 5.2.3 Air Quality

- ▲ Impact AQ-2: Implementation of the proposed Plan could result in a substantial net increase in construction-related emissions
- ▲ Impact AQ-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard
- ▲ Impact AQ-4: Expose sensitive receptors to substantial pollutant concentrations

### 5.2.4 Biological Resources

- ▲ Impact BIO-1a: Have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by CDFW, USFWS, or NOAA Fisheries

- ▲ Impact BIO-3: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridor, or impede the use of native wildlife nursery sites
- ▲ Impact BIO-5: Have the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species

### **5.2.5 Climate Change, Greenhouse Gases, and Energy**

- ▲ Impact GHG-1: Result in a net increase in greenhouse gas emissions, either directly or indirectly, compared to existing 2015 conditions that may have a significant impact on the environment
- ▲ Impact GHG-3: Conflict with an applicable state plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases

### **5.2.6 Cultural Resources and Tribal Cultural Resources**

- ▲ Impact CUL/TCR-1: Cause a substantial adverse change in the significance of a historical resource as defined in Guidelines Section 15064.5
- ▲ Impact CUL/TCR-2: Cause a substantial adverse change in the significance of a unique archaeological resource as defined in Guidelines Section 15064.5
- ▲ Impact CUL/TCR-4: Cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe

### **5.2.7 Geology, Seismicity, and Mineral Resources**

- ▲ Impact GEO-7: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

### **5.2.8 Hazards and Wildfire**

- ▲ Impact HAZ-4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment
- ▲ Impact HAZ-6: Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan
- ▲ Impact HAZ-7: Exacerbate the risk of wildland fires, associated pollutant release, and potential for flooding and landslides due to projected land use patterns and infrastructure in or near State Responsibility Areas or land classified as very high hazard severity zones

## 5.2.9 Land Use, Population, and Housing

- ▲ Impact LU-1: Physically divide an established community
- ▲ Impact LU-2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect
- ▲ Impact LU-4: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere

### 5.2.10 Noise

- ▲ Impact NOISE-1: Generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
- ▲ Impact NOISE-2: Generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
- ▲ Impact NOISE-3: Generate excessive groundborne vibration or groundborne noise levels
- ▲ Impact NOISE-4: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels

### 5.2.11 Public Services and Recreation

- ▲ Impact PSR-1: Result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, and other public facilities
- ▲ Impact PSR-2: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

### 5.2.12 Public Utilities and Facilities

- ▲ Impact PUF-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects
- ▲ Impact PUF-2: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years

- ▲ Impact PUF-3: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments
- ▲ Impact PUF-4: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and comply with federal, state, and local management and reduction statutes and regulations related to solid waste

### 5.2.13 Transportation

- ▲ Impact TRA-2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) pertaining to vehicle miles traveled

## 5.3 GROWTH-INDUCING IMPACTS

### 5.3.1 Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) requires an EIR to evaluate the potential growth-inducing impacts of a proposed project. Specifically, an EIR must discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth can be induced in a number of ways, including the elimination of obstacles to growth, or by encouraging and/or facilitating other activities that could induce growth. Examples of projects likely to have growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential or commercial uses in areas that are currently only sparsely developed or are undeveloped.

The CEQA Guidelines are clear that while an analysis of growth-inducing effects is required, it should not be assumed that induced growth is detrimental or beneficial to the environment. The analysis below examines these issues relative to the adoption and implementation of the proposed Plan.

## PROJECT OVERVIEW

The proposed project is a long-range regional plan for the nine-county San Francisco Bay Area (Bay Area or region) that outlines 35 integrated strategies across four key issues—housing, the economy, transportation, and the environment—to make the Bay Area more equitable for all residents and more resilient in the face of unexpected challenges. The proposed Plan serves as the third RTP/SCS for the Bay Area and is a major update to Plan Bay Area 2040. The proposed Plan's strategies chart a course to make the Bay Area more affordable, connected, diverse, healthy, and vibrant for all residents, while also achieving regional greenhouse gas emissions reduction targets established by the California Air Resources Board pursuant to the SB375.

The proposed Plan includes housing and economic strategies to accommodate forecasted regional growth, transportation strategies to invest expected transportation revenues, and environmental strategies to protect the region from future sea level rise inundation. It also seeks to meet or exceed

State and federal planning requirements, including State-mandated targets for GHG emissions reductions.

The Bay Area consists of nine counties and 101 cities, covering an area of approximately 4.4 million acres. In 2015 the region had 4.0 million jobs, 2.8 million households, and 7.6 million people. The proposed Plan would accommodate projected growth for an additional 1.4 million jobs, 1.4 million households, and 2.7 million people by 2050. The proposed Plan would not increase growth beyond what would otherwise be projected to occur in the Bay Area; rather, it provides a strategy to accommodate that growth in a manner that is more efficient in terms of the provision of transportation options, minimization of GHG emission, and development of various land uses.

## **ANALYSIS OF GROWTH-INDUCEMENT**

This analysis examines the following potential growth-inducing impacts related to implementation of the proposed Plan:

- ▲ foster population growth and construction of housing;
- ▲ eliminate obstacles to population growth;
- ▲ foster economic growth;
- ▲ affect service levels, facility capacity, or infrastructure demand; and
- ▲ encourage or facilitate other activities that could significantly affect the environment.

## **FOSTER POPULATION GROWTH AND CONSTRUCTION OF HOUSING**

The proposed Plan would accommodate the Bay Area's forecasted population through the identified housing and transportation strategies. Overall, the region would move toward its adopted vision of a more affordable, connected, diverse, healthy, and vibrant Bay Area for all, while also achieving the SB 375 State-mandated target for GHG emissions reductions. This is generally accomplished by some of the strategies' ability to shape the region's forecasted land use development pattern and focus new housing in transit-rich areas and high-resource areas. The proposed Plan is intended to help shape growth patterns in the region, leading to better efficiency, a more sustainable approach, and more compact and mixed patterns of land use that are better served by transit and other mode choice options.

