

3.0 Cumulative Study Area

This chapter of the Environmental Impact Report (EIR) provides a summary of the methodology used to analyze cumulative impacts and a list of the cumulative projects included in the cumulative analysis.

3.1 Methodology and CEQA Requirements

Section 15130 of the California Environmental Quality Act (CEQA) Guidelines requires that an EIR discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065(c). Section 15355 of the State CEQA Guidelines defines “cumulative impacts” as two or more individual effects that, when considered together, are either considerable or compound other environmental impacts. Cumulative impacts are further described as follows:

The individual effects may be changes resulting from a single project or a number of separate projects.

The cumulative impacts from several projects are 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 future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (State CEQA Guidelines, Section 15355[b]).

Furthermore, according to State CEQA Guidelines Section 15130(a)(1):

As defined in Section 15355, a “cumulative impact” consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.

In addition, as stated in the State CEQA Guidelines, Section 15064(i)(5):

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.

A typical “project-specific” cumulative analysis looks at the changes in the environment that result from the incremental impact of development of a proposed project and other reasonably foreseeable projects that have not been included in the environmental setting. For example, the air quality impacts of two projects in close proximity may prove to be insignificant when project emissions are analyzed separately but could be significant when these emissions are combined and analyzed together. While these projects may be unrelated, their combined (i.e., cumulative) air quality impacts would be significant.

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The goal of the cumulative project analysis is to identify those reasonably foreseeable projects that could have spatial and temporal overlaps with the Project. These projects could have the potential for a significant cumulative environmental impact. Projects with temporal overlaps include those that are planned to occur during the same timeframe as the Project. Projects with spatial overlaps are those that would have impacts in the same area or on the same resources as those of the Project (e.g., emissions that could affect the same air basin).

The area within which a cumulative effect can occur varies by issue area. For example, air quality impacts tend to disperse over a large area, while noise and safety impacts are typically more localized. For this reason, the geographic scope for the analysis of cumulative impacts must be identified for each issue area. The analysis of cumulative effects considers a number of variables including geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. In addition, each of the cumulative projects has its own implementation schedule, which may or may not coincide or overlap with the Project's schedule.

One of the main goals of the cumulative analysis is to determine if a significant adverse cumulative condition presently exists to which Project impacts could contribute, and then to determine if the incremental Project-specific impact to the existing adverse cumulative conditions is cumulatively considerable. If the Project would not result in a Project-specific impact in a specific issue area, then the Project could not contribute to any existing adverse cumulative impact. On the other hand, if a Project-specific impact was found to be significant and unavoidable in a specific issue area, then in most cases this would mean that the cumulative impacts would be significant and unavoidable.

The cumulative impact analysis for each individual issue area is included in the respective discussions in Sections 4.1 through 4.16 of this EIR.

3.2 Cumulative Projects

The EIR uses a list-based approach to determine the potential for cumulative significant impacts. Each of the cumulative project categories is summarized below. The final cumulative projects were assembled from the projects that could both temporally and spatially overlap with the Project, including California Department of Transportation (Caltrans) and County Public Works roadway projects, and projects on Santa Barbara County's cumulative projects list for northern Santa Barbara County. Although some uncertainty exists as far as the final scope, design, and start time of some cumulative projects, the best available information was used to determine the temporal and spatial overlaps. The cumulative projects are summarized in Table 3.1 at the end of this section.

Santa Maria Refinery Projects

There are two recently permitted and ongoing on-site remediation projects at the SMR: the Northern Inactive Waste Site (NIWS) and the Slop Oil Line Release remediation. The NIWS is located in a topographic low spot between two sand dunes near the entrance of the facility. The NIWS was reported to contain refinery trash and nonhazardous debris, slop oil emulsion, API (American Petroleum Institute studies-based system) separator sludge, asbestos contaminated materials, and domestic waste from local residents. The site cleanup, authorized under Coastal

Development/Minor Use Permit DRC2019-00231 and PMTG2020-00056 Major Grading, involved removal of soil and debris totaling approximately 15,000 cubic yards. The remediation earthwork has been completed and the ground surface has been recontoured. Restoration planting was completed in December 2023 and will be followed by monitoring.

