7.19 Transportation/Traffic

This section describes the environmental setting and potential impacts on transportation/traffic that may result from changes in hydrology or changes in water supply. Activities that affect transportation/traffic are generally associated with new construction or operation of facilities that require use by people. These activities could lead to congestion; disruption; increase in safety risks; reduced emergency access; or conflicts with applicable plans, policies, or ordinances regarding performance of transportation systems.

The actions associated with changes in hydrology and changes in water supply would not require new construction or the operation of facilities that require use by people and, therefore, would not result in increased use of transportation infrastructure or services that would affect transportation systems or traffic conditions.

The analysis in this section focuses on changes in hydrology and water supply for potential effects on transportation and traffic. Changes in hydrology could result in increased inundation of floodplains bounded by levees where roads and pedestrian and bicycle paths exist. Changes in hydrology also may result in modifications to Delta Cross Channel (DCC) gate operations, which could affect navigation. Changes in water supply could include changes in agricultural land use or fallowing that could lead to changes in agricultural product-related transportation.

Section 7.1, *Introduction, Project Description, and Approach to Environmental Analysis*, describes reasonably foreseeable methods of compliance and response actions, including actions that would require construction. These actions are analyzed for potential environmental effects in Section 7.21, *Habitat Restoration and Other Ecosystem Projects*, and Section 7.22, *New or Modified Facilities*.

7.19.1 Environmental Checklist

XVI. Transportation/Traffic	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion	☐	☐	☐	☒

XVI. Transportation/Traffic		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
	management agency for designated roads or highways?				
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e.	Result in inadequate emergency access?	☐	☐	☐	☒
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

7.19.2 Environmental Setting

This section describes the transportation/traffic setting to inform the impact discussion in this section and in Section 7.21, *Habitat Restoration and Other Ecosystem Projects*; Section 7.22, *New or Modified Facilities*; Chapter 9, *Proposed Voluntary Agreements*; and Chapter 13, *Revised Proposed Plan Amendments*.

Figure 7.19-1a is a map of the northern portion of California showing commercial ports, major highways, deep water ship channels, water navigation routes, and ferry terminals and routes of the Sacramento River watershed, Delta eastside tributaries, Delta, San Francisco Bay Area, Central Coast, and San Joaquin Valley geographic regions. Figure 7.19-1b is a map of the southern portion of California showing commercial ports, ferry terminals and routes, and major highways of the San Joaquin Valley, Central Coast, and Southern California geographic regions.

7.19.2.1 Roadways

Federal and State Highways

Federal and state highways in California are maintained by the California Department of Transportation (Caltrans) and include high-volume, multilane divided freeways in the interstate highway system. Numerous federal and state highways exist in the study area. Major interstate routes extend outside of the study area.

Interstate (I-) 5 runs north–south from north of Shasta Reservoir through the Central Valley and southern California, linking the major California cities of Redding, Sacramento, Stockton, Los Angeles, Santa Ana, and San Diego. Major cities not directly linked by I-5, but connected to it by local highways, are San Francisco, Oakland, and San Jose. I-880 runs parallel to the eastern shore of the San Francisco Bay and connects San Jose and Oakland.

