2.9 Cumulative Impacts

Several commenters expressed concerns related to the cumulative impacts of the proposed project and related projects:

1. The impacts of related project were not evaluated.
2. The related projects potential effects were not considered in the Draft EIR analysis.

Section 6.0, *Cumulative* of the Draft EIR analyzes potential cumulative impacts and describes the potential changes in environmental conditions that result from the incremental impact of the proposed project added to the impacts from other past, present, and reasonably foreseeable probable future projects.

The State California Environmental Quality Act (CEQA) Guidelines Section 15130, provides that an EIR shall discuss the cumulative impacts of a project "*when the project's incremental effect is cumulatively considerable*." Section 15065(a) (3) of the State CEQA Guidelines describes "cumulatively considerable" as follows:

> *"Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."*

Section 15130 further states that an adequate discussion of cumulative impacts necessarily includes either of the following elements:

> *(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 areawide 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.*

2.9.1 Related Projects

Commenters expressed concern that the Draft EIR did not evaluate all related projects in the cumulative analysis. The list of related projects was provided in Table 6-2, *Related Projects* in the Draft EIR. This table provides summary details on related projects that were used in the cumulative analysis (this list also was provided in Section 4.0, *Environmental Setting* of the Draft EIR). All of the related projects are located in the City, or nearby unincorporated territory within the County of Orange (County) and are identified on Figure 6-1, *Related Projects* of the Draft EIR.

The City maintains a list of related projects that includes past, present, and reasonably foreseeable probable future projects. For this list the City determined projects that would potentially produce related or cumulative effects. At the time of the issuance of the Notice of Preparation of the EIR, the City

Community Development Department and Public Works Department were contacted to define the list of related projects. These Departments were re-contacted in August 2013 related to any changes that could potentially affect the Related Project List. The City based on this review further determined that no changes were necessary. Therefore, no further analysis of this concern is warranted.

2.9.2 Evaluation of Cumulative Impacts

Commenters expressed concern that the Draft EIR did not evaluate related project's effects correctly in the cumulative analysis. As noted above, the Draft EIR in Section 6.1.3, *Sources* indicates the sources that were used in the consideration and discussion of the potential cumulative environmental impacts. Section 6.3, *Evaluation of Cumulative Impacts* of the Draft EIR addressed each of the 17 topical environmental factors referenced in the State CEQA Guidelines. The analysis for each environmental topic was accomplished in the following manner:

1. The analysis summarizes the proposed project and related projects and identifies impacts at the project-level of detail;
2. The analysis then discusses impacts that would result when the effects of the individual projects are viewed collectively;
3. The analysis addresses whether the proposed project's incremental contribution to a potentially significant impact is cumulatively considerable. If not, the analysis ends. If it is, the analysis continues to Items 4 and 5 (below);
4. The analysis then determines the proposed project's relative contribution to the significant cumulative effect; and,
5. The analysis then determines whether mitigation measures applicable to the proposed project or related projects can reduce the cumulative impacts, or whether new mitigation measures consistent with the CEQA Guidelines can be feasibly implemented to reduce or eliminate the significant cumulative effect.

The Draft EIR in Section 6.1.3, *Sources* indicates the sources that were used in the consideration and discussion of the potential cumulative environmental impacts. The City has determined that these sources are appropriate for the cumulative analysis of impacts. Further, the commenters have not provided evidence that the sources are not appropriate or that other data exists. Therefore, no further analysis of this concern is warranted.