Overall, the proposed Plan accommodates growth that is already forecasted to occur throughout the region, in a manner that is more efficient and effective from a regional perspective, consistent with SB 375. The proposed Plan includes economic strategies as well, leveraging a set of geographies identified for intensified job site development and policies aimed at creating a more equitable economy. The proposed Plan does not change local land use policies; individual jurisdictions retain local land use authority. However, the proposed Plan reflects differences from local adopted land use plans in some areas, and may reflect greater density/intensity of growth than included in current adopted local general plans. Where this occurs, implementation would require the local jurisdiction to consider and resolve those differences through appropriate amendments to local planning documents and required environmental review.

While development consistent with the proposed Plan would result in additional commerce, industry, recreation, public services, and infrastructure throughout the region, this economic activity is consistent with the housing and jobs growth forecasts. The number of housing units reflects a plan for no net growth in the in-commute into the region, consistent with State law and MTC's and ABAG's legal settlement with the Building Industry Association. See MTC/ABAG's webpage, <http://www.planbayarea.org>, for more information. Therefore, because forecasted growth would be

accommodated and managed, the proposed Plan is not growth-inducing overall; rather, it reflects the regulatory mandate to house the forecasted population. While there may be differences with general plans at the local level, implementation of the proposed Plan would require amendments to those local plans thus avoiding impacts related to unplanned growth and/or plan inconsistencies in smaller geographies.

### **Eliminate Obstacles to Population Growth**

Impediments to growth may be physical, regulatory, or fiscal. A physical obstacle to growth typically involves the lack of public infrastructure or insufficient infrastructure capacity. The extension of public service infrastructure (e.g., roadways, water and sewer lines) into areas that are not currently provided with these services may be considered growth inducing. Similarly, the elimination of a regulatory obstacle, such as a service boundary or growth management policy, or a change in land use designation, can also result in new growth in a manner that might be considered growth inducing. In addition, resolution of infrastructure funding constraints or the identification of new sources of funding can facilitate growth by funding the construction of new infrastructure.

The proposed Plan would result in substantial investments and improvements to the regional infrastructure in support of projected development. Transportation projects would create more efficient and effective circulation systems throughout the region. For the proposed Plan, the transportation network is designed to support the land use strategy in a way that moves the region closer to the attainment of the identified goals and objectives described above: a more efficient and equitable pattern that accommodates the forecasted growth.

The proposed Plan includes a mix of land uses balanced to minimize vehicle miles traveled (VMT) and maximize the ability for residents to conduct everyday activities within their neighborhood without the need to travel by car. In other words, the roadway investments of the proposed Plan are located and sized to achieve more sustainable forecasted growth. The proposed Plan's transportation strategies detail how the region intends to invest the region's \$593 billion in committed and forecasted transportation revenues over the next 30 years. The strategies were selected to move the region toward its adopted vision of a more affordable, connected, diverse, healthy, and vibrant Bay Area for all and to exceed the State-mandated target under the SB 375 process for GHG emissions reductions. This is generally accomplished by the strategies' ability to increase travel mode choices and accessibility while reducing travel times and costs. Projects that would widen or expand roadways could be considered growth-inducing on a local scale; however, this would support the housing, employment, and population forecasts for the region.

The proposed Plan also includes investment to protect the region from two feet of future permanent sea level rise inundation, reduce climate emissions, and maintain and expand the region's parks and open space system. The sea level rise adaptation infrastructure is located in areas where sea level rise threatens existing and locally planned development. This would generally protect existing developed areas from sea level rise hazards and would not create new areas of potential development.

In summary, the roadway investments of the proposed Plan are located and sized to achieve more sustainable forecasted growth. While obstacles to growth would be removed by providing more capacity in some instances, this growth is forecasted. In addition, sea level rise infrastructure has been planned to protect existing shoreline communities affected by sea level rise.

### **Foster Economic Growth**

As discussed above, the proposed Plan was developed to integrate forecasted population increases, employment opportunities, and housing needs within the Plan area. Therefore, the proposed Plan is



designed to accommodate growth that would occur with or without its adoption; it is not designed, nor is it anticipated to, drive further population growth beyond the levels forecasted. The proposed Plan supports the successful economic growth and prosperity of the region as required by law. Federal regulations governing the preparation of regional transportation plans require that they “support the economic vitality of the metropolitan area” (23 CFR Section 450.306). Population growth resulting from that economic vitality is not driven by the proposed Plan; thus, it is not a growth-inducing consequence of the proposed Plan.

### **Affect Service Levels, Facility Capacity, or Infrastructure Demand**

While development that may occur consistent with the proposed Plan could result in increases in demand for public services and infrastructure in excess of the existing conditions, local agencies retain the authority to ensure the provision of appropriately timed and sized services and utilities to serve new urban development concurrent with growth. These impacts are addressed in Section 3.13, “Public Services and Recreation,” and Section 3.14, “Public Utilities and Facilities,” of this Draft EIR.

### **Encourage or facilitate other activities that could significantly affect the environment**

This EIR analyzes at a programmatic level the potential for implementation of the proposed Plan’s land use development pattern, sea level rise adaptation infrastructure, and transportation projects to significantly affect the environment. These analyses are provided primarily in chapter 3.0 of this Draft EIR. While MTC and ABAG have planning authority to develop the policies and strategies in this Plan, decisions regarding project construction occur through other lead agencies. The mitigation measures identified in this Draft EIR would be implemented at the project level by those lead agencies, thus reducing the potential for significant effects to the maximum feasible level as determined by the approving agency. As noted above, the growth accommodated through the proposed Plan is projected to occur based on identified demographic and economic forces. The proposed Plan ensures that outcomes are more efficient and effective for the region overall.

