

7.0 CUMULATIVE IMPACTS

7.1 DEFINITION OF CUMULATIVE IMPACTS

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. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR. 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) is addressed 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. Cal. Res. Agency* (2002) 103 Cal.App.4th 98). 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 East Area 1 Specific Plan, there are conditions that must be considered in the local and, depending on the parameter, regional contexts of the 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 two determinations: Is the combined impact of this project and other projects significant? Is the project's incremental effect cumulatively considerable? 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)).

7.2 CUMULATIVE PROJECTS

As discussed in the previous Section, one way to determine trends in an area for cumulative analysis is through an inventory of projects in the project study area which are in the process of being developed or which will be developed in the near future. The City of Santa Paula identified approximately 20 projects to be included in this cumulative analysis. Table 7-1 summarizes planned and proposed developments in the vicinity of the Specific Plan site at various stages of approval. Figure 7-1 depicts the locations of these developments.

**TABLE 7-1
PLANNED AND PROPOSED LAND USES IN THE VICINITY OF EAST AREA 1 SPECIFIC PLAN**

INDEX^[1]	NAME/PROJECT LOCATION	LAND USE	Acres (ac)/Dwelling Units (du)/1,000 square feet (ksf), acres (ac)
1	234 W. Harvard Blvd.	Multifamily Apartments Commercial	36 du. 2.7 ksf.
2	Santa Ana Street	Multifamily Apartments	15 du.
3	611 E. Harvard Blvd.	Multifamily Apartments Retail	28 du. 5.2 ksf.
4	622 E. Main Street	Multifamily Apartments	41 du.
5	Santa Ana Street	Multifamily Apartments	24 du.
6	840 N. 10 th Street	Single Family Units	75 du.
7	Grant Line	Single Family Units	9 du.
8	126-132 12 th Street	Multifamily Apartments	11 du.
9	Grant Line	Residential Lots	19 du.
10	1318 Richmond Road	Apartments	6 du.
11	928 W. Telegraph	Multifamily Condominiums Offices	24 du. 20 ksf.
12	NW Foothill/Peck Road	Single Family Units	74 du.
13	210 W. Santa Barbara	Multifamily Apartments Condominiums	81 du. 70 du.
14	109 S. Montebello Street	Condominiums and Hangers	34 du.
15	263 Dove Court	Industrial	38 ksf.
16	Santa Maria Street	General Light Industrial	13 ac.
17	12 th Street	General Light Industrial	84 ksf.
18	East Area II	General Light Industrial Shopping Center Offices Asphalt Plant	495 ksf. 355 ksf. 120 ksf. 18 ac.
19	Fagan Canyon	Single Family Units Multifamily Apartments Condominiums/Townhomes Retail	1,176 du. 179 du. 145 du. 25 ksf.
20	Adams Canyon	Residential Units Public land and recreation Public passive open space School site Resort hotel and golf course	495 du. 100 ac. 200 ac. 40 ac. undesignated ac.

Source: City of Santa Paula Planning Department, 2006.



Source: Fehr & Peers, Kaku Associates (2007).

Figure 7-1
Locations of Related Projects

7.3 CUMULATIVE IMPACTS ANALYSIS

7.3.1 CUMULATIVE IMPACTS RELATED TO LAND USE AND PLANNING

As noted in Table 7-1, a number of projects are planned within the City of Santa Paula and would be constructed within the timeframe of the East Area 1 project (i.e., 2020). Although the majority of these projects are comprised of smaller infill projects, a number of future projects would include major developments proposed within the City's identified Expansion Areas (e.g., East Area 2, Adams Canyon and Fagan Canyon). It is anticipated that infill projects located within and/or immediately adjacent to existing urban areas would largely be compatible with these uses. Many of these projects would be expected to be similar in scale, nature and use as existing and surrounding land uses. However, the Expansion Area projects (including East Area 1) would be expected to result in conflicts relating to the interface of existing urban and rural uses and new urban development and the proposed project would substantially contribute to this change. In addition, as noted in Section 4.1 (Land Use) of this EIR, these conflicts could include inconsistencies with the General Plan and Santa Paula Municipal Code related to inconsistencies related to land use density standards or Growth Management regulations and development outside of the City's existing Sphere of Influence. This cumulative impact would be significant and unavoidable.

7.3.2 CUMULATIVE IMPACTS RELATED TO AGRICULTURAL RESOURCES

Few agricultural lands currently exist within the City and are largely focused to the west and east in unincorporated Ventura County. The California Department of Conservation has designated many of these areas as containing Prime and/or Unique Farmland. These lands and the crops produced constitute an important component of the County's economy. However, with increased development pressures, many of these areas are being converted to urban land uses. The overall result has been a marked reduction in available agricultural lands. More importantly, this trend has also resulted in secondary impacts including land use conflicts (as discussed in Section 4.2 (Agricultural Resources) of this EIR), limitations on farming techniques and a rise in associated land and water costs. Although both the County of Ventura and City of Santa Paula General Plans acknowledge that conversion of agricultural lands will continue, the proposed project in association with other county-wide projects would contribute to this loss (despite the project's proposed preservation of 55 acres associated with the Agricultural Preserve). As such, implementation of the proposed project would contribute to an unavoidable adverse cumulative impact related to loss of agricultural resources.

