

4.0 CUMULATIVE EFFECTS

4.1 INTRODUCTION

Section 15130(a) of the State CEQA Guidelines requires a discussion of the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Cumulatively considerable, as defined in CEQA Guidelines Section 15065(a)(3), 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." The State CEQA Guidelines Section 15355 defines a cumulative impact as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over time.

According to the CEQA Guidelines:

Cumulative impacts refer to two or more individual effects that, when considered together, are considerable and that compound or increase other environmental impacts.

- a) *The individual effects may be changes resulting from a single project or multiple separate projects.*
- b) *"The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probably future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." (CCR, Title 14, Division 6, Chapter 3, Section 15355)*

In addition, as stated in CEQA Guidelines:

The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable (CCR, Title 14, Division 6, Chapter 3, Section 15064[T][5]).

4.2 CUMULATIVE IMPACT SETTING

Cumulative impact discussions for each environmental issue area are provided within each individual impact section. As established in the CEQA Guidelines, related projects consist of "closely related past, present, and reasonably foreseeable probable future projects that would likely result in similar impacts and are located in the same geographic area" (CCR, Title 14, Division 6, Chapter 3, Section 15355).

The State CEQA Guidelines define a cumulative impact as two or more individual impacts that, when considered together, are significant or that compound or increase other significant environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over time (State CEQA Guidelines Section 15355). The incremental impact of a project, although less than significant on its own, may be considerable when viewed in the cumulative context of other closely related past, present, and reasonably foreseeable projects. A considerable contribution is considered significant from the point of view of cumulative impact analysis.



CEQA Guidelines Section 15130 identifies two basic methods for establishing the cumulative environment in which a project is considered: the use of a list of past, present, and probable future projects or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. This cumulative analysis uses a combination of the “list” approach and the “projections” approach to identify the cumulative setting. The plan and projections approach rely on an adopted plan or reliable projection that describes the significant cumulative impact. This Draft EIR combines both the project list and projection approaches to generate the most reliable future projections possible.

4.3 GEOGRAPHIC SCOPE

The geographic area analyzed for cumulative impacts is dependent on the resource being analyzed. The geographic area associated with the proposed project’s environmental impacts defines the boundaries of the area used for compiling the list of past, present, and reasonably foreseeable projects considered in the cumulative impact analysis.

Each section of this Draft EIR considers the specific geographic area that is directly related to the individual topic addressed within that section. For example, the analysis of air quality is based on a regional level because air quality impacts are regional in nature, whereas analysis of aesthetic impacts only considers related projects in the vicinity of the project site, because of the localized nature of the impact.

The geographic area that could be affected by implementation of the proposed project, in combination with other projects, varies depending on the type of environmental resource being considered. Table 4-1 provides the geographic area and the method of evaluation utilized in the cumulative analysis for each resource areas.

Table 4-1: Geographic Scope of Cumulative Impact and Method of Evaluation

Resource Topic	Geographic Area	Method of Evaluation
Aesthetics	Immediate project vicinity	Projects
Agricultural and Forestry Resources	Immediate project vicinity and region	Projects and Projections
Air Quality	Local (TACs) air basin (construction-related and mobile sources)	Projects and Projections
Biological Resources	Immediate project vicinity	Projects
Cultural and Historical Resources	Project site only (does not contribute to cumulative impacts)	Projects
Energy	Immediate project vicinity and region	Projects and Projections
Geology and Soils	Immediate project vicinity (effects are highly localized)	Projects
Greenhouse Gas Emissions and Climate Change	State	Projections
Hazards and Hazardous Materials	Project site only (does not contribute to cumulative impacts)	Projects



Resource Topic	Geographic Area	Method of Evaluation
Hydrology and Water Quality	Immediate project vicinity and region	Projects and Projections
Land Use and Planning	Immediate project vicinity	Projects
Noise	Immediate project vicinity (effects are highly localized)	Projects
Population and Housing	Region	Projects and Projections
Public Services	Immediate project vicinity	Projects and Projections
Recreation	Immediate project vicinity	Projects and Projections
Transportation	Immediate project vicinity	Projects and Projections
Tribal Cultural Resources	Project site only (does not contribute to cumulative impacts)	Projects
Utilities and Service Systems	Immediate project vicinity	Projects and Projections
Wildfire	Immediate project vicinity and region	Projects and Projections

Notes:

Projects = the use of a list of past, present, and reasonably foreseeable projects

Projections = the use of projections contained in relevant planning documents

For those environmental resources that were evaluated based on the projections approach, the projections take into consideration future projects that are not included in the below list of related plans and projects.

