

19. Cumulative Impacts

19.1 Introduction

This Draft Environmental Impact Report (DEIR) provides an analysis of overall cumulative impacts of the project taken together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the *California Environmental Quality Act Guidelines* (State CEQA Guidelines). The goal of such an exercise is twofold: first, to determine whether the overall long-term impacts of all such projects would be cumulatively significant; and second, to determine whether the project itself would cause a "cumulatively considerable" (and thus significant) incremental contribution to any such cumulatively significant impacts. (See State CEQA Guidelines Sections 15130[a]-[b], Section 15355[b], Section 15064[h], Section 15065[c]; *Communities for a Better Environment v. California Resources Agency* [2002] 103 Ca1.App.4th 98, 120.) In other words, the required analysis intends to first create a broad context in which to assess the project's incremental contribution to anticipated cumulative impacts, viewed on a geographic scale well beyond the project site itself, and then to determine whether the project's incremental contribution to any significant cumulative impacts from all projects is itself significant (that is, "cumulatively considerable" in CEQA parlance).

Pursuant to State CEQA Guidelines Section 15130, "[t]he discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impacts to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact." The proposed project is considered to have a significant cumulative effect if the following criteria are met:

- 1) The cumulative effects of development without the project are not significant, and the project's additional impact is substantial enough, when added to the cumulative effects, to result in a significant impact; or
- 2) The cumulative effects of development without the project are already significant, and the project contributes measurably to the effect. The term "measurably" is subject to interpretation. The standards used herein to determine measurability are that either the impact must be noticeable to a reasonable person, or must exceed an established threshold of significance.

State CEQA Guidelines Section 15130 states that the following elements are necessary for an adequate discussion of significant cumulative impacts:

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency (list approach), or a summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency (plan approach).
- A summary of expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available.

- A reasonable analysis of the cumulative impacts of the relevant projects. An EIR [environmental impact report] shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

Pursuant to State CEQA Guidelines Section 15130(d), previously approved land use documents may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in a previously certified EIR may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impacts analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed, as defined in Section 15152(f), in a certified EIR for that plan.

Tiering refers to using the analysis of general matters contained in a broader EIR (such as one prepared for an area plan) with later EIRs on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR solely on the issues specific to the later project (State CEQA Guidelines Section 15152(a)). Agencies are encouraged to tier the environmental analyses they prepare for separate but related projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR on the actual issues ripe for decision.

As discussed in State CEQA Guidelines Section 15152(f)(1) and (2), where a lead agency determines that a cumulative effect has been adequately addressed in the prior EIR, that effect is not treated as significant for purposes of the later EIR and need not be discussed in detail. When assessing whether there is a new significant cumulative effect, the lead agency shall consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects.

The project site is located entirely within the boundaries of the Sunset Area Plan (SAP), an area that encompasses 8,497 acres in unincorporated west Placer County (Placer County 2019). The SAP is a policy document intended to guide growth in the SAP area over a 20-year planning horizon; buildout of the SAP area is expected to occur over 80 years or more. An EIR was prepared to evaluate the physical environmental effects of the proposed SAP pursuant to CEQA (*Public Resources Code* [PRC] Section 21000, et seq.) and the CEQA Guidelines (*California Code of Regulations* [CCR], Title 14, Chapter 3, Section 1500, et seq.). The SAP EIR programmatically evaluated the environmental impacts that would be anticipated with the expansion of solid waste elements and development of industrial uses on the Western Placer Waste Management Authority (WPWMA) properties in a manner consistent with the site's land use and zoning designations. Both plan concepts include the development of the WPWMA's properties in a manner consistent with the land use and zoning designations identified in the SAP. Therefore, the impact analysis included in the SAP EIR is directly applicable to the proposed project.

The proposed project evaluated in this EIR was foreseen by the SAP and SAP EIR and is included in the cumulative project list in the SAP EIR. Consequently, the cumulative impacts of the proposed project, in conjunction with the development of the SAP and other projects included on the SAP EIR cumulative project list, were addressed in the SAP EIR.