7.3.3 CUMULATIVE IMPACTS RELATED TO MINERAL RESOURCES

Petroleum and aggregate are important non-renewable resources contained within Ventura County. Many of these resources are contained within designated extraction areas located throughout the County. The majority of these resources are located within the adjacent hillsides or streams and rivers. As noted in Section 4.3 (Mineral Resources) of this EIR, the project site does not contain these resources and would not preclude access to adjacent areas. A review of Figure 7-1 indicates that most of the infill projects would likely not preclude access to or extraction of these resources. However, development of the Expansion Areas for urban uses could preclude the access to or extraction of these resources, provided they exist on-site. Therefore, in the absence of mitigation cumulative impacts associated with mineral resources could be potentially significant.

7.3.4 CUMULATIVE IMPACTS RELATED TO TRANSPORTATION AND CIRCULATION

As discussed in Section 4.4 (Transportation and Circulation), the year 2020 future traffic projections were developed using the City's Transportation Model. The Transportation Model incorporates regional growth projections developed by SCAG and are reviewed by local agencies throughout the SCAG region. The City identified 20 cumulative projects (See Section 7.2) for inclusion in the Transportation Model. The traffic analysis with the cumulative projects and proposed project is presented in Section 4.4 (Transportation and Circulation).

As discussed in Section 4.4 (Transportation and Circulation), implementation of the proposed project and cumulative projects in the region would create a significant adverse traffic impact to 14 of the 40 intersections and one of the four freeway segments. However, implementation of mitigation measures T-1 through T-15 detailed in Section 4.4 (Transportation and Circulation) would reduce the significant adverse traffic impacts to below a level of significance. Therefore, no cumulatively considerable transportation and circulation impacts are anticipated as a result of the proposed project.

7.3.5 CUMULATIVE IMPACTS RELATED TO AIR QUALITY

The Ventura County Air Pollution Control District (VCAPCD) classifies cumulative impacts as direct and indirect project emissions. In the case of a subdivision project, a given project has a cumulative impact with all other subdivision projects, from the standpoint of each type of impact (cumulative construction emissions, residential natural gas consumption, solvent use, transportation emissions, congestion, etc.). Impacts of local pollutants (CO and TACs) are cumulatively significant when modeling shows that the combined emissions from the project and other existing and planned projects would exceed air quality standards. If a project related air quality impact is individually less than significant, the impacts of reasonably anticipated future activities, probable future projects, and past projects are included based on similar air quality impacts, transport considerations, and geographic location.

As most operational emissions are vehicular-related, this analysis analyzes the cumulative projects as listed within the *Traffic Impact Study*. Based upon data provided by the City of Santa Paula, the *Traffic Impact Study* analyzed 20 related projects, that are complete but not fully occupied, are currently under construction, or are presently only proposed but which could become operational within the same timeframe as the project. Thus, the cumulative build out assumptions utilized for the traffic analysis are consistent with this analysis.

Table 7-2 presents a summary of cumulative impacts based upon the City's list of related projects. As shown in the table below, the build out of the proposed project 1 would account for approximately 48 percent of ROG emissions, 38 percent of NO_x emissions, 43 percent of CO emissions, 55 percent of SO_x emissions, 48 percent of PM₁₀, and 33 percent of PM_{2.5}. Per the VCAPCD *Guidelines*, a project that is determined to be inconsistent with the AQMP is also determined to have a significant cumulative adverse air quality impact. Therefore, the proposed project's emissions would exceed standards, resulting in cumulative significant impacts. In addition, cumulative project would also exceed the VCAPCD standards.

**TABLE 7-2
CUMULATIVE OPERATIONAL EMISSIONS**

EMISSIONS SOURCE	EMISSIONS (LBS/DAY)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source Emissions						
Project Emissions	362	43	1,032	3	162	156
Cumulative Projects	246	36	95	<1	<1	<1
Mobile Source (VEHICLE) Emissions						
Project Emissions	187	277	2,002	1	229	44
Cumulative Projects	342	484	3,917	2	429	413
Total Project Emissions	549	320	3034	4	391	200
Total Cumulative Emissions	588	521	4013	3.31	429	414
Total	1137	840	7,046	7.31	820	614
Project percentage of Cumulative Emissions	48%	38%	43%	55%	48%	33%

1. Based on URBEMIS 2007 modeling results, worst-case seasonal emissions for area and mobile emissions.
2. Refer to Traffic Study (Future traffic Projections) for a complete listing of cumulative projects.

