

Chapter 5 Other CEQA Considerations

Section 15126 of the CEQA Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must identify the following four components, which are addressed in this chapter:

- a. Growth-inducing impacts of the proposed project (addressed below in Section 5.1);
- b. Effects found not to be significant as a result of proposed project implementation (addressed below in Section 5.2);
- c. Significant irreversible environmental effects that would be involved in the proposed project should it be implemented (addressed below in Section 5.3); and
- d. Significant environmental effects that cannot be avoided if the proposed project is implemented (addressed below in Section 5.4).

5.1 Growth Inducing Impacts

As required by the CEQA Guidelines, an EIR must include a discussion of the ways in which the proposed project could directly or indirectly foster population growth or economic development, and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[d]). According to CEQA Guidelines Section 15126.2(d), “it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

A project can have direct and/or indirect growth inducement potential. Direct growth inducement can result from the construction of new housing that would result in new residents moving to an area. Indirect growth can be induced in a number of ways, including the stimulation of economic activity within the region that would result in the need for additional housing and services to support the new employment demand, or through the elimination of obstacles to growth, including both physical and regulatory obstacles. These topics are discussed in Sections 5.1.1 through 5.1.3 below.

Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Since the general plan of a community defines the location, type and intensity of growth, it is the primary means of regulating development and growth in that community. If approved, the proposed General Plan Update would be the applicable land use plan for the City of Escondido, and the

City's sphere-of-influence (SOI) areas if annexed into the City. It proposes areas for development of residential, commercial and industrial land uses, as well as roads and other infrastructure, to accommodate forecasted population growth.

Growth under the proposed Downtown Specific Plan Update would be consistent with the growth identified for the General Plan Update. The Downtown Specific Plan Update has been prepared in conjunction with the General Plan Update and the growth projections for the Downtown Specific Plan Update are included in the growth projections for the General Plan Update. The Escondido Climate Action Plan (E-CAP) was prepared in conjunction with, and is intended to support, the General Plan Update land use designations. It does not propose any growth beyond that allowed under the General Plan Update and Downtown Specific Plan Update. E-CAP reduction measures, such as transit-oriented development, would be implemented as part of future development projects consistent with the General Plan Update. Therefore, the following analysis of growth inducing impacts pertains to the General Plan Update, the Downtown Specific Plan Update, and the E-CAP.

The General Plan is responsible for accommodating its fair share of regional growth, as identified in the Regional Housing Needs Assessment (RHNA), and discussed in Section 4.12, Population and Housing. While the General Plan Update would not result in unplanned growth, it would be considered growth inducing because it would accommodate an increase in population growth in the proposed project planning area as compared to the existing condition, as described in greater detail in Sections 5.1.1 through 5.1.3. Additionally, the CEQA Guidelines further explain that the environmental effects of induced growth are considered indirect impacts of a proposed project and may be considered significant, adverse environmental impacts. Potential environmental impacts of growth are discussed in Section 5.1.4.

5.1.1 Direct Population Growth

The General Plan is a statement of long-range public policy to guide the use of private and public lands within the City, the City's SOI and some areas adjacent to the City's SOI. By definition, the General Plan Update would provide for and address future growth in the General Plan Update planning area. The General Plan Update would directly influence the population of the planning area by providing land use designations to accommodate a population between 205,000 to 210,000 persons under buildout conditions in the year 2035, which is 24 to 31 percent greater than the City's existing 2010 population of 160,000 to 165,000. The General Plan Update would also allow an additional 9,924 dwelling units within the proposed project area by 2035, as compared to existing 2010 conditions. Therefore, the development of land uses and infrastructure that would be accommodated by the proposed General Plan Update would directly induce population growth, particularly the development of new residences. As described in Section 3.4.1, General Plan Update, the majority of future development under the General Plan Update would be concentrated in 15 study areas within and surrounding the City's existing urban core. Of the 9,924 new dwelling units that would be accommodated by the 2035 General Plan Update planning horizon, 6,174 dwelling units, or 62 percent, would be accommodated within the study areas. A total of 9,424 dwelling units, 95 percent, would be accommodated within the City's existing boundaries. The greatest increases in residential units would be accommodated in the Downtown Specific Plan Area (SPA) (+3,326 units), the Centre City Parkway/Brotherton Road Target Area (+700 units), and the Transit Station Target Area (+640 units). Therefore, population growth would be focused within the City's existing boundary, particularly in the study areas.