4.4 LIST OF RELATED PLANS AND PROJECTS

Table 4-2 lists the past, present, and probable future projects considered in the cumulative impact analysis. This list was developed based on communication with the County representatives who are responsible for approval of projects within the County’s jurisdiction that could be affected by project construction and operation. In addition, the City of Eureka was contacted, since the proposed project is immediately outside the City’s boundary. For topics requiring the use of projections, information is also drawn from the Humboldt County General Plan (General Plan) and supporting EIR for the General Plan Update (Humboldt County 2017a, 2017b). The land use map in the General Plan identifies the ultimate land use pattern and development potential of the adopted General Plan, and the EIR addresses the environmental effects associated with buildout of these land uses. The list shown in Table 4-2 is not intended to encompass every development project in the region; rather, it identifies the projects with the greatest potential for impacts that would overlap with those of the proposed project.

CEQA defines “probable future projects” as those with an active application at the time the NOP was released for a project (in this case, January 24, 2019). The list of projects in Table 4-2 was used in the development and analysis of the cumulative settings and impacts for each resource topic. Past and current projects in the project vicinity were also considered as part of the cumulative setting as they contribute to the existing conditions upon which the project and each probable future project’s environmental effects are compared.



Unless otherwise specified, significance criteria are the same for cumulative impacts as they are for project impacts for each environmental topic area. When considered in relation to other reasonably foreseeable projects, cumulative impacts to some resources would be significant and more severe than those caused by the project alone.

Table 4-2: Cumulative Projects

Lead Agency	Project Name	Project Address	Project Description
CAL FIRE	THPs	Eel River Watershed	Multiple THPs
Humboldt County	Commercial Cannabis Land Use Ordinance	Countywide	Land use regulations concerning the commercial cultivation processing, manufacturing, distribution, testing, and sale of cannabis for medicinal or adult use within the County of Humboldt
Humboldt County	Mid McKay Subdivision	Near Walnut Drive and Campton Road	A minor subdivision, zone reclassification, immediate TPZ rollout and HCSD annexation of an 88-acre parcel
City of Eureka	4-Plex	2348 23 rd Street	Multi-family development
City of Eureka	Sequoia Park Zoo	3414 W Street	Zoo renovation and expansion

Source: Trevor Estlow, personal communication, March 10, 2020; Kristen Goetz, personal communication, March 26, 2020

4.5 CUMULATIVE IMPACT ANALYSIS

For the purposes of this EIR, the North McKay Ranch Subdivision Project would result in a significant cumulative effect if:

- The cumulative effects of related projects (past, current, and probable future projects) are not significant, and the incremental impact of implementing the North McKay Ranch Subdivision Project is substantial enough when added to the cumulative effects of related projects to result in a new cumulatively significant impact; or
- The cumulative effects of related projects (past, current, and probable future projects) are already significant, and implementation of the North McKay Ranch Subdivision Project makes a considerable contribution to the effect. The standards used herein to determine a considerable contribution are that either the impact must be substantial or must exceed an established threshold of significance.

This cumulative analysis assumes that all MMs identified in Sections 3.1 through 3.19 to mitigate project impacts are adopted. The analysis herein analyzes whether, after adoption of project-specific mitigation, the residual impacts of the project would cause a cumulatively significant impact or would contribute considerably to existing and anticipated (without the project) cumulatively significant effects. Where the project would so contribute, additional mitigation is recommended where feasible.



4.5.1 Aesthetics

The geographic scope of the cumulative aesthetics analysis is the area surrounding the project site. This is the area within view of the project; therefore, the area most likely to experience changes in visual character or experience light and glare impacts.

The proposed project would not have significant impacts on scenic vistas, State Scenic Highways, or visual character, because the proposed project is establishing design standards and guidelines that provide certainty that the proposed development does not degrade visual character and does not result in impacts to scenic vistas. The proposed project would result in the introduction of new sources of light and glare, which may create a substantial source of nighttime light, and may affect nighttime views in the surrounding area. The proposed project would implement mitigation to prevent unwanted spillage of light and glare onto neighboring properties, thereby minimizing the amount of light and glare it would add to the ambient environment. The Mid McKay Tract project would be located approximately 0.75 mile south of the proposed development and is expected to be of similar scale. However, there is intervening development and vegetation that visually separates it from the proposed project. Similarly, other projects would be located more than 1 mile away and would not be associated with the visual character of the project area. Any other project resulting in significant impacts on aesthetics would be required to mitigate for its impacts in accordance with locally adopted land use regulations. Because the proposed project's impacts would be less than significant after mitigation, it would not have a cumulatively considerable impact.

