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13.0 Cumulative Impacts

13.1 CEQA REQUIREMENTS

CEQA Guidelines section 15130 requires a discussion of cumulative impacts when the project's incremental effect is cumulatively considerable, as defined in section 15065(a)(3), which states, "The project has possible environmental effects that are individually limited but cumulative considerable. 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."

Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. A cumulative impact consists of an impact that 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 that do not result in part from the project evaluated in the EIR. When the combined cumulative impacts associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting its conclusion that the cumulative impact is less than significant.

A lead agency may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and, therefore, is not significant. A project's contribution is less than cumulatively considerable 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 lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the other identified projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

CEQA requires a cumulative development scenario to consist of either 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, 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 area-wide conditions contributing to the cumulative impact.

13.2 CUMULATIVE DEVELOPMENT SCENARIO

CEQA requires a cumulative development scenario to consist of either:

- 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,
- 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 area-wide conditions contributing to the cumulative impact.

For this EIR, the evaluation of cumulative impacts is based on implementation of the proposed project when considered in conjunction with development forecasts based on the buildout of County of Monterey General Plan. The general plan addresses development within the unincorporated areas of Monterey County with a planning horizon year of 2030 and buildout in 2092. Following adoption, the general plan, the county prepared and adopted area plans for seven sub-areas: North County, Greater Salinas Valley, Greater Monterey Peninsula, Cachagua, South County, and Toro, where the project site is located. Each area plan contains supplemental policies intended to more specifically guide land use activities and development in accordance with the local characteristics of each area.

The general plan addresses development that influences development planning and decision-making in the county. The general plan identifies the project site for medium density residential development. Thus, development on the project site, in some form, has been anticipated by future development projects for the county and specific project area.

The analysis of cumulative impacts for individual topic areas provided below generally assumes, unless otherwise noted, that the cumulative development scenario is existing and probable future development associated with buildout of the county general plan.

As allowed by CEQA Guidelines section 15130 (b)(1)(B), the EIR includes a summary of projections contained in the general plan to form the cumulative projects scenario; i.e. build-out of the general plan. The general plan EIR provides an estimate of approximately 10,015 new residential units and 500 acres of commercial development within the inland areas of unincorporated Monterey County (Table 3-8, New Growth by Planning Area, Community Area and Rural Center, 2006-2030 and 2092 Buildout).

For each topic area, an evaluation and determination as to whether the proposed project's impacts are cumulatively considerable is presented.

13.3 CUMULATIVE IMPACTS AND THE PROPOSED PROJECT'S CONTRIBUTION

As identified in Section 11.0 Effects Not Found to be Significant, the proposed project would have no impact or less-than-significant impacts for the following topics: Agricultural/Forest Resources, Cultural Resources, Geology & Soils, Hazardous Materials, Surface Hydrology, Mineral Resources, Noise, Public Services, Recreation, Solid Waste, and Wastewater.

Therefore, the proposed project would not substantially contribute to potential cumulative impacts for these topics, and these topics are not further considered. Only environmental topics identified as having potential significant impacts which may thereby contribute to cumulative impacts are discussed in this EIR.

Aesthetics

The cumulative context for aesthetics impacts are areas of existing and potential future development within Monterey County. The county's general plan EIR concluded that buildout of the general plan with implementation of applicable goals, policies, and actions in the general plan, and specifically within area plans (including the Toro Area plan) would not result in significant impacts on scenic vistas or scenic highways. However, even with implementation of applicable goals, policies, and actions in the general plan, including area plans, the general plan EIR concluded that buildout of the general plan would result in significant and unavoidable impacts to visual character and light and glare impacts in the county.

The LPRSP FEIR (pp 56-59) recognized that the development of Las Palmas Ranch would "... be expected to change from the existing open land/agriculture to a more urban setting softened by landscaping, entry way treatment and architectural control." The LPRSP FEIR also states, "Given the distance from the highway (approximately 1/2-3/4 mile) and the level of development envisioned by the Toro Vista development [now Ferrini Ranch] visual impacts on Highway 68 are insignificant." The FIER goes on to prescribe mitigations measures for the Las Palmas Ranch development. The River View at Las Palmas project incorporated those measures into its design.

As identified in Chapter 5.0 Aesthetics, the proposed project would result in a less-than-significant impact, with mitigation, to altering the visual character of the site. However, as the development of the proposed project would contribute to the overall conversion of vacant county land to developed land, development of the proposed project is a contributor to the already identified significant and unavoidable impact for buildout of the general plan

for the county as a whole. As the project is required to mitigate for these visual impacts (AES-1, AES-2, AES-3), the project's contribution would not be considerable and therefore, would be less than significant.

As identified in Chapter 5.0 Aesthetics, the proposed project would have a less-than-significant impact from the introduction of new sources of light and glare on the project site with the implementation of Mitigation Measure AES-4. Therefore, the project's contribution to the county-wide significant light and glare impacts would not be considerable and therefore, would be less than significant.

