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Chapter 7
Cumulative Impacts

This section addresses cumulative impacts associated with implementation of the Housing Element Update (HEU). CEQA Guidelines Section 15355 defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Section 15355 further states that cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Section 15130(a) of the CEQA Guidelines requires a discussion of cumulative impacts of a project "when the project's incremental effect is cumulatively considerable." Cumulatively considerable, as defined in Section 15065(a)(3), "means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

According to Section 15130(b) of the CEQA Guidelines, the discussion of cumulative effects ". . . need not provide as great a detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness . . . ." The evaluation of cumulative impacts is to be based on either (a) "a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those impacts outside the control of the agency," or (b) "a summary of projections contained in an adopted local, regional, or statewide plan or related planning document, that describes or evaluates conditions contributing to the cumulative effect . . . Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency" (CEQA Guidelines Section 15130(b)(1)). Pursuant to Section 15130(d), cumulative impact discussions may rely on previously approved land use documents such as general plans, specific plans, and local coastal plans, which may be incorporated by reference.

7.1 Cumulative Analysis Setting and Methodology

In the case of a planning document with a 20-year buildout horizon, such as the HEU, cumulative effects would occur from development associated with buildout of the housing

sites combined with effects of development on land within and around the City of Encinitas (City) and region in the horizon year (2035). The cumulative impacts of the HEU should, therefore, take into account growth projected by the County General Plan for the unincorporated community of San Dieguito, the City of Carlsbad General Plan and the City of Solana Beach General Plan, along with other anticipated ambient growth in the City itself. A broad examination of cumulative impacts involves considering buildout of the HEU together with growth and new development in the surrounding jurisdictions identified above. For example, growth within the City and adjacent jurisdictions would result in increased traffic on area roadways and regional facilities, such as Interstate 5. While all subject areas are evaluated in the horizon year (2035 buildout of the HEU) based on a summary of projections method, the traffic analysis also includes a near-term analysis due to the North Coast Highway 101 Project, which, if approved, is anticipated to be completed prior to buildout of the HEU[1]

The geographic area considered for each cumulative impact depends upon the impact that is being analyzed. For example, in assessing air quality impacts, all development within the air basin contributes to regional emissions of criteria pollutants, and basin wide projections of emissions are the best tool for determining the cumulative effect. Each subsection below identifies the specific parameters for the cumulative evaluation.

The San Diego Association of Governments (SANDAG) estimates anticipated growth for the 18 cities and the unincorporated areas within San Diego County for the purpose of allocating growth to specific areas and identifying regional transportation infrastructure needed to support regional growth. The land uses and the associated potential development that would result from buildout of the housing sites generally correlate to regional growth forecasts for 2035 made by SANDAG for all three strategies. Strategy 3 (Modified Mixed Use Places [MMUP]), however, would result in slightly greater buildout intensity than projected by SANDAG.

A significant impact would occur if the project's contribution to the cumulative effect is determined to be significant. Each subsection below provides an overview of the potential cumulative impacts that could occur followed by a summary of the HEU's potential contribution to that cumulative effect. The subsection concludes with a determination of the significance of the HEU.

7.1.1 Plans and Programs Evaluated for Determination of Cumulative Impacts

Multiple Federal, State, and local planning documents and programs were used to evaluate the HEU's contribution to cumulative impacts. These plans and programs are discussed under the Regulatory Framework subsections throughout Section 4.0. Highlighted below is

[1] The North Coast Highway 101 Project is anticipated to be completed during the horizon of the HEU, although it is not fully funded in the six-year CIP.

a number of regional and City plans and programs relied upon throughout the cumulative evaluation.

7.1.1.1 San Diego Forward: The Regional Plan (San Diego Forward) October 2015

San Diego Forward combines and updates the region's two big picture planning documents: the Regional Comprehensive Plan and the Regional Transportation Plan/Sustainable Community Strategy. San Diego Forward provides a vision for the region's growth through the year 2050. The plan reflects a strategy for a more sustainable future.

7.1.1.2 City of Encinitas General Plan

The City's General Plan serves as a blueprint for physical development and contains goals and policies which aim to maintain the City's character, provide a balance of land uses and services, and to preserve environmentally sensitive areas.