Therefore, this EIR uses the tiering concept and is hereby incorporating by reference the information included in the SAP EIR, in accordance with CEQA Guidelines Section 15150. An EIR may incorporate by reference all or parts of another document that is a matter of public record or is generally available to the public (CEQA Guidelines Section 15150). This EIR tiers off the analysis included in the SAP EIR for the cumulative impact analysis. The discussion that follows in this chapter briefly summarizes the cumulative impacts identified in the SAP EIR and their relevance to the proposed project.

19.2 Cumulative Impact Analysis

19.2.1 Aesthetics

The SAP EIR concluded that development of the SAP and other cumulative projects would cause substantial degradation of visual quality in some areas south and west of State Route 65 where development creates abrupt transitions between open space and agricultural areas and development. The development of rural and agricultural areas into areas with commercial, residential, and industrial development would cause a substantial change in visual character. This development would also contribute to substantial light that would adversely affect nighttime views in the area. These cumulative impacts were identified in the SAP EIR as significant and unavoidable. The development of the SAP and other cumulative projects were estimated to create less-than-significant cumulative glare impacts.

The proposed project would not create new cumulatively considerable aesthetic resource impacts that were not considered in the SAP EIR. The proposed project does not include any uses that were not considered in the SAP EIR for the project site. Therefore, cumulative aesthetic resource impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

19.2.2 Air Quality

The SAP EIR concluded that development of the SAP and other cumulative projects would result in significant and unavoidable cumulative air quality impacts. These include significant and unavoidable construction emissions of criteria air pollutants and ozone precursors, long-term operational emissions of criteria air pollutants and ozone precursors, the exposure of sensitive receptors to TACs, and the exposure of sensitive receptors to odors. The cumulative generation of mobile-source CO emission concentrations were identified as less than significant.

The following discussion provides more details on the incremental air quality impacts of the proposed project when viewed in the context of past, present, and probable future projects. The proposed project would result in cumulatively considerable air quality impacts that are consistent with the SAP EIR findings of significant and unavoidable cumulative impacts.

Construction Emissions of Criteria Air Pollutants and Ozone Precursors.

Construction activities related to the proposed project, in combination with the reasonably foreseeable regional urban development described in the SAP DEIR, would add emissions of the criteria pollutants for which the project region is in nonattainment under applicable health-protective federal and state ambient air quality standards, including emissions of the ozone precursors, ROG and NO_x, and particulate matter (PM₁₀ and PM_{2.5}). Development projects, while required to mitigate for adverse air quality impacts from construction, would contribute to regional emissions that may conflict with area air quality plans and attainment efforts. The proposed project's contributions to the nonattainment status of Placer County and the SVAB with respect to the NAAQS and CAAQS would be cumulatively considerable. Because no mitigation is available beyond that recommended for the project, the cumulative impact for project-specific construction emissions would be significant and unavoidable. This finding for the proposed project is consistent with the findings of the SAP EIR, which determined that project construction emissions would be cumulatively considerable, and the cumulative impact would be significant and unavoidable.

Operational Emissions of Criteria Air Pollutants and Ozone Precursors.

As described in the SAP DEIR, ozone-related impacts are the result of cumulative emissions from numerous sources in the region and transport from outside the region. The SAP DEIR concluded that reasonably foreseeable development will add urban growth on over 50,000 acres of primarily undeveloped land in the region, increasing the ambient concentrations of precursor emissions, like NO_x, that contribute to ozone impacts. Sources of particulate matter emissions (PM₁₀ and PM_{2.5}) have similar regional cumulative impacts when concentrations increase over time, especially during periods of dry conditions with high winds or high levels of earth disturbing activities. When all sources throughout the region are combined, they can result in ambient concentrations of pollutants that exceed the NAAQS and CAAQS (Placer County 2018). The proposed project's contributions to the nonattainment status of Placer County and the SVAB with respect to the NAAQS and CAAQS would be cumulatively considerable. Because no mitigation is available beyond that recommended for the project, the cumulative impact for project-specific operational emissions would be significant and unavoidable. This finding for the proposed project is consistent with the findings of the SAP EIR, which determined that the project's contribution of pollutants that exceed the CAAQS and NAAQS would be cumulatively considerable, and the cumulative impact would be significant and unavoidable.

