

6.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the CEQA Guidelines requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development and operation. As part of this analysis, the EIR must also identify (1) significant environmental effects of the proposed project, (2) significant environmental effects that cannot be avoided if the proposed project is implemented, (3) significant irreversible environmental changes that would result from implementation of the proposed project, (4) growth-inducing impacts of the proposed project, and (5) cumulative impacts.

6.1 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

Table 2-1 Summary of Impacts and Mitigation Measures in Chapter 2.0 Summary and Sections 4.1 through 4.16 of this EIR provide a comprehensive identification of the proposed project's environmental effects, including the level of significance both before and after mitigation.

6.2 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Implementation of the proposed project would result in the following significant and unavoidable impacts:

- **Aesthetics (Shade and Shadow).** During the Winter Solstice, shadows generated from the implementation of the proposed project would impact residential land uses located within and around the CPIO subdistricts and Crenshaw Corridor Specific Plan.
- **Air Quality (Construction Regional and Localized Emissions).** During construction, regional and localized emissions would exceed the SCAQMD significance thresholds.
- **Greenhouse Gas Emissions (Operational GHG Emissions and Applicable Plans, Policies, or Regulations).** During operation of the proposed project, GHG emissions would not be reduced to less than existing levels. This would have the potential to interfere with implementation of the ClimateLA plan, and subsequently could interfere with the State's ability to meet its goals under AB 32.
- **Noise (Construction Noise and Vibration).** In the absence of detailed noise and vibration analyses associated with specific projects, it is anticipated that construction noise and vibration levels at various sensitive land uses would still exceed the City's thresholds of significance. Construction noise and vibration impacts would need to be evaluated further under subsequent CEQA documentation for individual projects proposed in the West Adams CPA.
- **Public Services (Public Parks and Libraries).** Implementation of the proposed project could increase the population within the West Adams CPA by approximately 36,141 persons and would cause significant impacts to public parks and recreational facilities. Similarly, the projected increase in population would likely use the Washington Irving and Baldwin Hills Libraries and require the expansion of the existing libraries or the development of a new library. No feasible mitigation measures were identified to reduce the significant impact related to public parks and libraries to less than significant.
- **Traffic (Circulation System and Congestion Management Plan).** No feasible mitigation measures were identified to reduce the significant impact related to the circulation system and CMP to less than significant.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irreversible commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Resources that will be permanently and continually consumed by the proposed project's implementation include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources. In addition, construction activities related to additional capacity provided by the proposed project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment.

With respect to operation activities, compliance with all applicable building codes, as well as project mitigation measures or project requirements, would ensure that all natural resources are conserved or recycled to the maximum extent feasible. It is also possible that new technologies or systems will emerge, or will become more cost-effective or user-friendly, that will further reduce the West Adams CPA's reliance upon nonrenewable natural resources; however, even with implementation of conservation measures, consumption of natural resources would generally increase with implementation of the proposed project.

In summary, implementation of the proposed project would involve irreversible environmental changes to existing natural resources, such as the commitment of energy and water resources as a result of the operation and maintenance of future development that would be permitted. However, the proposed project would not involve wasteful or unjustifiable use of energy or other resources, and energy conservation efforts could also occur with new construction. In addition, new development associated with the proposed project will be constructed and operated in accordance with specifications contained in Title 24 CCR. Therefore, the use of energy related to the proposed project would occur in an efficient manner.

6.4 GROWTH INDUCING IMPACTS

Section 15125.2(d) of the CEQA Guidelines requires that growth inducing impacts of a proposed project be considered. Growth inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the

surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Generally a project is considered to result in growth inducing effects it causes one of the following:

- The extension of infrastructure (sewer, water, etc.) to an area currently undeveloped and/or lacking adequate infrastructure; and
- The provision of housing or employment to an area currently undeveloped or lacking in adequate housing or employment.

