Chapter 4
Other Considerations

4.1 Introduction

This chapter includes information related to growth inducement, cumulative impacts, and the analysis of socioeconomics and environmental justice for the Proposed Project.

4.2 Growth Inducement

4.2.1 Introduction

Pursuant to Section 15126.2 of the State CEQA Guidelines, a project is to be considered growth inducing when it would remove an obstacle to growth or when it fosters residential or economic growth. A project may be growth inducing even when development has been previously planned for the area, because CEQA requires the project to be considered in the context of the baseline reflected by the current environment. Accordingly, if a project would foster growth or remove obstacles to growth beyond the existing level, it would be considered growth-inducing. A key question in growth-inducing impact analysis is, “If the project were not built, could growth still occur?”

4.2.2 Analysis of Growth Inducement

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Impact GI-1. Remove an Obstacle to Growth

Under Alternative 1, the installed pipelines would be sized to have a maximum capacity of 0.01 million gallons per day (mgd), which is enough capacity to accommodate the existing Applegate system demands (54 equivalent dwelling units [EDUs]) plus approximately 438 additional EDUs. Although these

particular segments of pipe would have capacity for future connections, the remaining 56,000 feet of downstream collection system does not have capacity to accommodate additional connections unless upgraded.

The pump station site(s) also would be designed and laid out to accommodate the full 0.01 mgd; however, only enough storage tank capacity and pumping ability to handle the existing demands (54 EDUs) would be constructed. In other words, components of the pump station(s) could not accommodate additional connections unless upgraded.

These elements would serve as limitations for additional growth. Therefore, Alternative 1 would not result in growth inducement. There would be **no impact**.

Alternative 2– Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Impact GI-1: Remove an Obstacle to Growth

Under Alternative 2, both the pipelines installed and all components of the pump station(s) would prohibit additional connections to the collection system without significant upgrades. As with Alternative 1, the remaining downstream collection system also could not accommodate additional connections unless upgraded. Therefore, Alternative 2 would not provide for additional wastewater treatment capacity above current demand and so would not result in growth inducement. There would be **no impact**.

Alternative 3

Impact GI-1: Remove an Obstacle to Growth

Under Alternative 3, the Applegate Wastewater Treatment Plant (WWTP) would continue to operate as it does under existing conditions. Because there would be no change, Alternative 3 would not result in growth inducement. There would be **no impact**.

4.3 Socioeconomics

4.3.1 Affected Environment

Placer County Service Area No. 28, Zone No. 24 (CSA No. 24), is an independent budget unit of Placer County, governed by the Board of Supervisors and staffed by the Department of Facility Services. Revenue for services is derived from a user fee imposed on all properties connected to the system. At the present time, the system provides service to approximately 37 active EDUs and

17 inactive EDUs. The active EDUs consist of 23 single-family homes and five commercial connections, including a church, a firehouse/civic center, offices, a motel, and a library. For fiscal year 2010 to 2011 the maintenance and operation fee for a single-family home was $82.00 per month.

4.3.2 Environmental Consequences

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Impact SOC-1. Affect the Local Economy

Construction of Alternative 1 would create temporary construction-related jobs. These jobs would have secondary impacts on the local economy as construction workers spend money within the local economy. These impacts are anticipated to be minor in the context of the local economy but would be **beneficial**.

In addition, operation of Alternative 1 would involve improving the efficiency of wastewater treatment within the project area. The current operation of the Applegate WWTP involves an inefficient and costly system of temporarily storing and hauling wastewater away from the WWTP and daily maintenance trips to the plant. Regionalization of the wastewater treatment system would provide economic benefits to the service area by taking advantage of economies of scale from the operation of larger, state-of-the-art facilities. Alternative 1 would provide a higher level of service to rate payers and would reduce future maintenance costs. These operational impacts would be **beneficial**.