Mobile-Source Concentrations of Carbon Monoxide.

The proposed project would not create new cumulatively considerable CO impacts that were not considered in the SAP EIR. Therefore, cumulative air quality impacts for mobile source concentrations of CO have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

Exposure of Sensitive Receptors to TACs.

The exposure of sensitive receptors to TACs, which has been evaluated at the project-level under Impact 6-5, is also an impact of localized, cumulative concern. The approved SAP/PRSP included an amendment to County General Plan Policy 4.G.11, to reduce the 1-mile (5,280-foot) buffer for new residential uses around the WPWMA property. Under the approved SAP/PRSP, new residential uses beyond 2,000 feet but within one mile of the WPWMA property boundary could occur if approved under a specific plan, master plan, or development agreement. Therefore, the General Plan amendment may result in future development of residential uses within 1 mile of the WPWMA property in currently undeveloped areas.

To evaluate potential impacts under cumulative conditions, exposures to project-related TACs and the associated health risks have been characterized for a receptor grid, which includes both the receptor locations analyzed in the project level analysis and the new receptor locations that could result from future area development, including residential communities, businesses, and sensitive receptors such as schools. This risk analysis does not evaluate the increases in cumulative TAC emissions that would be anticipated for development associated with buildout of the SAP and surrounding lands; the SAP EIR provided a qualitative evaluation of the cumulative risks associated with development of the SAP and other cumulative projects and concluded that the larger development of the SAP would result in significant and unavoidable exposure of sensitive receptors to TACs.

This risk assessment for cumulative impacts evaluated carcinogenic (cancer) and non-carcinogenic (non-cancer) health risks for potential receptor locations and exposure conditions under future development plans for cumulative conditions under both proposed project plan concepts. Specific assumptions, modeling inputs, figures, and full cumulative risk assessment results are presented in the Health Risk Assessment Modeling Report in Appendix C.5.

Based on the results of the HRA for project-related emissions under cumulative conditions, exposures to TACs at nearby residential receptor locations would result in risk values that exceed PCAPCD thresholds of significance for cancer risk. The incremental increase in lifetime cancer risk associated with exposure to project-related TAC emissions under cumulative conditions at the location of the MEIR (also the cumulative sensitive receptor, located approximately 1.5 kilometers from the facility's Southeast boundary) is predicted to be 56.9 in 1 million for Plan Concept 1 and 57.1 in 1 million for Plan Concept 2, exceeding the PCAPCD threshold of significance of 10 in 1 million. DPM emissions associated with offsite truck traffic are the main contributing source in this cancer risk assessment.

Risk values at the residential and sensitive receptor locations would not exceed PCAPCD thresholds of significance for non-cancer chronic or acute exposures for either Plan Concept. Similarly, the evaluated exposure conditions at nearby workplace locations under cumulative conditions would not result in risk values that exceed PCAPCD thresholds of significance for cancer, non-cancer chronic, or non-cancer acute exposures.

The SAP EIR concluded that development of the SAP and other cumulative projects would result in significant and unavoidable exposure of sensitive receptors to TACs. While emission reduction approaches and technologies would be implemented by the WPWMA as part of the Renewable Placer: Waste Action Plan, the nature and effectiveness of these measures are unknown at this time, and TAC-related impacts associated with the proposed project would be cumulatively considerable. Cumulative impacts related to exposure of sensitive receptors to TACs would be significant and unavoidable. This finding for the proposed project is consistent with the findings of the SAP EIR, which determined that the project's contribution to cumulative TACs would be cumulatively considerable, and the cumulative impact would be significant and unavoidable.