As analyzed in Section 4.13 Population, Housing and Employment, the population, housing, and employment associated with the proposed project would not exceed the growth anticipated for Southern California Association of Government's (SCAG) Los Angeles region. The proposed project would not remove impediments to growth. The project area already consists of commercial, industrial, and residential uses. In addition, the proposed project would help accommodate a portion of anticipated growth. With regard to infrastructure-induced population growth, all roadway improvements planned for the proposed project, or as mitigation, are intended to provide for better circulation flows throughout the area or to improve pedestrian safety and would not open any large undeveloped areas for new use. Utility and other infrastructure upgrades are also intended to meet project-related demand. The proposed project's demand for commercial goods and services would be met by new retail, services, and community facilities and by existing retail, service, and other resources already located within proximity to the project area. In conclusion, the proposed project is expected to satisfy a portion of the unmet population growth. The proposed project would also be consistent with the growth forecast for the Los Angeles region and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled.

6.5 CUMULATIVE IMPACTS

CEQA defines cumulative impacts as two or more individual actions that, when considered together, are considerable or will compound other environmental impacts. Cumulative impacts are the changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be insignificant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

AESTHETICS

The proposed project plans for additional land use capacity to accommodate the adopted 2030 growth forecast for the City of Los Angeles and associated community plan areas. This added land use capacity in the West Adams CPA is focused on CPIO subdistricts as targeted growth areas where new permitted use, design standards and/or densities are proposed. It is possible, however, that new growth and development would occur outside the targeted growth areas for projects where development could occur under existing zoning regulations not changed by this community plan update. The impetus for new development in this category of projects may be influenced by the additional capacity created in adjacent targeted growth areas. While mitigation measures identified would reduce impacts to visual character within and directly adjacent to targeted growth areas, there may be cumulative adverse impacts to visual character located outside of targeted growth areas. Changes to visual character in these areas could be reduced but not to a level of insignificance. Similarly, while mitigation measures identified would reduce impacts to light and glare

within and directly adjacent to targeted growth areas, there may be cumulative adverse impacts to light and glare located outside those targeted growth areas. Changes to light and glare in these areas could be reduced but not to a level of insignificance.

In addition, while shadow impacts associated with individual buildings are isolated in nature and do not contribute to additive effects on particular geographic location, the proposed project would result in a significant and unavoidable impact related to shade and shadow impacts. Therefore, the proposed project would result in a cumulatively considerable impact related to aesthetics.

AGRICULTURE AND FORESTRY RESOURCES

As discussed in Section 4.2 Agriculture and Forestry Resources, no impacts related to implementation of the proposed project would occur since the West Adams CPA does not contain any lands under the purview of the California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP). Furthermore, 0.69 square miles of area within the City are considered “Important Farmland” by the FMMP, none of which is within the West Adams CPA. Therefore, impacts related to agriculture and forestry resources would not be cumulatively considerable.

AIR QUALITY

The air quality analysis assessed construction and operational emissions. The proposed project would facilitate the development of hundreds of thousands of square feet of commercial and residential uses. Continued development in Metro Los Angeles Subregion, in conjunction with developments in other communities in the City of Los Angeles and in the South Coast Air Basin, will increase pollutant emissions and degrade regional air quality. As the proposed project would result in a regionally significant and unavoidable impact during construction from added plan capacity, it is anticipated that continued development in the Metro Los Angeles Subregion would also result in significant and unavoidable regional impacts. Therefore, the proposed project would result in a cumulatively considerable impact related to construction air quality.

