

CHAPTER 5.0

CUMULATIVE IMPACTS SUMMARY

This section identifies the cumulative impacts resulting from the proposed Project. Cumulative impacts are the result of combining the potential effects of the Project with other large scale proposed, approved and reasonably foreseeable renewable energy projects in the vicinity of the proposed Project. Full discussion of the cumulative impacts are provided in Sections 4.1 through 4.4 and 4.6 through 4.13 under subsections 4.1.4, 4.2.4, 4.3.4, 4.4.4, 4.6.4, 4.7.4, 4.8.4, 4.9.4, 4.10.4, 4.11.4, and 4.12.4. Section 4.13 had multiple discussions of cumulative impacts based on the number of public services and utilities (4.13.1.4, 4.13.2.4, 4.13.3.4, 4.13.4.4, 4.13.5.4, 4.13.6.4, and 4.13.7.4). Due to the global nature of climate change and GHG emissions and their potential effects, GHG emissions generated by an individual project were evaluated on a cumulative basis in Section 4.5.

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of cumulative impacts that may be associated with the proposed project. According to CEQA Guidelines Section 15130(a), “an EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” The term, “cumulatively considerable” means that “the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects” (as defined by Section 15130).

As defined in CEQA Guidelines Section 15355, a cumulative impact is an impact that results from the combination of the project evaluated in the EIR together with other projects causing related impacts. A cumulative impact occurs from:

... the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

CEQA Section 15130(b) identifies the following three elements as necessary for adequate cumulative analysis:

- 1) Either:
 - a) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or,
 - b) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.
- 2) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and
- 3) A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project’s contribution to any significant cumulative effects.

Where a lead agency is examining a project with an incremental effect that is not “cumulatively considerable,” a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

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This EIR uses the “list” approach described above in the cumulative analysis (refer to Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used).

5.2 CUMULATIVE IMPACTS SUMMARY

A summary of cumulative impacts that would result from the implementation of the project is provided below. Each cumulative impact is determined to have one of the following levels of significance: less than significant, significant, or significant and unavoidable. The reader is referred to Sections 4.1 through 4.13 for a complete discussion of the project’s cumulative impacts.

AESTHETICS

Cumulative Visual Impacts

Impact 4.1.4 Implementation of the proposed Project, in conjunction with large scale proposed, approved and reasonably foreseeable renewable energy projects in the Imperial Valley and the Ocotillo Wells Solar Project west of the Project, would alter the visual character of the region, resulting in a change to public views as well as increased daytime glare and nighttime lighting levels. Such impacts are typically addressed on a project-by-project basis. Therefore, cumulative impacts to visual resources are considered less than cumulatively considerable.

LAND USE

Cumulative Conflicts with Applicable Land Use Plans, Policies, or Regulations

Impact 4.2.2 Development of the proposed Project in combination with large scale proposed, approved and reasonably foreseeable renewable energy projects in the region would not incrementally add to conflicts with applicable land use plans, policies and regulations. Each project would be required to be consistent with the applicable plans that apply to the area in which it is located. Thus, this impact is considered **less than cumulatively considerable**.

Cumulative Land Use Compatibility/Conflict Impacts

Impact 4.2.3 Development of the proposed Project in combination with large scale proposed, approved and reasonably foreseeable renewable projects in the region would change the land use patterns, present potential land use conflicts, and result in conversion of agricultural. This impact is considered **less than cumulatively considerable**.

TRANSPORTATION AND CIRCULATION

Cumulative Impacts to Roadway Segment LOS (Year 2025)

Impact 4.3.6 Implementation of the proposed Project’s traffic in Year 2025 in combination with projected cumulative traffic in Year 2025 would add traffic to the segment of SR 78 adjacent to the Project site. However, this segment would continue to operate at LOS B under cumulative conditions. Therefore, impacts to cumulative traffic on SR 78 during Year 2025 cumulative conditions are considered **less than cumulatively considerable**.

AIR QUALITY

Violate Air Quality Standard/Cause Air Quality Violation

Impact 4.4.4 The proposed Project would generate criteria pollutant emissions during construction. However, the short-term construction emissions exceedances of ICAPCD thresholds would be mitigated with implementation of mitigation measures as well as payment of

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an in-lieu fee. Operational emissions would not exceed ICAPCD thresholds but would still incorporate mitigation measures to reduce dust. Therefore, the proposed Project would result in a **less than cumulatively considerable impact** with regard to violating an air quality standard.

CLIMATE CHANGE AND GREENHOUSE GASES

Generation of Greenhouse Gas Emissions

Impact 4.5.1 The proposed Project would generate greenhouse gas emissions during construction and reclamation activities, primarily related to emissions from construction equipment. Operational emissions would occur to a lesser degree in relation to the use of maintenance equipment. This impact is considered **less than significant**.

Conflict with an Applicable Plan, Policy, or Regulation Adopted to Reduce Greenhouse Gas Emissions

Impact 4.5.2 The proposed Project would not conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions. **No impact** would occur.

GEOLOGY AND SOILS

Cumulative Exposure to Geologic and Seismic Impacts

Impact 4.6.6 Implementation of the proposed Project, in combination with existing, approved, proposed, and reasonably foreseeable development, may result in cumulative exposure to geologic and seismic hazards. This is considered a **less than cumulatively considerable impact**.

CULTURAL & PALEONTOLOGICAL RESOURCES

Cumulative impacts to Archaeological and Historic Resources

Impact 4.7.6 Implementation of the proposed Project, in combination with large scale proposed, approved and reasonably foreseeable renewable energy projects in the region, has the potential to result in impacts to archaeological and historic resources. However, impacts are addressed on a project-by-project basis. Therefore, this is considered a **less than cumulatively considerable impact**.