### **Summary**

In summary, the proposed Plan includes 35 integrated strategies to enable the Bay Area to accommodate future growth and make the region more equitable and resilient in the face of unexpected challenges, such as sea level rise. This growth is not under the authority or control of MTC or ABAG. As dictated by existing State law, it will occur in a manner substantially consistent with local general plans and other applicable requirements.

The proposed Plan accounts for growth likely to occur through 2050 and makes assumptions about location and design that promote regional environmental benefits. While the effects of growth inducement can be considered an adverse impact under CEQA, the proposed Plan accommodates projected growth and implements State mandates to integrate land use and transportation decision-making in a way that achieves improved environmental and social outcomes. As discussed above, the proposed Plan would be growth-accommodating, not growth-inducing, and it reflects the regulatory mandate to house the forecasted population. At the regional and statewide level, the proposed Plan’s policies help prevent sprawl and make growth in existing centers more equitable and more efficient. Under the proposed Plan, GHG emissions and other environmental impacts would be lessened relative to what may otherwise occur absent the regional strategies embodied in the proposed Plan.

## 5.4 CUMULATIVE IMPACTS

The CEQA Guidelines define cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (Section 15355). Section 15130 of the CEQA Guidelines requires that an EIR evaluate potential environmental impacts that are individually limited but cumulatively considerable. These impacts can result from the proposed project alone or together with other projects. The CEQA Guidelines state: “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects” (Section 15355). A cumulative impact of concern under CEQA occurs when the net result of combined individual impacts compounds or increases other overall environmental impacts (CEQA Guidelines Section 15355). In other words, cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. CEQA does not require an analysis of incremental effects that are not cumulatively considerable, nor is there a requirement to discuss impacts that do not result in part from the project evaluated in the EIR.

### 5.4.1 Methodology

The proposed Plan is a cumulative plan by design. The Plan area encompasses 4.4 million acres and includes nine counties and 101 cities. It integrates transportation investments with land use strategies for an entire region of the state that shares, or is connected by, common economic, social, and environmental characteristics. Therefore, the environmental analysis of the proposed Plan presented throughout this Draft EIR is a cumulative analysis compliant with the requirements of CEQA and the CEQA Guidelines. Furthermore, this Draft EIR contains detailed analysis of regional (cumulative) impacts, which are differentiated from localized impacts that may occur at the county, TPA, and/or priority development area level. Nevertheless, the following discussion examines impacts associated with implementation of the proposed Plan, plus implementation of projected development for jurisdictions adjoining the Bay Area, to assess the potential for cumulative impacts from growth extending beyond the region.

CEQA allows the cumulative impact analysis to use either a list of past, present, and probable future projects, including projects outside the control of the lead agency, or a summary of projections in an adopted planning document, or a thoughtful combination of the two approaches. The cumulative analysis presented below uses a projections-based approach. Land use and growth projections for the region, which are the subject of analysis throughout this Draft EIR, are combined with the growth projections for the adjoining counties. Adjoining counties are listed as follows:

- ▲ Lake County: Lake County is located generally to the north of the Plan area, north of Napa County, and northeast of Sonoma County. It is sparsely populated, with the majority of development surrounding Clear Lake. According to the Lake County General Plan, the county is rooted in agriculture, resort development, and rural mountain communities (Lake County 2008).
- ▲ Mendocino County: Mendocino County is located to the north of the Plan area, north of Sonoma County, and west of Lake County. It has a history of timber and agricultural production. This county is facing increased development pressures from its more urban neighboring counties and changes in the timber and agricultural industries (Mendocino County 2009).

- ▲ Merced County: Merced County is located in the heart of California’s San Joaquin Valley, a very productive agricultural region. The county, which extends from the Coast Range to the foothills of the Sierra Nevada, is bordered by Santa Clara County to the west (Merced County 2011). It is generally southeast of the Plan area.
- ▲ Sacramento County: Sacramento County is located east of the Plan area, bordering Solano County to the east and Contra Costa to the north. This county has a large population (nearly 1.5 million people), centered around seven incorporated cities (Sacramento County 2016).
- ▲ San Benito County: San Benito County is located south of the Plan area, bordering Santa Clara County to the south. San Benito County is generally rural and contains substantial amounts of agricultural land (San Benito County 2015).
- ▲ San Joaquin County: San Joaquin County is located in the Central Valley of California, east of the Plan area. It borders Contra Costa and Alameda Counties to the east. San Joaquin County is primarily in agricultural production and contains a large population centered primarily around its seven cities (San Joaquin County 2016).
- ▲ Santa Cruz County: Santa Cruz County is located south of the Plan area, bordering the western edge of Santa Clara County and south of San Mateo County. Because of its climate and variety of landscape types, the county contains a diverse economic base that includes tourism, agriculture, and manufacturing. It has a relatively small population centered around the city of Santa Cruz (Santa Cruz County 1994).
- ▲ Stanislaus County: Stanislaus County is located east of the Plan area, bordering the eastern edge of Santa Clara County. This county is located in the San Joaquin Valley. Stanislaus County is primarily in agricultural production but is facing rapid population growth that began in the 1990s (Stanislaus County 2015).
- ▲ Yolo County: Yolo County was one of the original 27 counties created when California became a state in 1850. The county is located in the rich agricultural regions of California’s Central Valley and the Sacramento River Delta. It is directly west of Sacramento, the state capital, and northeast of the Bay Area counties of Solano and Napa (County of Yolo 2009:IN-2).

The area that includes the Bay Area and the above-referenced adjoining counties is referred to in this analysis as the “cumulative impact analysis area.” As shown in **Table 5-1**, the population for the cumulative impact analysis area is projected to grow from under 12 million people to nearly 15 million by 2050.

As shown in **Table 5-1**, approximately 68 percent of the existing population in the cumulative impact analysis area is located in the Plan area. By 2050, this proportion is expected to increase slightly (70 percent of the population). Thus, under both current and forecasted future conditions, the Bay Area represents a substantial portion of the growth in the cumulative analysis impact area. This is considered in the discussion below.

