

## 2.4 Cumulative Impacts

### 2.4.1 Regulatory Setting

Cumulative impacts are those that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of this project. A cumulative impact assessment looks at the collective impacts posed by individual land use plans and projects. Cumulative impacts can result from individually minor but collectively substantial impacts taking place over a period of time.

Cumulative impacts on resources in the project area may result from residential, commercial, industrial, and highway development, as well as from agricultural development and the conversion to more intensive types of agricultural cultivation. These land use activities can degrade habitat and species diversity through consequences such as displacement and fragmentation of habitats and populations, alteration of hydrology, contamination, erosion, sedimentation, disruption of migration corridors, changes in water quality, and the introduction or promotion of predators. They also can contribute to potential community impacts identified for the project, such as changes in community character, traffic patterns, housing availability, and employment.

State CEQA Guidelines Section 15130 describes when a cumulative impact analysis is warranted and what elements are necessary for an adequate discussion of cumulative impacts. The definition of cumulative impacts under CEQA can be found in Section 15355 of the State CEQA Guidelines. A definition of cumulative impacts under NEPA can be found in 40 CFR Section 1508.7 of the CEQ regulations.

### 2.4.2 Approach to Cumulative Impact Analysis

The cumulative analysis for the proposed project takes into consideration the other ongoing projects in the same geographic area as the proposed project, as well as planned land uses and transportation and circulation projections identified in city and county general plan and policy documents.

The existing and proposed projects listed below have been included in this analysis because they either are close to the project area or could affect regional resources. This information represents the most up-to-date information available as of the date of publication of this document.

- **North Connector Project:** The North Connector Project would construct a parallel route to the north of I-80 between Abernathy Road at I-80 on the east and SR 12 at Red Top Road on the west. This project would provide increased east/west capacity and provide an alternative to I-80 for local traffic. Construction of the first phase of the North Connector Project is expected to begin in summer 2009, with completion anticipated in December 2010.

- **Interstate 80 High-Occupancy Vehicle Lanes Project:** Eastbound and westbound high-occupancy vehicle (HOV) lanes will be constructed along an approximately 8.5-mile-long segment of I-80 from the Red Top Road interchange in Solano County to approximately 0.5 mile east of the Air Base Parkway interchange in Fairfield. This project (EA-04-0A5304) will increase the overall carrying capacity of I-80 in the project area and will facilitate the already high demand for ridesharing on I-80. Construction of this project began in June 2008, and completion is anticipated in late 2009.
- **Transit Improvements:** To support increased transit ridership and expanded bus routes in the county, the *I-80/I-680/I-780 Transit Corridor Study* identifies numerous potential locations for park-and-ride lots in these major corridors, three of which could be located in the project area: Red Top Road at I-80, a surface lot at Abernathy Road between I-80 and SR 12 or an expanded parking structure at the Fairfield Multimodal Transportation Center, and Gold Hill Road at I-680. These potential lots are expected to be constructed between 2010 and 2015.
- **Interstate 80/Interstate 680/State Route 12 Interchange Project:** The Interstate 80/Interstate 680/State Route 12 Interchange Project (EA-04-0A5300) would include numerous improvements to the I-80/I-680/SR 12 interchange to address existing and future traffic operations and congestion, including the relocation of the westbound Cordelia Truck Scales. The improvements are intended to add freeway capacity, reduce cut-through traffic on local roads, improve local access to and from the freeway, accommodate current and future truck volumes, improve safety and increase the use of HOV lanes and ridesharing. The environmental document for the project is currently underway and is expected to be completed in early 2010.
- **Jameson Canyon (SR 12) Widening from I-80 to SR 29:** This project would provide a continuous 4 lane expressway between I-80 and SR 29. The project currently in the final design phase and construction is planned to begin in 2011, with completion in 2013.
- **I-80 Improvements through Fairfield:** Several projects are programmed between SR 12 East and Air Base Parkway. They include construction of an eastbound auxiliary lane between Abernathy Road and Auto Mall Parkway, removal of existing hook ramps at Auto Mall Parkway, construction of an eastbound auxiliary lane between Beck Avenue and Travis Boulevard, construction of an eastbound auxiliary lane from Travis Boulevard to Air Base Parkway, construction of a westbound auxiliary lane from Waterman Boulevard/Air Base Parkway to Travis Boulevard, and construction of a westbound auxiliary lane from West Texas Street to Abernathy Road. These improvements are in the early planning phases. No construction date has been determined.

