

# CHAPTER 4

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## Cumulative Impacts

### 4.1 Introduction

This chapter presents CEQA requirements for cumulative impact analysis and analyzes the potential for the proposed program to have significant cumulative effects when combined with other past, present, and reasonably foreseeable future projects in each resource area's cumulative geographic scope. This section provides the requirements for cumulative impact analysis. Cumulative impacts for the proposed program when combined with other reasonable and foreseeable future projects in the area are organized by resource topic and analyzed below.

*CEQA Guidelines* Section 15130(a) requires that an EIR discuss the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. A consideration of actions included as part of a cumulative impact scenario can vary by geographic extent, time frame, and scale. They are defined according to environmental resource issues and the specific significance level associated with potential impacts. *CEQA Guidelines* 15130(b) requires that discussions of cumulative impacts reflect the severity of the impacts and their likelihood of occurrence. The *CEQA Guidelines* note that the cumulative impacts discussion does not need to provide as much detail as is provided in the analysis of project-only impacts and should be guided by the standards of practicality and reasonableness and focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impacts.

### CEQA Analysis Requirements

CEQA requires that an EIR assess the cumulative impacts of a project with respect to past, current, and probable future projects within the region. *CEQA Guidelines* (Section 15355) define cumulative effects as "two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts. The cumulative impact from several projects result from the incremental impacts of the proposed program when added to other closely related, and reasonably foreseeable, future projects." Pertinent guidance for cumulative impact analysis is given in Section 15130 of the *CEQA Guidelines*:

- An EIR shall discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable", (i.e., the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the

- effects of current projects, and the effects of probable future projects, (including those outside the control of the lead agency, if necessary).
- An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR.
  - A project's contribution is less than cumulatively considerable, and thus not significant, if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.
  - The discussion of impact severity and likelihood of occurrence need not be as detailed as for effects attributable to the project alone.

In addition, the *CEQA Guidelines* Section 15130(b) allows for the use of two alternatives methods to determine the scope of projects for the cumulative impact analysis:

- List Method - 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.
- Regional Growth Projections Method - A summary of projects 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 (Section 15130).

The analysis of cumulative effects in this PEIR utilizes a combination of the list and regional growth projections methods and focuses on the effects of concurrent construction and operation of the proposed EWMP projects along with the regional growth anticipated in each of the following Participating Permittee's jurisdictional areas: LACFCD, County of Los Angeles, and the following 46 cities: Los Angeles, Beverly Hills, Culver City, Inglewood, Santa Monica, West Hollywood, Hawthorne, El Segundo, Lomita, Baldwin Park, Covina, Glendora, Industry, La Puente, Malibu, Calabasas, Agoura Hills, Westlake Village, Hidden Hills, Santa Clarita, Rancho Palos Verdes, Palos Verdes Estates, Rolling Hills Estates, Redondo Beach, Hermosa Beach, Torrance, Manhattan Beach, Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre, Alhambra, Burbank, Glendale, Hidden Hills, La Cañada Flintridge, Montebello, Monterey Park, Pasadena, Rosemead, San Gabriel, San Marino, South Pasadena, and Temple City (refer to Figure 2-1).

Each of these jurisdictions have independent planning documents that guide the development of urban, agricultural and other land uses within their jurisdictional boundaries.

## 4.2 Related Projects

### Geographic Scope

Cumulative impacts are assessed for related projects within a similar geographic area. This geographic area may vary, depending upon the issue area discussed and the geographic extent of the potential impact. For example the geographic area associated with construction noise impacts

is limited to areas directly adjacent to construction sites, whereas the geographic area that is affected by construction-related air emissions may include the larger air basin. Construction impacts associated with increased noise, dust, erosion, and access limitations tend to be localized but could be exacerbated if other development or improvement projects are occurring within the same or adjacent locations as the proposed program.

Geographically, the proposed program is located in the Los Angeles basin. For the purposes of this analysis, the PEIR considered planned EWMP projects within the service area of LACFCD and all participating permittees, along with the adopted general plans or related planning documents for the EWMP areas, when evaluating potential cumulative impacts due to construction and operation of the proposed program. The planned EWMP projects are listed in **Table 4-1**, shown on **Figure 4-1**, Planned EWMP Projects and detailed further in Section 2.0, *Project Description*.