**Table 5-1 Population Projections of Cumulative Impact Analysis Area, 2015– 2050**

| Jurisdiction       | Acreage    | Population |            |
|--------------------|------------|------------|------------|
|                    |            | 2020       | 2050       |
| Lake County        | 851,000    | 63,800     | 66,200     |
| Mendocino County   | 2,045,000  | 87,500     | 85,600     |
| Merced County      | 1,266,000  | 284,800    | 372,500    |
| Sacramento County  | 636,000    | 1,562,200  | 1,901,500  |
| San Benito County  | 889,000    | 62,800     | 73,600     |
| San Joaquin County | 913,000    | 776,100    | 968,700    |
| Santa Cruz County  | 286,000    | 270,100    | 289,100    |
| Stanislaus County  | 970,000    | 556,000    | 668,200    |
| Yolo County        | 653,000    | 79,100     | 88,200     |
| Bay Area           | 4,400,000  | 7,930,000  | 10,330,000 |
| Total              | 12,909,000 | 11,672,400 | 14,843,600 |

Sources: DOC 2016; California Department of Finance 2020, 2021; MTC 2020

## CUMULATIVE EFFECTS OF THE PROPOSED PLAN

The following analysis examines the cumulative effects of the proposed Plan within the cumulative analysis impact area. The potential cumulative effects of the proposed Plan are summarized qualitatively below for each of the topics analyzed in Chapter 3 of this Draft EIR.

### Aesthetics and Visual Resources

Aesthetics and visual resources impacts associated with implementation of the proposed Plan are analyzed in Section 3.2 of this Draft EIR. The analysis examines impacts of the proposed Plan on aesthetics and visual resources throughout the Bay Area. Some impacts on scenic viewsheds would be expected, but these viewsheds are within the Bay Area and not visible to areas surrounding the Plan area. Generally, effects on scenic resources occur at the interface between development and the scenic resources and tend to be localized. Consequently, the proposed Plan would not be expected to combine with development in adjacent areas to produce a considerable contribution to cumulative impacts. The potential for cumulative impacts related to aesthetics and visual resources would not be cumulatively considerable, and the impact would be less than significant (LTS).

*Impact CUM-1: The incremental contribution to cumulative aesthetics and visual resources impacts from implementation of the proposed Plan would not be cumulatively considerable. This impact would be less than significant (LTS).*

### Mitigation Measure

None required.

### Agriculture and Forestry Resources

Implementation of the proposed Plan has the potential to result in conversion of land uses, including the conversion of agricultural lands and forestland to urban uses, as discussed in Section 3.3 of this Draft EIR. Similarly, development pursuant to other local and regional planning efforts within the cumulative impact analysis area could also have impacts on agriculturally designated land and forestry resources. As a result, cumulative impacts would be potentially significant. Further,

implementation of the proposed Plan and other cumulative development could also indirectly result in additional conversion of agriculture land and forestland to other uses. Because of the potential direct and indirect impacts that could occur as a result of the proposed Plan, implementation of the proposed Plan would contribute considerably to this impact and the impact would be significant (S).

*Impact CUM-2: The incremental contribution to cumulative agricultural and forestry resources impacts from implementation of the proposed Plan would be cumulatively considerable. This impact would be significant (S).*

### **Mitigation Measure**

CUM-2: Implement Mitigation Measures in Section 3.3.

Implementing these mitigation measures would reduce the significant impact of conversion of agricultural land and forestland to other uses because it would require avoidance or compensation for converted lands. However, conservation easements do not offset loss of agricultural land and forestland converted to other uses. While implementing these mitigation measures would protect other agricultural land and forestland in the future, it would not avoid conversion or restore new land to equivalent value to that lost. For these reasons, the residual impacts on conversion of agricultural land and forestland would be significant and unavoidable (SU). Additionally, the cumulative impact on agriculture and forestry resources would be significant and unavoidable (SU).

### **Air Quality**

As noted in Section 3.4, the nine-county MTC region encompasses all or parts of three air basins (the San Francisco Bay Area Air Basin in its entirety, portions of the North Coast Air Basin, and portions of the Sacramento Valley Air Basin), and it falls within the jurisdiction of the three related air districts (Bay Area Air Quality Management District, North Sonoma County Air Pollution Control District, and Yolo-Solano Air Quality Management District). Outside of the MTC region, three additional air basins are located in the other nine additional counties in the cumulative impact analysis area:

- ▲ Lake County Air Basin,
- ▲ San Joaquin Valley Air Basin, and
- ▲ North Central Coast Air Basin.

Additionally, portions of the cumulative impact analysis area (outside of the Plan area) fall within the jurisdiction of the following five additional air districts:

- ▲ Lake County Air Quality Management District – Lake County;
- ▲ Mendocino County Air Quality Management District – Mendocino County;
- ▲ Monterey Bay Unified Air Pollution Control District – San Benito County;
- ▲ Sacramento Metropolitan Air Quality Management District – Sacramento County; and
- ▲ San Joaquin Valley Air Pollution Control District – Merced, San Joaquin, and Stanislaus Counties.

The State has identified air basin-specific pollutants that have exceeded applicable federal and State pollutant standards. As noted in Section 3.4, any area that exceeds applicable standards for a particular pollutant is typically referred to as a “nonattainment” area for that pollutant. In addition, the air districts identified above have prepared area-specific air quality plans to improve air quality conditions within their jurisdiction to meet federal and State pollutant standards for those pollutants that currently exceed standards. Although each jurisdiction is primarily responsible for regulating its own emissions, pollutant transport, which is a result of a variety of topographical and atmospheric conditions that cause pollution generated in one location to move to another location (including a neighboring air

basin), can result in one area's emissions affecting another's ability to achieve applicable pollutant standards.