Alternative 2– Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Impact SOC-1. Affect the Local Economy

Construction of Alternative 2 would be the same as Alternative 1. The impact would be **beneficial**. The benefits are anticipated to be the same with the exception that Alternative 2 would not allow for the connection of additional EDUs.

Alternative 3 – No Project/No Action Alternative

Impact SOC-1. Affect the Local Economy

Under Alternative 3, the benefits described for Alternatives 1 and 2 would not be realized and it is anticipated that rate increases could likely occur related to the increasing costs that would be associated with continuing to transport wastewater

from the Applegate WWTP during wet weather. The County would also likely be subject to fines and further penalties associated with not complying with the terms of the Settlement Agreement. However, rate increases are anticipated to be minimal and this impact is considered **less than significant**.

4.4 Environmental Justice

4.4.1 Introduction

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires that a federal agency analyze and address the disproportionately high and adverse human health and environmental effects of a proposed federal action on low income populations or minority communities.

For the purposes of this analysis, minority is defined as those people who have identified themselves as African American, Asian American, American Indian, Alaskan Native, or Hispanic. The U.S. Census defines Hispanic origin as an ethnicity and not a race. Consequently, a person of Hispanic origin may be of any race, and because of this, the U.S. Census reports these characteristics separately.

The term *low income* is used to describe persons whose median household income is at, or below the Department of Health and Human Services poverty guidelines for the applicable household size. The poverty guidelines are a simplified version of the Census Bureau's poverty thresholds. According to the 2000 U.S. Census, poverty thresholds (weighted averages) are as follows for income per year: one person, $8,501; a family unit with two people, $10,869; a three-person family unit, $13,290; and a four-person family unit, $17,029.

Population characteristics are gathered by the U.S. Census Bureau related to race, ethnicity, and economic status. The U.S. Census Bureau groups population data into census tracts. Census tracts are comprised of census blocks. The study area consists of the 26 census blocks that would be affected (overlapping) with the project area.

4.4.2 Affected Environment

According to the 2000 U.S. Census, there are approximately 626 people living in the study area (U.S. Census Bureau 2000). Approximately 3% of the families within the study area are living below the poverty level. Approximately 3% of the study area's population is comprised of individuals who identified themselves as African American, Asian American, American Indian or Alaskan Native, Hawaiian or Pacific Islander, or some other race.

4.4.3 Environmental Consequences

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Impact EJ-1. Disproportionately Affect Environmental Justice Populations

Alternative 1 would result in some construction-related impacts such as temporary increases in dust, noise, and minor traffic delays. However, these impacts would be shared equally by the communities surrounding the project area, regardless of race or economic class. Furthermore, all impacts associated with Alternative 1 would be mitigated to less-than-significant levels. Therefore, Alternative 1 is not anticipated to result in adverse human health effects that would disproportionately affect environmental justice populations. This impact would be **less than significant**. No mitigation is required.

Alternative 2– Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Impact EJ-1. Disproportionately Affect Environmental Justice Populations

Alternative 2 would be the same as Alternative 1 with the exception that no future connections to the new pipeline would be allowed. Therefore, all environmental impacts would be borne equally along the proposed pipeline. This impact would also be **less than significant**. No mitigation is required.

Alternative 3 – No Project/No Action Alternative

Impact EJ-1. Disproportionately Affect Environmental Justice Populations

Under Alternative 3, the WWTP would continue operating as it does under existing conditions. As discussed in Chapter 3 and summarized in Table 3.1-1, under Alternative 3 there would be significant and unavoidable impacts on water quality and utilities and public service. These impacts are not anticipated to result in significant adverse effects on human health and would be experienced equally by all those within the study area. Therefore, this impact would be **less than significant**. No mitigation is required.

4.5 Cumulative Impacts

4.5.1 Introduction

A cumulative impact is one that results from the combined effects of numerous past, present, and future projects or activities. Where a significant cumulative impact exists, the key question is whether the project would make a cumulatively considerable contribution to that impact. A project may make a cumulatively considerable contribution even if the project's individual impact is less than significant. However, a project's impact may be rendered less than cumulatively considerable when the project is required to implement or fund its fair share of a mitigation measure, or take part in a program that is designed to alleviate the impact (State CEQA Guidelines Section 15130).