In September 2022, the Central Coast Regional Water Quality Control Board (Central Coast Water Board) concurred with Phillips 66 Company's assessment that no further action related to the soil portion of the NIWS is warranted. However, quarterly groundwater sampling to evaluate the presence or absence of contaminants is required to ensure that contaminants previously detected in groundwater will attenuate within a reasonable timeframe. The groundwater sampling will also ensure that the detected levels for future groundwater sampling events are below the 2019 Tier 1 Environmental Screening Levels (ESLs). This project is discussed further in Chapter 2.0, Project Description.

The Slop Oil Line Release was discovered in April 2016 when a release of light non-aqueous phase liquid (LNAPL) impacted groundwater in the center of the plant. No soil remediation is currently anticipated, but a conservative volume is included in soil export calculations for the Project remediation, as a worst case. Groundwater monitoring wells are currently in place and a hydrocarbon recovery system has been installed. Full remediation, including any soil remediation deemed necessary, would occur with implementation of the Project. The Slop Oil Release remediation is discussed in Chapter 2.0, Project Description.

Facilities to remain include some off-site facilities which will be/are idled and abandoned due to the removal of the SMR. As discussed in Chapter 2.0, Project Description, the abandonment of these facilities was discussed in the Rodeo EIR; however, only abandonment, and not removal, of these facilities was addressed in the Rodeo EIR. These cumulative projects would include the removal of the pipeline infrastructure of the Summit Pump Station and the Santa Maria Pump Station. The Santa Maria Pump Station is included in Santa Barbara County permits for removal if the pipeline is abandoned. Although these facilities may be sold and utilized for other projects and have therefore not been required to be removed under their respective existing permits, they may also not be utilized and left abandoned and thereby, under existing permits, be required to be removed. As it is reasonably foreseeable that they could be removed at some point in the future, they have been included in this cumulative analysis. The current permits issued by the County of Santa Barbara (permit #91-DP-003) require the removal of the equipment following permanent shutdown of the pipeline, which at this point has not been required by the County of Santa Barbara.

San Luis Obispo County Projects

Active projects in the County of San Luis Obispo (County) were identified using information from the County Planning & Building Department's Active Planning Projects website and from discussions with County staff. The projects included in the cumulative analysis and are listed below:

- Arroyo Grande Oil Field;
- Caballero Battery Energy Storage System Project;
- Dana Reserve Specific Plan;
- Diablo Canyon Power Plant Decommissioning Project;

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- Diablo Canyon Power Plant Orano Dry Cask Storage System;
- Los Osos Habitat Conservation Plan; and
- Monarch Dunes Specific Plan Amendment.

These projects are summarized in Table 3.1.

Roadway Projects

There are several Caltrans and the County Public Works roadway projects that could affect roadways near the Project site. These projects are listed in Table 3.1.

Santa Barbara County Santa Maria Area Projects

Some of the larger projects located in northern Santa Barbara County could have the potential to create cumulative project impacts with the Project and have therefore been included in the cumulative projects listing. Santa Barbara County projects located farther away, such as Gaviota and south Santa Barbara County, are considered too distant to have a cumulative project impact and were therefore not included. The northern Santa Barbara County projects are not listed on Figure 3-1 but are included in Table 3.1 and briefly discussed below:

- a. North County Jail Amendment (07GPA-00000-00011): 100-bed transition jail development, Final EIR dated 8/15/2013;
- b. Arctic Cold Industrial Development (20CUP-00000-00005): development of a 436,647-sq. ft. freezer/processor facility development to be located at 1750 East Betteravia Road in the Santa Maria area. The existing parcels total @108.76 acres and the site is zoned AG-II-40. Assessor's Parcel Numbers 128-097-001 (98.96) and 128-097-002 (9.80 acres);
- c. Plantel Nursery Development (19RVP-00000-00115): 1,596,480 sq. ft. of structural development at an existing, permitted nursery; and
- d. Plains Replacement Pipeline Project, DRC2017-00026. Installation of a new or updated pipeline from the ExxonMobil SYU to the Central Valley to replace or repair the pipeline that leaked as part of the Refugio 2015 pipeline spill. Currently delayed or withdrawn pending legal issues.