Because the air basins identified above are currently designated as nonattainment areas for one or more pollutants for which federal and/or State standards exist, a significant cumulative impact exists. Additionally, the proposed Plan could result in substantial increases in pollutant emission levels (PM<sub>10</sub> and PM<sub>2.5</sub>) during construction and operational activities associated with future growth and development patterns. However, the proposed Plan is intended to reduce the overall emissions load through a transportation and land use strategy that maximizes access to transit and other alternative transportation approaches, lowering potential VMT per capita. While an improvement over what would be expected absent the Plan, given existing air pollution conditions in surrounding areas, implementation of the proposed Plan would be cumulatively considerable and significant (S).

*Impact CUM-3: The incremental contribution to cumulative air quality impacts, from implementation of the proposed Plan would be cumulatively considerable. This impact would be significant (S).*

#### **Mitigation Measure**

CUM-3: Implement Mitigation Measures in Section 3.4.

As noted in Section 3.4, mitigation measures are available that could reduce an individual project's contribution (under the proposed Plan) to areawide emissions. However, the ability and requirement to implement such measures would ultimately be the responsibility of a lead agency to determine on a case-by-case basis, and implementation cannot be guaranteed by MTC or ABAG. As a result, the cumulative impact on air quality would be significant and unavoidable (SU).

#### **Biological Resources**

The effect of implementation of the proposed Plan on regional biological resources is analyzed in Section 3.5 of this Draft EIR. Biological resources impacts include direct and indirect effects on sensitive/special-status species or their habitat; substantial adverse effects on riparian, wetland, or other sensitive natural communities; interference with wildlife movement/corridors and nursery sites; or conflicts with plans or policies protecting biological resources. As noted in Section 3.5, implementation of the land use development pattern under the proposed Plan could result in regional impacts on special-status species. Similarly, development pursuant to other local and regional planning efforts within the cumulative impact analysis area could also have impacts on special-status species and habitat. As a result, cumulative impacts would be potentially significant. Further, implementation of the proposed Plan and other cumulative development could also result in disruption of movement corridors and nursery sites. Because of the potential direct and indirect impacts, including loss of individual species and habitat that may occur as a result of the proposed Plan, implementation of the proposed Plan would contribute considerably to this impact, and this impact would be significant (S).

*CUM-4: The incremental contribution to cumulative biological resources impacts from implementation of the proposed Plan would be cumulatively considerable. This impact would be significant (S).*

#### **Mitigation Measure**

CUM-4: Implement Mitigation Measures in Section 3.5.

These mitigation measures set requirements for surveys and actions to be taken if biological resources may be adversely affected. If the implementing agency and/or project sponsor adopts

these mitigation measures, it would reduce the contribution of the proposed Plan to cumulative impacts on biological resources. However, the mitigation measures may not be sufficient to reduce impacts to a less-than-significant level in all cases. Additionally, MTC and ABAG cannot require implementing agencies to adopt these mitigation measures. It is ultimately the responsibility of the implementing agency to determine and adopt mitigation. Therefore, the cumulative impact on biological resources would be significant and unavoidable (SU).

## **Climate Change, Greenhouse Gases, and Energy**

Section 3.6 in this Draft EIR addresses climate change, GHGs, and energy. Climate change is an inherently cumulative issue. MTC and ABAG have developed a land use and transportation strategy that meets SB 375 goals and places the Bay Area on a downward trajectory in GHG emissions, but the California Air Resources Board has stated that meeting SB 375 goals alone will not meet statewide goals under California's 2017 Climate Change Scoping Plan. The proposed Plan does not have additional land use strategies to feasibly bridge the gap between the proposed Plan GHG emissions and 2030 (and beyond) targets. This is not unique to MTC; all metropolitan planning organizations (MPOs) in California are faced with this same challenge. In the absence of State and local jurisdictional action (e.g., new State regulations, city and county GHG reduction plans targeted to 2030 and beyond), it is not possible to demonstrate that the proposed Plan would not impede the State's ability to achieve its SB 32 GHG reduction targets. Thus, implementation of the proposed Plan would contribute considerably to this impact and would be significant (S).

Impact CUM-5: *The incremental contribution to cumulative climate change and GHG impacts from implementation of the proposed Plan would be cumulatively considerable. This impact would be significant (S).*

### **Mitigation Measure**

CUM-5: Implement Mitigation Measures in Section 3.6.

Implementing these mitigation measures would reduce the potentially significant impact related to a conflict with State GHG reduction goals linked to transportation because it would require climate action planning, which would help to reduce GHG emissions from the land use projects that would be constructed under the Plan, as well as reduce GHG emissions from existing uses. Mitigation, via climate action plans for individual jurisdictions, or other programs, including retrofitting existing buildings, installing renewable energy facilities that replace reliance on fossil-fuel power in the region, altering the vehicle fleet (toward more non-fossil fuel-powered vehicles), and implementing other measures would be required to meet the goals needed for the State to attain the 2030 and 2050 targets. However, there is no assurance that the measures would reduce impacts to a less-than-significant level. Additionally, the ability and requirement to implement such measures would ultimately be the responsibility of the local jurisdiction, and implementation cannot be guaranteed by MTC or ABAG, resulting in a cumulatively considerable contribution by the proposed Plan. Therefore, the cumulative impact on climate change and GHGs would be significant and unavoidable (SU).

## **Cultural Resources and Tribal Cultural Resources**

The effect of implementation of the proposed Plan on cultural resources and tribal cultural resources (TCRs) is analyzed in Section 3.7 of this Draft EIR. While some cultural resources may have regional significance, the resources themselves are site specific, and impacts on them are project specific. For example, impacts on a subsurface archaeological find at one project site are generally not made worse by impacts from another project on a cultural resource at another site. Rather, the resources and the effects on them are generally independent. Therefore, the proposed Plan would not be expected to

combine with impacts on cultural resources in areas surrounding the Bay Area to create more considerable impacts. The potential for cumulative impacts related to cultural resources is not cumulatively considerable, and the impact would be less than significant (LTS).