4.5.2 Approach and Methodology

Under CEQA, cumulative impacts are defined as two or more individual impacts that, when considered together, are considerable, or compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (State CEQA Guidelines Section 15355[b]).

Potential projects that could result in cumulatively significant impacts when considered along with the Proposed Project were identified based on conversations with Placer County planning staff and review of the Placer County General Plan. As describe in Section 3.5, Land Use, the project area is relatively rural. At present, only one potential project has been identified within the same area. The Sugar Pine Ridge Planned Development is currently in the planning phase and is not anticipated to be constructed during the same timeframe as the Proposed Project (Wells pers. comm.).

The Sugar Pine Ridge Planned Development proposes the development of a 46-lot planned residential development subdivision on a 211-acre property east of Placer Hills Road. The area is bounded by Placer Hills Road to the west, the Meadow Vista community to the north, and Interstate (I)-80/Lake Arthur Road to the south and east. Water service for the Sugar Pine Ridge Planned Development would be provided by the Meadow Vista County Water District (MVCWD). MVCWD requires that the project include the construction of two 250,000-gallon water storage tanks on the project site. Pending authorization from Placer County Facility Services Department, wastewater service for this project site would be provided by SMD 1. The project proposes to tie into the Winchester STEP sewer collection system located to the west via Sugar Pine Road.

4.5.3 Assessment of Cumulative Impacts

Air Quality

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

As presented in Section 3.1, Air Quality, Alternative 1 is consistent with the general conformity rule. The federal conformity analysis is inherently cumulative because it evaluates a project's ability to meet de minimus levels to ensure a project would not contribute to an air quality impact on a statewide level. These thresholds are developed based on assumptions for projected growth and development for each planning region. Because Alternative 1 would not exceed the *de minimus* thresholds as indicated in Table 3.1-9 of Section 3.1, Air Quality, there would be no cumulatively significant impact on regional air quality from construction.

In the event that construction of another project was to occur during the same time as construction-related activity associated with Alternative 1, there would be a potential for cumulatively significant air quality impacts to occur on a localized basis. However, there are no other planned projects or activities in the study area that would affect the same resources as the Proposed Project. Furthermore, this is unlikely because project construction would progress along the pipeline alignment and would not be concentrated in one area for a long period of time.

Operation of Alternative 1would result in an improvement in air quality compared with existing conditions. There would be no cumulatively considerable contribution to an air quality impact from project operation.

Alternative 1 would also result in temporary increases in greenhouse gas (GHG) emissions from construction activities. As indicated in Section 3.1, Air Quality, projected emissions are not considered to be substantial in the context of statewide GHGs and implementation of Mitigation Measure AQ-2 would reduce GHG emissions to less than significant. Therefore, Alternative 1 would not contribute to a cumulatively significant increase in GHG emissions.

Alternative 2– Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Alternative 2 would be the same as Alternative 1, except that Alternative 2 would require a smaller footprint for the proposed Applegate Regional Pump Station. Construction and operation air emissions would be the same as for Alternative 1. There would be no cumulatively considerable contribution to air quality impacts from operation or construction. Similar to Alternative 1, Alternative 2 would not contribute to a cumulatively significant increase in GHG emissions.

Alternative 3 – No Project/No Action Alternative

Under Alternative 3, there would be no construction related air emissions and project operation would continue as it does under existing conditions. There would be no cumulatively considerable contribution to a significant air quality impact.

Biological Resources

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Alternative 1 would result in potential impacts on sensitive biological resources including sensitive plant and animal species, riparian habitat, and wetlands. There would be a potential for Alternative 1 to result in a cumulatively significant impact on biological resources if other projects or activities within the study area also affected these resources. As indicated in Section 3.2, Biological Resources, these impacts would all be mitigated to less than significant. Implementation of these measures would ensure that the contribution of Alternative 1 did not result in a cumulatively significant impact on biological resources.

