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## 5 OTHER CEQA CONSIDERATIONS

### 5.1 CUMULATIVE IMPACTS

The State CEQA Guidelines (Section 15130) requires that an environmental impact report (EIR) discuss cumulative impacts of a project and determine whether the project's incremental effect is "cumulatively considerable." The definition of cumulatively considerable is provided in Section 15065(a)(3):

"Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

According to the State CEQA Guidelines (Section 15130[b])

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 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.

For purposes of this EIR, the project would have a significant cumulative effect if it meets either one of the following criteria:

- ▲ The cumulative effects of related projects (past, current, and probable future projects) without the project are not significant but the project's incremental impact is substantial enough, when added to the cumulative effects, to result in a significant impact; or
- ▲ The cumulative effects of related projects (past, current, and probable future projects) without the project are already significant and the project represents a considerable contribution to the already significant effect. The standards used herein to determine "considerable contribution" are that the impact either must be substantial or must exceed an established threshold of significance.

Mitigation measures are to be developed, where feasible, that reduce the project's contribution to cumulative effects to less than considerable.

#### 5.1.1 Geographic Scope of the Cumulative Analysis

The analysis of cumulative environmental impacts associated with development of the proposed project addresses the potential incremental impacts of the project in combination with those of other past, present, and probable future projects and land use changes. The geographic area that could be affected by development of the proposed project varies depending on the type of environmental resource being considered. The general geographic area associated with various environmental effects of construction and operation of the proposed project defines the boundaries of the area used for compiling the list of projects considered in the cumulative impact analysis. Table 5-1 presents the general geographic areas associated with the different resources addressed in this Draft EIR and evaluated for this cumulative analysis.

Table 5-1 Geographic Scope of Cumulative Impacts

Resource Issue	Geographic Area
Aesthetics	Local (immediate project vicinity)
Air Quality	Regional (Sacramento Valley Air Basin —pollutant emissions that have regional effects) Local (immediate project vicinity—pollutant emissions that are highly localized)
Biological Resources	Regional (Central Valley)
Cultural Resources	Regional (Central Valley)
Geology and Soils	Local (immediate project vicinity)
Greenhouse Gas Emissions and Climate Change	Global
Hazards and Hazardous Materials	Local (immediate project vicinity)
Hydrology and Water Quality	Local (immediate project vicinity—local watershed)
Land Use and Planning	Local (City of Roseville)
Noise	Local (immediate project vicinity)
Public Services	Local (City of Roseville)
Recreation	Local (City of Roseville)
Utilities	Regional (regional utility area)

Source: Data compiled by Ascent Environmental in 2015

## 5.1.2 Analysis of Cumulative Impacts

### Aesthetics

#### **Cumulative Impact 4.1-1: Substantially degrade the visual character or quality of the site and its surroundings.**

Aesthetic and visual resources impacts are project-specific and highly localized. The proposed project would be aligned within the creek corridors of developed neighborhoods and business districts in the City of Roseville. With the exception of a few scattered parcels, the properties surrounding the creek corridors are fully developed. The properties adjacent to the proposed trail corridor include a mix of residential, commercial, parks, open space and public/quasi-public uses. Because of the project site's topography and vegetation, future projects outside of the immediate project vicinity, which is largely developed, would not be visible in combination with the proposed project. Therefore, the proposed project and alignment alternatives would not result in a considerable contribution to the cumulative degradation of the visual character or quality of the site. This cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

#### **Cumulative Impact 4.1-2: Create a new source of substantial light or glare that would adversely affect day or nighttime views of the area.**

The project may include lit undercrossings in locations where the trail passes under roadways, including Darling Way east of Riverside Avenue, Interstate 80 (I-80) north of Cirby Way, Sunrise Avenue south of Coloma Way, Rocky Ridge Drive north of Cirby Way, and Old Auburn Road north of South Cirby Way. Bridges may also be illuminated and would have a weathered steel finish to blend into the natural environment and not cause glare. Lighting may also be installed at the trailhead parking lot and at-grade roadway crossings to enhance visibility of bicyclists and pedestrians to motorists. Lighting of the complete trail alignment is not proposed. In adherence with adopted City standards, all

proposed lighting would be limited to the amount required to safely illuminate roadways and sidewalks. Therefore, project lighting would be localized and would not contribute considerably to cumulative increases in light or glare. This cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

## Air Quality

### **Cumulative Impact 4.2-1: Short-term construction-generated emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.**

Ozone impacts are the result of cumulative emissions from numerous sources in the region and transported from outside the region. Ozone is formed in chemical reactions involving oxides of nitrogen (NO<sub>x</sub>), reactive organic gases (ROG), and sunlight. All but the largest individual sources emit NO<sub>x</sub> and ROG in amounts too small to have a measurable effect on ambient ozone concentrations by themselves. However, when all sources throughout the region are combined, they can result in ambient concentration of ozone that exceed the national and state standards. PM<sub>10</sub> and PM<sub>2.5</sub> have a similar cumulative regional emphasis when particulates are entrained into the atmosphere and build to unhealthy concentrations over time. PM<sub>10</sub> and PM<sub>2.5</sub> also have the potential to cause local impacts during periods of dry conditions accompanied by high winds and during periods of heavy earth disturbing activities. PM<sub>10</sub> and PM<sub>2.5</sub> may have cumulative local impacts if, for example, several unrelated grading or earth moving activities are underway simultaneously at nearby sites. Operational-related PM<sub>10</sub> and PM<sub>2.5</sub> are less likely to result in local cumulative impacts as operational sources of PM<sub>10</sub> and PM<sub>2.5</sub> tend to be spread throughout the region (i.e., vehicles traveling on roads), not affecting any one receptor. Therefore, emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from cumulative development are significant in the air basin; the discussion below addresses whether the project's contribution of these criteria air pollutants and precursors are considerable.