However, with regard to TCRs, the aerial extent of ancestral territories for affected tribes may be extensive. Sacred Lands searches would be conducted through the Native American Heritage Commission during the CEQA process, and local jurisdictions in the region must initiate consultation with the Native American tribes as part of their compliance with Assembly Bill 52. The purpose of that consultation is to determine whether there is a potential for TCRs that could be affected by a proposed project and to engage the tribes in addressing the impacts on a project level. Ongoing consultation with tribes has identified, and would continue to identify, additional TCRs throughout the region. However, on a regional level, the loss of these resources may not be mitigated to acceptable levels through data recovery and collection, because their value may also lie in tribal cultural mores and religious beliefs. Therefore, cumulative disturbance of TCRs from Plan implementation within the historic boundaries of tribes in the Bay Area and surrounding counties, in particular disturbance of TCRs associated with the cultural and physical remains of native peoples whose descendants are living today, could contribute considerably to this impact and would be a significant impact (S).

*CUM-6: The incremental contribution to cumulative tribal cultural resources impacts would be cumulatively considerable and would be significant (S).*

#### **Mitigation Measure**

CUM-6: Implement Mitigation Measure CUL/TCR-4.

Implementation of Mitigation Measure CUL/TCR-4 would reduce impacts associated with TCRs because it would require the performance of professionally accepted and legally compliant procedures related to the identification of TCRs associated with subsequent projects. However, the ability and requirement to implement such measures would ultimately be the responsibility of a lead agency to determine on a case-by-case basis, and implementation cannot be guaranteed by MTC or ABAG. As a result, this cumulative impact on cultural resources and TCRs would be significant and unavoidable (SU).

#### **Geology, Seismicity, and Mineral Resources**

Impacts on geology, seismicity, and mineral resources related to implementation of the proposed Plan are analyzed in Section 3.8 of this Draft EIR. Geology, seismicity, and mineral resources impacts may result from increased exposure to seismic hazards, increased erosion and/or loss of topsoil, the presence of unstable/expansive soils, alternative waste disposal or septic systems, and the loss of known mineral resources or paleontological resources. These effects occur independently of one another, related to site-specific and project-specific characteristics and conditions. In addition, existing regulations specify mandatory actions that must occur during project development, which would adequately address the potential for effects from construction or operation of projects related to geology, seismicity, and paleontological and mineral resources as noted throughout the impact discussion in Section 3.8 of this Draft EIR.

The potential for cumulative impacts related to geology, seismicity, and paleontological and mineral resources is not cumulatively considerable, and the impact would be less than significant (LTS).

*CUM-7: The incremental contribution to cumulative geology, seismicity, and mineral resources impacts from implementation of the proposed Plan would not be cumulatively considerable. This impact would be less than significant (LTS).*



### **Mitigation Measure**

None required.

### **Hazards and Wildfire**

Impacts associated with hazards and wildfire related to implementation of the proposed Plan are analyzed in Section 3.9 of this Draft EIR. Hazards and hazardous materials impacts may be related to the transport, use, or disposal of hazardous materials (including by rail); reasonably foreseeable upset or accidental conditions involving the release of hazardous materials; emission of hazardous materials within ¼-mile of a school; location on a known hazardous materials site; and airport-related hazards. Most of these effects occur independently of one another, related to site-specific and project-specific characteristics and conditions. In addition, the proposed Plan would not generate a substantial increase in hazardous materials transport by rail. Furthermore, existing regulations specify mandatory actions that must occur during project development, including transport, use, and disposal of hazardous materials, which would adequately address issues pertaining to hazards and hazardous materials as noted throughout the impact discussion in Section 3.9 of this Draft EIR. The potential for cumulative impacts related to hazards and hazardous materials is not cumulatively considerable, and the impact would be less than significant (LTS).

Hazards related to implementation of an adopted emergency response plan or emergency evacuation plan would be potentially significant because increased population and employment in areas in the Bay Area would increase congestion on evacuation routes and could slow evacuation. The potential for cumulative impacts related to evacuation would be cumulatively considerable, and the impact would be significant (S). Features of the Plan that would reduce the potential to exacerbate the risk of wildfire include maintaining the urban growth boundaries, directing growth away from areas with the highest fire hazard severity potential, and supporting vegetation management on conservation lands. The proposed Plan is designed to accommodate anticipated population growth in a manner that reduces potential contributions to climate change, encourages concentrated growth in developed areas and land management in open space, and includes structural hardening efforts where existing structures are vulnerable to fire. Nonetheless, because development could occur near land classified as very high hazard severity zones and could indirectly result in extension or expansion of infrastructure through these areas, there is potential for the proposed Plan to exacerbate the risk of wildland fires. The Plan could indirectly result in extension or expansion of infrastructure through these areas and adversely affect emergency evacuation procedures. This impact would be potentially significant. Because the risk and effects of wildland fires are regional in nature, the potential direct and indirect impacts that could occur as a result of the proposed Plan would contribute considerably to this impact and would be significant (S).

*CUM-8: The incremental contribution to cumulative hazards and wildfire impacts from implementation of the proposed Plan would be cumulatively considerable. This impact would be significant (S).*

### **Mitigation Measure**

CUM-8: Implement Mitigation Measures in Section 3.9.

As noted in Section 3.9, mitigation measures are available that could reduce an individual project's contribution (under the proposed Plan) to inadequate emergency access and wildland fire risk. However, the ability and requirement to implement such measures would ultimately be the responsibility of a lead agency to determine on a case-by-case basis, and implementation cannot be guaranteed by MTC or ABAG. As a result, this cumulative impact on hazards and wildfire would be significant and unavoidable (SU).

