

8.0 CUMULATIVE IMPACTS

8.1 INTRODUCTION

Section 15130 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) discuss cumulative impacts of a project when the project's incremental effect is potentially cumulatively considerable. As defined by the CEQA Guidelines, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. To facilitate the discussion of potentially cumulative impacts that could result from implementation of the proposed project, each impact category evaluated in Section 5.0 (Existing Conditions, Impacts, Mitigation Measures and Level of Significance After Mitigation) is addressed individually in this cumulative impacts analysis.

A simple comparison of the cumulative environment contrasted with the increment of impact on its face is not an adequate rationale for concluding that a project does not have a cumulative effect. This is known as the ratio theory approach. Neither is the one molecule rule of change or addition an appropriate standard, where any increment, no matter how small, would be considered cumulatively significant. The most current interpretation of the standard is whether "any additional amount of effect should be considered significant in the context of the existing cumulative effect" (*Communities For A Better Environment v. California Resources Agency*, 126 Cal. Rptr. 2d. 441, [2002]). The same case states further:

“[T]his does not mean, however, that *any* additional effect in a nonattainment area for that effect *necessarily* creates a significant cumulative impact; the ‘one [additional] molecule rule’ is not the law. ...[T]he lead agency shall consider whether the cumulative impact is significant and whether the proposed project's incremental effects are cumulatively considerable.”

The objective of cumulative impact analysis is to look at trends with regard to each environmental parameter and ensure that past, present, and future projects in an area are aggregated to examine impacts in a big picture contextual approach. In the context of the proposed project, there are conditions that must be considered in the local and, depending on the parameter, regional contexts of the proposed project.

The cumulative impacts analysis provided here is consistent with the process contemplated by Section 15130(a) of the CEQA Guidelines in which the analysis of cumulative effects in an EIR is based on the following: Is the combined impact of this project and other projects significant? The cumulative impact must be analyzed only if the combined impact is significant and the project's incremental effect is found to be cumulatively considerable (CEQA Guidelines 15130[a][2] and [3]). When an EIR determines that a cumulative impact is not significant, or that the project's incremental effect is not cumulatively considerable, the EIR should briefly describe the basis for that determination (CEQA Guidelines 15130[a][2] and [3]).

8.2 CUMULATIVE PROJECTS

In conducting a cumulative impacts analysis, the proper frame of reference is the temporal span and spatial areas in which the proposed project would cause impacts. In addition, a discussion of cumulative impacts must include either:

- A list of past, present, and probable future projects, including, if necessary, those outside the lead agency's control; or

- A summary of projections contained in an adopted general plan or related planning document, or in a previously certified Environmental Impact Report, which described or evaluated regional or area-wide conditions contributing to the cumulative impact, provided that such documents are referenced and made available for public inspection at a specified location (Section 15130[b][1])

The term “probable future projects” includes: approved projects that have not yet been constructed; projects that are currently under construction; projects requiring an agency approval for an application that has been received at the time a Notice of Preparation is released; and projects that have been budgeted, planned, or included as a later phase of a previously approved project (Section 15130[b][1][B][2]). Projects meeting these criteria within the vicinity of the proposed project are listed in Table 8-1. This table also provides the location, a brief description, and status of each of these projects.

**TABLE 8-1
SUMMARY OF CUMULATIVE PROJECTS IN THE VICINITY OF THE PROPOSED PROJECT**

PROJECT NAME AND/OR CASE NUMBER	PROJECT LOCATION	DESCRIPTION	STATUS
City of Yorba Linda			
Old Canal Road Annex – Savi Ranch	Old Canal Road and Eastpark Drive (APN 352-117-13)	This project is a multi-family rezone that allows for the development of 84 residential units.	Planned.
Mitsubishi Motors Site - Savi Ranch	Oakcrest Circle and Eastpark Drive	This project is a multi-family rezone that allows for the development of 96 residential units.	Planned.
City of Anaheim			
Mountain Park Specific Plan	Located generally in Gypsum Canyon, south of the State Route (SR) 91, and east and west of the Eastern Transportation Corridor (SR-241)	This project allows for the development of up to 2,500 new homes, a city fire station, an elementary school site and adjacent public community park, a trail staging area, and public and private recreational facilities, including public riding and hiking trails. This project will preserve approximately 2,163 acres of the site as permanent open space.	Approved and on hold.