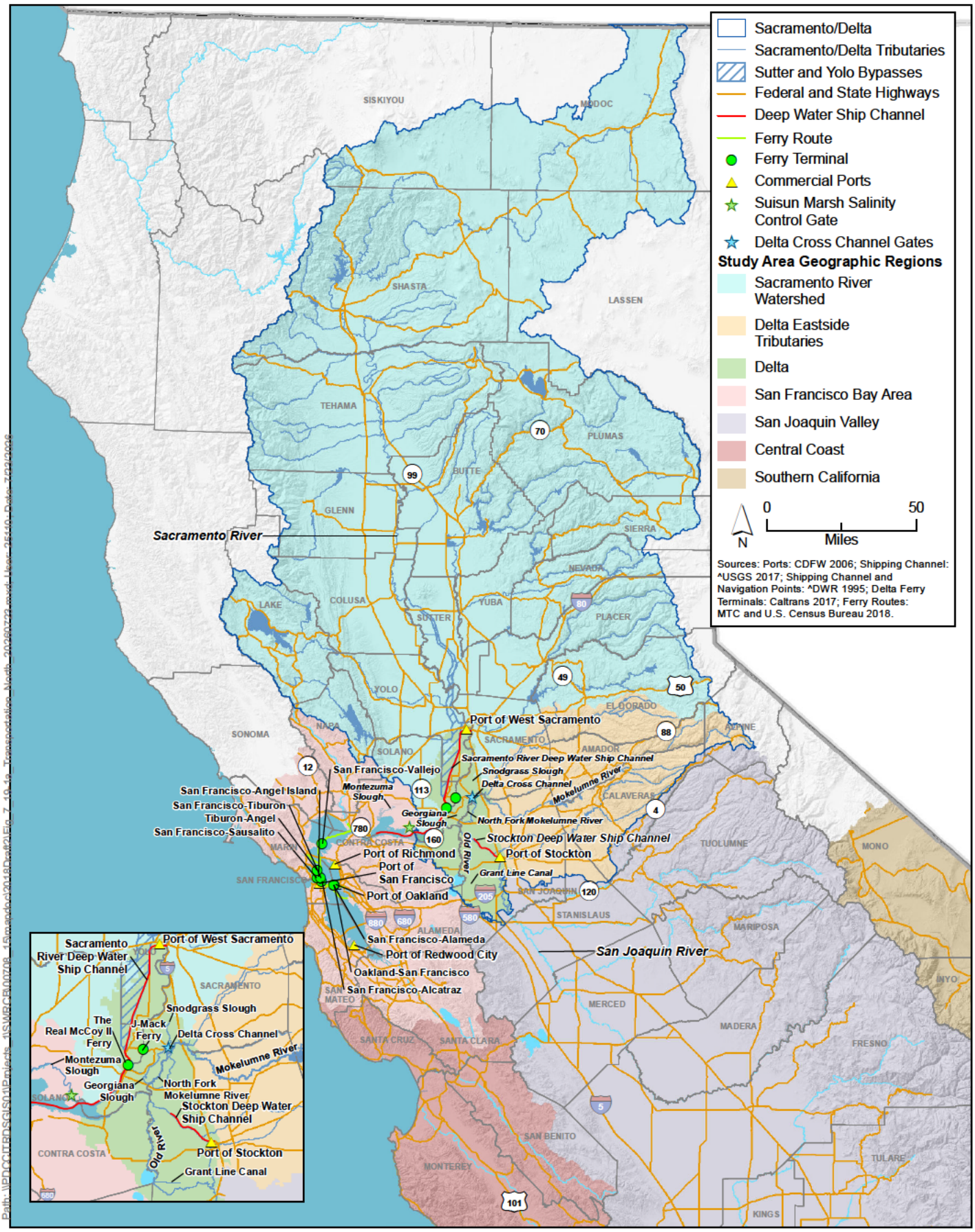

Figure 7.19-1a
Transportation Systems in the Study Area (northern)

