

# **CHAPTER 5.0**

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## **CUMULATIVE IMPACTS SUMMARY**

## 5.0 CUMULATIVE IMPACTS SUMMARY

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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 approved, proposed and reasonably foreseeable 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, 4.12.4 and 4.13.4.1 thru 4.13.4.7. 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, potentially 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 and Light and Glare Impacts

**Impact 4.1.4** The incremental effect of implementation of the proposed Project in conjunction with proposed, approved and reasonably foreseeable Projects in the vicinity of the Project area would not significantly alter the overall character of the Project area, which already consists of a pattern of agricultural fields and solar generation fields. There are not a large number of residents in the area and the agricultural land is not considered a significant visual resource nor are there any scenic resources or substantial sources of light and glare in the Project area. Therefore, cumulative impacts to visual resources, light and glare are considered **less than cumulatively considerable**.

Development of the proposed Project in combination with proposed, approved and reasonably foreseeable 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 overall consistent with the applicable plans policies and regulations. Thus, impacts associated with conflicts with applicable land use plans, policies and regulations 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 proposed, approved and reasonably foreseeable 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 overall consistent with the applicable plans policies and regulations. Thus, impacts associated with conflicts with applicable land use plans, policies and regulations are considered **less than cumulatively considerable**.

##### Cumulative Land Use Compatibility/Conflict Impacts

**Impact 4.2.3** Development of the proposed project in combination with approved, proposed and reasonably foreseeable projects in the region would change the land use patterns, present potential land use conflicts, and result in conversion of agricultural lands to a solar facility. This impact is considered **less than cumulatively considerable**.

## 5.0 CUMULATIVE IMPACT ANALYSIS

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### TRANSPORTATION AND CIRCULATION

#### **Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS - Existing (Year 2013) With Project Construction With Cumulative Conditions**

**Impact 4.3.7** Implementation of the proposed Project would contribute construction traffic to Project study area intersections, roadway and freeway segments under (Year 2013) With Project Construction With Cumulative Conditions. However, none of the intersections or segments would exceed LOS C or V/C ratios under this scenario. Therefore, cumulative impacts to study area intersections, roadway segments and freeway segments under (Year 2013) With Project Construction With Cumulative Conditions are considered **less than cumulatively considerable**.

#### **Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS (Near-Term (Year 2016) With Project Construction With Cumulative Conditions)**

**Impact 4.3.8** Implementation of the proposed Project would contribute construction traffic to Project study area intersections, roadway segments and freeway segments under Near-Term (Year 2016) With Project Construction With Cumulative Conditions. However, none of the intersections or segments would exceed LOS C or V/C ratios under this scenario. Therefore, cumulative impacts to Project study area intersections, roadway segments and freeway segments under Near-Term (Year 2016) With Project Construction With Cumulative Conditions are considered **less than cumulatively considerable**.

#### **Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS - Mid-Term (Year 2019) With Project Construction With Cumulative Conditions**

**Impact 4.3.9** Implementation of the proposed Project would contribute construction traffic to Project study area intersections, roadway segment and freeway segments under Mid-Term (Year 2019) With Project Construction With Cumulative Conditions. However, none of the intersections or segments would exceed LOS C or V/C ratios under this scenario. Therefore, cumulative impacts to Project study area intersection, roadway segments and freeway segments under Mid-Term (Year 2019) With Project Construction With Cumulative Conditions are considered **less than cumulatively considerable**.

#### **Cumulative Impacts to Intersection, Roadway and Freeway Segment LOS - Long-Term (Year 2024) With Project Construction With Cumulative Conditions**

**Impact 4.3.10** Implementation of the proposed Project would contribute construction traffic to Project study area intersections, roadway segments and freeway segments under Long-Term (Year 2024) With Project Construction With Cumulative Conditions. However, none of the intersections or segments would exceed LOS C or V/C ratios under this scenario. Therefore, cumulative impacts to Project study area intersections, roadway segments and freeway segments under Long-Term (Year 2024) With Project Construction With Cumulative Conditions are considered **less than cumulatively considerable**.