7.1.1.3 City of Encinitas Municipal Code

Multiple chapters were relied upon in the evaluation of impacts including:

- Volume II, Titles 20-30 of the City's Municipal Code which contains the primary zoning implementation and regulatory ordinances aimed at the classification and regulation of land uses throughout the City.

- Chapter 30.34.040B Cultural/Natural Resources Overlay Zone, applying to areas within the Special Study Overlay Zone where site-specific analysis indicates the presence of sensitive cultural, historic, and biological resources, including sensitive habitats.

7.1.1.4 North County Multiple Habitat Conservation Program

Coordinated through SANDAG, the Multiple Habitat Conservation Program (MHCP) is one of three subregional habitat conservation planning programs in the region that, together, contribute to a coordinated preserve system for the San Diego region. The MHCP is a comprehensive conservation planning process that addresses the needs of multiple plant and animal species in northwestern San Diego County.

7.1.2 Project Evaluated for Cumulative Impacts (Near-Term)

The Highway 101 project includes streetscape, pedestrian, circulation, traffic management, and parking improvements to a 2.5-mile segment of North Coast Highway 101 between A Street and La Costa Avenue. These improvements would alter traffic conditions in the area, and would potentially combine with the traffic effects of the proposed HEU. Thus, a specific near-term cumulative traffic analysis is included in Section 7.2.13, below. For this

interim condition, a cumulative impact would occur if buildout consistent with the HEU coupled with the growth of neighboring jurisdictional and the capacity changes resulting from the Highway 101 project would combine to result in a significant impact.

7.2 Cumulative Effect Analysis

7.2.1 Aesthetics

The study area for the assessment of cumulative visual impacts includes the North County coastal region comprised of the City and neighboring jurisdictions of the San Dieguito community in the County of San Diego and the cities of Carlsbad and Solana Beach. Future development within the study area could have a cumulative impact on visual resources due to changes in visual character and quality resulting from incremental increases in density and urbanization. This growth could gradually alter the visual makeup of the region. The following is a summary of the project's contribution to cumulative aesthetic impacts.

Future development in accordance with the HEU would not result in significant impacts to visual resources (except for three housing sites (L-7, O-4, and O-5) as described in Section 4.1).

Although adoption of the HEU would contribute to the increased density and urbanization in the region, the extent of adverse effects on visual character would be reduced through regulatory compliance with existing plans and programs as well as implementation of ~~HEU floating zone~~new zoning standards and design guidelines intended to maximize consistency with the surrounding land use, including preserving significant views. The design controls placed on subsequent development consistent with the ~~HEU floating~~new zone would ensure that development occurs in accordance with the City goals, policies and design objectives. Therefore, the HEU's incremental contribution to visual impacts would not be cumulatively considerable.

7.2.2 Air Quality

The study area for the assessment of cumulative air quality impacts is the San Diego Air Basin, which is currently in non-attainment for Federal and State ozone standards and respirable particulate matter (PM_{10} and $PM_{2.5}$) standards. Future development within the study area could have a cumulative impact on air quality due to increased air pollution emissions associated with construction and operations, including transportation. In addition to regional effects, increased traffic volumes could increase localized concentrations of carbon monoxide (CO_2). The following is a summary of the project's contribution to cumulative air quality impacts.

The cumulative assessment of air quality impacts to the San Diego Air Basin relies partially on assessment of HEU project consistency with the adopted Regional Air Quality Strategies (RAQS) and State Implementation Plan (SIP). The RAQS and SIP are based on growth forecasts for the region, which are in turn based on maximum buildout of land uses

as allowed in the adopted community and general plans. As discussed in Section 4.2.5.3, the additional units from the HEU (under any housing strategy) would exceed the assumptions used to develop the RAQS and applicable SIP (see Impact AQ-1). Since the RAQS and SIP contain the means of attaining air quality standards for the entire San Diego region, this exceedance is also considered significant on a cumulative basis (Impact AQ-1).

Construction related air quality effects of the HEU would be reduced through mitigation measure AQ-2 requiring restrictions on construction pursuant to the ~~HEU floating~~new zone including the use of low or no volatile organic compounds rating architectural coating products, or alternatively a restriction on the amount of square feet per day that would be allowed to be coated. Adherence to the HEU Mitigation Framework associated with construction emissions would reduce future project impacts to less than significant. Therefore, the HEU's incremental contribution to construction-related air quality impacts would not be cumulatively considerable.