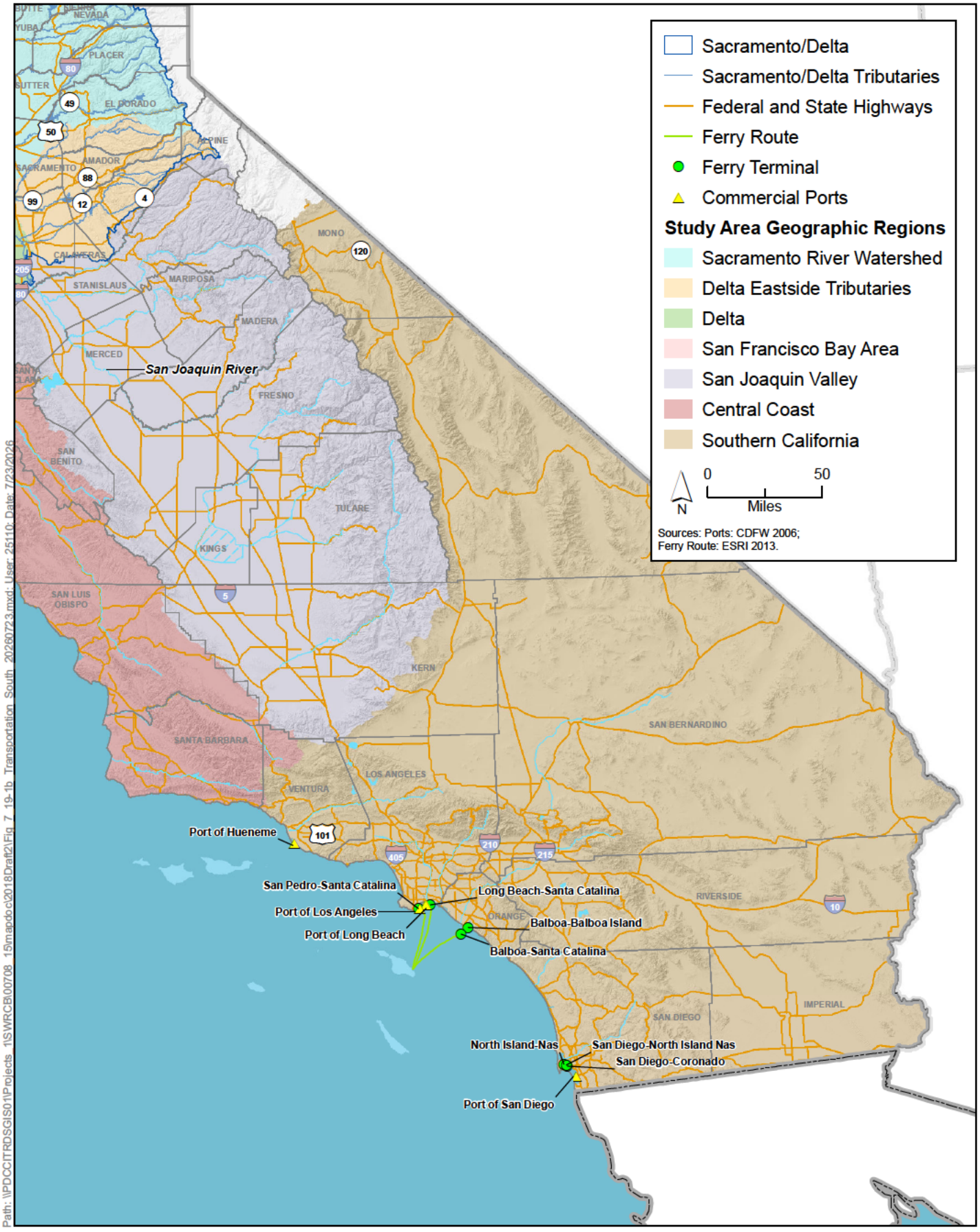

Figure 7.19-1b
Transportation Systems in the Study Area (southern)

I-80 extends from its western terminus in San Francisco at an interchange with U.S. Highway 101, heads east across the San Francisco–Oakland Bay Bridge; turns north and crosses the Carquinez Bridge; and then turns back northeast through the city of Vacaville, the Sacramento Valley, and the Sierra Nevada before crossing into Nevada.

U.S. Highway 50 runs east from I-80 in West Sacramento through Sacramento and Placerville to the Nevada state line in South Lake Tahoe.

Interstates 580, 680, 880, 280, and 205 form a network of routes connecting the San Francisco Bay Area (Bay Area) and Central Valley. I-580 is an east–west highway spur of I-80 that runs from San Rafael in the Bay Area to I-5 near the city of Tracy. I-680 runs north–south on the eastern side of the Bay Area from Fairfield to San Jose. I-280 runs down the San Francisco Peninsula, connecting U.S. Highway 101 in San Francisco to I-880 in San Jose. I-205 connects I-5 with I-580 north of the city of Tracy and provides access from the Bay Area to the northern San Joaquin Valley.