3.3 Project Not Included in the Cumulative Analysis

Some potential area projects are considered too speculative to be included in the cumulative analysis. These are discussed below.

State Parks Pismo State Beach and ODSVRA Public Works Plan: Volume 1: Draft Plan

Although speculative at this time and therefore not included in the Project cumulative analysis, the State Parks has released a draft plan for the area and therefore a discussion of the plan has been included for informational purposes. Ongoing planning related to Pismo State Beach and the Oceano Dunes State Vehicle Recreation Area (ODSVRA) by the California State Parks Department proposes a number of modifications to areas in their published draft Public Works

Plan (PWP, California State Parks 2020), including potential access to the ODSVRA from the south, including Oso Flaco area and the Phillips 66 site. The projects outlined in the PWP include the following:

- a. Oso Flaco Initial and Future Improvement Project;
- b. Park Corporation Yard Improvement Project;
- c. Oceano Campground Infrastructure Improvement Project;
- d. Pier and Grand Avenue Entrances and Lifeguard Towers Project;
- e. North Beach Campground Facility Improvements Project;
- f. Butterfly Grove Public Access Project;
- g. Pismo State Beach Boardwalk Project;
- h. Small Development Projects (7); and
- i. Phillips 66/Southern Entrance Project (Conceptual).

On March 18, 2021, the California Coastal Commission (CCC 2023) considered the PWP. The CCC did not take any action on the PWP as they determined the PWP to be “...*not consistent with the Coastal Act and the City of Grover Beach and San Luis Obispo County Local Coastal Programs...*” Instead, the CCC amended State Parks’ CDP to operate the ODSVRA, wherein the amended CDP phases out off-highway vehicle (OHV) use within ODSVRA over a three-year period and makes various other changes including the following:

- a. A new vehicle beach camping area between West Grand and Pier Avenue, including ADA access;
- b. The addition of a small low key, interpretative camping area in the southern area of the park, accessible only by “hike-in hike-out”;
- c. The closure of Pier Avenue; and
- d. Various operational changes regarding habitat fencing, trash containers and vehicle access through Arroyo Grande Creek.

The CCC’s March 18, 2021, decision was challenged by various groups who allege the CCC abused its discretion in making this decision. On July 19, 2023, the San Luis Obispo Superior Court issued a ruling regarding this challenge and the court held that the CCC abused its discretion because before it decided to phase out OHV use, it should have sought an amendment to the Local Coastal Program from the County to make that policy change. The ruling vacated the CCC’s March 18, 2021, decision and remanded it back to them for a decision consistent with the ruling. In August 2023, the CCC appealed the court’s decision. Given that the outcome of the appeal is unknown,

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the projects listed above are considered speculative and have not been included in the cumulative projects analysis.

SMR On-Site Facilities

The Project proposes to leave a number of facilities and assets in place that either could be utilized by a future use or are required for regulatory and remediation requirements (see Chapter 2.0, Project Description). These include the facilities listed in Chapter 2.0, Project Description, that are located at the SMR site, including the rail spur, the wastewater outfall line, and other items. Some or all of these facilities could be removed in the future once regulatory requirements are completed (i.e., monitoring wells), or if future uses do not require these facilities (i.e., truck scale). However, the timing and if these facilities would be removed are considered speculative at this time and these on-site activities have not been included in the cumulative projects analysis.