Create objectionable odors affecting a substantial number of people.

The SAP EIR predicted that cumulative development would make use of the WPWMA facilities for waste disposal, composting, and material recovery, which would result in a substantial increase in the incoming waste stream and associated odor emissions. The SAP EIR concluded that because the development of the SAP would result in the exposure of a substantial number of people to objectionable odors, the cumulative odor impacts would be significant and unavoidable.

While odor abatement approaches and technologies would be implemented by the WPWMA as part of the Renewable Placer: Waste Action Plan, the nature and effectiveness of these measures are unknown at this time, and odor impacts would be cumulatively considerable. Therefore, the cumulative impact for odors would be significant and unavoidable. This finding is consistent with the findings of the SAP EIR, which determined that the impact of the project relative to odor impacts would be cumulatively considerable, and the cumulative impact would be significant and unavoidable.

19.2.3 Biological Resources

The SAP EIR concluded that development of the SAP and other cumulative projects would result in significant and unavoidable cumulative impacts related to the loss and degradation of state or federally protected waters; the loss of federally listed vernal pool branchiopods and western spadefoot; and the loss of special-status reptile, bird, and mammal species. Less-than-significant cumulative biological resource impacts identified in the SAP EIR included loss of special-status plant and fish species, loss of elderberry longhorn beetle, loss or degradation of riparian habitat, interference with wildlife movement, loss of wildlife nursery sites, conflicts with local policies protecting biological resources, and conflicts with an adopted Habitat Conservation Plan.

The proposed project would not create new cumulatively considerable biological resource impacts that were not considered in the SAP EIR. The SAP EIR assumed the same disturbance to site-specific biological resources as assumed in this EIR. Therefore, cumulative biological resource impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

19.2.4 Cultural and Tribal Resources

The SAP EIR concluded that because no specific Tribal Cultural Resources (TCRs) have been identified within the SAP area, and mitigation measures were identified in the EIR that would minimize impacts to any discovered TCRs, the development of the SAP and other cumulative projects would result in less-than-significant impacts on TCRs. The SAP EIR further concluded that with implementation of SAP Policies CR-1.1, 1.5, 1.6, and 1.7, and Mitigation Measure 4.5-1b, as well as compliance with *Health and Safety Code* Sections 7050.5 and 7052, and PRC Section 5097, adverse effects on known archaeological resources, potentially newly discovered archaeological resources, and human remains would be less than significant. For historical resources, the SAP EIR concluded that although no known historical resources are located within the boundaries of the SAP, cumulative buildout could potentially destroy or damage historical cultural resources that have not yet been identified or evaluated. The destruction of or damage to historical resources was identified in the SAP EIR as a considerable contribution to a significant cumulative impact that would remain significant and unavoidable.

The proposed project would not create new cumulatively considerable cultural resource impacts that were not considered in the SAP EIR. No significant cultural, archaeological, or historical resources or TCRs were identified on the project site during cultural resource surveys. Therefore, cumulative cultural resource impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

19.2.5 Geology, Soils, and Paleontological Resources

Potential project impacts related to geology, soils, seismicity, and groundwater are site-specific and would not generally combine with related impacts of other projects to create cumulatively considerable impacts. The SAP EIR acknowledged that the cumulative development area is characterized by limited topographic relief and variation. All projects within the SAP larger than 1 acre, including the proposed project, would be required to comply with the National Pollution Discharge Elimination System Construction General Permit. Additionally, projects would be required to comply with standard engineering practices and applicable regulations regarding building within areas containing expansive soils. The SAP EIR concluded that cumulative development would not change the availability of mineral resources or contribute to a regional cumulative loss of paleontological resources. The SAP EIR concluded that development of the SAP and other cumulative projects would result in less-than-significant cumulative impacts on geology, soils, and paleontological resources.