The residential land use densities designated by the General Plan Update are consistent with state requirements that a general plan provide appropriately designated land to accommodate future housing demand. As discussed in greater detail in Section 4.13, Population and Housing, the residential land use designations in the General Plan Update provide adequate housing capacity to meet the City's RHNA of 4,175 additional residential units for the January 1, 2010 to December 31, 2020 period. Therefore, the General Plan Update would result in future residential development that would result in population growth.

The General Plan Update is the land use framework for anticipated future population growth and housing demand. The General Plan Update land use plan would accommodate an increase of approximately 24 to 31 percent population growth between 2010 and 2035, as well as an 18 percent increase in residential units within the proposed project area. Therefore, the General Plan Update would result in the direct inducement of growth in the General Plan Update planning area. The adverse environmental effects associated with this growth, such as those resulting from increased traffic and demand for public services and utilities, have been analyzed in the various subsections of Chapter 4, Environmental Analysis, of this EIR.

5.1.2 Employment Growth

In addition to direct growth, additional indirect growth could occur as new businesses are established or existing businesses expand, thus creating new sources of employment. Increased industrial, commercial, and residential development typically generates a secondary or indirect demand for other services, such as groceries, entertainment, and medical services that will stimulate economic activity. The development of new uses consistent with those proposed under the General Plan Update would result in this secondary demand for goods and services. In addition, economic growth would also result in additional population growth as new jobs are created and employees that fill those job positions create an increased demand for housing in the region. A focus of the General Plan Update is to provide new employment opportunities in the City in order to improve the City's jobs/housing balance. Employment and growth would be accommodated under the proposed General Plan Update through the proposed intensification of commercial, retail, office, and industrial development, particularly in the 15 study areas. Approximately 90 percent of new non-residential growth would be accommodated within the study areas, and 99 percent would be accommodated within the City boundary. The study areas proposed for the greatest amount of non-residential growth that would encourage employment growth are the Imperial Oakes SPA (+2,575,000 square feet (sf)), Downtown SPA (+1,888,000 sf), and the Transit Station Target Area (+1,221,000 sf).

The General Plan Update would accommodate new commercial, office, industrial, and other development that would create new sources of employment and therefore result in growth inducement in the proposed project planning area. Additionally, intensified non-residential land uses proposed in the Escondido Research Technology Park (ERTC) North and South SPAs, Nutmeg Street Study Area, Centre City Parkway/Brotherton Road Target Area, and the Westfield Shoppingtown Target Area would be located in close proximity to adjacent jurisdictions (City of San Marcos, City of San Diego, and unincorporated San Diego County). The increase in employment opportunities in these study areas would potentially increase demand for housing in surrounding jurisdictions.

The proposed development pattern directs future growth to areas within and surrounding the City's existing urban core, where underdeveloped vacant land and infill opportunities are available. The land

use framework described in the Land Use and Community Form Element assigns major land uses throughout the City to preserve and enhance the integrity and amenities of established residential neighborhoods, provide opportunities for future growth that meet the community's vision, and strengthen the economic viability of employment areas and commercial activity centers. Within the study areas, the General Plan Update encourages higher-density neighborhoods that integrate smart growth principles to develop pedestrian and transit-oriented commercial and employment centers in close proximity to a variety of housing opportunities, including mixed use. This framework would avoid development of a new commercial or other economic center away from planned residential development, which would have the potential to result in unplanned residential growth. Therefore, although the proposed project would result in growth inducement due to increased employment opportunities, the land use framework would guide development under the General Plan Update so that employment opportunities and associated housing demand would be developed consistent with each other.