An extensive and intricate network of interstate freeways and expressways runs through regions south of the Delta, including Interstates 405, 210, 15, 10, 40, 8, and 605. U.S. Highway 101 extends north–south near the coast from San Luis Obispo to Los Angeles. I-405 is a major north–south interstate in southern California and becomes a bypass auxiliary route of I-5. I-210 extends east–west from I-5 in Los Angeles to Redlands.

Similar to the interstate network, an extensive network of state routes connects urban, suburban, and rural communities. State highways can be low- to high-volume roadways with one or two lanes in each direction through more sparsely populated areas, or they can be multilane divided freeways. North–south highways generally run parallel to the Sacramento River, including State Route (SR) 99 and SR 273. SR 99 runs almost the entire length of the Central Valley, from the highway's southern end at I-5, through Sacramento, to its northern end at SR 36 near the city of Red Bluff. Major east–west routes on the east side of the Sacramento Valley include SR 70, SR 49, and SR 88. In the Bay Area, SR 92, SR 84, and SR 237 connect its western and eastern portions and SR 85 and SR 17 run through the southern portion of the San Francisco Peninsula. South of the Delta, SR 132 and SR 120 run east–west, while SR 99 and SR 33 run north–south. In the Delta, SR 4 and SR 12 run east–west and SR 160 and SR 113 run north–south. The most heavily populated areas are generally situated along interstate or state highway corridors.

County Highways

County-maintained highways range from low-volume, two-lane rural arterials, such as River Road along the Sacramento River, to four-lane arterials in suburban areas, such as Tracy Boulevard in the city of Tracy. Routes of similar size and capacity exist throughout the counties in the study area.

Local Roadways

Cities and counties maintain local roadways throughout the study area. Local roadways can range from two-lane local roads to much larger arterials.

Rural areas include areas situated along waterways in the Delta, located in agricultural areas on the Sacramento and San Joaquin Valley floors, and scattered throughout the foothills and mountainous areas of the coastal ranges along the western side of the state and the Sierra Nevada to the east. Local roadways in rural areas are predominantly two-lane rural roads and arterials. In heavily

populated areas, such as Redding, Sacramento, Bay Area cities, and Los Angeles, local roadways include multilane arterials.

A number of county roads are "levee roads" that run on the crowns of levees along the rivers and sloughs of the Delta. These narrow roads provide access to the Delta, including recreational access. Within Sacramento County, River Road (southern part of SR 160), Randall Island Road, and the Garden Highway run on top of levees along the Sacramento River (Sacramento County 2017). River Road becomes South River Road in Yolo County and continues along the Sacramento River.

Bridges

Numerous bridges span waterways throughout California, as well as ravines and canyons throughout the foothills and mountainous areas, carrying state-maintained and locally maintained roadways and private rail. Bridge structures include major freeway bridges over the Sacramento and American Rivers and local bridges over navigable waterways within the Bay-Delta. Some bridges, such as the Isleton Bridge on SR 160, are operable, meaning that they may be raised or opened to allow vessels to pass. More than 40 bridges cross the navigable waterways of the Delta (^DSC 2011). Some of the bridges in the Delta that provide navigation access and are operable include the Tower Bridge on SR 275 over the Sacramento River, SR 160 bridge over Steamboat Slough, SR 12 bridge over the North Fork Mokelumne River, and Navy Drive Bridge over the San Joaquin River. Some nonoperable bridges also exist, such as the SR 160 Antioch Bridge over the San Joaquin River, Bethel Island Road Bridge over Dutch Slough, and Sam Howard Road Bridge over the San Joaquin River (^DSC 2011).

Truck Routes

Designated truck routes are primarily located on major federal, state, and county highways and major local arterials.