Table 4.2-3 summarizes the daily emissions of ROG and NO<sub>x</sub> from project construction estimated for each year of construction activity. Emissions generated by construction would be below Placer County Air Pollution Control District's (PCAPCD) recommended CEQA project-level significance thresholds of 82 lbs/day of ROG and 82 lbs/day of PM<sub>10</sub>. However, construction emissions would exceed PCAPCD's recommended CEQA project-level significance threshold of 82 lbs/day of NO<sub>x</sub>. Implementation of Mitigation Measure 4.2-1 would reduce the magnitude of this impact to a less-than-significant level. Because the area surrounding the proposed project and alternate alignments is mostly built out and because construction emissions would be temporary, the short-term construction-generated emissions would not result in a considerable contribution to a cumulative impact. This cumulative impact would be **less than significant with mitigation** for the proposed project and Option 1A, Option 1C, and Option 5A.

### **Cumulative Impact 4.2-2: Long-term use-related emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.**

Over the long term, the proposed multi-use trail with accompanying parking lot is expected to decrease motor vehicle travel. Emissions generated by trail use would be below PCAPCD's project-level significance thresholds, and the project would not substantially contribute to air pollutant concentrations that exceed the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS). Therefore, the proposed project and alignment alternatives would not contribute to a cumulative increase in emissions, and this cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

### **Cumulative Impact 4.2-3: Generation of local mobile-source CO emissions.**

Concentrations of carbon monoxide (CO), which are examined under Impact 4.2-3, are pollutants of localized concern because CO disperses rapidly with distance from the source under normal meteorological conditions. Thus, it is unlikely that the concentration of CO at a single receptor would be the result of more than one source of CO, unless multiple sources of CO are located close together. The analysis under Impact 4.2-3 examines whether changes in vehicle trips generated under the

proposed project could result in localized CO concentrations that exceed the NAAQS and CAAQS for CO. The analysis determined that, over the long term, it is expected that trail use would contribute to decreased motor vehicle travel. Therefore, the proposed project would not result in a considerable contribution to a cumulative impact. This cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

#### **Cumulative Impact 4.2-4: Exposure of sensitive receptors to toxic air contaminant (TAC) emissions.**

Toxic air contaminants (TACs), which are examined under Impact 4.2-4, are also pollutants of localized concern. Diesel particulate matter emissions are the primary TAC of concern regarding the construction and operation of new urban land uses and infrastructure. The project would not be a substantial source of TAC emissions. However, a portion of the proposed trail improvements would be located near or directly adjacent to the I-80 freeway, which could result in the exposure of trail users to mobile source TAC emissions. The exposure period of trails users would be relatively short and temporary in nature. Therefore, the proposed project would not result in a considerable contribution to a cumulative impact. This cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

### **Biological Resources**

Generally, the geographic extent of cumulative impacts on biological resources consists of the City of Roseville, western Placer County and the Central Valley region of California that supports similar biological resource values and functions to those of the project area. Past and present actions by humans have substantially altered biological resources in the Central Valley region of California. Past, present, and foreseeable future urbanization in Roseville and western Placer County has contributed substantially to the loss of grassland, wetland, and agricultural habitats that are important to many species in the region.

#### **Cumulative Impact 4.3-1: Disturbance and loss of waters of the United States, waters of the state, and riparian habitat.**

Executive Order 11990, Protection of Wetlands (1997), calls for no net loss of habitats referred to as wetlands and established a policy to avoid adverse effects on wetlands wherever there is a practicable alternative. Permanent impacts to jurisdictional wetlands would be mitigated with implementation of Mitigation Measure 4.3-1 to comply with the Clean Water Act and the standard of no net loss of wetlands. Additionally, impacts to wetlands and other waters and associated riparian habitat have been minimized during project design and is limited to bridge footings and stream bank stabilization/restoration measures intended to increase habitat function over the long term. The project would not isolate or fragment any wetlands or other waters, or change the function of the urban creek corridor. As a result of the mitigation to achieve no net loss of wetlands, and project design to ensure minimal wetlands impacts, the project contribution to the cumulative loss of wetlands and Waters would not be cumulatively considerable, and this cumulative impact would be **less than significant with mitigation** for the proposed project and Option 1A, Option 1C, and Option 5A.

#### **Cumulative Impact 4.3-2: Interfere substantially with the movement of Central Valley steelhead and Central Valley fall-run Chinook salmon.**

With avoidance and implementation of minimization measures, the proposed project would not substantially affect the distribution, population viability, or the regional population of Central Valley Steelhead, or Central Valley fall-run Chinook salmon; or cause a change in species diversity locally or regionally. Construction-related effects would be temporary and would be minimized with implementation of Mitigation Measure 4.3-2. Therefore, the project's contribution to the cumulative impact would not be cumulatively considerable, and this cumulative impact would be less than significant with mitigation for the proposed project and Option 1A, Option 1C, and Option 5A.

**Cumulative Impact 4.3-3: Disturbance or loss of Valley Elderberry Longhorn Beetle or its habitat.**

With avoidance and implementation of Mitigation Measure 4.3-3, the proposed project would not substantially affect the distribution, population viability, or the regional population of valley elderberry longhorn beetle; or cause a change in species diversity locally or regionally. Therefore, the project's contribution to the cumulative impact would not be cumulatively considerable, and this cumulative impact would be **less than significant with mitigation** for the proposed project and Option 1A, Option 1C, and Option 5A.