In addition, the proposed project includes intensifying development around transit areas, also known as TOD. These TOD areas are located directly adjacent to Phase I of the Expo LRT stations at Exposition/Crenshaw Boulevards, La Brea/Farmdale Avenues, Jefferson/La Cienega Boulevards, and Venice/Robertson Boulevards. Furthermore, TOD areas are considered for station areas for the proposed Crenshaw Corridor LRT at the Crenshaw/Exposition Boulevards, Crenshaw/Martin Luther King Jr. Boulevards, Crenshaw Boulevard/Vernon Avenue, and Crenshaw Boulevard/Slauson Avenue intersections. All of these TODs would allow for an increase in both jobs and housing through their increased height and density characteristics. Locating jobs near housing can help reduce commutes and increase walking and biking rates. As a result of the proposed TOD development, and as shown in Table 4.3-7 of Section 4.3 Air Quality, the proposed project would reduce regional mobile source emissions. The decline in emissions also results in the reduction of vehicle emissions that are projected to occur between 2008 and 2030 due to stricter regulations and improved engine technology. The decline in regional emissions associated with the proposed project would improve regional emissions. While mitigation measures identified would reduce impacts to toxic air contaminants for sensitive receptors and projects located within 500 feet of a freeway or Major Highway, there may be cumulative adverse impacts to air quality located outside of areas. Changes to air quality in these areas could be reduced but not to a level of insignificance. Therefore, the proposed project would result in a cumulatively considerable impact related to operational toxic air contaminant emissions.

BIOLOGICAL RESOURCES

As discussed in Section 4.4 Biological Resources, impacts related to the proposed project would result in a significant impact to migratory birds and tree preservation without mitigation. Although no other significant impacts to biological resources would occur as a result of the proposed project, without mitigation, the potential exists for incremental impacts of similar or related projects to accrue into a significant cumulative

impact to biological resources. However, as discussed in Section 4.4 Biological Resources, all significant impacts identified in the analysis have been mitigated to less-than-significant levels. The mitigation measures identified would be enforced on a project-by-project basis, which would effectively impede any potential for significant cumulative impacts to accumulate. Therefore, impacts related to biological resources would not be cumulatively considerable.

CULTURAL RESOURCES

New developments as a result of implementation of the proposed project could include demolition of historic resources, or may include development near a known historic resource that may diminish the integrity of the historic resource's setting. The cumulative effect of these projects would contribute to the continued loss of historic resources if these resources are not protected. However, CEQA requirements, the City's preservation guidelines and regulations, and required adherence to the Secretary's Standards, protect historic resources throughout the City. Furthermore, mitigation measures would be imposed for development associated with the proposed project and enforced throughout construction to reduce historic resource impacts to less than significant.

In addition, new developments as a result of implementation of the proposed project would require grading and excavation that could potentially affect archaeological and/or paleontological resources or human remains. The cumulative effect of these projects would contribute to the continued loss of subsurface archaeological and paleontological resources, and human remains if these resources are not protected upon discovery. However, CEQA requirements and the City's Conservation Element protect archaeological and paleontological resources and human remains. If subsurface cultural resources are protected upon discovery, no cumulative impacts would occur. Furthermore, mitigation measures would be imposed for development associated with the proposed project and enforced throughout construction to reduce impacts to less than significant. Therefore, impacts related to cultural resources would not be cumulatively considerable.

GEOLOGY AND SOILS

As with other areas of Los Angeles, development resulting from the implementation of the West Adams New Community Plan would be subject to potential geological and soils impacts. In the event of a major geological incident, significant ground shaking could result at various project sites and in the surrounding area. Implementation of recommended mitigation measures would reduce, but not eliminate seismic risks. However, project impacts would be locally contained. Therefore, impacts related to geology and soils would not be cumulatively considerable.

GREENHOUSE GAS EMISSIONS

The GHG analysis assessed stationary and mobile source emissions. The proposed project would facilitate the development of hundreds of thousands of square feet of commercial and residential uses. Continued development in Metro Los Angeles Subregion, in conjunction with developments in other communities in the City of Los Angeles and in the South Coast Air Basin, will increase GHG emissions. The proposed project includes intensifying development around proposed TODs. These TODs would allow for an increase in both jobs and housing through their increased height and density characteristics. Locating jobs near housing can help reduce commutes and increase walking and biking rates. Despite the TOD development, and as shown in Table 4.7-3 of Section 4.7 Greenhouse Gas Emissions, the proposed project would result in a significant impact related to operational GHG emissions. The project increase in emissions would contribute to a significant impact when combined with GHG emissions associated with continued development in the Metro Los Angeles Subregion. Therefore, the proposed project would result in a cumulatively considerable impact related to GHG emissions.