## Project Timing

In addition to the geographic scope, cumulative impacts also take into consideration the timing of related projects relative to the proposed program. The implementation schedule is particularly important for construction-related impacts; for a group of projects to generate cumulative construction impacts, they must be temporally as well as spatially proximate. The EWMP projects that will be included in the proposed EWMPs along with other reasonably foreseeable future projects in the EWMP areas may or may not occur simultaneously. However, this analysis assumes some the EWMP projects and other local projects would be implemented concurrently, between 2015 and 2035.

## Type of Projects Considered

As described throughout Chapter 3 of this PEIR, the impacts associated with implementation of the proposed program include both short-term, temporary construction-related impacts and long-term impacts related to program operation.

## Cumulative Construction Impacts

Cumulative effects could result when considering the effects of the proposed program in combination with the effects of other construction projects in the area. For this PEIR, the analysis of cumulative construction impacts assumes that throughout the EWMP areas, planned future development projects will be on-going simultaneously with the proposed program, including other local major residential construction, small-scale construction project, and projects that have not yet been identified.

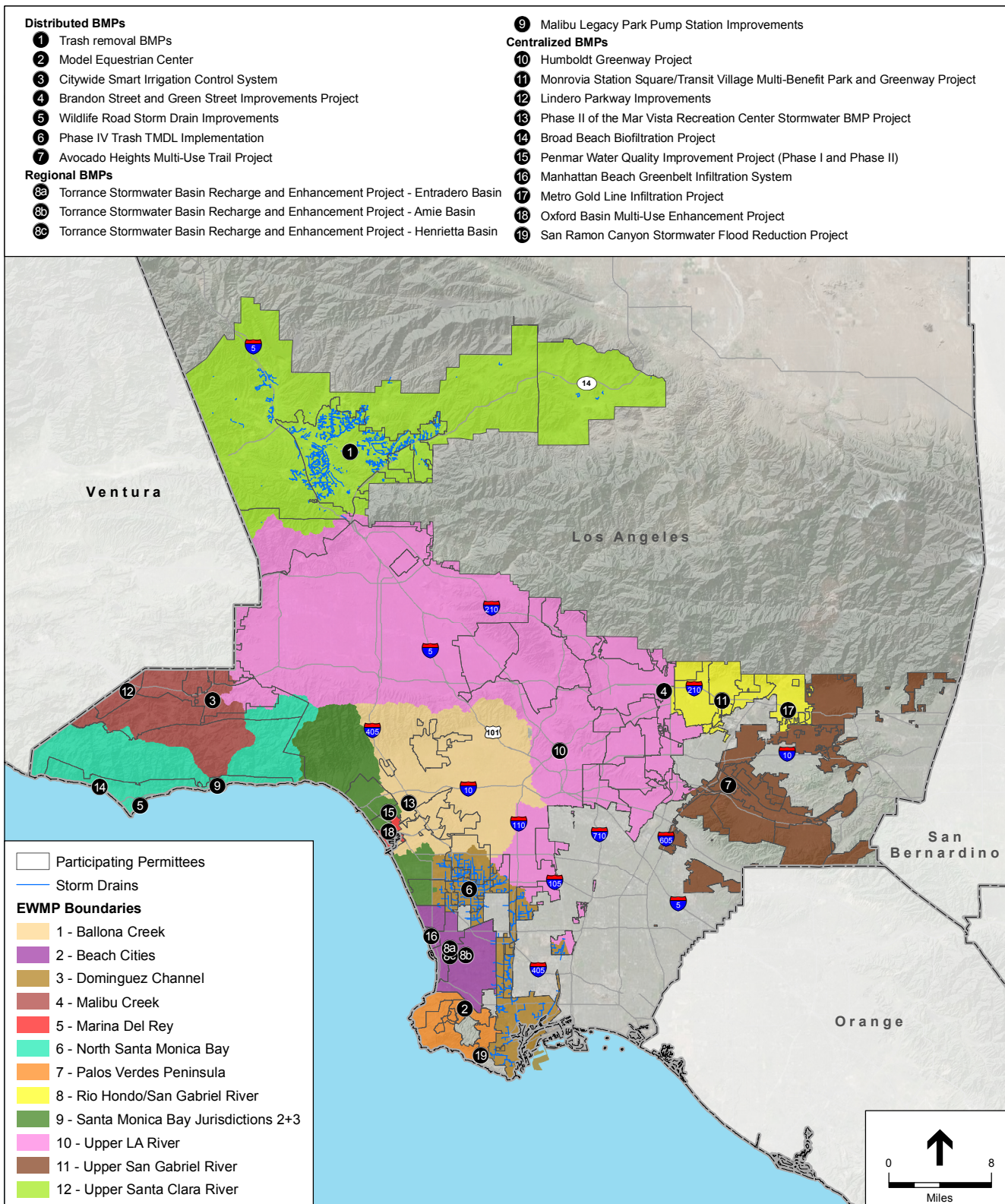
## Cumulative Operational Impacts

Cumulative effects could result when considering the effects of the proposed program in combination with the effects of operating other projects in the EWMP areas.

**TABLE 4-1  
EWMP PROJECTS**

<b>Map Number</b>	<b>Project Name</b>	<b>BMP Type</b>	<b>Project Sponsor</b>	<b>Project Implementation</b>
6	Phase IV Trash TMDL Implementation	Distributed	Dominguez Channel	Installation of CB covers began the Summer of 2013.
3	Citywide Smart Irrigation Control System	Distributed	Malibu Creek	Unknown
5	Wildlife Road Storm Drain Improvements	Distributed	North Santa Monica Bay Coastal Watersheds	Construction was scheduled to begin March 2014 and continue through August 2014
2	Model Equestrian Center	Distributed	Palos Verdes Peninsula	Completion anticipated June 2015
4	Brandon Street and Green Street Improvements Project	Distributed	Upper LA River	Construction Spring 2014 to Fall 2014
7	Avocado Heights Multiuse Trail Project	Distributed	Upper San Gabriel River	Constructed
1	Trash removal BMPs	Distributed	Upper Santa Clara River	Planned Implementation Date July 2015