**Cumulative Impact 4.3-4: Disturbance or loss of Swainson's hawk, white-tailed kite, and other nesting raptors; Cumulative Impact 4.3-5: Disturbances to special-status song birds; Cumulative Impact 4.3-6: Disturbance or loss of Western pond turtle; and Cumulative Impact 4.3-7: Disturbance or loss of special-status bats – pallid bat and silver-haired bat.**

The proposed project would result in the construction and operation of a multi-use trail in areas that provide suitable habitat for special-status wildlife, as addressed in the project-specific impact in Section 4.3. If special-status wildlife are present in those areas, project construction could cause the disturbance or loss of those species. Implementation of the proposed project and the cumulative projects in the region would result in conversion and fragmentation of habitat, introduction of additional non-motorized and pedestrian traffic, sources of noise, and other effects that could disturb the foraging and movement patterns of individuals, affect breeding activities and reproductive success, cause direct mortality or injury, and disturb or remove suitable habitat for some special-status wildlife species. When combined with the cumulative projects with similar biological effects, implementation of the proposed project without mitigation could have an adverse cumulative effect on special-status wildlife species. However, Mitigation Measures 4.3-4, 4.3-5, 4.3-6, and 4.3-7 require conducting focused preconstruction surveys for special-status wildlife and, if needed, limiting construction operations during the sensitive breeding periods. Implementation of these measures would avoid the potential disturbance or loss of individuals, nests, and roost sites of these species during construction of the proposed project. Furthermore, implementation of Mitigation Measures 4.3-1, 4.3-2, and 4.3-8 requires that sensitive habitats (i.e., wetlands, riverine, riparian, valley oak woodland) are avoided to the extent feasible and that sensitive habitats that cannot be avoided are restored following construction, or if the habitat cannot be restored, that the City compensates for unavoidable losses. With recommended mitigation measures, the project would not substantially affect the distribution, breeding productivity, population viability, or the regional population of any special-status species; nor would it cause a change in species diversity locally or regionally, either directly through loss of individuals or indirectly through habitat modification. Therefore, with implementation of project-specific mitigation measures, the project's contribution to the cumulative impacts on special-status species would not be cumulatively considerable, and these cumulative impacts would be **less than significant with mitigation** for the proposed project and Option 1A, Option 1C, and Option 5A.

**Cumulative Impact 4.3-8: Cumulative disturbance or loss of City protected trees, Valley Oak Woodland and other Sensitive Vegetation Alliances and Associations; and Cumulative Impact 4.3-9: Cumulative Disturbance or loss of special-status plants – Sanford's arrowhead.**

Construction of the proposed trail in combination with other cumulative development in the region could result in permanent loss or temporary disturbance of wetland, perennial stream, riparian, and oak woodland habitats. These potential impacts would be cumulatively significant. Construction activities for the proposed project and other cumulative projects would be required to comply with existing federal, state, and local regulations and permitting requirements that protect wetland, riparian, and other sensitive habitats through avoidance, restoration, enhancement, and other means such that sensitive habitat values are maintained. For the proposed project, implementation of Mitigation Measures 4.3-1, 4.3-2, and 4.3-8 requires that sensitive habitats (i.e., wetlands, riverine, riparian, valley oak woodland) are avoided to the extent feasible and that sensitive habitats that cannot be avoided are restored

following construction, or if the habitat cannot be restored, that the City compensates for unavoidable losses. Mitigation Measure 4.3-9 would require the City to identify and avoid Sanford's arrowhead plants or provide compensation for loss of Sanford's arrowhead plants through enhancement of existing populations, creation, conservation easements and management of offsite populations. Because the project would implement the protective provisions of existing regulations as well as project-specific design features and mitigation measures, the project's contribution to these cumulative impacts would not be cumulatively considerable, and these cumulative impacts would be **less than significant with mitigation** for the proposed project and Option 1A, Option 1C, and Option 5A.

**Cumulative Impact 4.3-10: Impacts on movement of native resident or migratory fish or wildlife species or migratory wildlife corridors or impede the use of native wildlife nursery sites.**

All trail maintenance activities would be conducted consistent with the City's Open Space Preserve Overarching Management Plan and related US Fish and Wildlife Service Biological Opinion and the City's California Department of Fish and Wildlife Streambed Alteration Agreement for Routine Maintenance. The Overarching Plan and Routine Maintenance Agreement include requirements for worker training and pre-maintenance nesting surveys as well as monitoring and reporting when nests are found. In addition, the creation of impervious surfaces associated with the Proposed Trail Alignment could result in indirect impacts to Dry, Linda, and Cirby Creeks and other downstream waters as a consequence of runoff that could affect Central Valley steelhead and Central Valley fall-run Chinook salmon. Therefore, impacts on terrestrial wildlife movement corridors and/or terrestrial wildlife nursery sites would be less than significant. The project would have to secure permits from federal and state agencies (i.e. Sections 401, 404, and 1602 permits) that would restrict work windows to those when these species are not expected to be within the stream corridor and would require the City to mitigate for the loss of aquatic and riparian habitat, it would not result in substantial effects migratory fish movement or to their breeding or nursery sites. Therefore, with implementation of project-specific Mitigation Measures 4.3-1 and 4.3-2, the project's contribution to cumulative impacts on special-status species would not be cumulatively considerable, and this cumulative impact would be **less than significant with mitigation** for the proposed project and Option 1A, Option 1C, and Option 5A.

## Cultural Resources

The cumulative context for the cultural resources analysis considers a broad regional system of which the resources are a part. The cumulative context for archaeological resources and human remains is the Nisenan territory. Nisenan territory comprised the drainages of the Yuba, Bear, and American rivers, and the lower drainages of the Feather River.