**TABLE 8-1
SUMMARY OF CUMULATIVE PROJECTS IN THE VICINITY OF THE PROPOSED PROJECT**

PROJECT NAME AND/OR CASE NUMBER	PROJECT LOCATION	DESCRIPTION	STATUS
City of Corona			
Green River Road Widening: SR-91 to Palisades (48-1106)	Green River Road from Palisades Drive to SR-91	This project includes widening Green River Road from 4 to 6 lanes from Palisades to SR-91. Improvements will include a new storm drain, sewer and water lines, a new traffic signal at Palisades Drive and a traffic signal modification at Dominguez Ranch Road.	Construction is anticipated to start in January 2015.
Riverside County Transportation Commission (RCTC)			
SR-91 Project	SR-91 from the Orange County/Riverside County line to Interstate 15 (I-15)	This project consists of the following: (1) extending the tolled express lanes on SR-91 between the Orange County/Riverside County line and I-15.; (2) adding one regular lane between SR-71 and I-15; (3) adding one regular lane from the I-15/SR-91 Interchange to Pierce Street; and improving five local interchanges and the I-15/SR-91 Interchange.	Under construction and anticipated to be completed in 2017.
Orange County Water District (OCWD)			
Orange County Water District Prado Basin Sediment Management Project	Prado Basin in western Riverside County.	This project will remove between 250,000 and 500,000 cubic yards of materials from the Prado Basin and re-entrain it into the lower Santa Ana River (SAR).	Recirculated EIR released in September 2014 for public review.
Orange County Water District La Palma Recharge Basin Project	3199 La Palma Avenue, Anaheim, CA	This project includes the construction and operation of a 14-acre groundwater recharge basin.	Initial Study/Notice of Preparation released in May 2014 for public review.

**TABLE 8-1
SUMMARY OF CUMULATIVE PROJECTS IN THE VICINITY OF THE PROPOSED PROJECT**

PROJECT NAME AND/OR CASE NUMBER	PROJECT LOCATION	DESCRIPTION	STATUS
United States Army Corps of Engineers (ACOE)			
SAR Main Stream Improvements – Lower SAR Reach 9, Phase 5A	The north bank of the SAR channel along La Palma Avenue (from 22290 La Palma Avenue to approx. 1,675 feet southeasterly of Via Lomas De Yorba West)	The SAR bank improvements consist of about 1,000 feet of grouted stone and about 3,000 feet sheet pile. The grouted stone and sheet pile will extend below the channel’s design scour depth.	Contract has been awarded and construction is anticipated to start in late 2015 and be completed in approximately 18 months.
SAR Main Stream Improvements – Lower SAR Reach 9, Phase 4	The south bank of the SAR channel between Gypsum Canyon and Coal Canyon Road.	The SAR bank improvements consist of about 3,150 feet of soil cement embankment.	The design has been completed and project is currently being advertised for construction.
SAR Main Stream Improvements – Lower SAR Reach 9, Phase 5B	The north bank of the SAR channel between Reach 9, Phase 5A and the Green River Golf Club	Embankment protection	This project is currently in the design stage.

Source: AECOM (2014), City of Anaheim Planning Services Division (2014), City of Corona Public Works Department (2014), City of Yorba Linda (2013 and 2014c), RCTC (2014), OCWD (2014b), and OCPW (2014a and 2014b).

8.3 CUMULATIVE IMPACTS ANALYSIS

This Draft EIR includes mitigation measures designed to minimize or avoid the proposed project’s contribution to any significant cumulative effects to the extent feasible. The mitigation measures provided in Section 5.0 of this Draft EIR have been developed to maximize either avoidance of, or minimization to, significant impacts, thereby addressing the proposed project’s incremental effect or contribution. The proposed project’s contribution as defined in this section includes the remaining impact for each environmental parameter after mitigation is considered.

8.3.1 CUMULATIVE IMPACTS RELATED TO AGRICULTURE RESOURCES

As described in Section 5.1 (Agriculture Resources), the project area contains 14.19 acres of Prime Farmland, 3.41 acres of Unique Farmland, and 1.15 acres of Farmland of Statewide Importance, which are mapped pursuant to the Farmland Monitoring and Mapping Program (FMMP). Implementation of the proposed project would provide new trails and bikeways on the north and south banks of the SAR, three non-vehicular bridges, and other associated amenities. One of the non-vehicular bridges (Bridge #1) would be constructed on, and would bisect, existing Prime Farmland. The proposed project would result in approximately 0.22 acre of temporary impacts (i.e., disturbance associated with construction staging/laydown, access, and work area) and 0.13 acre of permanent impacts (i.e., permanent loss) to Prime Farmland; and approximately 0.76 acre of temporary impacts and 0.57 acre of permanent impacts to other active farmland. It is anticipated the farmland that is temporarily affected during construction would continue to be available for agricultural use following construction of the proposed project.