13	Phase II of the Mar Vista Recreation Center Stormwater BMP Project	Centralized	Ballona Creek	Phase II is expected to be completed by December 2014.
16	Manhattan Beach Greenbelt Infiltration System	Centralized	Beach Cities WMG	The project construction was completed February 19, 2013.
18	Oxford Basin Multi-Use Enhancement Project	Centralized	Marina Del Rey	LACFCD anticipates the project to commence construction by the end of this year or early 2015.
12	Lindero Parkway Improvements	Centralized	Malibu Creek	Construction of the proposed improvements is expected to commence either Spring 2015 or early Summer 2015.
14	Broad Beach Biofiltration Project	Centralized	North Santa Monica Bay Coastal Watersheds	June 2014 (Completion of Construction)
19	San Ramon Canyon Stormwater Flood Reduction Project	Centralized	Palos Verdes Peninsula	Anticipated to be completed June 2015.
11	Monrovia Station Square/Transit Village Multi-Benefit Park and Greenway Project	Centralized	Rio Honda - San Gabriel River	Planned Implementation Date Spring 2015.
17	Metro Gold Line Infiltration Project	Centralized	Rio Honda - San Gabriel River	Planned Implementation Date Spring 2016.
15	Penmar Water Quality Improvement Project (Phase I and Phase II)	Centralized	Santa Monica Bay Jurisdictions 2+3	Phase II – expected completion by Spring 2015.
10	Humboldt Greenway Project	Centralized	Upper LA River	Under Construction
8A-8C	Torrance Stormwater Basin Recharge and Enhancement Project	Regional	Beach Cities WMG	Construction was scheduled for Spring 2014.
9	Malibu Legacy Park Pump Station Improvements	Regional	North Santa Monica Bay Coastal Watersheds	Anticipated to be completed June 2015.

SOURCES: EWMP Work Plans, 2014.



SOURCE: ESRI.

LA County PEIR EWMP . 140474  
**Figure 4-1**  
 Planned EWMP Projects

## 4.3 Plan Consistency

### General Plans

Construction of structural BMPs and adoption of non-structural BMPs would occur throughout each of the EWMP areas, encompassing 84 cities and large areas of unincorporated Los Angeles County. Each city has adopted land use plans and zoning codes covering development within their jurisdictions. Many cities including the City of Los Angeles have adopted LID ordinances that promote new development of storm flow retention and water quality BMPs. Each implementing agency would be required to evaluate the consistency of each BMP with local zoning codes. Compliance with city codes for placement of BMPs would ensure that the cumulative impact of installing multiple BMPs throughout the County would not conflict with local plans and policies.