Section 4.2.6.1 concludes that operational emissions associated with buildout of the HEU would be below the thresholds for all criteria pollutants. In addition, as discussed in Sections 4.9, and 4.13, the vehicle miles travelled analysis shows that although traffic generation would increase under any housing strategy scenario, trip lengths would decrease. This equates to greater trip efficiency. Therefore, the HEU's incremental contribution to operational-related air quality impacts would not be cumulatively considerable.

7.2.3 Biological Resources

The study area for the assessment of cumulative impacts to biological resources includes the North County coastal region comprised of the City and neighboring jurisdictions identified above. Future development within the study area could have a cumulative impact on biological resources through loss of habitat. The following is a summary of the project's contribution to cumulative biological impacts.

As discussed in Section 4.3, the City supports a number of sensitive resources. The distribution of these resources and potential for impacts to occur within the proposed housing sites are listed in Tables 4.3-1 and 4.3-2.

The extent of adverse effects to biological resources would be reduced through the implementation of Federal, State, and regional programs including MHCP compliance, and City General Plan policies and ordinances aimed at the protection of sensitive species. The City did not adopt the regional MHCP, but still uses the plan as a local reference guide. Additionally, mitigation measures BIO-1 through BIO-5 would reduce impacts to biological resources through requirements for site-specific biological and/or U.S. Fish and Wildlife Service protocol surveys, and pre-construction surveys if vegetation clearing is proposed during the typical bird breeding season. Although future projects on sites identified in Section 4.3 would contribute to cumulative biological resource impacts, following the MHCP as a reference for best practices, City codes and policies, and adherence to the HEU

Mitigation Framework would ensure that each project's incremental contribution to biological impacts would not be cumulatively considerable.

7.2.4 Cultural Resources

The study area for the assessment of cumulative impacts to cultural resources includes the San Diego region because loss of such resources would be detrimental to the entire region. Future development within the cumulative study area could have a cumulative impact on cultural resources through loss records or artifacts as land is developed (or redeveloped). The following is a summary of the project's contribution to cumulative cultural resource impacts.

As discussed in Section 4.4, future development in accordance with the HEU could impact historical or archeological resources which may be present on the housing sites (see Impact CUL-1 and CUL-2). Implementation of General Plan policies aimed at protection of historic resources, along with mitigation measures CUL-1 and CUL-2, would reduce impacts to cultural resources, although not to a less than significant level. Since preservation of historical and archeological resources can only be ensured at the project-level, this impact is also considered significant on a cumulative basis (Impacts CUL-1 and CUL-2).

With respect to paleontological impacts, future development in accordance with the HEU could substantially impact unknown subsurface resources (see Impact CUL-3). Mitigation measure CUL-3 would reduce impacts because it requires a monitor to have the authority to halt grading should paleontological resource be encountered. Should a resource be discovered, an excavation plan would be prepared to evaluate the resource and recommend additional mitigation. Although future projects throughout the cumulative project area would contribute to cumulative impacts to paleontological resources, compliance with codes and policies, and adherence to the HEU Mitigation Framework would ensure that the HEU's incremental contribution to paleontological impacts would not be cumulatively considerable.

7.2.5 Geology and Soils

The study area for the assessment of cumulative impacts to geology and soils includes the San Diego region. As population growth increases the number of people potentially exposed to seismic and geological hazards would increase. The following is a summary of the project's contribution to impacts associated with geology and soils.

Future development in accordance with the HEU would involve the construction of two- to three-story structures in a seismically active area. Likewise, future development in accordance with the HEU could have the potential to result in short-term soil erosion during construction activities. As discussed in Section 4.5, potential impacts to future development would be addressed through project-level analysis and the application of remedial measures identified in site-specific geotechnical investigations (when applicable), Additionally, adherence to the state and local regulations including building construction standards would assure potential impacts would be less than significant. Compliance with

remedial measures as identified on a project basis would ensure that the HEU's incremental contribution to geology and soils impacts would not be cumulatively considerable.

