6 Cumulative Impacts

Preparation of a cumulative impact analysis is required under both NEPA and CEQA. NEPA and CEQA identify three types of potential impacts: direct, indirect, and cumulative. “Cumulative impact” is the impact on the environment which results from the incremental impact of the proposed Project when considered with other past, present, and reasonably foreseeable future actions regardless of which agency (federal or non-federal) or person undertakes such other actions.

Under NEPA, "[c]umulative effects can result from individually minor but collectively significant actions taking place over a period of time" 40 CFR §1508.7. Among considerations for determining significance is "[w]hether the action is related to other actions with individually minor but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts." 40 CFR §1508.27(b)(7).

Under the State 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." 14 Cal Code Regs §15130(a)(1). An EIR must discuss cumulative impacts if the incremental effect of a project, combined with the effects of other projects is "cumulatively considerable." 14 Cal Code Regs §15130(a). Such incremental effects are to be "viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." 14 Cal Code Regs §15164(b)(1). Together, these projects comprise the cumulative scenario which forms the basis of the cumulative impact analysis.

The area over which the cumulative scenario is evaluated may vary by resource, for instance, air quality impacts tend to disperse over a large area or region whereas noise impacts are typically more localized in nature. This spatial area is identified as the geographic scope for the analysis of cumulative impacts related to a particular resource.

The analysis of cumulative effects considers a number of variables including geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. The geographic scope of the analysis is based on the nature of the geography surrounding the proposed Project and the characteristics and properties of each resource and the region to which they apply.

Noted above in Section 3 is a summary of the cumulative impacts analysis for the proposed Project and alternatives for each environmental issue area. In addition, Table 4 on the following page provides a summary comparison by issue area. These analyses describe the potential for impacts of the proposed Project and alternatives to combine with the effects of other projects within the geographic scope of the cumulative analysis.