**Cumulative Impact 4.4-1: Cumulatively disturb archaeological resources, including tribal cultural resources.**

Because all significant archaeological resources are unique and nonrenewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. The loss of any one archaeological site affects all others in a region because these resources are best understood in the context of the entirety of the cultural system of which they are a part. The boundaries of an archaeologically important site extend beyond the site boundaries. As a result, a meaningful approach to preserving and managing cultural resources must focus on the likely distribution of cultural resources, rather than on project or parcel boundaries. The cultural system is represented archaeologically by the total inventory of all sites and other cultural remains in the region. The proposed project, in combination with other development in the region, could cause a substantial adverse change in the significance of an historical resource or unique archaeological resource. Project-related earth-disturbing activities could potentially damage archaeological resources; however, implementation of Mitigation Measure 4.4-1 would ensure that the proposed project would not contribute to a cumulative effect on cultural resources because it would require the performance of professionally accepted and legally compliant procedures for the discovery of previously undocumented significant archaeological resources. Thus, the project's contribution to cumulative impacts on archaeological resources would not

be considerable, and this cumulative impact would be **less than significant with mitigation** for the proposed project and Option 1A, Option 1C, and Option 5A.

#### **Cumulative Impact 4.4-2: Cumulative accidental discovery of human remains.**

Although no evidence suggests that any prehistoric- or historic-era, marked or unmarked human interments are present within or in the immediate vicinity of the proposed multi-use trail alignment, the proposed project, in combination with other development in the region, could contribute to the disturbance of human remains because of project-related construction activities. However, compliance with California Health and Safety Code Sections 7050.5 and 7052 and Public Resources Code (PRC) Section 5097 and Mitigation Measure 4.4-2 would ensure that the treatment and disposition of the remains occur in a manner consistent with Native American Heritage Commission guidance. Thus, the project's contribution to cumulative impacts on human remains would not be considerable, and this cumulative impact would be **less than significant with mitigation** for the proposed project and Option 1A, Option 1C, and Option 5A.

### **Geology and Soils**

Geology, soils, and paleontological resource impacts are project specific and highly dependent on localized geologic and soil conditions. Therefore, the geographic extent for considering cumulative impacts for these resources is project sites within the vicinity of the proposed trail alignment.

**Cumulative Impact 4.5-1: Cumulatively expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides; and Cumulative Impact 4.5-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially cumulatively result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.**

With the adoption of construction practices consistent with the City's Design and Construction Standards, and the incorporation of design features to prevent localized creep, slumping, and small landslides, the potential effects of localized ground failure would be less than significant. Seismic risk in the City is low and the project would not increase the number of people living or working in the region who would be exposed to seismic hazards. Therefore, the proposed project would not result in a considerable contribution to a cumulative impact. This cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

**Cumulative Impact 4.5-2: Cumulatively result in substantial soil erosion or the loss of topsoil; and Cumulative Impact 4.5-4: Be located on expansive soil, creating a cumulatively substantial risk to life or property.**

The project, like all projects that would disturb more than 1 acre, would be required to adhere to the erosion control requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. The permit requires construction projects to implement best management practices (BMPs) to control earthwork activities and prevent erosion. For this reason, the City and adjacent cities have generally found geologic hazards not to be substantial issues in the project vicinity. The project, as well as other current and future projects, would implement BMPs and would adhere to the NPDES Phase II MS4 drainage control requirements during the operational phases. Through these actions, the overall contribution to erosion and loss of topsoil would not be substantial and there would be no significant cumulative impact. Therefore, the proposed project would not result in a considerable contribution to a cumulative impact. This cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

**Cumulative Impact 4.5-5: Cumulatively destroy a unique paleontological resource.**

Paleontological resources have been discovered in the region, and some regional geologic units are considered to have a high paleontological sensitivity. Unique paleontological resources are a nonrenewable resource. Destruction or loss of these resources during construction would contribute to a regional cumulative loss because paleontological resources are finite and contribute to our scientific repository of knowledge regarding the region. As described under Impact 4.5-5, the types of soil formations that underlay the project site have a low sensitivity for important paleontological resources, and there is no evidence to suggest that the proposed project, in combination with past, present, and reasonably foreseeable future projects, would result in a significant cumulative impact on paleontological resources. Therefore, the project's contribution to a cumulative impact on paleontological resources would not be cumulatively considerable, and this cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

**Greenhouse Gas Emissions and Climate Change****Cumulative Impact 4.6-1: Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.**

The quantity of greenhouse gas (GHG) emissions required to induce climate change is not precisely known; however, it is clear that the quantity is enormous, and no single project alone would measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro climate. Therefore, from the standpoint of CEQA, the contributions of any single project's GHG emissions to global climate change are inherently cumulative. Accordingly, the project-level impact analysis in Section 4.6 addresses whether the project's contribution of GHG emissions to global climate change is cumulatively considerable. As noted, the project's GHG emissions would not exceed the mass emission thresholds. In addition, the project would be consistent with adopted long-range plans and policies designed to reduce communitywide GHG emissions, consistent with Assembly Bill 32 and other local and State policies. Therefore, the project would not result in a cumulatively considerable contribution to a significant cumulative impact related to global climate change.