State Truck Routes

Caltrans has jurisdiction over designated truck routes. In California, the Surface Transportation Assistance Act (STAA) network consists of national network routes and terminal access routes (49 U.S.C. §§ 31111–31114). STAA-designated trucks are restricted to national network and terminal access routes because these routes generally provide "reasonable access to terminals and facilities for purposes limited to fuel, food, lodging, and repair when that access is consistent with safe operation…and when the facility is within one road mile of identified points of ingress and egress…" (Veh. Code, § 35401.5(c)). STAA network routes include I-5, I-80, I-680, I-205, and U.S. Highway 50. STAA terminal routes in the Delta and Suisun Marsh include portions of SR 4, SR 113, SR 12, and SR 160. Use of unidentified local streets and roads requires approval from the local highway authority.

County and Local Truck Routes

Local jurisdictions can designate local truck routes. For most communities, local truck routes generally connect with established STAA and California legal routes and are generally located in dense commercial areas, business parks, industrial areas, airports, rail facilities, and ports. In the Delta, only Sacramento County and the cities of Sacramento and Stockton have identified local truck routes.

Emergency Roadway Routes

Roadway facilities are designed to accommodate the flow of everyday vehicle operations and to allow emergency evacuations necessitated by natural or human-caused events. These emergency events include medical and fire emergencies, traffic incidents, earthquakes, wildfire, and flooding. Each county has an emergency response plan, and some counties have designated evacuation routes that allow for emergency evacuations necessitated by natural or human-caused events.

7.19.2.2 Railroads

Railroads in the United States are designated by the Surface Transportation Board as Class I, II, or III according to size criteria and annual carrier operating revenues. Two Class I railroads—Burlington Northern Santa Fe Railway and Union Pacific Railroad—and several smaller short line railroads are present in the study area. Amtrak's Capitol Corridor and interstate routes, the Altamont Commuter Express and Metrolink, provide passenger rail service.

7.19.2.3 Transit

Statewide and nationwide transit services are provided by many bus services, including Greyhound and Amtrak. Local transit services consist primarily of local bus service in communities and light rail and trolleys operated by city or regional providers in urban areas.

7.19.2.4 Ports, Deep Water Channels, Ferries, and Navigation

Commercial Ports and Deep Water Channels

Ports and deep water channels are a major element of goods movement in the Delta, Suisun Marsh, and other areas within the study area. Commercial ports provide port facilities such as harbor cranes, barge services, foreign trade services, and warehousing and commercial space. Ports also provide access to railroad lines and highways for road freight and may include adjacent multiuse industrial parks. Inland ports, such as those in Stockton and West Sacramento, are accessible via rivers and deep water channels and handle containers and bulk cargo. The Port of West Sacramento is situated along the Sacramento River Deep Water Ship Channel in West Sacramento. The port provides access to rail service, highways, and adjacent multiuse industrial parks and is in proximity to the Sacramento International Airport. The Port of Stockton is a 2,000-acre facility on the Stockton Deep Water Ship Channel. The port has rail access to Union Pacific Railroad and Burlington Northern Santa Fe Railway and is approximately 1 mile from I-5.

Large marine ports, such as those in Oakland, Long Beach, Los Angeles, and San Diego, handle container and large cargo direct from oceangoing vessels.

Ferry Services

Caltrans operates two public-access ferries to connect state highways across waterways in the Bay-Delta in lieu of a constructed bridge. The Real McCoy II provides service to Ryer Island by crossing Cache Slough to Rio Vista. The J-Mack Ferry crosses Steamboat Slough, connecting Grand Island to East Ryer Island. Several private ferries in the Delta and Suisun Marsh connect to public roadways, public land, and private islands. Private ferry operators elsewhere in the Bay-Delta and in coastal areas also transport people and vehicles across waterways. Delta River Cruise provides services

through the Delta and San Francisco Bay. Other private ferry services throughout the Bay-Delta include Captain Morgan's Delta Adventures, Bay View Charters, and Opportunity Cruises.

Navigation

Traditional navigable waters include large rivers and lakes (such as the Sacramento River and the Sacramento River Deep Water Ship Channel) and tidally influenced waterbodies (such as San Francisco Bay) used in interstate or foreign commerce. Navigable waters are also tributaries, which include perennial and intermittent rivers and streams that contribute surface flow to traditional navigable waters (USEPA 2021).

