



Section 4.0:

Basis of Cumulative Analysis



SECTION 4.0

BASIS OF CUMULATIVE ANALYSIS

4.1 INTRODUCTION

This section analyzes potential impacts resulting from reasonably foreseeable growth, including The Fullerton Plan (i.e., General Plan Update).

CEQA Guidelines Section 15355 defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts . . .” The following elements are necessary in an adequate discussion of cumulative impacts, as noted in Sections 15130(b) through 15130(e) of the *CEQA Guidelines*.

(b) *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 standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. The following elements are necessary to an adequate discussion of significant cumulative impacts:*

(1) *Either:*

(A) *A list of relevant past, present and probable future projects, producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or*

(B) *A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.*

(2) *When utilizing a list, as suggested in paragraph (1) of subdivision (b), factors to consider when determining whether to include a related project should include the nature of each environmental resources being examined, the location of the project and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.*

(3) *Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.*



- (4) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and*
- (5) A specific analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.*
- (c) With some projects, the only feasible mitigation for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis.*
- (d) Previously approved land use documents such as general plans, specific plans, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impact analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed, as defined in Section 15152(f), in a certified EIR for that plan.*
- (e) If a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact, as provided by Section 15183(j).*

4.2 APPROACH TO CUMULATIVE ANALYSIS

Cumulative impacts may be discussed in terms of impacts resulting from The Fullerton Plan (proposed project), in combination with impacts anticipated for future development (including approved and planned development within the project area and surrounding affected area), and impacts associated with growth within the region. The geographic area for each impact varies, depending on the nature of the impact, whether it is regional, such as air quality, or local, such as noise.

Quantification can be difficult for cumulative impacts, as it requires speculative estimates of impacts including, but not limited to the following: the geographic diversity of impacts (impacts of future development may affect different areas); variations in time of impacts; and data for buildout projections may change following subsequent approvals. However, every attempt has been made herein to make sound qualitative judgments of the combined effects of, and relationship between, land uses and potential impacts.

This EIR assesses the overall environmental effects of The Fullerton Plan at a program level of detail. This EIR evaluates the overall (cumulative) effects of development in accordance with the community development types, land use assumptions, and all Goals, Policies, and Actions contained in The Fullerton Plan. Therefore, the environmental analyses in Sections 5.1 through 5.21 of this EIR consider proposed project impacts in combination with regional impacts, where



applicable, that could be expected as other cities within the Orange County subregion approach buildout.

In compliance with *CEQA Guidelines* Section 15130(1)(b), this section of the EIR describes the environmental effects of The Fullerton Plan in combination with the effects of regional buildout, as forecasted in the Southern California Association of Governments (SCAG) Regional Comprehensive Plan and Guide (RCPG).

The City of Fullerton's existing population is an estimated 135,314 persons. These residents receive public services from the public agencies discussed in [Section 5.12](#) through [Section 5.20](#). The City of Fullerton is substantially developed (approximately 90 percent). The City is forecast to have approximately a maximum total of 56,130 dwelling units (DU) by the year 2030, which would result in an approximate population of 165,303 persons. Therefore, the addition of 10,183 DU over the next 20-year period would result in a population growth of approximately 29,989 persons in the City under implementation of The Fullerton Plan.

The Southern California Association of Government (SCAG) provides population, housing, and employment projections to 2035. SCAG forecasts that the Orange County Council of Governments (OCCOG)¹ subregional population will grow to 3,629,539 persons by 2030, an increase of approximately 14.6 percent over the 2010 population estimate of 3,166,461 persons. The number of households in the OCCOG subregion is projected to increase from approximately 1,005,478 households in 2010 to 1,110,659 households in 2030. Similarly, the number of dwelling units the OCCOG subregion is projected to increase from approximately 1,040,544 DU in 2010 to 1,149,394 DU in 2030.

It is anticipated that most of the future growth in the subregion would occur through infill and redevelopment within existing urban areas. Environmental constraints such as water supply, landfill capacity, energy demand, air quality, traffic levels of service and infrastructure, among others, will become predominate issues of concern as the subregion approaches buildout.

¹ The OCCOG Subregion is contiguous with the County of Orange.



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