Alternative 2– Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Alternative 2 would be the same as Alternative 1, except that Alternative 2 would require a smaller footprint for the proposed Applegate Regional Pump Station. Therefore, Alternative 2 would result in slightly fewer impacts on biological resources. Similar to Alternative 1 Alternative 2 would not result in a cumulatively significant impact on biological resources.

Alternative 3 – No Project/No Action Alternative

Under Alternative 3, there would be no construction related impacts and project operation would continue as it does under existing conditions. However, as discussed in Section 3.4, Hydrology and Water Quality, there is a potential for the WWTP ponds to overtop in wet weather. Although it is unlikely that water quality thresholds in the receiving waters would be exceeded, there is a potential for water quality impairment to affect aquatic wildlife. In the event that pollutants from other projects were also discharged in the immediate vicinity, Alternative 3 could result in a potentially significant cumulative contribution to impacts on biological resources. However, there are no other planned projects or activities within the study area that would affect the same resources as the

Proposed Project. Therefore, Alternative 3 would not result in a cumulatively significant impact on biological resources.

Cultural Resources

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Alternative 1 has the potential to result in impacts on unknown cultural resources through construction disturbance. Implementation of the mitigation described in Section 3.3, Cultural Resources would ensure that impacts on historic structures would be less than significant. If additional construction occurs near cultural resources within the study area, Alternative 1 could contribute to a cumulatively significant impact on cultural resources. However, there are no other planned projects or activities that would within the study area that would affect the same resources as the Proposed Project. Therefore, Alternative 1 would not result in a cumulatively significant cultural resources impact.

Alternative 2 – Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Alternative 2 would be the same as Alternative 1, except that Alternative 2 would require a smaller footprint for the proposed Applegate Regional Pump Station. Therefore, Alternative 2 would result in slightly less ground disturbance. Similar to Alternative 1, there are no other planned projects or activities that would within the study area that would affect the same resources as the Proposed Project. Therefore, Alternative 2 would not result in a cumulatively significant cultural resources impact.

Alternative 3 – No Project/No Action Alternative

Under Alternative 3, there would be no construction and project operation would continue as it does under existing conditions. There would be no cumulatively considerable contribution to a significant cultural resources impact.

Hydrology and Water Quality

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Alternative 1 has the potential to result in water quality impacts associated with construction. Water quality would be improved in the long term by reducing the potential for periodic discharges of wastewater from the existing Applegate WWTP to a tributary of Clipper Creek. In the event that other discharges to

surface waters occurred during the same timeframe as construction of the Proposed Project, there would be a potential for cumulatively significant water quality impacts to occur on a localized basis. However, there are no other planned projects or activities that would involve construction within the study area that would affect the same resources as the Proposed Project. Also, as indicated in Section 3.4, Hydrology and Water Quality, water quality impacts would be mitigated to less-than-significant levels for Alternative 1. Therefore, Alternative 1 would not result in a considerable contribution to a cumulative water quality impact.

Alternative 2 – Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Alternative 2 would be the same as Alternative 1, except that Alternative 2 would require a smaller footprint for the proposed Applegate Regional Pump Station. Therefore, similar to Alternative 1, it is unlikely that Alternative 2 would contribute to a cumulatively significant impact on hydrology or water quality.

Alternative 3 – No Project/No Action Alternative

Under Alternative 3, there is a potential for groundwater inflow to cause the WWTP ponds to overflow during extreme wet weather. Currently, none of the surface waters within the study area exceed water quality thresholds. However, in the event that pollutants from other projects were also discharged in the immediate vicinity, Alternative 3 could result in a potentially significant cumulative contribution to water quality impacts. However, as indicated previously, no other projects or activities are currently planned that would affect the same resources. Therefore, Alternative 3 would not result in a cumulatively significant impact on water resources.