## Hydrology and Water Quality

Hydrology and water quality impacts associated with implementation of the proposed Plan are analyzed in Section 3.10 of this Draft EIR. These impacts may be related to violation of water quality standards; interference with groundwater recharge; increased erosion; increased nonpoint source pollution; increased runoff; effects on flood zones; and exposure of people to a significant risk of loss, injury, or death involving flooding (including flooding as a result of the failure of a levee or dam), seiche, tsunami, or mudflow. These effects, like those related to geology, seismicity, and mineral resources above, occur independently of one another, related to site-specific and project-specific characteristics and conditions. In addition, existing regulations specify mandatory actions that must occur during project development, which would adequately address the potential for construction or operation of projects to affect water resources as noted throughout the impact discussion in Section 3.10. Thus, the potential for cumulative impacts related to water resources is not cumulatively considerable, and the impact would be less than significant (LTS).

*CUM-9: The incremental contribution to cumulative hydrology and water resources impacts from implementation of the proposed Plan would not be cumulatively considerable. This impact would be less than significant (LTS).*

### Mitigation Measure

None required.

## Land Use, Population, and Housing

Land use, population, and housing impacts associated with implementation of the proposed Plan are analyzed in Section 3.11 of this Draft EIR. As noted in Section 3.11, the additional population, housing, and job growth forecasted for the planning period is not a result of the proposed Plan; rather, the growth is forecast to occur with or without the proposed Plan. The proposed Plan provides a strategy to accommodate growth in such a way as to achieve a more balanced jobs/housing ratio and to optimize transportation investments that support those land uses. The land use growth footprint assumes a number of residential units adequate to meet the forecasted demand, taking into account localized displacement of some households within the region. Thus, implementation of the proposed Plan would not result in displacement at the regional scale, and localized displacement would not be expected to exert development pressure on areas surrounding the Bay Area. Because the proposed Plan would not exert development pressure on adjacent counties through displacement of land uses, indirect effects that would otherwise be expected (effects tied to development) would not occur. This would be a less-than-significant cumulative effect (LTS).

*CUM-10: The incremental contribution to cumulative land use, population, and housing impacts from implementation of the proposed Plan would not be cumulatively considerable. This impact would be less than significant (LTS).*

## Noise

Impacts associated with noise related to implementation of the proposed Plan are analyzed in Section 3.12 of this Draft EIR. Noise impacts are based on factors related to site-specific and project-specific characteristics and conditions, including distance to noise sources, barriers between land uses and noise sources, and other factors. Impacts related to construction, traffic, and transit would be significant. Cumulative noise increases from traffic within the Plan area are addressed in Section 3.12. No other cumulative sources of noise (in relation to cumulative development) are expected.

The proposed Plan is not expected to substantially increase interregional travel, because the proposed Plan accommodates projected growth. Therefore, proposed Plan-related contributions to traffic noise outside the region are expected to be minimal, and the proposed Plan's contribution to cumulative traffic noise would be less than significant (LTS).

*CUM-11: The incremental contribution to cumulative noise impacts from implementation of the proposed Plan would not be cumulatively considerable. This impact would be less than significant (LTS).*

### **Mitigation Measure**

None required.

## **Public Services and Recreation**

Impacts on public services and recreation related to implementation of the proposed Plan are analyzed in Section 3.13 of this Draft EIR. This assessment includes an analysis of the need for new facilities or modification to facilities, the construction of which causes significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for schools, emergency services, police protection, fire protection, and other public facilities or for regional parks or other recreational facilities.

Law enforcement, fire protection, and emergency services are provided by local governments or fire protection districts for areas within their jurisdiction, although mutual-aid agreements between agencies help spread and share resources. The California Highway Patrol has specific jurisdiction over all California State routes (including all freeways and expressways), U.S. highways, interstate highways, and all public roads in unincorporated parts of a county. The U.S. Forest Service and California Department of Forestry and Fire Protection provide fire protection services within many rural areas.

Public schools are provided by school districts to areas within their jurisdictions. While districts may have cross-jurisdictional boundaries, school services are still provided at the local, rather than regional, level. Libraries are also generally provided by local governments for areas within their jurisdiction, and services are not provided on a regional basis, although there are often regional cooperation programs. Social services are generally provided by counties and not provided on a regional basis.

Neighborhood and city/county parks and recreational services are provided by local governments for areas within their jurisdiction. The Bay Area also includes numerous regional, State, and federal parks, open space, and recreational areas.

The effects of the proposed Plan as it relates to most public services and local parks and recreation facilities would not be cumulatively considerable, because of the localized (and inherently noncumulative) nature of these services. As a result, cumulative impacts related to these services would be less than significant (LTS).

*Impact CUM-12: The incremental contribution to cumulative public services and recreation impacts from implementation of the proposed Plan would not be cumulatively considerable. This impact would be less than significant (LTS).*

### **Mitigation Measure**

None required.

## **Public Utilities and Facilities**

Impacts on public utilities and services related to implementation of the proposed Plan are analyzed in Section 3.14 of this Draft EIR. The analysis includes an examination of potential impacts related to the availability and capacity of water supply, stormwater, wastewater, solid waste, natural gas, propane, electricity, and telecommunications infrastructure. The utilities identified below are generally provided or delivered on a local level but may originate from sources outside of the local jurisdiction and/or as part of a regional distribution system. The proposed Plan's contribution to cumulative impacts associated with the provision of utilities is discussed below.

### **Water Supply and Infrastructure**

Water supply and associated infrastructure have both local and regional aspects. The rivers that provide virtually all the surface water supplies in the Bay Area originate outside the region and travel through the region and beyond, providing water supply to jurisdictions inside and outside of the Bay Area along the way.