Table 3.1 Cumulative Projects

# ^a	Project	Location	Description	Dates and Numbers
1	Phillips 66 Co. – SMR Site Remediation Projects	2555 Willow Road, near Arroyo Grande (Rural South County)	<ul style="list-style-type: none"> NIWS: Minor Use Permit/Coastal Development Permit to allow for the removal of approximately 15,000 cubic yards of soil and debris mounds containing petroleum coke that is impacted with vanadium and nickel that is associated with brick and slag from a former calciner unit. Status: grading completed; restoration ongoing. Slop Oil Line Release: interim remediation for a release from a pipeline discovered in 2016. Status: ongoing. 	NIWS: DRC2019-00231 Slop Oil project ongoing (RWQCB 2022) Geotracker Global ID - SL203121248
2	SMR Off-site Facilities	Santa Maria Pump Station Summit Pump Station	These cumulative projects would include the removal of the pipeline infrastructure of the Summit Pump Station (2a on the map) and the Santa Maria Pump Station (2b on the map) as they are included in Santa Barbara County permits for removal if the pipeline is abandoned. Status: no permits or applications received, but lease conditions require removal if the pipeline is abandoned.	No permits or applications received
3	Caballero Battery Energy Storage System Project	650 Joshua Street, south of the community of Nipomo, and 1000 feet west of Highway 101	The Caballero Battery project is a 100 MW Battery Energy Storage System (BESS) project developed by Origen Energy. Conditional Use Permit (DRC2019-00258) was approved in June 2023. The project will include BESS container units housing battery banks that store electricity for dispatch into the local PG&E grid via the existing and adjacently located PG&E Mesa Substation. Status: The project has an approved entitlement and will start construction in Spring of 2024.	DRC2019-00258/ED23-018 approved by the Planning Commission on June 22, 2023.
4	Arroyo Grande Oilfield	1821 Price Canyon Road on both the east and west sides of Price Canyon Road, approximately 2.7 miles north of the City of Pismo Beach	Sentinel Peak Resources California LLC (formerly Freeport-McMoRan Oil and Gas) Conditional Use Permit (DRC2015-00002) to amend a previously approved Conditional Use Permit (D010386D) granting additional time to install the final 31 oil wells of 95 approved wells at the Arroyo Grande Oilfield. Status: well installation is in process.	DRC2015-00002 D010386D

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Table 3.1 Cumulative Projects

# ^a	Project	Location	Description	Dates and Numbers
5	Dana Reserve Specific Plan	Dana Reserve, west of U.S. Highway 101 and south of Willow Road in the Nipomo area.	The County Planning & Building Department has received an application for the Dana Reserve Specific Plan. The applicant is requesting approval of a Specific Plan that includes open space, trails, parks, residential neighborhoods, flex commercial and village commercial areas, a daycare center, and a satellite community college. Status: In October 2023, the Planning Commission recommended approval of the Specific Plan. The Specific Plan is scheduled to be heard by the Board of Supervisors in April 2024.	Draft EIR Published August 2022 SCN# 2021060558 PLN1118 SUB2020-00047 LRP2020-00007 ED21-094 Approval recommended by Planning Commission October 2023. Board of Supervisors hearing to occur in April 2024
6	Diablo Canyon Power Plant Decommissioning	Diablo Canyon	In 2021, Pacific Gas and Electric Company (PG&E) filed a land use permit application and additional informational supplements to the County for the planned decommissioning of PG&E’s 2,200 MW Diablo Canyon Power Plant (DCPP). The power plant’s Nuclear Regulatory Commission operating licenses were scheduled to expire in 2024 and 2025 for Unit 1 and Unit 2, respectively. In September 2022, SB 846 was signed into law providing the opportunity for the operations of the DCPP to be continued to October 2029 for Unit 1 and October 2030 for Unit 2. Given that extended operations was not guaranteed, PG&E requested the County continue preparation of the Draft EIR, which was issued in July 2023. The Final EIR is anticipated to be issued in August 2024, with a Planning Commission hearing anticipated to occur in November 2024.	CEQA process ongoing, Draft EIR issued July 28, 2023 Final EIR to be issued in August 2024 DRC2021-00092
7	Diablo Canyon Power Plant Decommissioning spent fuel cask system changes	Diablo Canyon	PG&E is also planning on changing the spent fuel cask system and installing new casks as part of a separate project. The Final EIR prepared and certified by the County in 2004 for the DC ISFSI evaluated the use of a Holtec HI-STORM 100 dry cask storage system (Holtec System) for the long-term storage of spent nuclear fuel (SNF) at DC ISFSI Site. The County decision was appealed to the Coastal Commission which found the project approval raised substantial conformity issues regarding compliance with the California Coastal Act and	DRC2021-00080 Approval needed CCC under APPEAL #A-3-SLO-04-035, approved December 2004 by CCC, CDP Amendment to use Orano approved May 2023 by CCC