HAZARDS AND HAZARDOUS MATERIALS

As discussed in Section 4.8 Hazards and Hazardous Materials, impacts related to implementation of the proposed project would result in a significant impact to the community and environment from potential exposure to hazardous materials sites known to exist within the West Adams CPA. Although no other significant impacts to the community from exposure to hazardous materials would occur as a result of the proposed project, without mitigation, the potential exists for incremental impacts of similar or related projects to accrue into a significant cumulative impact to the community and environment. However, as discussed in Section 4.8 Hazards and Hazardous Materials, all significant impacts identified in the analysis have been mitigated to less-than-significant levels. The mitigation identified would be enforced on a project-by-project basis, which would effectively impede the potential for significant cumulative impacts. Therefore, impacts related to hazards and hazardous materials would not be cumulatively considerable.

HYDROLOGY AND WATER QUALITY

Compliance with State and federal requirements, including development of a Storm Water Pollution Prevention Plan for project-specific construction, and adherence to local regulations for construction and operation of new developments would be required. This would be expected to mitigate any potential cumulative impacts by requiring on-site detention, treatment, or other best management practices for controlling urban runoff. Therefore, impacts related to hydrology and water quality would not be cumulatively considerable.

LAND USE AND PLANNING

All development projects within the City would be required to be consistent with the General Plan, other applicable plans, and the City's ordinances, including the zoning ordinance. All projects (past, present, and future) within the City's jurisdiction are required to be consistent with the City's plans and ordinances. Future development as a result of the proposed project would generally be consistent with surrounding land uses. Additionally, the proposed project would be consistent with the City's General Plan and zoning ordinance. No land use impacts are expected to result from implementation of the proposed project. Therefore, impacts related to land use and planning would not be cumulatively considerable.

MINERAL RESOURCES

As discussed in Section 4.11 Mineral Resources, impacts resulting from implementation of the proposed project would result in a less than significant impact to known mineral resources in the West Adams CPA. There is a limited potential for the proposed project to have a significant cumulative impact to known mineral resources. This is primarily because the project area is substantially urbanized, therefore, limiting the proposed project and similar projects to primarily infill development, redevelopment, and/or intensification of existing urban lands. Therefore, impacts related to mineral resources would not be cumulatively considerable.

NOISE

The noise analysis assessed construction and operational noise and vibration levels. Temporary noise and vibration levels would be generated by construction activity, and as discussed in Section 4.12 Noise, the proposed project would expose sensitive receptors to noise levels in excess of acceptable City standards. Construction noise levels decrease substantially with distance. Consequently, in order to achieve a substantial cumulative increase in construction noise levels, more than one source emitting high levels of construction noise would need to be in close proximity to a noise receptor. The potential exists for overlapping construction activity between individual projects. Thus, the possibility exists that a substantial cumulative increase in construction noise levels could result from construction associated with multiple projects. Therefore, the proposed project would result in a cumulatively considerable impact related to construction noise and vibration.

The mobile source noise analysis completed for the proposed project included an assessment of all cumulative regional traffic growth. The analysis presented in Table 4.12-8 of Section 4.12 Noise, represents cumulative mobile source noise. It was determined that the proposed project would result in a less-than-significant mobile noise impact. Therefore, impacts related to operational noise would not be cumulatively considerable.