The California LESA model prepared for the proposed project found this impact to Prime Farmland to be less than significant. The cumulative projects identified above in Table 8-1 (which are located within

the vicinity of the proposed project) would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (per CEQA) to non-agricultural use, as shown in Table 8-2, below. Therefore, the proposed project would not contribute to a cumulative impact related to the loss of agricultural land.

**TABLE 8-2
SUMMARY OF INDIVIDUAL AND CUMULATIVE PERMANENT AGRICULTURAL
IMPACTS TO PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF
STATEWIDE IMPORTANCE**

PROJECT NAME AND/OR CASE NUMBER	PERMANENT AGRICULTURAL IMPACTS
Proposed Project	0.13
Old Canal Road Annex – Savi Ranch	0 ^[A]
Mitsubishi Motors Site - Savi Ranch	0 ^[A]
Mountain Park Specific Plan	0 ^[B]
Green River Road Widening: SR-91 to Palisades (48-1106)	0 ^[C]
SR-91 Project	0 ^[D]
Orange County Water District Prado Basin Sediment Management Project	0 ^[E]
Orange County Water District La Palma Recharge Basin Project	0 ^[F]
SAR Main Stream Improvements – Lower SAR Reach 9, Phase 4	0 ^[G]
SAR Main Stream Improvements – Lower SAR Reach 9, Phase 5A	0 ^[G]
SAR Main Stream Improvements – Lower SAR Reach 9, Phase 5B	0 ^[G]
Total Cumulative Permanent Agricultural Impacts	0.13

Source: AECOM (2015), City of Anaheim Planning Services Division (2015), City of Yorba Linda (2010), LSA (2010), OCWD (2013), OCWD (2014a), and RCTC (2015).

Notes:

- ^[A] The Old Canal Road Annex and Mitsubishi Motors Site within Savi Ranch were identified in the City of Yorba Linda’s 2008-2014 Housing Element and Implementation Program for rezoning to multi-family. These two sites are currently zoned as Planned Development (PD)/Support Commercial and their current use is vacant land. There is no agriculture land on these sites. Refer to Table 1, Sites for Potential Rezoning to Multi-Family at 10, 20, and 30 Units, on page 2-7 of the Initial Study completed for the City of Yorba Linda’s 2008-2014 Housing Element and Implementation Program.
- ^[B] The Initial Study for the Mountain Park Specific Plan indicated that this project would result in no impact to agricultural resources. See page 19 of the Initial Study, provided in Appendix A of the Mountain Park Specific Plan Draft EIR.
- ^[C] The Initial Study/Mitigated Negative Declaration completed for the Green River Road Widening Project indicated that this project would result in no impact to agricultural resources. See pages 42-43 of this Initial Study/Mitigated Negative Declaration.
- ^[D] The Final EIR/Environmental Impact Statement (EIS) for the SR-91 Corridor Improvement Project indicated that the project (for both Alternatives 1 and 2) would result in no impact to Prime Farmland, Farmland of Statewide Importance, or Unique Farmland in accordance with CEQA.
- ^[E] The Initial Study for the Orange County Water District Prado Basin Sediment Management Project indicated that this project would result in no impact to agricultural resources. See page 4-2 of this Initial Study.
- ^[F] The Initial Study for the Orange County Water District La Palma Recharge Basin Project indicated that this project would result in no impact to agricultural resources. See pages 4-2 and 4-3 of this Initial Study.
- ^[G] The “minor encroachment” (0.14 acre) mentioned in the SEA/EIR addendum for Reach 9 (Phase 4, 5A, 5B, and BNSF) refers to impacts to vegetation communities (e.g. riparian habitat) if present over the buried toe of the proposed embankment for Phase 5B. The affected area only contains agricultural areas and will be backfilled with previously excavated material. This would not result in permanent conversion of farmland to non-agricultural use; thus, there is no permanent impact to agricultural resources.