### 2.4.3 Assessment of Cumulative Impacts

#### ***Human Environment***

##### *Land Use*

The study area for cumulative land use effects includes the geographic area of the ongoing projects listed above which generally coincides with the areas immediately surrounding I-80 and

State Route 12 in Solano County and the City of Fairfield. Land uses in the study area have changed dramatically in some areas and remained relatively stable in others. Portions of the study area within Solano County have remained relatively stable over the years and focused on agricultural uses with intermittent industrial and commercial uses. Areas within the City of Fairfield have changed rapidly over the years particularly north of I-80 in the Green Valley area of Fairfield with large amounts of commercial, office and residential land uses being developed. As discussed in section 2.1.1, the proposed project would affect agricultural and residential environments confined to within the project area. The project in combination with other ongoing and reasonably foreseeable projects in the study area would contribute to additional conversion of agricultural lands to non-agricultural uses as well as additional residential and business displacement. These changes could cause a cumulatively adverse effect. However as with the proposed project, each ongoing and reasonably foreseeable project would be required to mitigate the individual land use impacts resulting from each project. In addition, the cumulative changes in land use that would occur as a result of this project in combination with other ongoing and reasonably foreseeable projects are generally consistent with the long range community and transportation plans of the County, City of Fairfield and transportation planning agencies (MTC, STA, Caltrans, and FHWA).

### *Growth*

The study area for cumulative growth effects is the same as described above for land use. As discussed in section 2.1.2, the proposed project would not contribute to growth-inducement and as such would not contribute to a cumulative effect.

### *Farmlands*

The study area for cumulative farmland effects is the same as described above for land use. As discussed in section 2.1.3, and above under land use, the proposed project would result in the conversion of farmlands to non-farm uses. The project in combination with other ongoing and reasonably foreseeable projects in the study area would contribute to additional conversion of farmland to non-farm uses. The amount of farmland conversion could cause a cumulatively adverse effect. However as with the proposed project, each ongoing and reasonably foreseeable project would be required to mitigate the individual farmland impacts resulting from each project. If mitigation similar to that specified for the proposed project is required of other ongoing and reasonably foreseeable projects, cumulative impacts to farmlands should be substantially reduced and result in more farmland within the County being permanently protected from future conversion.

### *Community Impacts*

The study area for cumulative community impacts is the same as described above for land use. As discussed in section 2.1.4, the proposed project would not result in an adverse community impact nor affect an environmental justice community. As such the proposed project would not contribute to a cumulative effect.

### *Utilities/Emergency Services*

The study area for cumulative utilities/emergency services impacts is the same as described above for land use. As discussed in section 2.1.4, the proposed project would not result in an adverse effect on utilities or emergency services. As such the proposed project would not contribute to a cumulative effect.

### Traffic and Transportation

As discussed in section 2.1.6, the only adverse effect on traffic and transportation would be a temporary effect associated with construction. Implementation of measures listed in Section 2.1.6 would reduce this effect. Because the only adverse effect is temporary, there would be no cumulative impact on traffic and transportation.

### Visual Resources

The visual quality of the land along I-80 near Fairfield, has decreased as a result of recent development which has altered the general visual character from agricultural to suburban. Development continues along the I-80 corridor and as a result, visual quality continues to decrease. Although the project would be developing one of the remaining somewhat vivid agricultural/undeveloped areas along this portion of the freeway, its contribution to this cumulative impact would not be considerable because of the removal of the existing truck scales along with landscape and architectural treatments that mitigate any visual impacts from the project.

### Cultural Resources

As discussed in section 2.1.8, there would be no adverse impacts on cultural resources. Therefore, the project would not contribute to any cumulative impacts.

## **Physical Environment**

### Hydrology and Floodplain

Related projects in the area of the study area that would impact the floodplain include: A) the HOV project that is currently under construction, B) the North Connector project that is currently under design and located parallel to and a short distance north of the freeway, C) and the large I-80/I-680/SR12 interchange freeway reconstruction project that is in the planning stages.

The potential impacts of the HOV project and the North Connector project are minimal. The HOV project resulted in no changes to the culverts under the freeway, and where the floodplain overtops the freeway, a metal beam guard rail has been constructed instead of a concrete barrier to minimize impacts to the floodplain. The North Connector project is constructed at or slightly below existing grade, so there is no new impediment to overland flows.