5.1.3 Removing Obstacles to Growth

5.1.3.1 Physical Obstacles to Growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The General Plan Update would trigger growth if it would result in infrastructure with excess capacity or if it would remove an obstacle to growth in an area, such as providing infrastructure that was previously not available.

Implementation of the proposed General Plan Update would allow for the development of land uses in areas that are currently vacant and do not contain existing utility infrastructure and services. Therefore, increased road access and infrastructure, such as water and sewer service, would occur under the General Plan Update in order to serve new development. However, the majority of future growth under the General Plan Update is focused in the City's urban core and 15 study areas. Infrastructure has not been provided to the vacant areas of the study areas because development and the associated demand for utility and circulation infrastructure has not occurred yet. The City proposes to focus growth in these areas because opportunities for connections to existing utilities and the circulation network are available in these areas; therefore, lack of infrastructure is not an obstacle to growth in the study areas. Providing infrastructure to these areas would not remove an obstacle to growth. Additionally, infrastructure development would occur concurrently with the planned growth accommodated by the General Plan Update, and planned regional growth, such the transportation improvements consistent with the San Diego Association of Government (SANDAG) Regional Transportation Plan (RTP). Infrastructure improvements would not provide more infrastructure than is necessary or extend infrastructure into areas that are not planned for growth.

As described in Section 3.4.1.4, General Plan Elements, of Chapter 3, Project Description, the Mobility and Infrastructure Element identifies a multi-modal road network and utility facilities consistent with buildout of the General Plan Update land use framework. The purpose of the Mobility and Infrastructure Element is to identify the types, locations and extent of existing and proposed transportation and utility facilities, and to establish goals and guiding policies for implementing improvements necessary to serve existing and future residents. The Mobility and Infrastructure Element includes several policies that

require utility services to be provided consistent with planned growth. Water System Policy 14.1, Wastewater System Policy 13.1, and Storm Drainage Policy 14.1 require the City to regularly review and update the water, wastewater, and drainage master plans to define utility improvements needed to provide utilities concurrently with planned growth in the Land Use and Community Form Element.

Additionally, the proposed General Plan Update includes a Growth Management Element. The purpose of the Growth Management Element is to establish policies for balancing the timing of infrastructure improvements with current and anticipated demands for service through the adoption of specific implementation techniques. In the course of building out the community, the Growth Management Element integrates the General Plan's goals and objectives with adopted quality of life standards, public improvements and private development. A goal of the Growth Management Element is to phase capital facility improvements concurrent with population growth. Therefore, implementation of the General Plan Update would extend utility and circulation infrastructure; however, this type of development would be provided concurrently with planned growth and would not remove obstacles to growth or provide excess infrastructure that would induce unplanned growth.

5.1.3.2 Regulatory Obstacles to Growth

The elimination or change in regulatory processes, including existing plans, policies and ordinances, would potentially result in the removal of restrictions to growth, which would allow for new or increased population growth to occur. The General Plan Update replaces the City's existing General Plan so that the land use designations and densities accommodated by the General Plan Update can be achieved. The Zoning Code would be updated to reflect the updated General Plan. However, implementation of the General Plan Update would not remove any regulatory processes that guide or regulate development within the City. Future development would still be required to comply with the adopted General Plan Update, the Zoning Ordinance, other regulations in the City's Municipal Code, and the City's permitting processes. Development would also continue to be required to obtain applicable permitting from other agencies, such as permits from the San Diego Air Pollution Control District (SDAPCD) for stationary sources of air pollutants or California Department of Fish and Game (CDFG) for impacts to sensitive biological resources. Additionally, Zoning Ordinance update would provide consistency with the updated General Plan with respect to proposed changes in land use. Changes are not proposed to the sections of the existing Zoning Ordinance that regulate other activities, such as Article 55, Grading and Erosion Control, which provides guidelines to ensure grading designs for new development are sensitive to natural topographic, cultural, or environmental features. Therefore, implementation of the General Plan Update would not result in the removal of regulatory obstacles that would induce growth.