7.3.6 CUMULATIVE IMPACTS RELATED TO NOISE

Although the City of Santa Paula considers construction noise temporary and intermittent, future development within the project site would be required to follow the Santa Paula Municipal Code § 93.21 which generally requires construction to be restricted to the hours of 8:00 A.M. to 6:00 P.M., Monday through Friday. Since the proposed project would be constructed in phases over a period of 10-years, completed and occupied residential units, schools and assisted living facilities adjacent to areas under construction would experience significant adverse vibration impacts from demolition and construction activities. However, these impacts would be within the Specific Plan site and impacts to off-site sensitive receptors (within City jurisdiction) would be less than significant and would not contribute to cumulative impacts at more distant locales. In addition, cumulative projects under construction concurrently with the proposed project would also be required to comply with the applicable City and County Municipal Codes for noise. The proposed project would contribute to vehicular-generated noise along roadways near the Specific Plan site, as identified in Section 4.6 (Noise). A 3.2 dB(A) projected increase in ambient noise in the future-term (2020) would occur, representing a significant adverse impact. However, proposed mitigation measures N-6 and N-7 would reduce this impact to below a level of significance. It should be noted that all future cumulative projects, including the proposed Specific Plan, must take future noise levels into account when citing sensitive receptors and include appropriate mitigation for on- and off-site impacts. Existing ordinances and regulations for each jurisdiction proposing and approving a cumulative project would reduce project-specific on- and off-site impacts. Therefore, the proposed project would not contribute to cumulatively significant impacts related to noise.

7.3.7 CUMULATIVE IMPACTS RELATED TO BIOLOGICAL RESOURCES

Ventura County is biologically diverse and contains both common and sensitive plant and animal species. However, as noted in Section 4.7 (Biological Resources) of this EIR, the project site has limited resources to support biological resources due to its current agricultural use. Of the total on-site acreage (501 acres), some 415 acres are in agricultural production, while remaining areas are comprised of natural lands (sage scrub and chaparral, totaling approximately 80 acres) and urban uses. The infill projects noted in Table 7-1 would have limited impacts on common or sensitive plant or wildlife species since most species would avoid these areas or are considered habitat generalist and highly tolerate of urban uses. However,

implementation of the Expansion Areas which are located within non-urban areas and may contain intact and/or high quality habitat (which could support both common and sensitive plants and animals) has the potential to result in adverse and significant cumulative impacts. Similar impacts to jurisdictional drainage (including wetlands), wildlife corridors and native trees (if protected by ordinance) could also result.

7.3.8 CUMULATIVE IMPACTS RELATED TO GEOLOGY AND SOILS

Projects noted in Table 7-1 would be subject to a number of geological and/or seismic risks similar to other communities within Southern California. Given that these projects would be required to adhere to seismic and building safety standards contained in the California Building Code and would be required to be reviewed on a case-by-case basis, exposure of people or structures to potential substantial adverse cumulative impacts would be less than significant.

7.3.9 CUMULATIVE IMPACTS RELATED TO HYDROLOGY AND WATER QUALITY

Surface and groundwater quality can be adversely affected by urban development due to the introduction of associated pollutants (e.g., oil grease, fertilizers) and the reduction of impervious surfaces. In addition, landform modifications can alter drainage patterns and result in increased erosion and mudflows and exceed existing stormwater drainage design capacity. In the absence of proper planning, people and structures can also be exposed to flooding, inundation due to seiches and tsunamis. The land uses contained in Table 7-1 would contribute to increased water degradation due to the introduction of urban uses. However, the presence of regulations including adherence to state and federal Clean Water Act would largely mitigate these impacts. Moreover, given that state and federal regulations are in place to ensure that development in high risk areas is prohibited or risks are minimized, the impacts associated with these hazards would also be greatly reduced. Therefore, cumulative impacts associated with hydrology and water quality would be less than significant.

7.3.10 CUMULATIVE IMPACTS RELATED TO HAZARDS AND HAZARDOUS MATERIALS

Land uses contained within Table 7-1 have the potential to contain hazardous materials (both known and unknown). In addition, these uses would necessitate the routine transport, handling and use of hazardous materials and which could result in spills and other associated accidents. In certain instances, these uses could be within or transport materials within one-quarter of a mile of an existing and/or proposed school. Similarly, these uses could also potentially be located within an airport plan or within close proximity of private airstrip. In the absence of proper planning, these uses could also be located within areas prone to wildland fires or impair the implementation of an emergency evacuation plan. However, the presence of regulations including adherence to state and federal hazardous materials, airport safety and fire/life safety laws would largely mitigate these impacts. Moreover, given that state and federal regulations are in place to ensure that development in high risk areas is prohibited or risks are minimized, the impacts associated with these hazards would also be greatly reduced. Therefore, cumulative impacts associated with hazards and hazardous materials would be less than significant.