The future interchange and freeway widening project has the potential to have an adverse effect on the floodplain, however, all waterway crossings will be reconstructed with new bridges or new culverts, creating the same or increased conveyance of flood flows. At Raines Drain, the future freeway widening project that is part of the large interchange project will negatively impact the floodplain elevations unless specific flood control improvements are made. Presently the total runoff in Raines Drain is the combination of runoff from the immediate Raines Drain watershed and excess flood flows that escape from the adjacent Suisun Creek. These combined flood flows reach the undersized culverts at the highway. In the future, when the mainline is raised and the westbound truck scales relocated, a combination of additional storm drain capacity and/or detention facilities will need to be constructed. The eastbound truck scales project will not affect the floodplain flows because the existing freeway centerline is the control to the floodplain elevation; all flows that overtop the freeway will likewise pass, at a lower elevation across the

eastbound scales improvements. These projects taken together are not expected to have a cumulative effect on hydrology and the floodplain in the project vicinity.

Impacts to the hydrology and floodplain as a result of the proposed project would be minimal and would be mitigated. Therefore, the project will not contribute to a cumulative impact on the hydrology and floodplain in the project vicinity.

#### *Water Quality and Stormwater Runoff*

Related projects in the vicinity of the study area include that would affect water quality and stormwater runoff include: A) the HOV project that is currently under construction, B) the North Connector project that is currently under design and located parallel to and a short distance north of the freeway, C) and the large I-80/I-680/SR12 interchange freeway reconstruction project that is in the planning stages.

All State or local transportation projects, including the three mentioned here, are subject to incorporating construction storm water treatment measures, the design of erosion control measures, and incorporating new stormwater runoff treatment control measures. Each project will be required to meet the water quality regulations of the Regional Water Quality Control Board. With each project meeting the requirements of the Regional Board there should be no net cumulative effect, and therefore the project will not contribute to a cumulative impact.

#### *Geology/Soils/Seismic/Topography*

As discussed in section 2.2.3, construction in the project area could lead to an increased sediment load to receiving waters and an increase in the potential for seismic- or expansive soil-related hazards. There are measures in place to conduct a site-specific geotechnical investigation and to design and construct the project to avoid or minimize the potential for such hazards to result in damage to project facilities. Therefore, the project is not anticipated to have a cumulatively considerable contribution to these impacts.

#### *Paleontology*

As discussed in section 2.2.4, potential adverse impacts on paleontological resources would be mitigated through a monitoring plan in sensitive areas. Therefore, the proposed project would not contribute to any cumulative impacts.

#### *Hazardous Waste/Materials*

As discussed in section 2.2.5, there are measures in place to conduct site-specific hazardous materials investigations, prepare and implement a safety plan, and design and construct the project to avoid or minimize the potential exposure of humans and the environment to hazardous conditions. With these measures in place, the project is not anticipated to contribute to cumulative impacts related to hazardous materials.

#### *Air Quality*

Air quality impacts are inherently cumulative since the traffic forecasts are consistent with buildout assumptions that are consistent with adopted demographic forecasts. Consequently, air quality conditions incorporate regional growth. The only exception to this is for construction related impacts. The proposed project would improve movement, increase capacity, and improve overall traffic operation in the general vicinity, thereby lowering the concentration of pollutants

emitted by the motor vehicles. Consequently, with the relocation of the trucks scales, transportation improvements for the corridors I-80/I-680/SR-12 proposed and the secondary improvement in vehicular movement, such as the HOV lanes and longer truck on-/off-ramps, no cumulative adverse regional or local air quality impacts are anticipated.

### *Construction Activities*

Construction of the proposed project would not result in adverse impacts on air quality, with the implementation of the standard construction control measures. Additionally, short-term effects are minimized through compliance with BAAQMD rules and regulations and the Department specifications during construction. Therefore, impacts of the proposed project as a result of construction activity are not expected to contribute to cumulative impacts on air quality.