The Los Angeles County General Plan includes land use designations covering development throughout the County. Section 3.9 Land Use and Agriculture provides a list of goals and policies in the Los Angeles County General Plan that promote storm water quality infrastructure. The installation of multiple BMPs throughout the County would be consistent with the County General Plan goals promoting LID infrastructure and improved storm water quality. Section 3.3 Biological Resources identifies the regional conservation planning efforts throughout the County including critical habitat, significant ecological areas, habitat conservation planning areas, and regional, state and federal parks. The goals of enhanced water quality and a more natural hydrology encouraged by the proposed program are consistent with the habitat conservation goals of each of these plans. Furthermore, the Permit describes the Watershed Management Program optional compliance approach as providing more opportunities for multi-benefit projects that would encourage goals of recreation and habitat value creation as part of the BMP. The proposed program would be consistent with regional General Plan goals and policies.

### Resource Management Plans

In addition to the municipalities and County, resource management agencies mitigate cumulative effects of development on the environment. Several regional agencies including SCAQMD, Water Replenishment District, LARWQCB, Department of Toxic Substances Control, wildlife agencies, Coastal Conservancy, Coastal Commission, National Parks, National Forest Service, Santa Monica Mountains Conservancy, and Metropolitan Water District of Southern California manage resources cumulatively impacted by regional development. Each of these resource managers prepare resource management plans to mitigate potentially significant cumulative impacts. Consistency with these management plans minimizes impacts to cumulative impacts. **Table 4-2** lists major resource management agencies and identifies where consistency with resource management plans is discussed in the PEIR. The proposed program would be consistent with regional resource management plans.

**TABLE 4-2  
KEY REGIONAL RESOURCE MANAGEMENT AND/OR PROTECTION AGENCIES**

<b>Agency</b>	<b>Management Plan</b>	<b>Where Discussed in PEIR</b>
SCAQMD	Air Quality Management Plan	Section 3.2
Water Replenishment District	Groundwater Basins Master Plan	Section 3.8
RWQCB	Basin Plan	Section 3.8
Department of Toxics Substances Control	CUPA	Section 3.7
Wildlife agencies (CDFW, USFWS, NMFS)	Critical Habitat Designations, NCCP/HCPs	Section 3.3
Coastal Conservancy and Coastal Commission	Ocean Plan	Section 3.8
National Parks and Forest Service	Forest and Parks Plans	Section 3.9
Santa Monica Mountains Conservancy	Santa Monica Mountains Comprehensive Plan	Section 3.3

SOURCE: Environmental Science Associates.

## 4.4 Cumulative Impacts and Mitigation Measures

For some impact issue areas (i.e., air quality, traffic, and water supply), the cumulative setting is defined by specific regional boundaries (air basin, regional roadway network, etc.) or projected regional or area-wide conditions, contributing to cumulative impacts. For the remaining impact issue areas, the cumulative setting is based on development anticipated within the vicinity of the EWMP project. The impact analysis in Chapter 3 includes a discussion of cumulative impacts for each resource area. **Table 4-3** summarizes the conclusions of the cumulative analysis in Chapter 3. As shown in the table, implementation of the BMPs would result in cumulative significant impacts to air quality, cultural resources, and noise.

**TABLE 4-3  
SUMMARY OF CUMULATIVE IMPACT ANALYSIS**

<b>Issue Area</b>	<b>Significance Determination</b>
Aesthetics (Cumulative)	LSM
Air Quality (Cumulative)	<b>SU</b>
Biological Resources (Cumulative)	LSM
Cultural Resources (Cumulative)	<b>SU</b>
Geology and Soils/Mineral Resources (Cumulative)	LSM
Greenhouse Gas Emissions (Cumulative)	LTS
Hazards and Hazardous Materials (Cumulative)	LSM
Hydrology and Water Quality (Cumulative)	LSM
Land Use and Planning/Agriculture (Cumulative)	LTS
Noise (Cumulative)	<b>SU</b>
Population and Housing (Cumulative)	LTS
Public Services/Recreation (Cumulative)	LTS
Traffic and Transportation(Cumulative)	LSM
Utilities and Service Systems (Cumulative)	LSM

LTS = Less than Significant  
 LSM = Less than Significant with Mitigation  
 SU = Significant and Unavoidable

SOURCE: ESA 2014.