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# ^a	Project	Location	Description	Dates and Numbers
			assumed jurisdiction of the permit. The Coastal Commission approved the use of the Holtec system. PG&E is now proposing the use of a new system, known as the Orano NUHOMS EOS System. In May 2023, the use of this system was approved by the Coastal Commission until 2030 when PG&E will have to apply for a new or amended permit. Status: The specific construction schedule for installation of the Orano system is uncertain.	
8	Los Osos Habitat Conservation Plan (HCP)	County of San Luis Obispo	The County obtained a programmatic incidental take permit from the U.S. Fish and Wildlife Service in February 2024. The permit is for a term of 25 years to authorize take of covered species associated with covered activities in the Habitat Conservation Plan area, which is approximately 3,560 acres bounded by the Los Osos Urban Reserve Line. As the permittee, the County will have the ability to issue certificates of inclusion to confer incidental take coverage to landowners and other entities as long as their activities are Included on the incidental take permit(s). Status: The HCP has been approved.	Review FEIR Dated July 2020 SCN# 2013091071 Programmatic Incidental Take Permit issued by USFWS Feb. 2024
9	Monarch Dunes Specific Plan Amendment	957-acre development located on the Nipomo Mesa, approximately two miles west of the community of Nipomo	The Monarch Dunes Specific Plan establishes the roadmap for the development of the Woodlands Village (commonly known as “Trilogy at Monarch Dunes”). The applicant’s request is to modify the allowable land uses (as designated in the Monarch Dunes Specific Plan) for four sites within the Woodlands Village through amending the Monarch Dunes Specific Plan. The project, as approved by the Board of Supervisors, includes completion of the Village Center, with shops on the first floor and condominiums on the second, a 65-room hotel in the Village Center, additional duplex homes on land previously designated for the hotel and a public park, and a new public walking trail adjacent to an existing equestrian trail in lieu of the public park. Status: BOS approved June 2023.	Planning Commission hearing October 2022 AFEIR August 2022 Board of Supervisors Approval June 2023 LRP2021-00003
10	Caltrans Roadway Projects listed on Caltrans project portal projectbook.dot.ca.gov	Highway 1 and Valley Rd Hwy 101 at Thompson Ave	a. In design stage: Highway 1 and Valley Rd – ADA upgrades, widen shoulders, bike lanes (ID 15922).	All in design stage