### *Operational Impacts*

Proposed project operations were shown to have a minor decrease in criteria pollutants and MSAT emissions near residences. Therefore, project-related emissions would decrease with the implementation of the project for each criteria and MSAT pollutant in the region. The combined impacts from the proposed project with other nearby projects would result in cumulatively considerable effects from the proposed project and other nearby projects would not result in cumulatively considerable effects for criteria pollutants and MSAT emissions. All of the projects listed in Section 2.4.2 are listed in 2007 TIP, including the I-80 EB Cordelia Truck Scales Relocation Project, and therefore conforms to the SIP. Therefore, emissions would not result in an adverse cumulative effect.

### Noise

For consideration of cumulative impacts, this analysis examines whether implementation of the project would make a considerable contribution to noise levels under design-year no-project conditions.

### **Impact NOI-3: Contribution to Cumulative Traffic Noise Impact**

Traffic noise levels exceed the NAC under existing conditions and will continue to do so in the future, as I-80 traffic demands increase, further increasing noise levels. As indicated in Table 2.2-17, implementation of the proposed project is predicted to increase traffic noise levels by at least 1 dB at noise-sensitive receiver locations over design-year no-project conditions. Accordingly, implementation of the proposed project is anticipated to contribute to a considerable cumulative traffic noise impact at noise-sensitive receiver locations within the project area.

Implementation of the standard Department procedures would reduce the severity of this adverse effect, and would eliminate the project's contribution to any cumulative adverse noise effects.

### Energy

For the purposes of this draft EIR/EA, cumulative impacts on energy would occur if the selected alternative, in conjunction with other related projects, collectively resulted in excessive or inefficient energy use.

### *Construction*

The proposed project would require the use of energy resources during construction. Energy impacts involve one-time, non-recoverable energy use associated with construction activities and the use of materials. Energy use for construction would be a short-term impact and would represent a small percentage of the total energy consumed in the region during the period of project construction. As a result, the proposed project is not anticipated to result in an adverse impact on the overall supply of or demand for energy during project construction and, therefore, would not contribute to adverse cumulative impacts on energy resources.

### *Operations Impacts*

Development of related projects in the project area would have a tendency to result in increased energy consumption, whereas the proposed project and other transportation-related projects are expected to result in improved or reduced energy consumption associated with more efficient traffic flow. In either case, because of the relatively high cost of energy, cumulative energy consumption related to proposed project operations is not expected to be excessive or inefficient.

The proposed project would not result in an adverse effect on fuel consumption. Therefore, proposed project operations would not contribute to cumulative direct impacts on energy resources. Indirect energy resources include the consumption of energy for construction of materials and supplies and manufacture of parts associated with the maintenance of the truck scales. This would occur, and therefore the project would result in a slight adverse effect on indirect energy in the long term and would contribute to a cumulative adverse impact on energy.

The proposed project would contribute to the cumulative short-term impacts since it would require the expenditure of energy resources to construct the proposed project. This expenditure would be offset by the energy savings associated with reduced congestion as result of the relocation of the Cordelia truck scales, improvements to the I-80/I-60/SR-12 freeways and local intersections.

### **Impact EN-5: Contribution to Cumulative Effect on Non-renewable Natural Resources**

Implementation of the projects in the study area would result in a cumulative effect on the consumption of non-renewable natural resources (i.e. lumber for construction, fossil fuels [gasoline and diesel] used for equipment operation and vehicle trips to and from construction sites). Considering a number of projects in the study area are redevelopment projects, it is anticipated that modern energy-conserving fixtures, appliances, etc. would replace inefficient equipment, lessening the use of non-renewable energy sources on-site. The projects are also anticipated to stimulate the local economy and may result in a net increase in vehicular trips over existing conditions, particularly the shopping areas. Therefore, implementation of the projects in the study area has the potential for increasing demand on energy sources.

This is an adverse effect, but its severity is reduced through various laws, policies, and programs by both Federal and State agencies. The most significant mitigation for direct energy expenditures would be adoption and implementation of more rigorous CAFE standards for motor vehicles, as stated in the Energy Independence and Security Act of 2007. In addition, the EPA's Energy Star Program, Governor's Executive Order S-20-04 and Green Building Action Plan incorporate programs and techniques that create appliances with Energy Star efficiency

compliance, buildings with a LEED Silver or higher rating, and other energy-saving projects to conserve energy that help provide for a sustainable environment.