7.2.6 Greenhouse Gas Emissions

The analysis of greenhouse gas (GHG) emissions is, by its nature, a cumulative issue. The HEU'~~project~~s incremental effect on statewide GHG emissions is discussed in detail in Section 4.6. The following is a summary of the project's contribution to impacts associated with GHG emissions.

Future development in accordance with the HEU would result in an increase in GHG emissions from the existing condition. Likewise, future development throughout the ~~s~~State would also contribute to this global condition. As discussed in Section 4.6, GHG emissions associated with the buildout of the housing strategies reflect the effects of statewide laws including the Energy Code, CalGreen Code, and statewide regulations on vehicles, fuels, and renewable energy requirements. Notwithstanding implementation of regulatory measures, the HEU would increase GHG emissions under the three housing strategies (see Table 4.6-7). Another means of assessing the project's contribution to GHG emissions includes the evaluation of the proposed project's compliance with regulatory programs including SB 375, the Energy Code, the CalGreen Code, Assembly Bill 341, and the City's Water Efficient Landscape Ordinance. As detailed in Section 4.6, due to the uncertainty of future project ~~construction~~ details, at the program-level buildout of the HEU would result in significant impacts due to transportation, energy, and area sources of GHG emissions.

Overall, until the anticipated growth under the HEU is included in the emission estimates of the Sustainable Communities Strategy (SCS), impacts relative to conformance with the SCS would be cumulatively significant and unavoidable. In addition to compliance with State and local regulations, as mitigation for the increase in GHG emissions under the HEU, the City would prepare an updated climate action plan (CAP) (refer to Mitigation Framework GHG-2). The CAP would serve as a city-wide program to reduce GHG emissions from both existing and future development. ~~f~~Future projects would be required to demonstrate compliance with the CAP to ~~implement Mitigation Measures GHG-1 through GHG-6 to~~ address GHG emissions impacts. Until the updated CAP is adopted, mitigation measure GHG-3 would apply to all projects consistent with the HEU zone program. While the proposed mitigation framework would reduce ~~project~~ GHG emissions associated with buildout of the HEU, GHG emissions reductions cannot be adequately quantified at this time. Therefore, this impact would be cumulatively significant and unavoidable.

7.2.7 Hazards and Hazardous Materials

The study area for the assessment of cumulative impacts to geology and soils includes the San Diego region. As population growth increases the number of people potentially exposed to hazards and hazardous materials would increase. The following is a summary of the project's contribution to impacts associated with hazards and hazardous materials.

Generally, the release of hazardous materials has site-specific impacts that do not compound or increase in combination with impacts elsewhere. As discussed in Section 4.7 future development in accordance with the HEU could result in hazards to the public or the environment by disturbance of existing unknown contaminated soils or groundwater. Specifically, as discussed in Section 4.7.4.1, grading and excavation activities could disturb soils and cause contaminants below ground to become airborne. Excavation below the groundwater table or dewatering could also bring construction workers in contact with contaminants. Additionally, during construction, workers could be exposed to hazardous materials during demolition of older buildings (pre-1978) including asbestos-containing materials, lead-based paints, asbestos. Because schools are located within 0.25 mile of housing sites (including those with listed hazardous materials sites), as well as the uncertainty of where future schools may be sited, future development could also result in hazardous emissions close to a school.

Adverse effects would be reduced through the implementation of local, Federal, State, and regional programs including those aimed at requiring safe handling and storage of known hazardous materials. Additionally, mitigation measure HAZ-1 would reduce impacts to hazardous material emissions through requirements for preconstruction assessments to assure that soil contamination/hazardous materials are identified and remediated. Compliance with these regulations, General Plan policies, and the HEU mitigation framework would ensure no direct or cumulative impacts related to hazardous materials would result from implementation of the HEU.

Adoption of the HEU could contribute to an increased risk of exposure to wildfire. As discussed in Section 4.7.7.1, three housing sites (C-6, O-4, and O-5) are located within the City's designated Very High Fire Hazard Safety Zone. Locating residential land uses adjacent to or within a high fire hazard area can result in increased fire-related risk to people and structures. To avoid risk from wildland fires, future development on housing sites C-6, O-4, and O-5 must adhere to California Fire Code Title 19, Division 1, Section 3.07(b), which requires a minimum 30-foot brush clearance around structures for fire safety. Potential impacts to future development would be addressed through project-level analysis and the application of remedial measures (when applicable). Additionally, adherence to the State and local regulations including building construction standards would assure potential impacts would be less than significant. Compliance with these regulations as identified on a project basis would ensure that the HEU's incremental contribution to hazardous materials impacts would not be cumulatively considerable.