#### **Cumulative Increase Hazards Due to a Design Feature**

**Impact 4.3.11** Implementation of the proposed Project would not require improvements or modifications to any Project study area roadways. Therefore cumulative increases in hazards due to a design feature are considered **less than cumulatively considerable**.

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### Cumulative Increases in Hazards Due to a Design Feature – Damage to County-Maintained Roadways During Project Construction

**Impact 4.3.12** Construction of the proposed Project, in combination with other cumulative projects using Project study area roadways, will require movement of heavy duty equipment and large vehicles on County roadways not designed to accommodate high volumes of overweight trucks and loads. The high volume of trips in combination with the weight of construction vehicles would deteriorate the surface of Project study area roadways. This is considered a **cumulatively considerable impact**.

### AIR QUALITY

#### Cumulative Violation of Air Quality Standard/Cause Air Quality Violation

**Impact 4.4.4** The proposed Project, in combination with other proposed, approved and reasonably foreseeable cumulative projects, would generate criteria pollutant emissions during construction. However, emissions of criteria pollutants would be reduced below significance thresholds on a project-by-project basis through compliance with recommended and required mitigation measures. Therefore, the Project's cumulative contribution to a violation of an air quality standard is considered a **less than cumulatively considerable**.

### CLIMATE CHANGE AND GREENHOUSE GASES

#### Generation of GHG Emissions

**Impact 4.5.1** Construction, operation and decommissioning of the proposed Project would generate GHG emissions. Neither the County nor any other agency with jurisdiction over the proposed Project has adopted GHG emissions thresholds. The Project would also not exceed GHG emissions thresholds adopted by the nearby SCAQMD where related thresholds have been adopted. Thus, Project GHG emissions are considered **less than significant**.

#### Conflict with an Applicable Plan, Policy, or Regulation Adopted to Reduce GHG Emissions

**Impact 4.5.2** The Full Build-out Scenario or Phased CUP Scenario would not conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions. Neither the County nor any other agency with jurisdiction over the proposed Project has adopted GCC or GHG reduction measures. As such, the proposed Project would not conflict with any applicable plan, policy, or regulation for the purpose of reducing GHG emissions. Therefore, **no impact** would occur.

### GEOLOGY AND SOILS

#### Cumulative Exposure to Geologic and Seismic Impacts

**Impact 4.6.9** Implementation of the proposed Project, in combination with proposed, approved and reasonably foreseeable projects, may result in cumulative exposure to geologic and seismic hazards. However, geologic and seismic hazards are analyzed and mitigated on a project-by-project basis. Therefore, cumulative exposure to geologic and seismic impacts is considered **less than cumulatively considerable**.

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### CULTURAL RESOURCES

#### Cumulative impacts to Archaeological and Historic Resources

**Impact 4.7.5** Implementation of the proposed Project, in combination with proposed, approved, and reasonably foreseeable projects in the cumulative setting, has the potential to result in impacts to archaeological and historic resources. However, archeological and historical impacts are addressed on a project-by-project basis through the CEQA process. Therefore, this is considered a **less than cumulatively considerable impact**.

#### Cumulative Impacts to Paleontological Resources

**Impact 4.7.6** Implementation of the proposed Project in combination with proposed, approved, proposed, and reasonably foreseeable development in the cumulative setting, has the potential to result in impacts to paleontological resources including fossil remains and fossil bearing geological formations. However, such impacts are addressed on a project-by-project basis through the CEQA process. Therefore, impacts to paleontological resources are considered **less than cumulatively considerable**.