It is not anticipated that the West Adams CPA would be developed with substantial sources of vibration (e.g., blasting operations). Operational vibration in the project vicinity would be generated by vehicular travel on the local roadways. As noted above, the mobile source noise analysis completed for the proposed project included an assessment of all cumulative regional traffic growth. Similar to existing conditions, traffic vibration levels would not be perceptible by sensitive receptors. Therefore, impacts related to operational vibration would not be cumulatively considerable.

POPULATION, HOUSING, AND EMPLOYMENT

SCAG projects a significant increase in population, employment, and housing in the Los Angeles area. The proposed project seeks to accommodate this level of growth. Therefore, the implementation of the proposed project would result in contributing to the growth of housing stock and the creation of greater opportunities for employment. While other community plans, as well as regional plans, seek to accommodate forecasted growth, some of these other plans could result in significant impacts to population, employment, and/or housing. However, the proposed project would not contribute to such impacts in a considerable manner. Therefore, impacts related to population, housing, and employment would not be cumulatively considerable.

PUBLIC SERVICES

Fire Protection and Emergency Services

The implementation of the proposed project would result in increased intensity of development in the West Adams CPA, which may require the upgrading or improvements of existing fire protection equipment or infrastructure, or may cause a deterioration in existing operating traffic conditions, which could adversely affect the response times for fire fighting and paramedic services. Increased land use densities would generate an increased demand for fire protection services in the Los Angeles area. The Infrastructure and Public Services Element of the City of Los Angeles General Plan includes policies that require the evaluation of fire service needs based on existing and future conditions. Areas with deficient fire and emergency facilities are identified, and priority is given to the areas in need of upgraded facilities based on established fire protection standards. As a result, it is expected that the Los Angeles Fire Department will maintain acceptable emergency response times with the provision of additional personnel and equipment as needed throughout the City. Therefore, impacts related to fire protection and emergency services would not be cumulatively considerable.

Police Protection Services

The implementation of the proposed project would likely contribute to the Citywide need for greater and expanded police services. The project includes mitigation measures that would reduce project impacts below a level of significance. It is similarly anticipated that as a result of these policies the project contribution to impacts to Citywide police protection capabilities would not be significant. Therefore, impacts related to police protection services would not be cumulatively considerable.

Public Schools

The anticipated student population generated by the proposed project would contribute incrementally to the demand for public school services in the Los Angeles Unified School District (LAUSD). The implementation of the proposed project would result in an increase in the student population in the West Adams CPA. In general, existing public, non-charter student enrollments have been below operating capacities in existing LAUSD schools. It is anticipated that with the operation of the LAUSD New School

Construction Program and Facilities Services Division Strategic Execution Plan, as well as provisions of State regulations, school facilities would have the potential to accommodate the anticipated increase in the student population. Therefore, impacts related to public schools would not be cumulatively considerable.

Public Parks and Other Public Services

The existing overall parkland acreage in the West Adams CPA is not adequate to accommodate the anticipated increase in population because there is currently an acute shortage in the West Adams CPA and in nearby community plan areas. Implementation of the proposed project would further exacerbate this shortage in the West Adams CPA and surrounding community plan areas. The proposed project includes mitigation measures that would reduce the impacts from the CPIO subdistricts and Crenshaw Corridor Specific Plan amendments. However, impacts related to public parks would still result in a significant impact. Therefore, the proposed project would result in a cumulatively considerable impact related to public parks.

Some public libraries located in the West Adams CPA, and in other community plan areas in close proximity to the West Adams CPA, are presently inadequate to serve their residents in terms of the required library space and materials collection. At present, three of the five public libraries servicing the West Adams CPA do not meet the newly adopted library facilities standards in terms of building size for the population served. No feasible mitigation measures were identified to reduce the significant impact related to public libraries to less than significant. Therefore, the proposed project would result in a cumulatively considerable impact related to public libraries.