Waterways that can be used for navigation exist throughout the study area. The presence of operable gates, passive barriers, and bridges can affect navigation. Operable gates control channel flows and connect rivers and sloughs, including the DCC gate and the Suisun Marsh Salinity Control Gates. The DCC gate controls flows into a channel that connects the Sacramento River near Locke and Walnut Grove to Snodgrass Slough and the Mokelumne River. The gate is closed during specific times for water quality and supply reasons. When the gate is closed, boats can access Snodgrass Slough through Georgiana Slough and North Fork Mokelumne River (California Delta Chambers and Visitor's Bureau 2023). The Suisun Marsh Salinity Control Gates on Montezuma Slough near Collinsville generally operate from October through May with boat locks available to provide passage around closed gates. The California Department of Water Resources installs seasonal rock barriers in the southern Delta with facilities to transport boats around the barriers at Old River near Tracy and Grant Line Canal. Bridges carrying roadways or railroad lines may be operable to allow passage for taller boats and ships as needed.

The Sacramento River Deep Water Ship Channel facilitates navigation of large oceangoing ships from the Delta to the Port of West Sacramento. Built by the U.S. Army Corps of Engineers in 1963, the shipping channel is 43 miles long and is maintained to a depth of 30 feet. The Stockton Deep Water Ship Channel serves the Port of Stockton with an average depth of 35 feet, allowing ships up to 900 feet long to navigate the channel (Port of Stockton 2021).

Within the Sacramento River watershed, navigation on rivers, such as the Sacramento River, Feather River, and Middle Fork Feather River, is possible along some portions of the rivers. However, existing dams limit navigation on rivers and tributaries. The Shasta and Keswick Dams limit navigation on the Sacramento River.

Reservoirs generally impede navigation because dams typically found at the downstream end of reservoirs block access for boats traveling from one location to another. Within a reservoir, boating occurs more for recreational activities than for transportation and is discussed further in Section 7.18, *Recreation*.

Some counties encourage navigation on waterways by adopting goals, policies, and objectives in their general plans. The San Joaquin County General Plan includes policy TM-1.3, Multimodal System, which encourages, where appropriate, development of an integrated, multimodal transportation system that includes travel on waterways (^San Joaquin County 2016). The Solano County General Plan includes an implementation program to encourage the use of water transportation when industrial and commercial uses are proposed near deep water channels (policy TC.I-20) (Solano County 2008). Other counties within the Delta do not specifically include navigation on waterways as part of their transportation planning process.

7.19.2.5 Airports

Several airports are located in the study area, ranging from single-runway airstrips supporting single-engine airplanes to general aviation airports to international airports, such as the Sacramento, San Francisco, and Los Angeles International Airports.

7.19.2.6 Bicycle and Pedestrian Facilities

Transit, bicycle, and pedestrian facilities are typically planned as part of a city or county general plan, specific plans for developments or areas, bicycle and pedestrian master plans, and transit district plans.

In addition to promoting recreational activities, bicycle and pedestrian facilities provide a mode of transportation for local and regional travel. These facilities include paved bicycle and walking paths, shared bicycle lanes, sidewalks, and natural trails, all of which are present throughout the study area. Bicycle and pedestrian paths often follow rivers and other waterways, such as the Jedediah Smith Memorial Trail, a 32-mile paved multiuse pathway that runs along the American River from its confluence with the Sacramento River north of downtown Sacramento to Folsom Reservoir. Parks and wildlife areas that contain hiking trails include the Yolo Bypass Wildlife Area, Lower Sherman Island Wildlife Area, and Cosumnes River Preserve.

7.19.2.7 Transportation Planning

Transportation systems provide for the mobility of people and goods and influence patterns of growth and economic activity by providing access to land. Transportation planning includes both long- and short-range program strategies and actions that address air quality, congestion management, demand management, safety, funding sources, freight movement, maintenance, and land use, among other elements. Transportation needs identified during planning inform the design and construction of development projects to ensure that transportation investments reflect community needs.