Air Quality

The cumulative context for this topic is the effect of existing and future growth of the county general plan on the air quality of the North Central Coast Air Basin (air basin). As discussed in Section 6.0, Air Quality, the air basin is in non-attainment with state mandated thresholds for ozone and suspended particulate matter (PM¹⁰).

The county general plan EIR identified significant impacts on regional air quality resulting from buildout of the general plan. Under cumulative conditions, there could be an increase in reactive organic gases (ROG), nitrogen oxides (NO_x) and particulate matter (PM¹⁰) and these cumulative impacts were determined to contribute considerably to cumulative impacts on air quality.

The proposed project would generate construction and operational emissions of ozone precursors and particulate matter that that would contribute to cumulative air quality impacts. As reported in Section 6.0, Air Quality, the proposed project is consistent with the air district's air quality management plan at 2020 and later time periods. Development of the project site would result in criteria pollutant emissions of ozone precursors and PM¹⁰ that exceed air district standards and for which the air basin is in nonattainment. According to the CalEEMod air quality modeling, the proposed project would generate operational PM¹⁰ and ROG emissions that would exceed the air district's thresholds during the construction phase of the project. Therefore, unmitigated project-related PM¹⁰ and ROG emissions would be cumulatively considerable.

However, implementation of Mitigation Measures AQ-1 – AQ-4 (Section 6.0, Air Quality) would reduce the project contribution to regional air quality impacts to less than cumulatively considerable. For these reasons, the proposed project's contribution to cumulative air quality impacts would not be cumulatively considerable.

Biological Resources

The cumulative context for impacts on biological resources varies with the type of resource being considered, as the range of any particular type of plant or wildlife resource varies in size and species concentration.

As reported in Section 7.0, Biological Resources, if not mitigated, the proposed project would result in contributing to the cumulative loss of important biological resources, including the direct losses of special-status plant and wildlife species and their habitat.

Implementation of the mitigation measures BIO-1 – BIO-6 identified in Section 7.0, Biological Resources, would reduce the project's impacts to biological resources to less than significant. Therefore, the proposed projects' contribution to the cumulative impact on biological resources would not be cumulatively considerable.

Greenhouse Gas Emissions

Global climate change is, as the name implies, a global phenomenon. Greenhouse gas emissions released to the atmosphere from a variety of human activities and natural processes that occur across the globe are contributing to global warming. While the U.S. emits the largest per capita volume of GHGs of any country in the world, other major countries contribute substantial volumes of emissions that continue to grow on a per capita basis. Because climate change is a global phenomenon, it is highly unlikely that any one development project located anywhere in the world would have a significant individual impact on climate change. It is the sum total of contributions of development around the world that contribute to the problem. Hence, global climate change is inherently a cumulative effect.

The individual contribution of a project to GHGs in the atmosphere can generally be quantified in terms of volume of greenhouse gas emissions that it generates. However, the precise indirect effects of that contribution are difficult if not impossible to identify due to the complexity of local, regional, and global atmospheric dynamics and to the broad scale at which global warming impacts such as sea level rise, increase in weather intensity, decrease in snowpack, etc. are known to occur.

As noted in Section 8.0, Greenhouse Gas Emissions, the proposed project as mitigated, would generate approximately 634.02 metric tons CO₂e annually that contribute to climate change. Because the potential impacts of the proposed project are inherently considered in a cumulative context, the analysis in Section 8.0, Greenhouse Gas Emissions, is a cumulative impact assessment.

The resident population for this project is conservatively assumed to be the sum of all the casita beds (42) plus approximately one-quarter of the remaining 100 beds (25). As described in section 8.0, Greenhouse Gas Emissions, the one-quarter figure is based on the vehicle trip rates for care facilities, which are approximately one-quarter the rate for single-family residences. The total resident population would, therefore, be 67. The proposed project is projected to create 92 jobs at maximum capacity. Therefore, the service population is 159 (67 residents plus 92 employees). The 2020 GHG efficiency metric for the proposed project is 3.99 MT CO₂e/service population (634.02 MT/159). This is below the threshold of significance of

4.88 MT CO_{2e}/service population. Consequently, the project's GHG emissions fall below the threshold of significance and are not cumulatively considerable.

Traffic

2030 Cumulative Traffic Volume Forecasts

Future traffic growth projections for the study area were derived based on 2030 traffic volume projections within the 2010 Monterey County General Plan. A growth rate of 15 percent was applied to the existing traffic volumes to estimate 2030 cumulative traffic volumes. This is more conservative than the projections developed for SR 68 in the draft scenic highway plan for SR 68 currently being prepared by TAMC, which is based on the Fort Ord Reuse Authority travel demand model that projected slightly less than 10 percent growth along the SR 68 corridor between the years 2016 and 2035.

Cumulative Plus Project Conditions Intersection Operations

Two study intersections are projected to operate at unacceptable levels of service under cumulative plus traffic conditions. Intersection levels of service are summarized in [Figure 9-4, Intersection Levels of Service](#). LOS calculation worksheets are included in the project's traffic impact assessment (Appendix D).