TRANSPORTATION AND TRAFFIC

A travel demand forecasting model was used to evaluate future travel patterns that may result from future changes to the transportation system and potential land use alternatives. The travel demand model was used along with future year SCAG and West Adams CPA land use projections to produce forecasts of future traffic flows in the West Adams CPA. To estimate the effectiveness of the proposed West Adams Transportation Improvement and Mitigation Program (TIMP), the 2030 highway network was modified to incorporate the physical improvement elements of the TIMP. In addition, roadway capacity changes associated with three bicycle facility improvement scenarios were applied to the modified 2030 highway network.

While the West Adams TIMP includes many beneficial elements aimed to encourage alternative modes of travel, such as the creation of more pedestrian-friendly environments around transit stations and the provision of bicycle facilities along major corridors, none of the three proposed TIMP scenarios would be effective in improving overall operating conditions over existing (Year 2008) conditions as measured by average volume-to-capacity (V/C) ratio. The West Adams TIMP scenarios are also projected not to maintain the same number (or fewer) of segments at LOS E or F when compared to existing (Year 2008) conditions. Therefore, the proposed project would result in a cumulatively considerable impact related to transportation and traffic.

UTILITIES AND SERVICE SYSTEMS

Water

The issues of water demand and supply are region-wide in the southern California area and transcend the boundaries of individual community plan areas or even the City. As discussed in Section 4.16 Utilities and Service Systems, implementation of the proposed project would result in a 17 percent increase in water usage by year 2030 as compared to existing water usage within the West Adams CPA. However, when placed in a regional context, the increase in water usage as a result of the proposed project is equivalent to a 0.66 percent increase of total water supplied by the Los Angeles Department of Water and Power in year 2008. Therefore, impacts from the proposed project were determined to be less than significant without mitigation.

Nevertheless, while water conservation programs would result in a decline of per capita water use in normal years, notwithstanding the effects of commercial growth and other factors that tend to increase per capita use, the rate of the City's population growth would be higher than the rate of decline in per capita use, thus causing an increase in total water consumption. Therefore, the proposed project would result in a cumulatively considerable impact related to water.

Wastewater

The issue of wastewater flow is a Citywide concern and transcends the boundaries of individual community plan areas. The existing Citywide wastewater flow is approximately 466.5 million of gallons per day (mgd), whereas the increase in wastewater flows resulting from the proposed project in year 2030 would be approximately 5.5 mgd. Implementation of the proposed project would contribute to an anticipated Citywide increase in wastewater flow, as well as placing added demands on the wastewater conveyance system as future projects are undertaken in pursuit of the goals, policies, and objectives of the proposed project. Therefore, the proposed project would result in a cumulatively considerable impact related to wastewater.

Solid Waste

Solid waste management is another Citywide concern, with growing solid waste disposal needs and a finite limit to landfill capacity. Implementation of the proposed project would contribute to solid waste generation and, therefore, increase the demands on landfill facilities serving the City. While the existing solid waste capacity and collection system would be able to accommodate the anticipated increase in solid waste generated from the proposed project, the potential exists for a cumulative impact from the incremental impacts of many individual projects. Therefore, the proposed project would result in a cumulatively considerable impact related to solid waste.

Energy

Implementation of the proposed project would facilitate an increase in the Citywide consumption of non-renewable energy resources, including petroleum, electricity, and natural gas. As discussed in Section 4.16 Utilities and Service Systems, while implementation of the proposed project would facilitate demand for petroleum, electricity, and natural gas to increase, the impact to the City's energy resources was determined to be less than significant without mitigation. Nevertheless, the potential exists for a cumulative impact from the incremental impacts of many individual projects. Therefore, the proposed project would result in a cumulatively considerable impact related to energy.

In summary, while CEQA recognizes that the analysis of cumulative impacts need not be as detailed as the analysis of project level impacts, the analysis of cumulative impacts should "be guided by the standards of practicality and reasonableness" (CEQA Guidelines Section 15130(b)). The analysis presented above concluded that proposed project would result in cumulatively considerable impacts related aesthetics, air quality, GHG emissions, noise and vibration, public services, and utilities and service systems.