5.1.4 Environmental Impacts of Population Growth

As described above, the proposed General Plan Update would be considered growth inducing because it would allow for the development of new residential and employment land uses in order to accommodate planned future population growth and provide an increase in employment opportunities. Therefore, the proposed project would have the potential to result in adverse physical environmental effects due to population growth. The General Plan Update proposes land use designations that would accommodate future population growth; therefore, the effects of population growth within the General Plan Update planning area are the direct and cumulative impacts of the proposed project, and are

addressed in Sections 4.1 through 4.17 of this EIR. Environmental impacts of the proposed project were evaluated and significant impacts were identified and mitigated to the extent feasible. Any direct and cumulative impacts that would not be mitigated to below a level of significance are identified below in Section 5.4, Significant and Unavoidable Impacts.

5.2 Effects Found to be Less than Significant

CEQA Guidelines Section 15128 requires that an EIR contain a brief statement disclosing the reasons why various possible significant effects of a proposed project were found not to be significant and, therefore, not discussed in detail in the EIR. The City reviewed the proposed project against the potential environmental issues contained in Appendix G of the CEQA Guidelines. The following issues were found not to be significant.

Conflicts with Zoning for Forest or Timberland

Would the proposed project conflict with zoning for forest or timberland uses or cause a rezoning of forest or timberland uses, as defined in PRC Section 12220(g); PRC Section 4526; and Government Code Section 51104(g)?

There are no state forests or lands currently used for timber production or management in the proposed project area (CalFire 2011). Additionally, there is no zoning designation for timberland or forest resources within the proposed project area. Therefore, the proposed project area would not conflict with forest or timberland zoning. No impact would occur; therefore, no further analysis is required.

Direct and Indirect Conversion of Forest Land

Would the proposed project directly or indirectly convert a forest land resource to non-forest use or substantially impair the ongoing viability of important forest land resources?

No state forests or state lands currently used for timber production or management are located in the proposed project area (CalFire 2011). However, as identified Figure 4.2 4, Potential Forest Resources, there are areas within the proposed project area that contain potential forestry resources. In total, approximately 4,945 acres of potential forest resources are present within the proposed project area, as shown in Table 4.2 6, Potential Forest Resources. In the proposed project area, approximately 4,734 acres of potential forest resources are under the jurisdiction of the City while an additional 211 acres of potential forest resources are under the jurisdiction of the U.S. Forest Service, in the Daley Ranch area. Potential forest resources under the jurisdiction of the City include coast live oak woodland and Engelmann oak woodland habitat that generally surrounds the City's landholdings of Daley Ranch and Lake Wohlford. Under implementation of the General Plan Update, the areas containing potential forest resources would not undergo a land use change and no impact to these forest resources would occur. Therefore, the proposed project would not result in the direct or indirect conversion of forest lands. No impact would occur and no further analysis is required.

5.3 Significant Irreversible Environmental Changes

CEQA Sections 21100(b) (2) and 21100.1(a) require that EIRs prepared for the adoption of a plan, policy, or ordinance of a public agency must include a discussion of significant irreversible environmental changes of project implementation. Section 15126.2(c) of the CEQA Guidelines describes significant irreversible environmental changes that would be caused by a proposed project as:

Uses of nonrenewable resources during the initial and continued phases of a 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. Irretrievable 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:

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

Implementation of the proposed project would accommodate future development that would result in the conversion of presently undeveloped land to residential, commercial, industrial, office, public and recreational uses. Development consistent with the General Plan Update would constitute a long-term commitment to these land uses. Additionally, irreversible changes would likely occur due to future excavation, grading, and construction activities associated with the development of future land uses consistent with the General Plan Update. Although the environmental impacts of these changes can generally be addressed by mitigation measures, the potential for disturbance would represent an irreversible change. Restoration of the region to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Renewable, nonrenewable, and limited resources that would likely be consumed as part of future development consistent with the proposed project would include, but not limited to, oil, gasoline, lumber, construction aggregates, asphalt, surface water and groundwater, energy, steel, and similar materials. For example, construction equipment would require oil and gasoline for operation, construction materials would include aggregates and asphalt, and residents of new housing units would consume energy and water during daily activities. Future development would be required to comply with the proposed E-CAP, which would minimize the future electricity, water, and fossil fuel

consumption of future growth. However, a net increase in consumption would still occur as a result of growth.