4.5.2 Agricultural and Forestry Resources

The geographic scope of the cumulative agricultural and forest resources analysis is Humboldt County. Agricultural and forest resources are most commonly evaluated in the context of countywide resources; therefore, it is most appropriate to use this as the basis for assessing cumulative impacts. As discussed in Section 3.3, Agricultural and Forestry Resources, the project site would not be located on prime soils as shown on the County's Prime Agricultural Land map, or on prime agricultural land as defined in Section 51201(c) of the California Government Code. Therefore, the proposed project would not have a cumulatively considerable impact on agricultural resources.

The proposed water storage tank would have less than significant cumulative impacts related to the conversion of forest land to non-forest uses as no trees would be removed.

The project area consists primarily of lands that have historically been used for timber harvesting. However, based on the current zoning, the project area is planned for development. The Eureka Community Plan also considered the rezoning of the site from its historical TPZ use to a subdivision development, which has since occurred since the Eureka Community Plan was adopted (Humboldt County 1995). Therefore, the proposed project would have a less than significant impact related to conflict with existing zoning of forest land. The Mid-McKay project in Table 4-2 would result in conversion of up to 88 acres of timber forests. However, similar to the proposed project, it is zoned for development. Therefore, the proposed project would not make a cumulatively considerable contribution to a significant cumulative impact related to the conversion of forest land to non-forest uses.



4.5.3 Air Quality

The cumulative setting for air quality is the NCAB. The NCUAQMD regulates air pollutant point sources in the NCAB. The County is in attainment of all California and national ambient air quality standards for criteria air pollutants, except the 24-hour California ambient air quality standard for respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM₁₀). Monitoring results have shown that PM₁₀ is the principal pollutant in the NCAB, including the County. The primary sources of PM₁₀ in the NCAB are vehicles (engine exhaust and fugitive dust generated by travel on both paved and unpaved roads), open burning of vegetation (both residential and commercial), residential wood stoves, and stationary industrial sources (factories). PM₁₀ emissions from these sources are considered significant cumulative air quality impacts (Humboldt County 2017b).

Air pollution is largely a cumulative impact by its very nature. No single project is sufficient in its overall emission, in isolation, to result in nonattainment of ambient air quality standards. A project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. Although the project requires a general plan amendment, the estimated population growth is well within the County projections for its 2040 General Plan. The proposed project would not exceed the NCUAQMD thresholds of significance for PM₁₀ emissions and would be required to comply with all applicable NCUAQMD rules and regulations. Therefore, impacts of the proposed project would not be cumulatively considerable when combined with the impacts of the other cumulative projects.

4.5.4 Biological Resources

The geographic scope of the cumulative biological resources analysis is the project vicinity. Biological impacts tend to be localized; therefore, the area near the project area would be the area most affected by project activities (generally within a 0.5-mile radius).

The County is one of the most rural in California. According to the Humboldt County General Plan, past development in the region, including the timber harvest, have resulted in substantial loss of native habitat and degradation of aquatic habitat and water quality in the County's watersheds. Continuing development and other land use activities in both incorporated and unincorporated areas of the County would contribute to a significant cumulative impact on special-status wildlife, special-status plants, natural communities, waters of the U.S., and migratory corridors (Humboldt County 2017b).

Several of the projects listed in Table 4-2 may have the potential to impact biological resources. The proposed project would have significant impacts on special-status species, riparian habitat, wetlands, conflicts with local biological policies, and conflicts with an adopted habitat conservation plan that could be mitigated to a less than significant level. All other project-related biological impacts were found to be less than significant and did not require mitigation. Other projects that result in similar impacts would be required to mitigate those impacts. Because the proposed project can mitigate biological impacts to a less than significant level, it would not have a cumulatively considerable impact.

4.5.5 Cultural Resources

The geographic scope of the cumulative cultural resources analysis is the project area. Cultural Resource impacts tend to be localized; therefore, the area nearest the project area would be most affected by project activities (generally within a 500-foot radius).