**Hydrology and Water Quality****Cumulative Impact 4.8-1: Cumulative potential to violate any water quality standards or waste discharge requirements, or to otherwise degrade water quality.**

Implementing the proposed project would result in construction activity and ground disturbance that would increase the potential for pollution of waterways. However, because the proposed project and all other foreseeable development and infrastructure projects in the region would be required to comply with applicable protective regulations, the potential for construction-related adverse water quality impacts would not be cumulatively considerable. Runoff from urban development can carry pollutants that can degrade water quality. However, because State Water Resources Control Board (SWRCB), Central Valley Regional Water Quality Control Board (CVRWQCB), and City of Roseville regulations are in place to minimize erosion and transport of sediment and other pollutants during construction, and appropriate project-specific measures would be defined to secure necessary permits and approvals, construction-related impacts would be minimized and would not result in substantial adverse effect on water quality. Additionally, water quality effects from long-term use and maintenance of the trail would be minimized through compliance with the existing California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement for the City of Roseville Routine Maintenance of Streams and Drainage Facilities project (Agreement). This Agreement covers routine activities, such as trail maintenance, channel alignment maintenance, debris removal, facilities repair or replacement, vegetation control in channels, minor erosion control work, and bridge washing and painting. Development projects in the area would be required to comply with low-impact development (LID) measures in Roseville and western Placer County (including in the Placer County LID Manual and the *West Placer Storm Water Quality Design Manual*) that implement the CVRWQCB municipal NPDES

permits. Because the proposed project and other foreseeable projects within the region would be required to comply with water quality measures for construction and operation, the proposed project would not make a considerable contribution to a significant cumulative impact related to water quality. This cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

**Cumulative Impact 4.8-2: Cumulative potential to substantially alter existing drainage patterns or to create runoff volume that would exceed the capacity of drainage systems or result in erosion, siltation, or flooding; and Cumulative Impact 4.8-3: Cumulatively alter or redirect 100-year flood flows, or expose people or structures to risk of injury or damage by flood waters.**

The cumulative context for hydrologic impacts is the Dry Creek Watershed. The Dry Creek Watershed has experienced significant degradation as urban development has increased (Placer County 2003). Many stream channels have been modified or straightened and much of the native vegetation has been removed. As urban development has spread through the watershed, impervious surfaces have increased resulting in a corresponding increase in peak stormwater flows and bank erosion. This has resulted in an existing cumulative adverse condition. Open space preservation, prohibitions against development within floodways, and stream restoration projects, have begun to improve hydrologic conditions within the watershed. The development of multi-use trails within the 100-year flood plain was identified by the Dry Creek Watershed Resources Management Plan (Placer County 2003) as a potential opportunity to improve existing conditions through long-term management.

Federal, State, and Local protections for water bodies and flood plains have strengthened over the years. The proposed project would be required to comply with stormwater runoff controls and water quality objectives during construction and use of the proposed multi-use trail through compliance with SWRCB NPDES and City of Roseville Permit Conditions. These permits also require that the potential increase in stormwater runoff generated by the trails impervious surfaces be infiltrated by the adjacent natural area and through the installation of permanent BMPs. Finally, the trail would comply with the City of Roseville Design Standards for Bikeways in Floodplains and would not create a significant increase in base flood elevations. For these reason, the proposed project would not contribute to the existing cumulative adverse hydrologic condition within the Dry Creek Watershed. Therefore, the project's contribution to a cumulative impact would not be cumulatively considerable, and this cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

## Land Use

**Cumulative Impact 4.9-1: Consistency with applicable land use plans.**

The City of Roseville General Plan provides goals and policies related to land use in the City. The Zoning Ordinance implements the City's General Plan and Specific Plans, and establishes regulations governing the use, placement, spacing and size of land and buildings. The Zoning Ordinance also describes various permits available through the Planning Division, when they are needed, and the process for obtaining permits. The City's Bicycle Master Plan includes a plan for development of over 28 miles of Class I trails in Roseville, including the Dry Creek Greenway East Trail. The General Plan, Zoning Ordinance, and Bicycle Master Plan are long-term planning documents, therefore buildout under these plans is inherently cumulative in nature. In the course of environmental review, permitting, and approval, projects proposed in the City are reviewed for consistency with adopted land use guidance documents. Land use compatibility was considered for most of the facilities proposed in the Bicycle Master Plan during the adoption of the 2035 General Plan, and the City's various specific plans. The Bicycle Master Plan proposed several new Class I bike trails, including the proposed project, that were not previously included within any of these documents. The new Class I bike trails included in the 2008 Bicycle Master Plan were proposed within open space and park parcels. Class I bike trails are considered primary uses of open space areas and are principally permitted as within open space, parks and most other land uses as part of the Resource Related Recreation use type. The designation of new

bike trails within open space and parks and recreation areas would not result in a conflict with any adopted land use plan, policy or regulation, and the proposed project would be consistent with the intent of the City of Roseville General Plan, Zoning Ordinance, and Bicycle Master Plan. Therefore, **no cumulative impact** related to conflicts with any relevant land use plans, policies, designations, or zoning would occur under the proposed project, Option 1A, Option 1C, and Option 5A.

#### **Cumulative Impact 4.9-2: Physically divide an established community.**

As discussed under the project-specific impact, although constructing the multi-use trail would create a linear travel corridor, the corridor would provide linkages through, rather than divide, the community. In addition, the project would not involve any change in access to the parcels requiring right-of-way acquisition or construction easements, and this was identified as a beneficial impact. Because no significant impact to the established community would occur on a project-specific basis, the project would not contribute to any potential cumulative land use impacts. Therefore, the project's contribution to a cumulative impact would not be cumulatively considerable, and this cumulative impact would be less than significant for the proposed project and Option 1A, Option 1C, and Option 5A.