In addition, development of land uses consistent with the proposed project would result in incremental increased demand on public services and utilities (see Section 4.14, Public Services, and Section 4.17, Utilities and Service Systems). This increased demand would require the expansion of infrastructure that would result in the irreversible conversion of land and a permanent commitment of resources such as water and energy. The proposed project would also result in significant and unavoidable effects related to air pollutant emissions (see Section 4.3, Air Quality). Long-term impacts would also result from an increase in vehicular traffic, and associated noise emissions (see Section 4.16, Transportation and Traffic, and Section 4.12, Noise). Additional development that would occur under the proposed project could result in the loss of agricultural resources (see Section 4.2, Agricultural Resources) and biological resources (see Section 4.4, Biological Resources) as land containing these resources is converted to other land uses.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the proposed project. As described in Section 4.7, Hazards and Hazardous Materials, implementation of the proposed project would accommodate new light industrial, general industrial, industrial office, neighborhood commercial, general commercial and planned commercial development that would typically involve the use and storage of hazardous materials. Additionally, because growth would be accommodated in the proposed project area, the demand for goods and services would also be expected to increase, such as industrial manufacturing or drycleaners, both of which involve the use of hazardous materials and have the potential for the accidental release of these materials. However, all future development allowable under the proposed land use designations identified in the General Plan Update would be required to comply with applicable federal, state and local regulations related to the transportation, use, storage, and disposal of hazardous materials such as the Chemical Accident Prevention Provision, Resource Conservation and Recovery Act, Robert T. Stafford Disaster Relief and Emergency Assistance Act, California Health and Safety Code, California Code of Regulations Title 23, Aboveground Petroleum Storage Act, Accidental Release Prevention Program, and the California Emergency Services Act. Compliance with such regulations would minimize the potential for a release to occur and provide planning mechanisms for prompt and effective cleanup if an accidental release did occur. Compliance with applicable federal, state and local hazardous materials regulations would ensure that the proposed project would not result in irreversible environmental damage related to the accidental release of hazardous materials.

5.4 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects. Specifically, Section 15126.2(b) states:

Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reason why the project is being proposed, notwithstanding their effect, should be described.

Significant, unavoidable adverse impacts were identified for several environmental issues in Chapter 4, Environmental Analysis. These impacts and their implications are described in greater detail in their respective section in Chapter 4. Despite these unavoidable effects, a comprehensive update to the City's General Plan is still being proposed because the existing General Plan is based on outdated information and does not reflect City and regional goals for future development, including the provision of additional employment lands, implementation of smart growth principles and achievement of reductions in greenhouse gas emissions. Therefore, the existing General Plan is not considered to be a sound basis for current land use decisions. Additional reasons for supporting a comprehensive update to the City's General Plan, including project objectives, are provided in Chapter 3, Project Description. The following is a summary of the significant and unavoidable impacts that would result from the proposed project:

Air Quality

- **Issue 2 – Air Quality Violations:** Estimated annual construction under the proposed project would result in significant emissions of VOCs and PM₁₀ during construction. Additionally, operational emissions of criteria pollutants associated with future development under the proposed project would exceed the significance thresholds for PM₁₀ and PM_{2.5}. Future development would be required to comply with California Air Resources Board (CARB) motor vehicle standards, SDAPCD regulations for stationary sources and architectural coatings, the General Plan Update goals and policies and applicable mitigation measures (Air-1 and Air-2). Compliance with these regulations, policies and measures would reduce project impacts associated with air quality violations; however, these measures cannot guarantee that operational emissions would be reduced to a less than significant level. Therefore, even with implementation of mitigation, impacts from operation of the proposed project would remain significant and unavoidable.
- **Cumulative Impact – Air Quality Violations:** Construction of future development under the General Plan Update in combination with other cumulative projects would have the potential to exceed air quality significance thresholds, particularly in the 15 study areas where the greatest amount of growth and redevelopment would occur. Additionally, operation of future development under the General Plan Update would have the potential to result in cumulatively considerable operational impacts to air quality from particulate matter emissions from vehicular sources. Implementation of mitigation measures Air-1 and Air-2 would reduce construction emissions, but it cannot be guaranteed that these measures would reduce impacts to below a significant level. Therefore, the proposed project would result in a cumulatively considerable and unavoidable contribution to a significant cumulative impact.