8.3.2 CUMULATIVE IMPACTS RELATED TO AIR QUALITY

As discussed in Section 5.2 (Air Quality), the South Coast Air Quality Management District (SCAQMD) regional analysis focuses on whether a specific project would result in cumulatively considerable increase in emissions. By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development within the South Coast Air Basin (Basin), and this regional impact is cumulative rather than being attributable to any one source. The SCAQMD thresholds of significance are relevant to whether a project's individual emissions would result in a cumulatively considerable incremental contribution to the existing cumulative air quality conditions. If a project's emissions would be less than those threshold levels, the project would not be expected to result in a considerable incremental contribution to the significant cumulative impact.

Because the proposed project would exceed the SCAQMD project-level air quality significance thresholds for NO_x, PM₁₀, and PM_{2.5} emissions, the proposed project's construction emissions would have a cumulatively considerable contribution to the region's air quality. Therefore, the cumulative impact would be significant. However, with implementation of mitigation measure AQ-1, the mitigated NO_x emissions would not exceed the SCAQMD threshold of significance and impacts for NO_x would be reduced to a less than significant level. Although implementation of the SCAQMD Rule 403 for fugitive dust would reduce PM₁₀ and PM_{2.5} emissions during construction, localized PM₁₀ and PM_{2.5} impacts would not be reduced to a less than significant level. There are no additional feasible mitigation measures to reduce localized PM₁₀ and PM_{2.5} emissions. Therefore, the proposed project would result in a cumulatively considerable net increase of PM₁₀ and PM_{2.5}.

8.3.3 CUMULATIVE IMPACTS RELATED TO BIOLOGICAL RESOURCES

As discussed in Section 5.3 (Biological Resources), the proposed project could result in a potentially significant impact during construction to Santa Ana River woolly star, California gnatcatcher, Santa Ana sucker, least Bell's vireo, nesting birds, sensitive natural communities, and federally protected wetlands. However, implementation of mitigation measures BR-1 through BR-13 would reduce potentially significant impacts related to biological resources to below a level of significance. Minimization Measures BR-14 and BR-15 would further reduce impacts through avoidance and minimization of impacts. It should be noted that potential impacts to the federally-endangered Santa Ana River woollystar and least Bell's vireo and to the federally-threatened California gnatcatcher and Santa Ana sucker, would be further evaluated through specific biological surveys for these species in accordance with current California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) survey protocols. Should any of these surveys result in findings that a potentially significant impact could occur, the County would be required to comply with Section 7 of the Endangered Species Act and enter into associated agency consultation. Consultation with the appropriate agency would identify appropriate mitigation to implement in such cases, which would be developed in the context of cumulative impacts to these species due to the nature of their conservation status.

It should also be noted that the ACOE cumulative projects identified in Table 8-1 (i.e., SAR Mainstream Improvements) would be constructed within the same project area of the proposed project, which could result in similar or overlapping impacts to biological resources. However, as mentioned in Section 5.3, in order for project-related impacts to remain as expected, and not increase due to potential conflicts with installation of future habitat mitigation (of other parties' projects), the County has agreed to coordinate with other agencies/contractors working within the project area so that complex, high quality riparian or upland mitigation for other projects' impacts will not be constructed within the proposed route for the SAR Parkway trails. Close coordination among these parties, in combination with the implementation of mitigation measures and general avoidance and minimization practices identified in Section 5.3, would

ensure impacts to biological resources are less than significant. Therefore, the proposed project would not result in a cumulative adverse impact related to biological resources.

8.3.4 CUMULATIVE IMPACTS RELATED TO CULTURAL RESOURCES

As discussed in Section 5.4 (Cultural Resources), implementation of the proposed project would result in a significant adverse impact on the environment if it would cause a substantial adverse change in the significance of an archaeological resource or destroy a unique paleontological resource. Construction associated with development of the proposed project has the potential to result in a significant adverse impact on any unknown buried archaeological or paleontological resource which might exist on the project site. However, with implementation of mitigation measures C-1 through C-5, impacts to archaeological and paleontological resources would be reduced to below a level of significance.

Implementation of the projects contained in Table 8-1 combined, have the potential to also impact previously unidentified (not visible on the surface) paleontological and/or archaeological resources regionally. However, since these projects would be required to mitigate any impacts to cultural resources to a level that is less than significant, such impacts are not cumulatively considerable.