### NOISE

#### Cumulative Noise Increases

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

### AGRICULTURAL RESOURCES

#### Cumulative Agricultural Resources Impacts

**Impact 4.9.4** Implementation of the Full Build-out Scenario as well as each individual CUP (13-0036 thru 13-0052) 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 Public Benefit Agreements. 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 solar field site parcels, would increase the density of development in the area, thereby potentially increasing the potential for the presence hazards and use of hazardous materials. However, are addressed on a case-by-case basis through federal and state hazardous materials laws, regulations, and policies. Therefore, cumulative hazards and hazardous materials impacts are considered **less than cumulatively considerable**.

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### HYDROLOGY AND WATER QUALITY

#### Cumulative Water Quality, Quantity and Runoff Impacts

**Impact 4.11.6** With the implementation of legally required SWRCB, RWQCB, and County policies, plans and ordinances governing land use activities that may degrade or contribute to the violation of water quality standards, the proposed Project, in combination with approved, proposed and other reasonably foreseeable projects in the Salton Sea watershed would not contribute to the cumulative effects of degradation of water quality, but would result in changes in water quantity runoff patterns ultimately discharging to the Salton Sea. This impact is considered **less than cumulatively considerable**.

### BIOLOGICAL RESOURCES

#### Cumulative Impacts to Biological Resources

**Impact 4.12.16** Implementation of the proposed Project in combination with other proposed, approved and reasonably foreseeable projects could have cumulative impacts on special status species, sensitive vegetation communities, and jurisdictional waters. However, impacts to biological resources are addressed and mitigated on a project-by-project basis. Therefore, cumulative impacts to biological resources are considered **less than cumulatively considerable**.

### PUBLIC SERVICES AND UTILITIES

#### Cumulative Impacts to ICFD Fire Protection and Emergency Response

**Impact 4.13.3** Development of the proposed Project, in combination with proposed, approved and reasonably foreseeable projects in the ICFD service area, would increase demand for fire protection and emergency medical response. However, each individual project would be required to incorporate fire safety features, adequate access, and worker safety protocols in compliance with all applicable fire and occupational safety standards and codes. The projects will not cause ICFD to expand its public facilities. Therefore, cumulative impacts to fire protection and emergency response are considered **less than cumulatively considerable**.

#### Cumulative Law Enforcement Impacts

**Impact 4.13.5** Development of the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects in Imperial County would result in an increased cumulative demand for law enforcement. However, cumulative projects would not cause the Sheriff to expand its public facilities. Therefore, impacts to law enforcement services are **less than cumulatively considerable** for both the Full Build-out Scenario each individual CUP (13-0036 thru 13-0052) proposed as part of the Phased CUP Scenario.

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### Cumulative Water Supply Impacts

**Impact 4.13.9** Development of the proposed Project would require use of surface water from the IID canal system. Requests for water supply are approved by the IID on a project-by-project basis. The proposed Project would require less water than current agricultural uses on the solar field site parcels. Therefore, the Project's contribution to cumulative water supply impacts is considered **less than cumulatively considerable**.

### Cumulative Wastewater Impacts

**Impact 4.13.11** Development of the proposed Project would generate demand for on-site wastewater treatment. An OWTS is proposed where necessary at individual CUPs to provide wastewater service. Therefore, cumulative wastewater impacts are considered **less than cumulatively considerable**.

### Cumulative Impacts to Solid Waste Service and Landfill Capacity

**Impact 4.13.13** Implementation of the proposed Project, in combination with other proposed, approved and reasonably foreseeable 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 and disposal service is available to serve the Project. Therefore, cumulative solid waste impacts are considered **less than cumulatively considerable impact**.

### Cumulative Impacts to Electric Service

**Impact 4.13.15** Implementation of the proposed Project, in combination with proposed, approved and reasonably foreseeable 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**.

### Cumulative Impacts to Telephone and Internet Services

**Impact 4.13.17** Implementation of the proposed Project, in combination with other existing, proposed, approved and reasonably foreseeable development, would result in cumulative demands to telephone and internet service. Telecommunication service providers procure service to individual development projects on an as-needed basis. Therefore, cumulative impacts to telephone and internet services are considered **less than cumulatively considerable**.



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