The related project sites do not contain any recorded cultural resources or burial sites. However, there is the possibility that previously undiscovered resources could be encountered by subsurface earthwork activities; implementation of standard construction MMs would ensure that undiscovered cultural resources and burial sites are not adversely affected by project-related construction activities, which would prevent the destruction or degradation of potentially significant undiscovered cultural resources or burial sites in the Cutten and Eureka areas. Other projects that result in similar impacts would be required to mitigate for their impacts pursuant to federal and state law. Because the proposed project can mitigate all of its impacts to a less than significant level, it would not have a cumulatively considerable impact.

4.5.6 Energy

The project would be designed in accordance with Title 24, California's Energy Efficiency Standards for Residential and Nonresidential Buildings. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (heating, ventilation, air conditioning, and water heating systems), indoor and outdoor lighting, illuminated signs, and the installation of solar panels on all residential structure less than three stories. This would ensure that the project would not result in the inefficient, unnecessary, or wasteful consumption of energy. Other projects in the vicinity and region would similarly be designed to meet existing Title 24 standards. Thus, the proposed project, in conjunction with other planned projects, would not have a cumulatively considerable impact on energy.

4.5.7 Geology and Soils

Geology and Soils

The geographic scope of the cumulative geology, soils, and seismicity analysis is the project area. Geologic, soil, and seismic impacts tend to be localized; therefore, the area near the project area would be most affected by project activities.

Cumulative projects may have the potential to impact geology, soils, and seismicity. The proposed project would have significant impacts on seismic hazards, erosion, unstable geologic units and soils, and expansive soils that could be mitigated to a level of less than significant. All other project geologic impacts were found to be less than significant and did not require mitigation. Other projects that result in similar impacts would be required to mitigate for their impacts pursuant to state law and adopted building code requirements. Because the proposed project can mitigate all of its impacts to a less than significant level, it would not have a cumulatively considerable impact.

Paleontology

The project area lies within an area of Pleistocene era deposits, and according to the SVP guidance, the paleontological potential of the proposed project would be considered high due to the age and geographic context of these deposits. Project-specific mitigation would be implemented to reduce impacts to a less than significant level. Because of the site-specific nature of unique paleontological resources, the low probability that any project would encounter unique and scientifically important fossils, development of cumulative projects, including the proposed project, and other regional development would not result in a cumulatively significant impact on paleontological resources. The proposed project would have a less than cumulatively considerable contribution to cumulative impacts.



4.5.8 Greenhouse Gas Emissions and Climate Change

GHGs and climate change are cumulative global issues. Based on climate change predictions for California, it is reasonably foreseeable that the local climate in the County will shift due to climate change. This shift could lead to other environmental effects on the unincorporated county, such as increased flooding as a result of increased precipitation and runoff, habitat modification and loss, and impacts on sensitive plant and animal species. The unincorporated County areas could also be affected by an increase in sea level.

The County has adopted policies to achieve reductions in GHG emissions consistent with state requirements and is preparing a CAP that will comply with statutory requirements. Although not yet finalized, the County is suggesting GHG reduction targets of 40 percent below 1990 levels by 2030 and 60 percent below 1990 levels by 2040. Because the timing of CAP preparation is uncertain, the influence of CAP policies on future emissions levels cannot be estimated; therefore, the County General Plan EIR considered GHG impacts to be cumulatively significant.

Construction and operation of the proposed project combined with related projects in the County would contribute CO₂ emissions that would contribute to global climate change. The maximum annual construction emissions of the proposed project are estimated to be 451 MTCO_{2e}, which is well below the SMAQMD threshold of significance of 1,100 MTCO_{2e} that was used to determine GHG impacts for the project.

Operation of the proposed project would comply with CalGreen, which includes requirements to increase recycling, reduce waste, reduce water use, increase bicycle use, and other measures that would reduce GHG emissions. However, largely due to mobile GHG emissions, the project would exceed the SMAQMD operational significance thresholds of 1,100 MTCO_{2e} per year. To reduce operational GHG emissions, the project would implement MM GHG-2, which will require a network of on-site EV charging stations. In addition, MM GHG-3 would be implemented, which requires catalytic converters on all wood burning stoves. As required by Title 24, the project would install solar panels on the residential units. Motor vehicle emissions associated with the proposed project would be reduced through compliance with state regulations on fuel efficiency and fuel carbon content. Although these measures would reduce project-level GHG emissions, emissions still would exceed SMAQMD thresholds; therefore, operation of the project would be cumulatively considerable and significant and unavoidable.