### Noise

#### **Cumulative Impact 4.10-1: Cumulative short-term construction-related noise.**

Noise dissipates rapidly from its source. For construction impacts, only the immediate area around the project site would be included in the cumulative context. For example, construction impacts related to noise dissipate/attenuate quickly as the distance between the construction site and the receptor increases. As a result, only those construction projects located within a distance of no more than 1,000 feet would be considered within the cumulative context of construction noise. Cumulative impacts from construction-generated noise could result if construction activities of other planned projects were to take place at the same time in close proximity to the proposed project such that noise effects would cumulatively combine. The project area is predominately built out and no large-scale development and specific plan-type projects are planned for the surrounding area during the same construction timeline as the proposed project. As a result, the potential for the project construction noise to combine with other offsite construction activities at nearby receptors is considered unlikely. Implementation of Mitigation Measure 4.10-1 would reduce the magnitude of the project-specific noise impact, but not to a less-than-significant level. Recognizing the significant unavoidable project noise impact during the construction period, even though a combining of the project's construction noise with other temporary activities or substantial noise sources would be unlikely, for CEQA purposes the potential cannot be dismissed for a contribution by the significant project noise to other nearby noise generation. Therefore, this would remain a **potentially significant and unavoidable cumulative impact**.

#### **Cumulative Impact 4.10-2: Cumulative long-term increases in use-related noise.**

Long-term uses associated with the proposed project would be non-motorized activities and would not expose persons to or generate use-related noise levels in excess of adopted standards. Therefore, the project's contribution to a cumulative impact would not be cumulatively considerable, and the cumulative noise impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

#### **Cumulative Impact 4.10-3: Exposure to construction-related groundborne vibrations.**

Cumulative impacts from construction-generated vibration could result if other future planned construction activities were to take place very close to other construction activities and cumulatively combine with construction vibration from the project. Vibration associated with construction activities is of primary concern within proximity (e.g., 550 feet) of sensitive land uses. At increasing distances from the source, vibration levels dissipate rapidly and have less potential to cause disturbance to people or damage to structures. In addition, vibration generated from construction is typically associated with foundation

construction activities that only occur during discrete phases of construction and for intermittent and brief periods at a time. For these reasons, and because of the unlikelihood of construction activities to combine during the proposed project timeframe, vibration impacts would remain local and would not combine with vibration source from other construction activities. Project-generated vibration levels would be mitigated with implementation of Mitigation Measure 4.10-3 for the proposed project and Option 1A and 1C. The impact would remain significant and unavoidable under Option 5A. However, because vibration levels would be limited to the vicinity of construction activities and would be minimized to the extent feasible, the cumulative short-term construction-generated vibration impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

## Public Services

### **Cumulative Impact 4.11-1: Effects on fire protection and emergency services; and Cumulative Impact 4.11-2: Effects on police protection services.**

The cumulative context for police protection, fire protection, and emergency services is the city of Roseville, which is the service area for both the City of Roseville Fire Department and Police Department. As described in Section 4.11, Public Services, the City of Roseville is currently capable of meeting public service needs, including law enforcement and fire protection. As described in Impacts 4.11-1 and 4.11-2, construction and operation of the Dry Creek Greenway East Trail Project would not increase the risks to public safety associated with fire and public safety issues. Thus, implementation of the project would not contribute to a cumulative impact in these areas because the project site is already served by these agencies and the project would not increase the service area or add additional population that would require service. Therefore, the project's contribution to a cumulative impact would not be cumulatively considerable, and the cumulative public services impacts would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

## Recreation

### **Cumulative Impact 4.12-1: Increased use of existing neighborhood and regional parks.**

The cumulative context for recreation is the City of Roseville. Roseville maintains approximately 12 acres of park land per 1,000 residents. The City of Roseville Department of Parks and Recreation strives to ensure new public parks and recreation facilities, open space, paseos, landscape areas and greenways are provided with adequate funding for initial development, as well as ongoing maintenance and operation. Thus, there is not an existing cumulative effect related to degradation of neighborhood and regional parks related to increased use. As discussed in Section 4.12, "Recreation," the proposed project would not result in any new permanent residents and would therefore not directly generate new recreation users such that new facilities would need to be built to accommodate increased use. Ongoing maintenance and funding for operation would continue for the foreseeable future. In addition, ratios related to acreage of park per resident would not be increased due to implementation of the project. Thus, the project would not combine with other reasonably foreseeable projects such that a significant cumulative effect would occur related to increased used of neighborhood and regional parks. The project's contribution to a cumulative impact would not be cumulatively considerable, and the cumulative recreation impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

## Transportation and Circulation

### **Cumulative Impact 4.13-1: Safety-related traffic impacts.**

Design and operation of the proposed project would conform to applicable standards and be consistent with traffic safety and operational requirements, and no significant safety-related traffic effects would occur from use of the trail and parking lot after completion of the trail and trailhead improvements. Construction activity with its related truck and worker traffic could result in a significant construction-related safety impact. Implementation of Mitigation Measure 4.13-1 would require the preparation and

implementation of a traffic management plan. The traffic management plan would be specific to the portion of the project alignment under construction and would take into account existing conditions at the time and require regular inspections to assess contractor compliance. Therefore, the project's contribution to a cumulative impact would not be cumulatively considerable, and the cumulative impact would be **less than significant with mitigation** for the proposed project and Option 1A, Option 1C, and Option 5A.