7.2.8 Hydrology and Water Quality

The study area for the assessment of cumulative impacts to hydrology and water quality includes the Carlsbad Hydrological Unit. New construction and operation of future projects could result in significant impacts on drainage patterns, water quality, flooding, and groundwater, and an increase in storm water runoff within the study area. The following is a summary of the project's contribution to impacts associated with hydrology and water quality.

Adoption of the HEU could contribute to impacts with respect to drainage patterns, water quality, flooding, and an increase in storm water runoff. Development consistent with the HEU must adhere to Federal, State, and local regulations, as described in Section 4.8, to assure potential impacts would be less than significant. Compliance with remedial measures as identified on a project basis would ensure that the HEU's incremental contribution to hydrology and water impacts would not be cumulatively considerable.

7.2.9 Land Use and Planning

The study area for the assessment of cumulative land use impacts would be the City and neighboring jurisdictions as detailed above. Cumulative land use impacts could result from changes to land use plans, which become incompatible and/or unsustainable. The following is a summary of the project's contribution to cumulative impacts associated with land use and planning.

Adoption of the HEU could contribute to cumulative impacts if buildout would conflict with land use plans and/or policies, State planning initiatives, or created incompatible neighborhoods. The HEU would be consistent with, modify, or replace policies of adopted plans and regulations governing land use and development in the City. In addition,– the HEU would not conflict with any relevant regional or local plans. Specifically, the HEU is consistent with the goals of San Diego Forward and the City's General Plan policies aimed at conservation and sensitive land. While development pursuant to the HEU would contribute to an overall increase in density and intensity of uses throughout the City, the extent of adverse effects on land use and planning would be reduced through regulatory compliance with existing plans and programs as well as implementation of ~~HEU floating~~new zone standards and design guidelines. The design controls placed on future projects consistent with the new ~~HEU floating~~ zone would ensure that development occurs in accordance with the City goals, policies, and design objectives. Therefore, the HEU's incremental contribution to land use impacts would not be cumulatively considerable

7.2.10 Noise

The study area for the assessment of cumulative noise impacts would be the City and neighboring jurisdictions as detailed above. Although the City and surrounding jurisdictions are largely urbanized, future development or redevelopment could cumulatively increase ambient noise. The following is a summary of the project's contribution to cumulative noise impacts.

Noise impacts were assessed by comparing noise levels without the HEU and future noise levels with buildout of the three housing strategies. As discussed in Section 4.10, the increases in ambient noise would be less than 3 dB, which is not a perceptible noise increase. Therefore, the project's incremental contribution to an increase in ambient noise levels would not be cumulative considerable.

Future development pursuant to the HEU must adhere to the City's General Plan Policies and Noise Abatement and Control Ordinance to assure that it would not exceed applicable

property line noise level limits. However, as identified in Section 4.10.6.1, the degree of success of these regulations cannot be adequately known at the program-level. Mitigation measure NOS-1, identified in Section 4.10.6.1, would reduce impacts associated with on-site noise levels to a level that is less than significant because individual projects would require site-specific noise studies. Future development could result in a cumulative construction-related noise impact if construction of multiple projects were to take place in close proximity (generally closer than 110 feet) and simultaneously. Development of several housing sites identified in Section 4.10.7 have the potential to result in temporary construction noise impacts that are significant due to their proximity to each other. Mitigation measure NOS-2, identified in Section 4.7.2, would reduce impacts associated with construction noise to a less than significant level by requiring contract specific best management practices that would attenuate the construction noise to acceptable levels.

Thus, compliance with the goals, policies, and recommendations of the General Plan and adherence to the HEU Mitigation Framework associated with noise abatement would ensure that the HEU's incremental contribution noise impacts would not be cumulatively considerable.

7.2.11 Population and Housing

The study area considered for the population and housing cumulative impact analysis is defined as the region. The following is a summary of the project's contribution to cumulative impacts associated with population and housing.