Land Use

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Alternative 1 would not result in any land use impacts as indicated in Section 3.5, Land Use. Therefore, Alternative 1 would not result in a considerable contribution to cumulative land use impacts.

Alternative 2 – Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Alternative 2 would be the same as Alternative 1, except that Alternative 2 would require a smaller footprint for the proposed Applegate Regional Pump Station.

Therefore, similar to Alternative 1, it is unlikely that Alternative 2 would contribute to a cumulatively significant land use impact.

Alternative 3 – No Project/No Action Alternative

Under Alternative 3, the Applegate WWTP would continue to operate as it does under current conditions. There would be no changes that would affect land use. Therefore, Alternative 3 would not result in a considerable contribution to cumulative land use impacts.

Noise and Vibration

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Alternative 1 has the potential to result in noise and vibration impacts associated with construction and operation. In the event that construction of another project was to occur during the same time, there would be a potential for cumulatively significant noise impacts to occur on a localized basis. However, no projects or activities are planned within the same timeframe as the Proposed Project. And as indicated in Section 3.6, Noise and Vibration, construction noise and vibration impacts would be mitigated to a less- than-significant level for Alternative 1. Therefore, Alternative 1 would not result in a considerable contribution to a cumulative noise and vibration impact during construction.

Alternative 2 – Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Alternative 2 would be the same as Alternative 1, except that Alternative 2 would require a smaller footprint for the proposed Applegate Regional Pump Station. Therefore, similar to Alternative 1, it is unlikely that Alternative 2 would contribute to a cumulatively significant noise impact.

Alternative 3 – No Project/No Action Alternative

Under Alternative 3, the Applegate WWTP would continue to operate as it does under current conditions. There would be no changes that would result in additional noise impacts. Therefore, Alternative 3 would not result in a considerable contribution to cumulative land use impacts.

Public Health and Safety

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Alternative 1 has the potential to result in increased exposure of construction workers and the public to hazardous materials through routine handling of these materials and the possibility for accidental spills. Alternative 1 would also have the potential to increase the risk of wildfire during construction. In the event that construction of another project was to occur during the same time, there would be a potential for cumulatively significant public health and safety impacts to occur on a localized basis. However, no projects or activities are planned within the same timeframe as the Proposed Project. Also, as indicated in Section 3.7, Public Health and Safety, construction and operational impacts would be mitigated to less-than-significant levels for Alternative 1. Therefore, Alternative 1 would not result in a considerable contribution to a cumulative public health and safety impacts.

Alternative 2 – Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Alternative 2 would be the same as Alternative 1, except that Alternative 2 would require a smaller footprint for the proposed Applegate Regional Pump Station. Therefore, similar to Alternative 1, it is unlikely that Alternative 2 would contribute to a cumulatively significant impact on public health and safety.

Alternative 3 – No Project/No Action Alternative

As discussed in Chapter 3, Alternative 3 would result in a significant impact on public health and safety because of the combined potential for stormwater and wastewater to overtop the ponds and flow into a tributary of Clipper Creek. In the event that pollutants from other projects were also discharged in the immediate vicinity, Alternative 3 could result in a potentially significant cumulative contribution to public health impacts. However, as indicated previously, no projects or activities are planned within the study area that would affect the same resources. Therefore, Alternative 3 would not result in a cumulatively significant impact on public health and safety.

Transportation and Traffic

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Alternative 1 has the potential to temporarily disrupt traffic during construction, including creating traffic hazards and blocking emergency access routes. In the

event that construction of another project was to occur during the same time, there would be a potential for cumulatively significant transportation impacts to occur on a localized basis. However, no projects or activities are planned within the same timeframe as the Proposed Project. Also, as indicated in Section 3.8, Transportation and Traffic, transportation impacts would be less than significant for Alternative 1. Therefore, Alternative 1 would not result in a considerable contribution to a cumulative transportation impact from construction.