4.5.9 Hazards and Hazardous Materials

The geographic scope of the cumulative hazards and hazardous materials analysis is the project area that could cause soil or groundwater contamination or create a risk of upset conditions. Adverse effects of hazards and hazardous materials tend to be localized; therefore, the area near the project area would be most affected by project activities. Impacts related to the transport, use, or disposal of hazardous materials and hazards to the public or environment because of upset and accident conditions are primarily site-specific. These impacts of the proposed project would not combine with impacts from cumulative projects, such that a cumulatively significant impact associated with hazards or hazardous materials could occur. The proposed project would have significant impacts associated with emergency access, wildfires, and accidental release of hazardous substances that could be mitigated to a level of less than significant. All other project-related hazards impacts were found to be less than significant and did not require mitigation. In addition, the project must comply with existing regulations, which would



reduce the potential to create a hazard to the public or environment. Because the proposed project can mitigate all of its impacts to a less than significant level, it would not have a cumulatively considerable impact.

4.5.10 Hydrology and Water Quality

The geographic scope of the cumulative hydrology and water quality analysis is the County area. Hydrologic and water quality impacts concern local waterways and groundwater sources, which affect the Humboldt area.

Preparation and implementation of the SWPPP and compliance with NPDES permitting and 401 certifications would reduce the contribution of each project to the temporary, short-term construction related drainage and water quality effects of urbanization, a potentially significant cumulative impact. The proposed project would have significant impacts on short-term water quality, long-term water quality, groundwater, and drainage, which could be mitigated to a less than significant level.

All other project hydrology impacts were found to be less than significant and did not require mitigation. Other projects that result in similar impacts would be required to mitigate for their impacts pursuant to federal and state law. Adhering to existing regulatory requirements and implementing the MMs outlined in this EIR would reduce the project's impacts on hydrology and water quality to less than significant levels. As a result, the proposed project would not result in a cumulatively considerable contribution to a significant water quality impact.

4.5.11 Land Use and Planning

The geographic scope of the cumulative land use analysis is the County, since land use decisions are made at the county level. The proposed project requires the approval of a General Plan amendment and rezone to facilitate the development of the proposed uses. These approvals are self-mitigating in the sense that they are designed to make changes to bring the project into conformance with the requirements of the General Plan and County Code. Other projects would be required to demonstrate consistency with applicable land use plans and mitigate where necessary in accordance with state law and locally adopted land use regulations. Therefore, the proposed project, in conjunction with other planned projects, would not have a cumulatively considerable impact on land use.

4.5.12 Noise

The geographic scope of the cumulative noise analysis is the project vicinity, including surrounding sensitive receptors. Cumulative impacts from construction-generated noise could result if other future planned construction activities were to take place near the proposed project and cumulatively combine with construction noise from the project. A list of current and future projects considered for the cumulative analysis is presented in Table 4-2. Mid McKay would be the closest construction project to the project and is located approximately 0.35 mile southwest of the project site. The proposed project would result in significant construction noise from construction traffic and construction activities. MMs are proposed that would reduce impacts to less than significant. Therefore, because construction activities would be limited to the project site, construction-generated noise would not combine with any other proposed construction activities within the County, nor result in a substantial contribution such that a new significant cumulative



construction noise impact would result. Cumulative construction noise impacts would continue to be less than significant.

For other noise-related issue areas, the proposed project would have significant impacts related to on-site noise from fixed sources that could be mitigated to less than significant levels. Other projects that result in similar impacts would be required to mitigate for their impacts in accordance with state law and locally adopted land use regulations. Because the proposed project can mitigate all of its construction and operational noise impacts to a less than significant level, it would not have a related, cumulatively considerable impact.

4.5.13 Population and Housing

The geographic scope of the cumulative population and housing analysis is the HCAOG region. The proposed project, in conjunction with other future development in the County, is within the growth projections provided by HCAOG. The proposed project would not have a significant impact on the housing and jobs balance, but would help the County meet its Regional Housing Needs Allocation. Therefore, the proposed project, in conjunction with other planned projects, would not have a cumulatively considerable impact on population and housing.

4.5.14 Public Services

The geographic scope of the cumulative public services analysis is the County area. The proposed project was found not to have significant impacts on fire protection, police protection, school, parks and library services. Prior to building permit issuance for new residential development, a mitigation fee will be collected pursuant to the existing Eureka City Schools school construction impact fee. State law provides that this fee is sufficient mitigation for a potential increase in the school age population, so the impact is less than significant. The project will increase the population by 778 people (residential + commercial), which is a 1 percent increase in the County population. As discussed in Section 3.14, Public Services, this increase will not require additional personnel to meet staffing ratios or alter response times from the Sheriff's Office or law enforcement. Furthermore, the proposed project would not require expansion of library facilities. The related projects would be required to evaluate whether sufficient public services are available and mitigate, as necessary, in accordance with state law and locally adopted land use regulations. Because the proposed project impacts would be less than significant with mitigation, they would not have a cumulatively considerable impact.