**Cumulative Impact 4.13-2: Conflict with an applicable plan, ordinance or policy which establishes measures of effectiveness for the performance of the circulation system or with an alternative transportation plan.**

Generally, any increase in bicycle use would be consistent with the overarching goals and objectives of an alternative transportation plan, including the City Bicycle Master Plan. As explained above under "Land Use," the Bicycle Master Plan is a long-term planning document, therefore buildout under this plan is inherently cumulative in nature. The designation of new bike trails within open space and parks and recreation areas would not result in a conflict with any adopted land use plan, policy or regulation, and the proposed project would be consistent with the intent of the City of Roseville's alternative transportation plans and Bicycle Master Plan. Therefore, the project's contribution to a cumulative impact would not be cumulatively considerable, and the cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

## Utilities

**Cumulative Impact 4.14-1: Insufficient water supplies available to serve the project from existing entitlements and resources, or result in the construction of new water treatment facilities; Cumulative Impact 4.14-3: Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs or fail to comply with federal, state, and local statutes and regulations related to solid waste; Cumulative Impact 4.14-4: Result in a substantial increase in electrical demand; and Cumulative Impact 4.14-5: Disrupt existing utility service.**

As discussed in Section 4.14, "Utilities," the proposed project would not result in the construction of new housing or other project elements that would increase the permanent resident population in the City. Therefore, the project would not generate a substantial increased demand for electricity, solid waste disposal, water, or water treatment related to use of the trail. The project could require small amounts of electricity for bridge and undercrossing lighting and water to establish new plantings and maintain landscaping. The project would not result in the need for new or expanded water supplies or construction of new water treatment facilities. Thus, implementation of the project would not contribute to a cumulative impact in these areas because the project site is already served by providers with adequate capacity to serve the project and the project would not increase the service area or add additional population that would require service. Therefore, the project's contribution to a cumulative impact would not be cumulatively considerable, and the cumulative utilities impacts would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

**Cumulative Impact 4.14-2: Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

As explained above under Cumulative Impact 4.8-2, as urban development has spread through the Dry Creek watershed, impervious surfaces have increased resulting in a corresponding increase in peak stormwater flows. This has resulted in an existing cumulative adverse condition. Open space preservation, prohibitions against development within floodways, and stream restoration projects, have begun to improve hydrologic conditions within the watershed. The development of multi-use trails within the 100-year flood plain was identified by the Dry Creek Watershed Resources Management Plan (Placer County 2003) as a potential opportunity to improve existing conditions through long-term

management. The proposed project would be required to comply with stormwater runoff controls during construction and use of the proposed multi-use trail through compliance with SWRCB NPDES and City of Roseville Permit Conditions. These permits also require that the potential increase in stormwater runoff generated by the trails impervious surfaces be infiltrated by the adjacent natural area and through the installation of permanent BMPs. Finally, the trail would comply with the City of Roseville Design Standards for Bikeways in Floodplains and would not create a significant increase in base flood elevations. For these reason, the proposed project would not contribute to the existing cumulative adverse hydrologic condition within the Dry Creek Watershed. Therefore, the project's contribution to a cumulative impact would not be cumulatively considerable, and this cumulative impact would be **less than significant** for the proposed project and Option 1A, Option 1C, and Option 5A.

## 5.2 GROWTH-INDUCING IMPACTS

CEQA specifies that growth-inducing impacts of a project must be addressed in an EIR (PRC Section 21100[b][5]). Specifically, the State CEQA Guidelines (Section 15126.2[d]) 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 analysis 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, the EIR should discuss the characteristics of the project 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.

Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- ▲ substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- ▲ substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; and/or
- ▲ removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

The State CEQA Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth. Therefore, for purposes of this EIR, to reach the conclusion that a project is growth-inducing as defined by CEQA, the EIR must find that the project would foster (i.e., promote or encourage) additional growth in economic activity, population, or housing, regardless of whether the growth is already approved by and consistent with local plans. The conclusion does not determine that induced growth is beneficial or detrimental, consistent with the State CEQA Guidelines (Section 15126.2[d]).

If the analysis conducted for the EIR results in a determination that a project is growth-inducing, the next question is whether that growth may cause adverse effects on the environment. Environmental effects resulting from induced growth fit the CEQA definition of "indirect" effects in the State CEQA Guidelines (Section 15358[a][2]). These indirect or secondary effects of growth may result in significant environmental impacts. CEQA does not require that the EIR speculate unduly about the precise location and site-specific characteristics of significant, indirect effects caused by induced growth, but a good-faith effort is required to disclose what is feasible to assess. Potential secondary effects of growth

could include consequences – such as conversion of open space to developed uses, increased demand on community and public services and infrastructure, increased traffic and noise, degradation of air and water quality, or degradation or loss of plant and wildlife habitat – that are the result of growth fostered by the project.

The decision to allow those projects that result from induced growth is the subject of separate discretionary processes by the lead agency(ies) responsible for considering such projects. Because the decision to allow growth is subject to separate discretionary decision making, and such decision making is itself subject to CEQA, the analysis of growth-inducing effects is not intended to determine site-specific environmental impacts and specific mitigation for the potentially induced growth. Rather, the discussion is intended to disclose the potential for environmental effects to occur more generally, such that decision makers are aware that additional environmental effects are a possibility if growth-inducing projects are approved. The decision of whether impacts do occur, their extent, and the ability to mitigate them is appropriately left to consideration by the agency responsible for approving such projects at such times as complete applications for development are submitted.

### 5.2.1 Growth-Inducing Impacts

Mechanisms by which a project may directly induce growth may include creating jobs that attract economic or population growth to the area, promoting the construction of homes that would bring new residents to the area, or removing an obstacle that impedes growth in the area. The proposed project does not include the construction of new homes and, therefore, would not directly bring new residents into the project area.

As described in Chapter 3, “Project Description,” construction of the project would occur in phases and a phasing plan would be developed to provide a logical sequence of implementation for each of the future phases. The project could be constructed over a total of up to four construction seasons. The project workforce would vary according to construction phase and type of design element being constructed; however, the number of construction workers at any given time would not be large. The maximum number of workers commuting to the project construction site any given time would be approximately 15 (see Section 4.13, “Transportation and Circulation”). Workers would come from the regional labor pool already available in the City and region. No substantial relocation of workers would occur, and no new demand for housing and public services would result. Therefore, project construction would not be growth inducing.