Biological Resources

- **Cumulative Impact – Special Status Plant and Wildlife Species:** The proposed project would have a cumulatively considerable contribution to a significant cumulative impact associated with special status species until the City's MHCP Subarea Plan is in place for the long-term protection of special status plant and wildlife species in the proposed project planning area. The proposed General Plan Update policies and existing regulations would reduce cumulative impacts to special status species, but not to below a level of significance.

- **Cumulative Impact – Riparian Habitat and Other Sensitive Natural Communities:** The proposed project would have a cumulatively considerable contribution to a significant cumulative impact associated with riparian habitat and other sensitive natural communities until the City's MHCP Subarea Plan is in place for the long-term protection of sensitive natural communities in the proposed project planning area. The proposed General Plan Update policies and existing regulations would reduce cumulative impacts to riparian habitat and other sensitive natural communities, but not to below a level of significance.
- **Cumulative Impact – Wildlife Movement Corridors and Nursery Sites:** The proposed project would have a cumulatively considerable contribution to a significant cumulative impact associated with wildlife movement corridors and nursery sites until the City's MHCP Subarea Plan is in place for the long-term protection of wildlife movement corridors and nursery sites in the proposed project planning area. The proposed General Plan Update policies and existing regulations would reduce cumulative impacts to wildlife movement corridors and nursery sites, but not to below a level of significance.

Noise

- **Issue 2 – Excessive Groundborne Vibration:** Construction of future land uses under the General Plan Update would have the potential to generate excessive groundborne vibration at vibration-sensitive land uses. Mitigation Measure Noi-1 would reduce groundborne vibration impacts from construction by requiring the implementation of best management practices (BMPs). However, it cannot be guaranteed that the mitigation measure would reduce all construction-related vibration impacts to a less than significant level. Therefore, impacts from groundborne vibration during construction would be significant and unavoidable.
- **Cumulative Impact – Excessive Groundborne Vibration:** The potential exists for future construction projects to result in combined construction vibration impacts if occurring simultaneously. Mitigation measure Noi-1 would reduce the proposed project's impacts related to groundborne vibration by requiring construction BMPs. However, impacts related to construction may still exceed the significance criteria for groundborne vibration impacts. Therefore, the proposed project would result in a cumulatively considerable and unavoidable impact related to groundborne vibration during construction.
- **Cumulative Impact – Permanent Increase in Ambient Noise Levels:** A significant cumulative impact related to a regional increase in traffic noise would occur. Implementation of the proposed project, in combination with other cumulative projects, would result in a permanent increase in ambient roadway noise levels. Therefore, the proposed project would have a cumulatively considerable contribution to a significant cumulative traffic noise impact. Implementation of General Plan Update Policy 5.6 would require future development with the potential to substantially increase noise levels to prepare a noise technical report and attenuate increases in noise levels at nearby sensitive receptors. However, the development associated with the proposed project would still contribute to future regional noise increases associated with roadway traffic and General Plan Update policies would not reduce impacts to a less than significant level. The proposed project's cumulative traffic noise impact would remain significant and unavoidable.

Population and Housing

- **Issue 2 – Displacement of Housing and People:** Implementation of the proposed project would result in the displacement of a maximum of up to 442 ~~142~~ existing residential dwelling units located in areas proposed to be re-designated for employment lands and from improvements associated with the proposed Mobility and Infrastructure Element. This under the General Plan Update, which is considered a significant impact. Implementation of mitigation measure Pop-1 would reduce impacts associated with the displacement of people and housing, but not to below a level of significance. Impacts would be significant and unavoidable.