8.3.5 CUMULATIVE IMPACTS RELATED TO GEOLOGY AND SOILS

As discussed in Section 5.5 (Geology and Soils), the proposed project has the potential to result in significant impacts related to seismic shaking, seismic-related ground failure, seismically-induced settlement, liquefaction, lateral spreading, and expansive soils. However, with implementation of mitigation measure G-1 and compliance with California Building Code (CBC) regulations and County of Orange grading requirements, impacts would be reduced to below a level of significance.

Geotechnical impacts are considered site-specific; any cumulative development in the region would also be required to be constructed to withstand probable geology and soils-related impacts, and therefore, the identified cumulative projects in Table 8-1 would similarly have to comply with current building code regulations and County requirements. Therefore, implementation of the proposed project would not result in a substantial incremental impact to geology and soils and would not result in a significant cumulative adverse impact.

8.3.6 CUMULATIVE IMPACTS RELATED TO GREENHOUSE GAS EMISSIONS

Because no single project is large enough to result in a measurable increase in global concentrations of greenhouse gas (GHG) emissions, climate change impacts of a project are considered on a cumulative basis. The analysis presented in Section 5.6 (Greenhouse Gas Emissions) is also applicable to the cumulative analysis. As discussed in Section 5.6, the proposed project would not generate significant GHG emissions and would be consistent with applicable GHG reduction plans. Therefore, the proposed project would not contribute to a cumulatively considerable GHG impact.

8.3.7 CUMULATIVE IMPACTS RELATED TO HAZARDS AND HAZARDOUS MATERIALS

As discussed in Section 5.7 (Hazards and Hazardous Materials), construction and operation of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of existing on-site hazardous materials into the environment. The minimal amount of hazardous materials would be used during construction (e.g., petroleum-based products, paints, solvents, sealers, etc.), which would be subject to

compliance with a number of spill prevention, containment, and cleanup measures identified within permits issued by the Regional Water Quality Control Board (RWQCB), such as the National Pollutant Discharge Elimination System (NPDES) permits. Best Management Practices (BMPs) specified in the NPDES permits include storm water prevention measures included in a Storm Water Pollution Prevention Plan (SWPPP), and protocols for the procedures for the storage, usage, and disposal of hazardous materials. Adherence to the BMPs would be required for all phases of construction. Compliance with the SWPPP and the implementation of standard BMPs during construction would reduce the potential for hazardous materials spills. The proposed project would thus not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. In addition, although the regulatory database search identified hazardous material sites within 1 mile of the project area, these identified sites have either been granted closure from regulatory agencies, are known active underground storage tanks that are not identified as leaking underground storage tanks, are hydraulically downgradient, or otherwise are listings having no indication of releasing hazardous materials. Furthermore, no disturbance of these sites would occur as a result of implementation of the proposed project. The cumulative projects identified in Table 8-1 would also be required to comply with city, county, state, and federal regulations related to transport, use, storage, and disposal of hazardous materials as well as any appropriate mitigation measures based on requirements established by their respective jurisdictions. Therefore, there are no anticipated significant cumulative impacts associated with hazards and hazardous materials.

8.3.8 CUMULATIVE IMPACTS RELATED TO HYDROLOGY AND WATER QUALITY

As discussed in Section 5.8 (Hydrology and Water Quality), proposed project grading activities could potentially result in sediment runoff into the SAR and ultimately, downstream receiving waters during runoff events, as well as from sediment tracking from construction truck trips leaving the project site. Additionally, construction of the trail and bridge amenities would involve use of concrete, asphalt, and other building materials that could contaminate storm water if not properly managed. Also, the proposed project would introduce new impervious surfaces to the project area, which would result in minor increases in storm water runoff. However, the proposed project would be required to adhere to the provisions of the Orange County Municipal Separate Storm Sewer System (MS4) Permit, the De Minimus Surface Water Discharge Permit, and the SWPPP as part of compliance with General Construction Permit (CGP) 2009-0009-DWQ, which would reduce impacts related to water quality, erosion, and siltation to a level that is less than significant. Also, the proposed project would adhere to the NPDES-related provisions to ensure impacts associated with alteration of the existing drainage pattern and 100-year flood hazard during construction and operation would be less than significant. However, operation of the proposed project would extend the Riding & Hiking Trail through the project area, which could introduce additional horses (and associated horse manure) into the project area. Additional horse manure would result in an increase in nitrates and bacteria which could potentially result in negative impacts to the quality of surface water runoff. Therefore, a potentially significant impact related to water quality could occur during operation of the proposed project. However, implementation of mitigation measure BR-13 and adherence with the requirements of the CGP and Orange County MS4 Permit would reduce impacts related to hydrology and water quality to a level that is less than significant.