## ***Biological Environment***

### ***Natural Communities***

#### **Impact NC-2: Cumulative Loss of Riparian Woodland**

Implementation of the proposed project, in combination with other local and regional projects, would contribute to the cumulative loss of riparian woodland in the project vicinity. Historic loss of riparian vegetation in Solano County has occurred from conversion of riparian habitat for agriculture and development. Although riparian vegetation remains along some of the major streams in the County, including Suisun Creek, the riparian corridor is substantially narrower than it was historically because of this development. The project would contribute incrementally to Solano County cumulative impacts on riparian woodland caused by similar bridge modification projects, new bridge construction, and road widening projects, and from the loss of riparian habitat attributed to urban development. Additional projects proposed within the county, such as Fairfield Corporate Commons, Green Valley Corporate Park, and other business and residential projects in the area, have the potential to contribute to the cumulative loss of riparian habitat.

Indirect impacts can be caused adjacent disturbances to riparian woodland and have the potential to add to the cumulative loss of these natural communities.

However, Measures NC-1a through NC-1e would reduce these cumulative impacts on riparian woodland to a less than cumulatively considerable level.

### ***Wetlands and Other Waters***

#### **Impact WOW-4: Cumulative Loss of Perennial Wetland Drainage, Perennial Drainage, and Seasonal Drainage**

Implementation of the proposed project, in combination with other local and regional projects, would contribute to the cumulative loss of wetlands and drainages that are waters of the United States within the Suisun Bay hydrologic unit (HUC 18050001). Most wetland drainages that historically occurred in the rivers in the Solano County have been modified or drained over the last century or more to improve water transport, flood protection, and agricultural development (SCWA 2007). These wetlands and drainages include features that are waters of the United States. Direct loss of 0.08 acre of waters of the United States in a seasonal drainage would be caused by the project, and indirect effects on waters of the United States due to sedimentation could also occur. Additional projects proposed within the hydrologic unit, such as Fairfield Corporate Commons, Green Valley Corporate Park, and other business and residential projects in the area, have the potential to cause cumulative direct and indirect impacts on wetlands and drainages. Direct impacts can result from the placement of fill within a wetland or drainage. Indirect impacts can be caused by the accumulation of sediment in wetlands and drainages.

resulting from adjacent disturbances. Both direct and indirect impacts have the potential to add to the cumulative loss of wetland and drainage habitat.

The proposed project's contribution to these direct and indirect impacts would be considered an adverse effect. However, with the implementation of Measures NC-1a, NC-1b, WOW-1, WOW-3, and WQ-2 the impact would be not be cumulatively considerable.

### *Plant Species*

No special-status plant species are present within the project area, so there would be no impacts on plant species. As such, the project would not contribute to cumulative impacts on plant species.

### *Animal Species*

## **Impact AS-8: Cumulative Loss and Disturbance of Nesting Migratory and Special-status Birds**

The study area for cumulative effects on nesting migratory and special-status bird habitat includes the geographic area of the ongoing projects listed above which generally coincides with the areas immediately surrounding I-80 and State Route 12 in Solano County and the City of Fairfield. Wildlife species and their habitats have changed dramatically in some areas and remained relatively stable in others. Portions of the study area within Solano County have remained relatively stable over the years and focused on agricultural uses which provide wildlife foraging and nesting opportunities. Areas within the City of Fairfield have changed rapidly over the years particularly north of I-80 in the Green Valley area of Fairfield with large amounts of commercial, office and residential land uses being developed.

As discussed in section 2.3.4, the proposed project would affect foraging and nesting habitat confined to within the project area along I-80, an already heavily disturbed area. The project in combination with other ongoing and reasonably foreseeable projects in the study area would contribute to additional conversion of nesting and foraging habitat for birds. These changes could cause a cumulatively adverse effect. However, as with the proposed project, each ongoing and reasonably foreseeable project would be required to mitigate the individual nesting migratory and special-status bird species impacts resulting from each project. In addition, the cumulative changes in species habitat that would occur as a result of this project, in combination with other ongoing and reasonably foreseeable projects, are generally consistent with the long range community and transportation plans of the County, City of Fairfield and transportation planning agencies (MTC, STA, Caltrans, and FHWA). However, with the implementation of Measure AS-2 the effect would not be cumulatively considerable.

## **Impact TES-12: Cumulative Loss of Swainson's Hawk Nesting and Foraging Habitat**

The study area for cumulative effects on Swainson's hawks is the same as described above for nesting migratory and special-status birds. The proposed project would result in the permanent loss and temporary disturbance of some foraging habitat and of riparian woodland that provides potential nesting habitat for Swainson's hawks.