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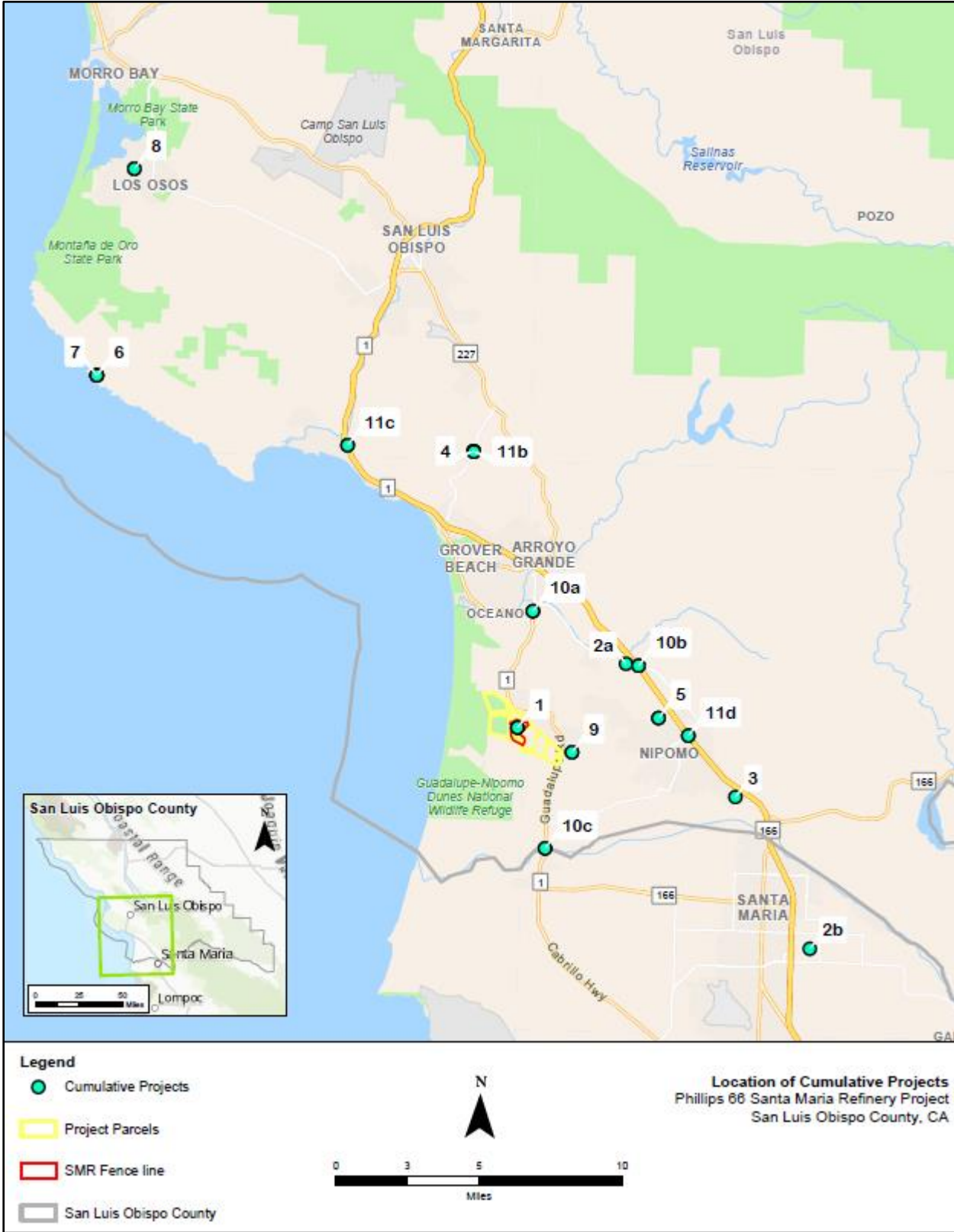
Table 3.1 Cumulative Projects

# ^a	Project	Location	Description	Dates and Numbers
		Hwy 1 at Santa Maria Bridge	<ul style="list-style-type: none"> b. In design stage: Highway 101 at Thompson Ave – Rehabilitate pavement, drainage improvements, bikeways (ID 19164). c. In design stage: Highway 1 at Santa Maria River – Bridge replacement over Santa Maria River (ID 9228). 	
11	County of San Luis Obispo Public Works – Road Closures and Delays	Southern San Luis Obispo County	<ul style="list-style-type: none"> a. Various minor road work with delays up to 10 minutes. b. Road work on Price Canyon - street light install, delays. c. Avila Beach Drive at Highway 101 - installation of a roundabout. d. Tefft Street at Highway 101 - widening and turn movement modifications. e. Main Street at Highway 101 - reconfiguring the interchange. 	Various stages
12	Northern Santa Barbara County various projects (not shown on Figure 3-1)	Santa Maria Valley listed projects in the SB County Cumulative Projects listing, larger projects.	<ul style="list-style-type: none"> a. North County Jail Amendment (07GPA-00000-00011). b. Arctic Cold Industrial Development (9 20CUP-00000-00005). c. Plantel Nursery Development (19RVP-00000-00115). d. Plains Replacement Pipeline Project (DRC2017-00026). 	Various stages

Note: ^a Designates the number used in Figure 3-1 to show the location of the cumulative projects.

Sources: County 2023; Caltrans 2023; and Santa Barbara County 2023

Figure 3-1 Location of Cumulative Projects



Source: Prepared as part of the EIR by MRS 2024

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3.4 References

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