As with the proposed project, cumulative projects in the region would be developed in compliance with existing regulations, and all local and regional plans regulating water quality, including NPDES permits. Therefore, cumulative impacts related to hydrology and water quality would be considered less than significant.

8.3.9 CUMULATIVE IMPACTS RELATED TO NOISE AND VIBRATION

As discussed in Section 5.8 (Noise and Vibration), implementation of the proposed project would not result in significant impacts related to noise or vibration. The proposed project would be compliant with the City of Yorba Linda Municipal Code Noise Ordinance and the County of Orange Noise Ordinance, which limits construction activities to the least noise-sensitive parts of the day and provide code exemptions to construction-related noise. Also, construction of the proposed project would not result in any vibration-related damage to structures in the vicinity of work areas. Noise and vibration mitigation measures are provided to further reduce construction noise and vibration resulting from the proposed project. In addition, operation of the proposed project would not result in a substantial change to the existing noise levels within the project area. Although the proposed project is anticipated to result in an increased number of parkway users and additional maintenance activities, the associated noise levels would be similar to existing conditions and the impact would be less than significant. Furthermore, cumulative projects in the region would be required to comply with the noise and vibration requirements of the jurisdiction where the cumulative project is located. Therefore, no significant cumulative noise and vibration impact would result from implementation of the proposed project.

8.3.10 CUMULATIVE IMPACTS RELATED TO RECREATION

As discussed in Section 5.10 (Recreation), the proposed project would not result in significant adverse impacts related to recreation. Construction-related impacts of the proposed project (e.g., a temporary increase in the use of nearby parks and recreational facilities in the vicinity of the project area from construction employees, temporary delays/interruptions of the existing Class I Bikeway within the project area due to construction activities, etc.) would be minimal and short-term. Operation of the proposed project is anticipated to result in an increased use of the SAR Parkway, and also potential increased use of nearby recreational facilities; however, the proposed project would be regularly maintained by the County of Orange to prevent physical deterioration. As discussed in Section 3.0 (Project Description), a maintenance plan would be adopted as part of the proposed project. Overall, implementation of the proposed project would result in a net increase in regional recreation resources and would not include additional land uses, such as residential units, that would place further demand on recreational resources. Therefore, implementation of the proposed project would not result in a cumulatively significant impact related to recreation. The cumulative projects identified in Table 8-1 (e.g., residential development projects) may result in increased demand for recreation resources; however, such projects would be required to coordinate with local jurisdictions to ensure compliance with regulations, plans, policies, and goals regarding recreation resources. Furthermore, as part of the environmental review process for such developments, local jurisdictions would continue to evaluate levels of service desired and the potential funding sources to meet expected demands, so as not to create a substantial demand for additional recreational resources. Therefore, implementation of the proposed project would not result in a cumulatively significant impact related to recreation.

8.3.11 CUMULATIVE IMPACTS RELATED TO TRANSPORTATION AND TRAFFIC

As stated in Section 5.11 (Transportation and Traffic), operation of the proposed project would result in a worst-case, maximum of approximately 52 trips at any given time because the proposed Staging Area would only accommodate 26 vehicles at one given time (i.e., 26 vehicles could leave the Staging Area parking while 26 vehicles access the Staging Area parking). This is a minimal amount of trips and is substantially less than the number of trips analyzed for construction (220 daily trips). As discussed in Section 5.11, all study area roadway segments would continue to operate at an acceptable level of service during construction of the proposed project. As such, the maximum 52 trips associated with operation of the proposed project would not be expected to result in any significant impacts to existing levels of

service, and due to the small number of trips, would not be cumulatively considerable. The projects listed in Table 8-1 have the potential to generate a substantial amount of additional trips, which could occur throughout the local and regional arterial network, at various times of the day and week. However, these types of projects would be required to account for cumulative growth through the use of regional traffic models and consideration for future traffic from other planned projects. Any identified impacts would be required to be mitigated accordingly. Therefore, no significant cumulative transportation and traffic impact would result from implementation of the proposed project.