Post-project maintenance would be conducted by existing City employees and would not require additional employees. Therefore, long-term operation of the proposed project would not result in workers relocating to the area and would not be growth inducing.

The project site is located along the creek corridors of developed neighborhoods and business districts in the City of Roseville and would not result in an expansion of urban services or the pressure to expand beyond the City’s existing Sphere of Influence. It would not open additional undeveloped land to future growth or provide expanded utility capacity to serve future development.

Because construction and operation of the project would not create jobs that would fuel economic or population growth, promote the construction of homes that would bring new residents to the area, or remove an obstacle that impedes growth, the proposed project would not be growth inducing.

## 5.3 SIGNIFICANT ENVIRONMENTAL EFFECTS

Chapter 2, “Summary,” and Sections 4.1 through 4.14 of this Draft EIR provide a comprehensive identification of the proposed project’s environmental effects, including the level of significance both before and after mitigation. Project impacts found to be significant and requiring mitigation are listed below.

- 4.2-1 Short-term construction-generated and long-term use-related emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.
- 4.3-1 Disturbance and loss of waters of the United States, waters of the state and riparian habitat.
- 4.3-2 Central Valley steelhead and Central Valley fall/late fall-run Chinook salmon.
- 4.3-3 Disturbance or loss of valley elderberry longhorn beetle or its habitat.
- 4.3-4 Disturbance or loss of Swainson’s hawk, white-tailed kite, and other nesting raptors.
- 4.3-5 Disturbances to special-status song birds.
- 4.3-6 Disturbance or loss of Western pond turtle.
- 4.3-7 Disturbance or loss of special-status bats – pallid bat and silver-haired bat.
- 4.3-8 Disturbance or loss of City protected trees, oak woodlands and other sensitive vegetation alliances and associations.
- 4.3-9 Disturbance or loss of special-status plants – Sanford’s arrowhead.
- 4.3-10 Impacts on movement of native resident or migratory fish or wildlife species or migratory wildlife corridors or impede the use of native wildlife nursery sites.
- 4.4-1 Disturb archaeological resources, including tribal cultural resources.
- 4.4-2 Accidental discovery of human remains.
- 4.7-5 Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are located adjacent to urbanized areas or where residences are intermixed with wildlands.
- 4.10-3 Exposure to construction-related groundborne vibrations. (proposed project, Option 1A, Option 1C)
- 4.13-1 Safety-related traffic impacts during construction.

### 5.3.1 Significant and Unavoidable Impacts

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Chapter 4, “Environmental Setting, Impacts, and Mitigation Measures,” provides a detailed analysis of all potentially significant, direct and indirect, environmental impacts of the proposed project; identifies feasible mitigation measures that could reduce or avoid the project’s significant impacts; and describes whether these mitigation measures would reduce these impacts to less-than-significant levels. The

proposed project's significant cumulative impacts are discussed at the beginning of this chapter. If a specific impact cannot be reduced to a less-than-significant level, it is considered a significant and unavoidable impact.

As discussed under "Cumulative Impacts" above and in the technical sections of this Draft EIR, all but one potentially significant impact would be reduced to a less-than-significant level with mitigation:

4.10-1 Short-term construction-related noise.

4.10-3 Exposure to construction-related groundborne vibrations. (Option 5C only)

### 5.3.2 Significant and Irreversible Environmental Effects

The State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, the Section 15126.2(c) states:

Use 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, irreversible 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.

Generally, a project would result in significant irreversible environmental changes if:

- ▲ the primary and secondary impacts would generally commit future generations to similar uses;
- ▲ the project would involve a large commitment of nonrenewable resources;
- ▲ the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy); or
- ▲ the project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project.

The Dry Creek Greenway East Trail project is a 4.25-mile multi-use trail that would follow creek corridors along portions of Dry, Cirby, and Linda Creeks. The multi-use trail would consist of a 10-foot wide paved trail with two-foot wide shoulders. The project would also include the construction of up to eight bridges to provide creek crossings along with areas of bank stabilization and retaining walls. Implementation would require the removal of aquatic, riparian, and oak woodland habitat, and the loss or disturbance of elderberry shrubs within the disturbance area (see Section 4.3, "Biological Resources"). This loss of habitat would be permanent as a result of paving and other necessary construction components. Uses of nonrenewable resources during construction of the project may be irreversible because a large commitment of such resources makes removal or reuse thereafter unlikely. Implementation of the project would result in permanent changes to the existing environment that have been described throughout this Draft EIR. Construction activities associated with the project would result in the irreversible consumption of nonrenewable resources. The irreversible commitment of limited resources is inherent in any construction project. Resources anticipated to be irreversibly committed would include: sand, gravel, concrete, petrochemicals, construction materials, and water. The project would also require the consumption of fossil fuels to meet energy demands associated with construction vehicles.

Implementation of the proposed project would result in the consumption of energy and materials. Fossil fuels would be required for construction of the project, as well as maintenance. Construction associated with the new bridges, the paved trail, and the areas of bank stabilization and retaining walls would require the manufacture of new materials (e.g., asphalt, concrete, rebar, paint, prefabricated steel). The

raw materials and energy required for the manufacture of the materials would result in an irretrievable commitment of natural resources.

The project does not provide for an appreciable increase in use of hazardous materials relative to existing conditions and would transport, use, and generate only small volumes of hazardous materials associated with construction. The construction contractor would prepare relevant hazardous materials management plans, including a Hazardous Materials Contingency Plan. With continued compliance with existing federal, state, and local laws and regulations related to hazardous materials, the proposed project would not be expected to result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment (see Section 4.7, "Hazards and Hazardous Materials").

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