Cumulative Impacts to Paleontological Resources

Impact 4.7.7 Implementation of the proposed Project in combination with large scale proposed, approved and reasonably foreseeable renewable energy projects in region, has the potential to result in impacts to fossil remains and fossil bearing geological formations. However, such impacts are addressed on a project-by-project basis. Therefore, this is considered a **less than cumulatively considerable impact**.

NOISE

Contribution to Cumulative Noise Levels

Impact 4.8.5 Long-term operation of the proposed Project would not result in a substantial contribution to cumulative noise levels. Therefore, cumulative noise impacts would be considered **less than cumulatively considerable**.

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AGRICULTURAL RESOURCES

Cumulative Agricultural Resources Impacts

Impact 4.9.3 Implementation of the proposed Project would incrementally add to the temporary conversion of agricultural land in Imperial County. Temporary impacts to agricultural resources are mitigated on a project-by-project basis through payment of in-lieu fees, conservation easements and/or execution of a Public Benefit Agreement. Therefore, temporary impacts to agricultural resources are considered **less than cumulatively considerable**.

HAZARDOUS AND HAZARDOUS MATERIALS

Cumulative Hazards and Hazardous Materials Impact

Impact 4.10.3 The proposed Project, in combination with other reasonably foreseeable projects in the vicinity of the Project area, would increase the density of development in the area, thus potentially increasing the potential for the presence hazards and use of hazardous materials. However, this is considered to be a **less than cumulatively considerable impact**.

HYDROLOGY AND WATER QUALITY

Impact 4.11.6 The proposed Project, in combination with large scale proposed, approved and reasonably foreseeable renewable energy projects in the Salton Sea watershed would contribute to the cumulative effects of changes in runoff patterns ultimately discharging to the Salton Sea, degradation of water quality, and reduction of groundwater supply. This impact is considered **less than cumulatively considerable**.

BIOLOGICAL RESOURCES

Impact 4.12.16 Implementation of the proposed Project could have cumulative impacts on special status species, sensitive natural communities, and protected waters. However, mitigation measures are proposed to help ensure that the proposed Project does not cumulatively affect any of these biological resources. Therefore, cumulative impacts are considered **less than cumulatively considerable**.

PUBLIC SERVICES AND UTILITIES

Fire Protection

Cumulative Impacts to ICFD Services

Impact 4.13.2 Development of the proposed Project, in combination with large scale proposed, approved and reasonably foreseeable renewable energy projects in the ICFD service area, would increase demand for fire protection. However, each individual project would be required to incorporate fire safety features and worker safety protocols in compliance with all applicable fire and occupational safety standards and codes. Therefore, cumulative impacts to ICFD services are considered **less than cumulatively considerable**.

Law Enforcement

Cumulative Impacts to ICSO Services

Impact 4.13.4 Development of the proposed Project, in combination other large scale proposed, approved and reasonably foreseeable renewable energy projects in Imperial County would result in an increased cumulative demand for law enforcement and strain current industry-standard service levels. Therefore, the proposed Project in combination with other cumulative projects would result in a **cumulatively considerable impact** ICSO services.

Water Service

Cumulative Groundwater Supply Impacts

Impact 4.13.7 Development of the proposed Project would result in a reduced demand for groundwater from the Ocotillo-Clark Valley Groundwater Basin compared to historical demand. The WSA prepared for the proposed Project demonstrates that there is adequate groundwater to serve Project development over the next 20 years. No other projects were identified within the cumulative setting to affect groundwater supply. Therefore, cumulative groundwater supply impacts are considered **less than cumulatively considerable**.

Cumulative Water Distribution and Storage Impacts

Impact 4.13.8 The proposed Project would result in an increased demand for on-site water distribution and storage. No municipal water infrastructure is available on or in the vicinity of the Project area. The Project includes construction of the needed water distribution and storage facilities. Therefore, cumulative impacts to water distribution and storage are considered **less than cumulatively considerable**.

Wastewater Services

Cumulative Wastewater Treatment and Conveyance Infrastructure

Impact 4.13.10 The proposed Project would generate demand for on-site wastewater treatment and disposal. No municipal wastewater infrastructure is available on or in the vicinity of the Project area. An on-site sanitary waste septic system is proposed for each of the five developed solar project lots that would use either leach fields or an underground tank for storage tank to hold wastewater. Therefore, cumulative impacts to wastewater treatment and conveyance infrastructure are considered **less than cumulatively considerable**.

Solid Waste

Cumulative Impacts to Solid Waste Service and Landfill Capacity

Impact 4.13.12 Implementation of the proposed Project, in combination with other large scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial, would result in cumulative demand for solid waste service and landfill capacity. However, the proposed Project would not generate a substantial quantity of waste, pick-up service is available to serve the Project and sufficient landfill capacity is available. Therefore, cumulative impacts to solid waste service and landfill capacity are considered **less than cumulatively considerable impact**.

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Electricity

Cumulative Impacts to Electric Service

Impact 4.13.14 Implementation of the proposed Project, in combination with other large scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial, would result in a minimal increase in the current use of IID electricity and a substantial increase in solar energy generation. Therefore, cumulative impacts to electrical service are considered **less than cumulatively considerable**.

Telephone/Internet

Impact 4.13.16 Implementation of the proposed Project, in combination with other large scale proposed, approved and reasonably foreseeable renewable energy projects in the County of Imperial, would not result in cumulative demands to telephone and internet service. Telecommunication service providers provide service to individual development projects on an as-needed basis. Therefore, cumulative impacts to telephone and internet services are considered **less than cumulatively considerable**.