The proposed project would not create new cumulatively considerable geology, soils, and paleontological resource impacts that were not considered in the SAP EIR. The proposed project does not include any soil-disturbing activities that were not considered in the SAP EIR for the project site. Therefore, cumulative geology, soils, and paleontological resource impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

19.2.6 Greenhouse Gas Emissions

The SAP EIR concluded that development of the SAP and other cumulative projects would result in a significant and unavoidable cumulative GHG impact. This impact includes specifically the generation of significant and unavoidable operational GHG emissions that could conflict with the state's ability to meet its statewide GHG targets. More details on cumulative GHG emissions impacts are provided in the following.

The analysis of GHG emissions associated with the proposed project is inherently a cumulative impact analysis. GHG emissions from one project cannot, on their own, result in changes in climatic conditions, therefore, the emissions of individual projects must be considered in the context of their contribution to cumulative global emissions. The emissions estimates prepared to support this draft environmental impact report indicate that the level of construction and operational emissions associated with implementation of the proposed project would exceed PCAPCD's bright line threshold of 10,000 MT CO₂e per year, and therefore would be cumulatively considerable. Implementation of GHG reduction measures and mitigation measures, along with establishment of offsets or purchase of carbon credits, would not reduce GHG emissions below PCAPCD significance thresholds for the life of the project. Because the availability and affordability of GHG offset credits in the future is uncertain, the impact remains significant and unavoidable.

19.2.7 Hazards, Hazardous Materials, and Wildfire

The SAP EIR concluded that hazards associated with development of the SAP and other cumulative projects would be local and would have no potential to contribute to cumulative hazardous conditions. Future development in the region would be subject to contemporary safety and hazardous materials controls, as set forth in the numerous regulations that control the use of potentially hazardous materials. The development of the SAP and other cumulative projects was estimated to create less-than-significant cumulative hazard and hazardous materials impacts.

The proposed project would not create new cumulatively considerable hazards impacts that were not considered in the SAP EIR. The proposed project does not include any uses that were not considered in the SAP EIR for the project site. Therefore, cumulative hazards impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

While the SAP EIR did not evaluate impacts to wildfire, the proposed project and surrounding vicinity are not located in a wildland area with substantial forest fire risks and hazards nor in very high fire hazard severity zones. Therefore, the proposed project would result in no cumulative impacts on wildfire.

19.2.8 Hydrology and Water Quality

The SAP EIR stated that development of the SAP and other cumulative projects would adversely affect hydrology and water quality but concluded that these impacts would be less than significant. Cumulative development would increase regional stormwater runoff and the potential for downstream flooding. However, projects would be required to comply with the Central Valley Regional Water Quality Control Board, Placer County, and municipal stormwater regulations and ordinances. Therefore, these impacts would not be cumulatively considerable. Because most new developments, including those within the SAP and other cumulative projects, would be served primarily by surface water, development would not cumulatively contribute to groundwater depletion or recharge. Similar to stormwater runoff impacts, the cumulative water quality impacts associated with both construction and post-construction operations

would be minimized through the implementation of regulatory water quality protection measures. Therefore, development of the SAP and other cumulative projects would not contribute considerably to a significant cumulative impact related to water quality. Cumulative development projects would be required to meet existing mitigation standards to prevent an increase in 100-year flood flows and would be subject to federal and County floodplain protection regulations. Therefore, flood impacts would be less than significant.

The proposed project would not create new cumulatively considerable hydrology or water quality impacts that were not considered in the SAP EIR. The proposed project does not include any uses that were not considered in the SAP EIR for the project site. Therefore, cumulative hydrology and water quality impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

19.2.9 Land Use and Planning

The SAP EIR stated that development of the SAP and other cumulative projects would result in no cumulative land use impacts. The SAP would be consistent and compatible with existing and planned development, would not cause the physical division of an established community, and would not cause economic or social changes that would result in physical environmental changes.