Transportation and Traffic

- **Issue 1 – Traffic and Level of Service Standards:** As part of the proposed project, some roadways within the proposed project area would undergo classification downgrades and would not be widened to the extent proposed in the currently adopted General Plan. The downgrading proposed within the General Plan Update would result in a significant and unavoidable impact to four roadway segments and seven-six ~~seven~~ intersections, even with implementation of mitigation measure Tra-1. A fifth roadway segment impact (Montiel Road) is located outside of the City's jurisdiction and is considered significant and unavoidable because implementation of ~~the identified~~ mitigation measure Tra-2 to reduce the impact cannot be assured. Implementation of the improved roadway capacity lane configurations proposed in the Mobility and Infrastructure Element would result in impacts to nine additional roadway segments resulting in intersections that operate at unacceptable LOS levels. Mitigation measures Tra-1-3 through Tra-9-12 would reduce these impacts to a level below significant.
- **Cumulative Impact – Traffic and Level of Service Standards:** The proposed project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with increased in traffic and unacceptable LOS. Mitigation measures Tra-1-3 through Tra-9-12 would reduce direct project impacts to a level below significant. However, the downgrading proposed within the General Plan Update would result in a significant and unavoidable impact to seven-six ~~seven~~ intersections and four roadway segments, even with implementation of mitigation measure Tra-1. A fifth roadway segment impact is located outside of the City's jurisdiction and is considered significant and unavoidable because implementation of ~~the identified~~ mitigation measure Tra-2 to reduce the impact cannot be assured. Therefore, the proposed project, in combination with other cumulative projects, would result in a significant and unavoidable cumulative impact to traffic and LOS.

Utilities and Service Systems

- **Issue 4 – Adequate Water Supplies:** As described in Section 4.17, Utilities and Service Systems, none of the 2010 Urban Water Management Plans (UWMPs) account for the growth proposed under the General Plan Update or Downtown Specific Plan Update. Additionally, the UWMPs of San Diego County Water Authority, Vallecitos Water District and Rincon del Diablo Water District, which serve the proposed project area, predict water supply shortages during multiple dry water years until 2035. Although implementation of General Plan Update policies and E-CAP reduction measures would reduce water supply demand; they would not reduce demand to the extent that an adequate water supply would be assured. No feasible mitigation measures are available to reduce potentially significant impacts related to adequate water supply. Therefore, impacts would be significant and unavoidable.

- **Cumulative Impact – Adequate Water Supplies:** The proposed project, in combination with other cumulative projects in the region, would result in a significant cumulative impact associated with adequate water supplies. The proposed General Plan Update policies and E-CAP reduction measures would reduce the proposed project's water supply demand, but not to below a level of significance. No feasible mitigation measures are available to reduce the potentially significant impact to adequate water supplies. Therefore, impacts would be significant and unavoidable.

- **Issue 6 – Sufficient Landfill Capacity:** As described in Section 4.17, Utilities and Service Systems, adequate landfill capacity is not available to serve buildout of the proposed project through 2035. Implementation of General Plan Update policies and E-CAP reduction measures would minimize the proposed project's demand for landfill capacity through recycling programs and energy conservation measures. However, even with these policies and reduction measures in place, the proposed project would allow for the development of land uses that would increase the demand for solid waste disposal. Implementation of the General Plan Update policies and E-CAP reduction measures would reduce impacts associated with sufficient landfill capacity, however, not to below a significant level. No feasible mitigation measures are available to reduce the potentially significant impact to landfill capacity. Therefore, impacts would be significant and unavoidable until additional solid waste disposal capacity is available to serve buildout of the proposed project.

- **Cumulative Impact – Sufficient Landfill Capacity:** The proposed project, in combination with other cumulative projects in the region, would result in a significant cumulative impact associated with sufficient landfill capacity. The proposed General Plan Update policies would reduce the proposed project's demand for landfill capacity, but not to below a level of significance. No feasible mitigation measures are available to reduce the potentially significant impact to landfill capacity. Therefore, impacts would be significant and unavoidable until additional solid waste disposal capacity is available to serve planned growth in the San Diego region.