An increase in demand and water consumption in one region has the potential to affect supplies throughout California, because the surface water supply systems are interconnected. Development of future water supply and associated infrastructure regionally and beyond depends on several factors, such as surface water and groundwater availability, groundwater recharge, land use density, and land use type. Future urban growth (population, housing, and employees) anticipated with implementation of the Plan would result in an increase in water supply needs and demand. Future growth elsewhere in the cumulative impact analysis area could also lead to potential future water shortages and depletion of existing water supplies. As a result, the proposed Plan's contribution with respect to water supply and water infrastructure would be cumulatively considerable, and this impact would be potentially significant (PS).

### **Wastewater and Infrastructure**

Wastewater service (sewer treatment) is a localized concern because the wastewater treatment facilities and services are usually provided and regulated by local governments or special districts for areas within their jurisdiction. For this reason, wastewater systems and associated infrastructure within the Bay Area would not be substantially affected by development outside of the region or substantially affect other counties in the cumulative impact analysis area. Therefore, the proposed Plan's contribution with respect to wastewater and wastewater infrastructure would not be cumulatively considerable, and impacts would be less than significant (LTS).

### **Stormwater and Infrastructure**

Stormwater drainage systems in the Bay Area are generally provided by local governments for areas within their jurisdictions or for county/city areas combined and are not typically provided on a regional or extraregional basis. Stormwater drainage solutions typically depend on site-specific and project-specific characteristics and implementation. For this reason, stormwater drainage systems within the Plan area would not be significantly affected by development outside of the region, nor would development under the proposed Plan significantly affect stormwater drainage systems in the cumulative impact analysis area. Therefore, the proposed Plan's contribution with respect to stormwater and stormwater infrastructure would not be cumulatively considerable, and impacts would be less than significant (LTS).

### **Solid Waste**

Solid waste management is generally provided by privately operated landfills (with the exception of one landfill operated by the Sonoma County Public Works Department) under the oversight of each county's

local enforcement agency and not on a regional basis. There are 57 transfer stations in the Bay Area that receive solid waste and transfer it into containers or vehicles before it is finally disposed of in a landfill or transformation facility, and solid waste generated in one county can be transported to another county or outside the region. Implementation of the proposed Plan, in conjunction with other development projected to occur in the cumulative impact analysis area, has the potential to exceed available local solid waste capacity. Because of the potential solid waste generated through Plan implementation, the proposed Plan's contribution would be cumulatively considerable. Impacts would be significant (S).

*CUM-13: The incremental contribution to cumulative public utilities and facilities impacts from implementation of the proposed Plan would be cumulatively considerable. This impact would be significant (S).*

### **Mitigation Measure**

CUM-13: Implement Mitigation Measures in Section 3.14.

The mitigation measures identified in Section 3.14 would ensure that adequate public utilities would be available to serve the project at applicable service levels. If the implementing agency and/or project sponsor adopts these mitigation measures, it would reduce the cumulative contribution of the proposed Plan to less than considerable, and residual impacts on public utilities and facilities would be less than significant (LTS). However, the ability and requirement to implement such measures would ultimately be the responsibility of the local jurisdiction, and implementation cannot be guaranteed by MTC or ABAG, resulting in a cumulatively considerable contribution by the proposed Plan. Therefore, the cumulative impact on public utilities and facilities would be significant and unavoidable (SU).

### **Transportation**

Impacts on transportation related to implementation of the proposed Plan are analyzed in Section 3.15 of this Draft EIR. As discussed in Section 3.15, implementation of the proposed Plan would reduce per capita VMT compared to the 2015 baseline but would increase total VMT because of the projected population increase. If implemented, the proposed Plan's comprehensive suite of land use, transportation, and environmental strategies would help the region make progress in reducing per capita VMT and would not directly interfere with statewide VMT reduction policies intended to meet the State's statutory GHG emission targets. However, because there is a gap between SB 375 targets and GHG reductions needed to achieve statewide GHG reduction goals, and because the ability to bridge this gap relies on implementation of travel demand management and other strategies that can be employed only at the local jurisdictional level, MTC and ABAG cannot conclude that the reductions would be sufficient to meet the State's climate goals. The inability to meet this goal is not limited to MTC or the proposed Plan; rather, it affects all MPOs and the entire state. Thus, the proposed Plan would contribute considerably to this impact and would be significant (S). The less-than-significant impacts related to conflicts with a program, plan, ordinance, or policy addressing the circulation system; increased hazards related to geometric design features or incompatible uses; and emergency access would be localized. Consequently, the proposed Plan would not be expected to combine with development in adjacent areas to produce a considerable contribution to cumulative impacts. The potential for cumulative impacts related to conflicts with existing programs and plans, increased hazards, and emergency access would not be cumulatively considerable, and these impacts would be less than significant (LTS).

*Impact CUM-14: The incremental contribution to transportation impacts from implementation of the proposed Plan would be cumulatively considerable. This impact would be significant (S).*

**Mitigation Measure**

CUM-14: Implement Mitigation Measures in Section 3.6.

These mitigation measures would reduce the significant impact of meeting State GHG reduction goals linked to transportation because they would involve implementing additional State policy actions and funding to close the VMT gap between what the MPOs could achieve through implementation of their SCSs, and reductions needed to meet State goals. However, there is no assurance that implementation of the mitigation measures would be enough to achieve the regional reductions needed to attain the State's goals. Additionally, the ability and requirement to implement such measures would ultimately be the responsibility of the local jurisdiction, and implementation cannot be guaranteed by MTC or ABAG, resulting in a cumulatively considerable contribution by the proposed Plan. Therefore, the cumulative impact on transportation would be significant and unavoidable (SU).

## **5.5 IMPACTS FOUND NOT TO BE SIGNIFICANT**

This EIR focuses on potentially significant impacts. CEQA requires that an EIR provide a brief statement indicating why various possible significant impacts were determined to not be significant and were not discussed in detail. For the issue areas addressed in Chapter 3, all potential impacts are identified. See Sections 3.2 through 3.15 for discussions related to impacts found not to be significant.