4.5.15 Recreation

The geographic scope of the cumulative recreation analysis is the County area. The proposed project was found to have significant impacts on recreation resources, such as Redwood Fields Park, during construction. Mitigation is proposed to reduce impacts to less than significant levels. The proposed project includes dedication of undeveloped forest land to the County and provides trail connections to the adjacent McKay Community Forest. Other projects would be required to evaluate project-specific impacts on recreational facilities and mitigate through impact fees or the creation of recreational opportunities. Because proposed project impacts would be less than significant with mitigation, it would not have a cumulatively considerable impact.



4.5.16 Transportation

The geographic scope of the cumulative transportation analysis is the City of Eureka and Humboldt County area. Note that Section 3.16, Transportation, provides a detailed evaluation of project-related transportation impacts.

All the new development projects would generate new vehicle trips that may trigger or contribute to unacceptable intersection operations, roadway operations, and freeway operations. All projects would be required to mitigate for their fair share of impacts. The proposed project would generate 2,879 daily trips, including 215 AM peak hour trips, and 269 PM peak hour trips. The proposed project would contribute trips to intersections facilities that would operate at unacceptable levels under Existing Plus Project and Cumulative conditions. All feasible MMs are proposed that would improve operations to acceptable levels. Therefore, the proposed project, in conjunction with other projects, would not have a cumulatively considerable contribution to unacceptable intersection or roadway operations.

For other transportation-related areas, the proposed project would have significant impacts on roadway hazards emergency access and construction traffic. After the implementation of mitigation, these impacts would be reduced to a level of less than significant. Other projects that result in similar impacts would be required to mitigate for their impacts. Because the proposed project can mitigate all of its impacts to a less than significant level, it would not have a cumulatively considerable impact.

4.5.17 Tribal Cultural Resources

According to CEQA, the importance of TCRs is the value of the resource to California Native American tribes culturally affiliated with the project area. Therefore, the issue in a cumulative impact analysis is the loss of TCR. For TCRs that are avoided or preserved through dedication within open space, no impacts would occur. However, if avoidance or dedication of open space to preserve TCRs is infeasible, those impacts must be considered in combination with TCRs that would be impacted for other projects included in the cumulative project list.

Cumulative projects located in the region would have the potential to result in a cumulative impact associated with the loss of tribal resources through development activities that could cause a substantial adverse change in the significance of a tribal resource. Any cumulative projects that involve ground-disturbing activities would have the potential to result in significant impacts to tribal resources. All projects would be regulated by applicable federal, state, and local regulations to avoid the destruction of TCRs. As discussed in Section 3.17, Tribal Cultural Resources, no TCRs were identified during the cultural resource study or through government-to-government consultation. As such, impacts to TCRs would be unlikely to occur due to implementation of the project. The project would not be likely to cumulatively contribute to a significant TCR impact. Therefore, cumulative impacts would be less than significant.

4.5.18 Utilities and Service Systems

The geographic scope of the cumulative utilities analysis is the HCSD service boundary. The proposed project would require annexation into the HCSD service boundary to receive water and wastewater service. The proposed project includes construction of an off-site water storage tank. The size of the tank is dependent upon a Water Storage, Pressure, and Supply study that is currently underway. In addition, infrastructure improvements, such a lift station and extension of high-pressure sewer line, are required to



serve the proposed development. The proposed project's impact on water supply and adequate pressure would be reduced to less than significant with mitigation. Impacts to other utilities were determined to be less than significant or would fully mitigate to a level of less than significant. Other projects would be required to evaluate whether sufficient public services and utilities are available for their respective projects and mitigate where necessary, in accordance with state law and locally adopted land use regulations. Therefore, the proposed project's impacts to utilities and service systems would not be cumulatively considerable.

4.5.19 Wildfire

The geographic scope of the cumulative wildfire analysis is the County region. The Mid-McKay project would also be located in a high fire hazard zone similar to the proposed project. The proposed project would be constructed in accordance with building codes and implement MMs as required under WF-1, Fire Safety Management Plan. However, the proposed project would still contribute to any potential significant cumulative impacts related to wildfire risks as the project does not provide the required 100-foot defensible space. Therefore, the proposed project would result in a cumulatively considerable impact.