Although the project would result in the permanent loss and temporary disturbance of some foraging habitat and of riparian woodland that provides potential nesting habitat for Swainson's hawks because this habitat occurs along I-80 and is unlikely to be used by nesting Swainson's hawks, the loss of habitat located along I-80 would not be cumulatively considerable, and cumulative impacts on Swainson's hawk from the proposed project are not anticipated.

Additionally, the project would permanently increase the amount of noise and visual interference as well as increase the human presence in the project area. The proposed project's contribution to these impacts would be considered an adverse effect. However, with the implementation of Measures NC-1a through NC-1e, AS-2 and TES-2, the effect would not be cumulatively considerable.

### **Impact TES-13: Cumulative Impact on Valley Elderberry Longhorn Beetle**

In addition to the direct impacts on VELB habitat in the project vicinity, the project would contribute incrementally to cumulative impacts on VELB in Solano County as a result of similar bridge modification projects, new bridge construction, and road widening projects, and from the loss of riparian habitat attributed to urban development. Additional projects proposed within the county have the potential to have cumulative indirect impacts on VELB habitat through dust accumulation and the accumulation of sediment around shrubs resulting from upstream disturbances. The proposed project's contribution to these impacts would be considered an adverse effect. However, with implementation of Measures NC-1a through NC-1e and TES-3, the effect would not be cumulatively considerable.

### **Impact TES-14: Cumulative Impact on California Red-Legged Frog**

The study area for cumulative effects on CRLF is a 5-mile radius around the project site. There are 15 records for CRLF within a 5-mile radius of the project site (California Natural Diversity Database 2008). The proposed project would contribute incrementally to impacts on CRLF in Solano County within a 5 mile radius of the project site caused by similar bridge modification, new bridge construction, and road widening projects and from the loss of riparian habitat attributed to urban development. Other projects proposed in the county have the potential to cumulatively affect CRLF and its habitat through the loss of aquatic and riparian habitat. The proposed project's contribution to these impacts would be considered an adverse effect. However, with implementation of Measures TES-4, TES-5, and TES-6, the impact would not be cumulatively considerable.

### ***Central California Coast Steelhead***

Between 1990 and 2000, the population of Solano County increased by 16.2% (U. S. Census Bureau 2008). It is assumed that future private and state projects will continue within the project area, increasing as population density increases. As the human population in the project area continues to grow, demand for commercial or residential development is also likely to grow. The impacts of new development caused by that demand are likely to further reduce the conservation value of habitat for steelhead within the project area. Nonfederal projects in the project area include the Fairfield Corporate Commons, Green Valley Corporate Park, and other business and residential projects in the area. However, it is reasonable to conclude that the proposed project would not result in cumulative impacts on the survival and recovery of Central Valley steelhead

in the context of these larger nonfederal projects because the proposed project would result in minimal, short-term impacts that are spatially and temporally separated from impacts of these other projects in the area. Implementation of the avoidance and minimization measures described for the proposed project would not result in adverse impacts on steelhead and its habitat; consequently, this project would not contribute incrementally to cumulative impacts on steelhead and its habitat.

#### *Central Valley Fall/Late Fall-Run Chinook Salmon*

The Magnuson-Stevens Fishery Conservation and Management Act requires all federal agencies to consult with the NMFS on all cumulative and synergistic projects or proposed projects that may adversely affect EFH. The assessment of cumulative impacts on EFH is the same as the assessment of cumulative impacts presented for steelhead above. In addition, because the impacts on EFH would be temporary, the proposed project in conjunction with the other nonfederal projects would not contribute incrementally to cumulative impacts on EFH for Chinook salmon.

#### *Invasive Species*

##### **Impact IPS-2: Cumulative Spread of Invasive Plant Species**

Implementation of the proposed project, in combination with other local and regional projects, could contribute to the cumulative spread of invasive plant species in the Solano County. The project could contribute incrementally to the cumulative spread of invasive plant species in Solano caused by similar bridge modification projects, new bridge construction, road widening projects, and urban development adjacent to open space areas.

The proposed project's contribution to invasive plant species impacts would be considered a potentially adverse effect. However, with implementation of Measure IPS, the impact would not be cumulatively considerable.