The construction or operation of facilities, such as commercial buildings, housing, military facilities, and industrial facilities, that are used by people can result in an increased need for transportation and thus, affect traffic patterns. Qualified transportation consultants typically analyze transportation and traffic impacts as part of a project-specific or program environmental review. These analyses contain descriptions of current roadway and intersection conditions and projections of traffic levels at future points—typically for the build year, when the project is scheduled for completion, and the design year, when the completed project has reached a specific age. Prior to July 1, 2020, CEQA required that impacts on roadways and intersections were to be measured using level of service (LOS), a scale that identifies the operating quality of a roadway segment or intersection, based on volume-to-capacity ratio or average delay experienced by vehicles on the facility. LOS levels range from A to F, with LOS A representing free traffic flow and LOS F representing severe traffic congestion.

Caltrans sets an operational goal for state highways at the transitions between LOS C and LOS D (Caltrans 2002). LOS guidelines for other roadways are set by the city or county maintaining jurisdiction over the roadways under analysis. General plans, local or regional transportation plans, and congestion management plans often contain these guidelines. Typically, significant impacts are considered to be those that degrade a roadway segment or intersection below the applicable LOS guidelines.

Subsequent to July 1, 2020, CEQA requires lead agencies to analyze transportation impacts using vehicle miles traveled (VMT) instead of LOS. Where LOS measures the average amount of delay experienced by drivers at an intersection during the most congested time of day (with levels from A to F), the new metric, VMT, measures the total number of miles traveled by vehicles daily on the roadway network and thereby the impacts on the environment from those miles traveled. This shift in transportation impact criteria is expected to align transportation impact analysis and mitigation outcomes with the state's goals to reduce greenhouse gas emissions and traffic-related air pollution while promoting multimodal transportation networks and a diversity of land uses.

Although the Governor's Office of Planning and Research provides recommendations for adopting new VMT analysis guidelines, according to section 15064.3 of the State CEQA Guidelines, the lead agency has discretion in designing its methodology. Thus, lead agencies are not required to abandon LOS for purposes other than CEQA analysis, especially because some cities have LOS requirements built into their general plans. Ultimately, a project may consider both LOS and VMT analysis for CEQA purposes to establish consistency between the project and the general plan. (Tsou 2019)

Transportation plans include Caltrans plans for state highways, regional transportation plans, and city and county general plan circulation elements, all of which include goals, policies, and performance standards for the covered transportation network. Plans typically identify service goals for streets, highways, intersections, pedestrian and bicycle access, and public transit services. Plans also may include standards to guide roadway surface maintenance.

State-mandated congestion management programs identify goals and objectives to reduce congestion on highways and roads in the state. (Gov. Code, § 65089.) Regional transportation agencies work with councils of government and planning agencies to implement congestion management programs' planning measures, infrastructure improvements, land use regulation, and monitoring and enforcement actions to improve conditions on specified roadways.

7.19.3 Impact Analysis

Activities that could affect transportation/traffic are generally associated with new construction or operation of facilities that require use by people (e.g., commercial buildings, residential housing), which could increase use of transportation infrastructure or services. The actions associated with changes in hydrology and changes in water supply would not involve new construction or operation of facilities inhabited or used by people. These actions would not generate population growth or economic activity that would increase traffic or result in conditions that would conflict with an applicable congestion management plan, change air traffic patterns, or substantially increase a hazard due to design features. There would be no impact. Accordingly, these topics (Impacts TRA-b, TRA-c, and TRA-d) are not evaluated further in this section.

Changes in hydrology could result in increased inundation of floodplains bounded by levees. There are a few transportation corridors within these floodplains that could be subject to increased inundation. In addition, changes in hydrology could include increased closures of the DCC gate, which controls flows into a channel that connects the Sacramento River near Locke and Walnut Grove to Snodgrass Slough and the Mokelumne River. While passenger and commercial ship navigation would not be affected, increased closures of the DCC gate could affect recreational boat access. These conditions are evaluated further under Impacts TRA-a, TRA-f, and Impact TRA-e.