The Reservation Road / SR 68 WB Ramp intersection is projected to operate at an unacceptable LOS D during the PM peak hour under cumulative plus project traffic conditions. The River Road / SR 68 EB Ramp intersection is projected to operate at an unacceptable LOS D during the AM peak hour under cumulative plus project traffic conditions (Higgins 2017).

The project's traffic impact study (Higgins 2017) identified that the following improvements would result in acceptable levels of service at the two intersections. The project's traffic impact study concludes that both of the two options listed below would be feasible, but that each would require Monterey County and Caltrans coordination.

1. Add a dedicated southbound right-turn lane at the Reservation Road / SR 68 WB Ramp intersection and a second southbound left-turn lane at the River Road / SR 68 EB intersection.
2. Convert the Reservation Road / SR 68 WB Ramps and River Road / SR 68 EB Ramp intersections to roundabouts.

Per CEQA Guidelines Section 15130(3), a project's contribution is less than cumulatively considerable if a project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. Therefore, by paying TAMC and Monterey County traffic impact fees, which could be used for either or both

mitigation options listed above, the proposed project would have a less than cumulatively considerable impact on the identified intersections.

IMPACT At a Cumulative Level, the Proposed Project Would Add Vehicle Trips to the Reservation Road and State Route 68 Westbound Ramp Intersection and the River Road and State Route 68 Eastbound Ramp Intersection (Less than Significant with Mitigation)

The proposed project would add vehicle trips to the Reservation Road and State Route 68 Westbound Ramp Intersection and the River Road and State Route 68 Eastbound Ramp Intersection. These intersections are projected to operate at unacceptable levels of service under cumulative plus traffic conditions.

Mitigation Measures

CTRA-1 The applicant shall pay Transportation Agency for Monterey County and County of Monterey traffic impact fees.

Cumulative Plus Project Conditions Road Segment Operations

River Road is expected to continue to operate at LOS C between SR 68 and Las Palmas Road and LOS D from Las Palmas Road to Las Palmas Parkway under 2030 cumulative Conditions, according to the 2010 Monterey County General Plan Environmental Impact Report. These are considered acceptable levels of service (Higgins 2017).

As previously stated, SR 68 currently operates at LOS F. The projected increase in traffic volumes under cumulative conditions would exacerbate these conditions and the project would contribute to these cumulative conditions.

IMPACT At a Cumulative Level, the Proposed Project Would Add Vehicle Trips to State Route 68 (Significant and Unavoidable)

Under cumulative plus project conditions, SR 68 is projected to operate at LOS F. The proposed project would contribute to incremental increases in cumulative traffic volumes on SR 68 and would, therefore, contribute to a significant cumulative impact.

There are no mitigation measures available to reduce cumulative-level impacts to a less-than-significant level, based on the Monterey County and Caltrans threshold. However, the project would be required to pay regional traffic impact fees that would serve as some mitigation for impacts to SR 68 improvements. Nevertheless, the project would not be directly implementing any improvements to offset its impacts and would, therefore, have an unmitigated significant impact on SR 68. At this time, it is unknown whether any Caltrans/TAMC improvements to the corridor (e.g., widening and/or roundabouts along the route) would improve the level of service on SR 68.

Furthermore, the applicant has proposed mitigation measures TRA-1 and TRA-2, which would reduce impacts to the traffic circulation in the vicinity of the project site. Additionally, the applicant shall be required to pay TAMC and Monterey County traffic impact fees, per mitigation measure CTRA-1. However, the mitigation measures would not change the proposed project's significant and unavoidable impact to SR 68.

Water Resources

The cumulative development scenario for water supply is development within the boundary of the Salinas Valley Groundwater Basin. As described in Section 10.0, Water Supply, past and present development within the boundary of the groundwater basin has contributed to groundwater overdraft conditions - a significant cumulative impact. The impact analysis presented in Section 10.0, Water Supply, is also a cumulative impact analysis, as the water demands on one project would not significantly affect the groundwater supply.

The proposed project would contribute to the water demand anticipated by the county's general plan and accounted for in the urban water management plan. According to the urban water management plan demand for California Water Service's Salinas District, municipal water demand is anticipated to increase from 19,180 acre-feet per year in 2020 to 23,154 acre-feet per year in 2040 (California Water Service 2016). The 11.376 acre-feet per year required for the proposed project when completed, comprises approximately .05 percent of the California Water Service Salinas District's demand by 2020 and approximately .04 percent of the projected year 2040 demand.

Although the proposed project would increase water demand on the project site, no new or expanded facilities, the construction of which could result in or contribute to environmental impacts, would be required to meet that demand. No new cumulative impacts would occur associated with construction of new water treatment, storage and distribution facilities already in progress or planned to meet demand in the California Water Service Salinas District. The proposed project's contribution to a cumulative increase in water demand would not result in impacts that are greater than those studied and addressed by the general plan EIR and the recently updated urban water management plan. Therefore, the proposed project's contribution to cumulative impacts to water supply is not cumulatively considerable.