Under Alternative 1, the WWTP would be closed so daily maintenance trips to the WWTP would no longer be required. This would result in beneficial transportation impacts from project operation. Therefore, there would be no cumulatively significant transportation impacts during operation.

Alternative 2 – Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Alternative 2 would be the same as Alternative 1, except that Alternative 2 would require a smaller footprint for the proposed Applegate Regional Pump Station. Therefore, similar to Alternative 1, it is unlikely that Alternative 2 would contribute to a cumulatively significant impact on transportation and traffic.

Alternative 3 – No Project/No Action Alternative

Under Alternative 3, the WWTP would continue to operate as it does under current conditions. There would be no changes that would result in additional transportation impacts. Therefore, Alternative 3 would not result in a considerable contribution to cumulative transportation and traffic impacts.

Utilities and Public Service

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Alternative 1 would result in the transfer of wastewater to the SMD 1 WWTP and would not affect that plant’s ability to meet the requirements for treating wastewater. Therefore, Alternative 1 would not result in a considerable contribution to cumulative utilities or public services impacts.

Alternative 2 – Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Alternative 2 would be the same as Alternative 1except Alternative 2 would require a smaller footprint for the proposed Applegate Regional Pump Station.

Therefore, similar to Alternative 1, it is unlikely Alternative 2 would contribute to a cumulatively significant impact on utilities and public service.

Alternative 3 – No Project/No Action Alternative

Impact CUME-1. Result in a Cumulatively Significant Increase in Wastewater Discharge

Alternative 3 would result in the potential for stormwater and wastewater to overtop the WWTP ponds under extreme wet weather conditions. Because Alternative 3 involves no action, there is a potential for discharge from the ponds to occur, exceeding WWTP capacity. This impact would be considered **significant and unavoidable** and would result in a significant cumulative utilities and public service impact.

Socioeconomics

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

As discussed above in Section 4.3, Socioeconomics, Alternative 1 would result in beneficial socioeconomic impacts. Therefore, Alternative 1 would not result in a considerable contribution to an adverse cumulative impact on socioeconomics.

Alternative 2 – Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Construction of Alternative 2 would be the same as Alternative 1. The benefits are anticipated to be the same with the exception that Alternative 2 would not allow for the connection of additional EDUs. Alternative 2 would not result in a considerable contribution to an adverse cumulative impact on socioeconomics.

Alternative 3 – No Project/No Action Alternative

Under Alternative 3, the benefits described for Alternatives 1 and 2 would not be realized and it is anticipated that rate increases would likely occur related to the increasing costs that would be associated with continuing to transport wastewater from the Applegate WWTP during wet weather. The County would also likely be subject to fines and further penalties associated with not complying with the terms of the Settlement Agreement. Increased costs are not anticipated to reach the levels that would cause undue burdens on rate payers.

Environmental Justice

Alternative 1 – Decommission Applegate WWTP and Construct Pipeline and Pump Station(s)

Alternative 1 would result in the project-level environmental impacts discussed in Chapter 3 and the cumulative impacts described above. These impacts would not disproportionately affect environmental justice populations because they would be shared equally by the communities surrounding the project area. Therefore, Alternative 1 would not result in a considerable contribution to a cumulative environmental justice impact from construction and operation.

Alternative 2 – Decommission WWTP and Construct Smaller Pipeline and Pump Station(s)

Alternative 2 would be the same as Alternative 1 except that Alternative 2 would limit future connections to the pipeline and would therefore require a smaller pump station to service the new pipeline. Alternative 2 would not result in a considerable contribution to a significant cumulative impact on environmental justice populations.

Alternative 3 – No Project/No Action Alternative

Under Alternative 3, the Applegate WWTP would continue operating as it does under existing conditions. As noted previously, there are significant and unavoidable impacts on water quality and utilities and public service. However, these impacts would not be cumulatively significant and would be experienced equally by all those within the study area. Therefore, Alternative 3 would not result in a considerable contribution to a significant cumulative impact on environmental justice populations.