Changes in water supply and the resultant changes in agricultural land use or fallowing that affect agricultural production could lead to changes in agricultural product-related transportation. These conditions are further evaluated further under Impacts TRA-a and TRA-f.

Increased groundwater pumping or use of other water management actions (i.e., groundwater storage and recovery, water transfers, water recycling, and water conservation) would use existing infrastructure and would not involve transportation systems or increase traffic. There would be no impact from changes in water supply related to groundwater pumping or use of other water management actions and these actions are not evaluated further.

Section 7.21, *Habitat Restoration and Other Ecosystem Projects*, and Section 7.22, *New or Modified Facilities,* describe and analyze potential transportation impacts from various actions that involve construction.

Impact TRA-a: Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit

Impact TRA-f: Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities

The analyses of activities that could conflict with an applicable transportation plan, ordinance, or policy or an adopted policy, plan, or program regarding public transit, bicycle, or pedestrian facilities are closely related; therefore, Impacts TRA-a and TRA-f are combined and addressed together.

Changes in hydrology would result in changes in flows and reservoir levels. Changes in reservoir levels would not affect water navigation because the presence of reservoirs generally impedes navigation and boating within reservoirs is used for recreational purposes and not typically for transportation.

Roads and pedestrian and bicycle paths access close to waterways on the landward side of levees and on top of levees would not be more susceptible to flooding because flow requirements would incorporate existing flood control operations. Further, the highest flows, which are the ones that could cause exceedance of levee capacities, are not expected to increase as a result of changes in hydrology (see discussion of flood risk in Section 7.12.1, *Surface Water*). Changes in hydrology could result in increased inundation of floodplains bounded by levees, including bypasses. A few transportation corridors, including roads and pedestrian and bicycles paths, could be affected by this inundation, which could prevent their use intermittently. However, these corridors generally accommodate a relatively small amount of traffic, are secondary to other transportation corridors, and already are subject to intermittent inundation. The impact would be less than significant.

Although unlikely, changes in hydrology could result in increased DCC gate closures in the Delta region. The DCC gate provides access for recreational boating; when it is closed, recreational boats can access Snodgrass Slough through Georgiana Slough and North Fork Mokelumne River. This

alternative route delays recreational navigation and an increase in gate closures could further increase navigation delay. However, the DCC gate currently operates frequently, and boaters are advised to check gate status (Reclamation 2021). Therefore, impacts would be less than significant.

Changes in water supply and the resultant changes in agricultural land use or fallowing that affect agricultural production could lead to changes in agricultural product-related transportation. However, determining the effect of these changes is speculative and would depend on farmers' responses to reduction in water supply and consumers' responses to reduction in California agricultural product supply (see Section 7.8, *Energy*, Impact EN-f for additional discussion). It is unlikely that a reduction in California agricultural production would cause a substantial change in transportation such that there would be any impact on the circulation system, transit operations, or use of pedestrian or bicycle paths. This impact would be less than significant.

Impact TRA-e: Result in inadequate emergency access

The actions associated with changes in hydrology and changes in water supply would not require new construction or the operation of facilities that would require impediments to roadways or transportation systems and, therefore, would not result in impacts on transportation systems or traffic conditions that would result in inadequate emergency access. As noted under Impacts TRA-a and TRA-f, a few transportation corridors within floodplains bounded by levees could be subject to increased inundation. These corridors are known to be subject to inundation and are secondary to other transportation corridors. As a result, emergency services authorities have predetermined alternate routes for emergency access within these corridors. Additionally, the proposed program of implementation for the inflow objective is intended to provide for floodplain inundation to benefit native species. It is not intended to be implemented in a way that contributes to flooding that would result in public safety concerns or major property damage (see Section 7.12.1, *Surface Water*, *Flood Risk Analysis* under Impact SW-i). There would be no impact.

7.19.4 References Cited

7.19.4.1 Common References

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