7.3.11 CUMULATIVE IMPACTS RELATED TO AESTHETICS

The proposed Specific Plan site of 501 acres is located in a rapidly urbanizing portion of southwestern Ventura County where changes to the aesthetic environment abound. Specifically, new development in the area would alter the natural terrain and result in artificial topography. Alteration of the natural

topography from implementation of the proposed Specific Plan would be significant. Mitigation measures identified in Section 4.11, Aesthetics, of this DEIR would help to ensure that some project-level impacts as a result of this change would be reduced, but impacts would still remain significant. It is anticipated that the proposed project would result in significant adverse impacts related to the loss of scenic vistas (i.e., row crops, orchards), the loss of scenic resources (i.e., mature trees, orchards, agricultural lands), and to the fundamental visual character of the site, which would be converted from agriculture to primarily suburban/urban in character.

Existing City policies regarding visual quality, such as protecting views of the surrounding mountains, canyons and open space areas, would work to ensure high aesthetic quality of future development. In addition, other large-scale developments in the area such as the proposed Fagan Canyon, Adams Canyon and East Area 2 projects of Ventura County would similarly meet the requirements of their jurisdictional municipal codes and remain consistent with prescribed landscape design guidelines; however, these projects would affect additional natural terrain. Therefore, a cumulatively significant and unavoidable impact associated with aesthetics would occur.

7.3.12 CUMULATIVE IMPACTS RELATED TO CULTURAL AND HISTORIC RESOURCES

Section 4.12 (Cultural and Historic Resources) concluded that there was a very low likelihood for finding significant archaeological resources on the project site. However, a precautionary mitigation measure was added to the project and described in Section 4.12 to ensure that any previously unknown archaeological resources on the project site would be protected should they be discovered during grading operations. In addition, mitigation measures have been added to the proposed project to avoid or minimize paleontological related impacts.

The proposed Adams Canyon project may result in the loss of agricultural lands which were found in the *Santa Clara Valley Survey Phase V: Western Santa Clara Valley* (San Buenaventura Research Associates, 1996) to contribute towards the NHRP eligibility of the Santa Clara Valley rural historic district, as well as other unspecified impacts on the integrity and historic character of the district due to road construction and other project related activities. No other pending or proposed project outlined in Table 7-1 of the EIR appears to have a significant potential to adverse impact historic resources.

Given the low likelihood of resources being on-site and the fact that other projects in the area are typically subject to similar protective mitigation for cultural and historic resources, no cumulatively considerable impacts would occur to these resources as a result of the proposed project.

7.3.13 CUMULATIVE IMPACTS RELATED TO PUBLIC SERVICES

The City has regulations and/or ordinances in place to address impacts on public services (e.g., police, fire) including the provision and acquisition of new facilities and equipment. All planned development would need to be reviewed by these agencies and corresponding impacts evaluated and mitigated. Therefore, cumulative impacts associated with public services would be less than significant.

7.3.14 CUMULATIVE IMPACTS RELATED TO RECREATION

The City has regulations and/or or ordinances in place to address impacts on recreational services (e.g., parks) including the provision and acquisition of new facilities and equipment. All planned development would need to be reviewed by these agencies and corresponding impacts evaluated and mitigated. Therefore, cumulative impacts associated with recreation would be less than significant.

7.3.15 CUMULATIVE IMPACTS RELATED TO UTILITIES AND SERVICES

Depending on their location, land uses contained in Table 7-1 could require the construction of new storm drain facilities or entail processes which exceed wastewater requirements. Moreover, the timing of their implementation could directly affect the ability of wastewater and solid waste service providers to meet the service needs of these projects. In the absence of proper planning, these services may not be available or may require the construction of new or expanded facilities. Similar conditions could also result relative to water supplies, especially in the event that adequate supplies are not available. Because all planned development would be required to be reviewed by the City and would be subject to California Environmental Quality Act (CEQA) review, the potential for these services to be absent and/or insufficient would be greatly reduced. Therefore, cumulative impacts associated with utilities & services would be less than significant.

7.3.16 CUMULATIVE IMPACTS RELATED TO POPULATION AND HOUSING

The land uses identified in Table 7-1, include expansion areas and infill projects identified and/or contemplated in the City's General Plan. The City's infrastructure planning process considered these new developments and associated population growth in its long-range planning. As such, these projects including the proposed project would not result in the inducement of substantial population growth in an area, either directly or indirectly. In addition, these planned projects would neither displace a substantial numbers of existing housing or people requiring replacement housing elsewhere. Therefore, cumulative impacts related to population and housing would be less than significant.