The proposed project would not create new cumulatively considerable land use impacts that were not considered in the SAP EIR. The proposed project does not include any uses that were not considered in the SAP EIR for the project site. Therefore, cumulative land use impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

19.2.10 Noise

The SAP EIR concluded that development of the SAP and other cumulative projects would result in significant and unavoidable cumulative impacts related to short-term construction noise and long-term operational noise (stationary and transportation). Implementation of a noise-reduction program (SAP Program N-2) was identified as a way to minimize transportation noise associated with cumulative development, although not to a less-than-significant level. The SAP EIR concluded that cumulative vibration noise impacts would be less than significant.

The proposed project would not create new cumulatively considerable noise impacts that were not considered in the SAP EIR. The proposed project would generate noise levels consistent with the solid waste and industrial uses anticipated for the site in the SAP. Therefore, cumulative noise impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

19.2.11 Public Services

The SAP EIR stated that development of the SAP and other cumulative projects would increase the demand on public services but concluded that these impacts would be less than significant. Cumulative development would increase the demands on fire protection and emergency response services, law enforcement services, public schools, library services, and parks and recreation facilities. However, upgraded public service infrastructure would be constructed in a manner consistent with development of the SAP. Therefore, development of the SAP and other cumulative projects would not contribute considerably to a significant cumulative impact related to public services, and these impacts would be less than significant.

The proposed project would not create new cumulatively considerable public services impacts that were not considered in the SAP EIR. The proposed project does not include any uses that were not considered in the SAP EIR for the project site. Therefore, cumulative public services impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

19.2.12 Transportation

The SAP EIR concluded that development of the SAP and other cumulative projects would result in significant and unavoidable cumulative impacts related to the generation of vehicle miles traveled (VMT). The SAP VMT per capita would remain above the regional average VMT per capita, as forecast in the Sacramento Area Council of Governments 2016 Metropolitan Transportation Plan (SACOG 2016). The SAP EIR also identified significant and unavoidable cumulative level-of-service impacts on local roadways and freeway interchanges. However, with adoption of SB 743 by the California legislature in 2013 and the addition of Section 15064.3 into the State CEQA Guidelines, traffic level-of-service impacts are no longer considered significant.

The proposed project would not create new cumulatively considerable transportation impacts that were not considered in the SAP EIR. The SAP EIR assumed the generation of substantially greater VMT from the project site than is anticipated in this EIR. Therefore, cumulative transportation impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

19.2.13 Utilities and Energy

The SAP EIR stated that development of the SAP and other cumulative projects would increase the demand on public utilities and energy but concluded that these impacts would be less than significant. Cumulative development would increase the demand for water supply, including conveyance and treatment; waste water collection and conveyance; waste water treatment; stormwater drainage infrastructure; solid waste services; electricity; natural gas; and communication services. However, upgraded utility and energy infrastructure would be constructed in a manner consistent with development of the SAP. Therefore, development of the SAP and other cumulative projects would not contribute considerably to a significant cumulative impact related to public utilities and energy, and these impacts would be less than significant.

The proposed project would not create new cumulatively considerable public utility or energy impacts that were not considered in the SAP EIR. The proposed project does not include any uses that were not considered in the SAP EIR for the project site. Therefore, cumulative public utility and energy impacts have been adequately addressed in the SAP EIR, and no additional discussion of cumulative impacts beyond what was included in the SAP EIR is warranted.

19.3 References

Placer County. 2019. *Sunset Area Plan/Placer Ranch Specific Plan Final Environmental Impact Report*. State Clearinghouse #2016112012. October. Prepared by Ascent Environmental, Sacramento, CA.

Sacramento Area Council of Governments (SACOG). 2016. *2016 Metropolitan Transportation Plan/Sustainable Communities Strategy: Building a Sustainable System*. https://www.sacog.org/sites/main/files/file-attachments/mtpscs_complete.pdf?1489089196.