Overall, buildout of the HEU would respond to the need for affordable housing in compliance with Regional Housing Needs Assessment allocation and associated projected population increase within the City through the horizon year. Because the City is almost completely built out, any new development would be primarily infill or redevelopment of underutilized lands. The increase in housing stock would accommodate the projected growth in population in the region and is consistent with adopted plans and regional growth principles. No permanent displacement of housing or people would occur with implementation of the HEU. Therefore, buildout of the HEU would not result in a cumulatively considerable contribution to population and housing impacts.

7.2.12 Public Services and Facilities

The study area for public services and facilities is the applicable provider's service area. New development or redevelopment within the service area could result in cumulative impacts associated with additional demands for public services, resulting in the need for new or expanded facilities. The following is a summary of the project's contribution to cumulative impacts associated with public services and facilities.

As discussed in Section 4.12, all future development within the City would be required to provide evidence that adequate facilities and services are available at the time of application. Additionally, future development is required to pay applicable fees that support the acquisition and construction of additional facilities for fire/emergency response,

schools, and parks and recreational facilities. No expanded services or facilities are warranted with the adoption of the HEU, and impacts would be less than significant. Therefore, the HEU's incremental contribution to public services and facilities impacts would not be cumulatively considerable.

7.2.13 Transportation/Traffic

The study area for traffic includes the roads that would support project-related traffic, traversing neighboring jurisdictions. New development or redevelopment within the study area could result in cumulative impacts associated with increased trips resulting in congested roadways. The following is a summary of the project's contribution to cumulative impacts associated with traffic.

7.2.13.1 Near-Term Effects

As mentioned above, the North Coast Highway 101 project is currently proposed. This project consists of sidewalk, curb, gutter, enhanced crosswalks, raised medians, roundabouts at El Portal and La Costa Avenue, bike lanes, increased parking options, and landscaping elements. Road diets would be implemented, which includes reducing the number of lanes of traffic. Overall, these improvements would reduce the capacity of North Coast Highway 101. Thus, a limited cumulative near-term analysis of North Coast Highway 101 was completed (North Coast Highway 101 Roadway Analysis (Chen Ryan 2015). This analysis includes a segment analysis, as well as an intersection analysis of North Coast Highway at La Costa Avenue.

As shown in Table 4.13-1, the completion of the North Coast Highway 101 project alone would cause five of the eight North Coast Highway 101 segments to operate at unacceptable level of service (LOS) E. However, the completion of the North Coast Highway 101 project would improve the North Coast Highway 101 at La Costa Avenue intersection operations from LOS B to LOS A.

a. Housing Strategy 1 – Ready Made (RM)

With the addition of housing strategy 1 (RM) traffic to the near-term with North Coast Highway 101 improvements, the five segments operating at unacceptable LOS E would operate at unacceptable LOS F. The addition of project traffic to these segments would further degrade the five segments to LOS F, resulting in a significant contribution to this impact.

b. Housing Strategy 2 – Build Your Own (BYO)

With the addition of housing strategy 2 (BYO) traffic to the near-term with North Coast Highway 101 improvements, two of the segments operating at unacceptable LOS E would operate at unacceptable LOS F and the other three segments would continue to operate at unacceptable LOS E. The addition of project traffic to these segments would further degrade two of the segments to LOS F, resulting in a significant contribution to this impact.

c. Housing Strategy 3 – Modified Mixed Use Places (MMUP)

With the addition of housing strategy 3 (MMUP) traffic to the near-term with North Coast Highway 101 improvements, the five segments operating at unacceptable LOS E would operate at unacceptable LOS F. The addition of project traffic to these segments would further degrade the five segments to LOS F, resulting in a significant contribution to this impact.

The intersection analysis was completed for the highest traffic-generating housing strategy, which is housing strategy 3 (MMUP). The North Coast Highway 101 at La Costa Avenue intersection would operate acceptably with the completion of both the North Coast Highway 101 improvements and the proposed housing strategy 3 (MMUP). Thus, near-term cumulative intersection impacts would be less than significant.

7.2.13.2 Plan Buildout Effects

As discussed in Section 4.13 and detailed in the Traffic Impact Assessment (see Appendix N), the assessment of traffic impacts associated with each housing strategy is based on identifying the buildout traffic conditions and subtracting ambient growth (growth that would occur without the HEU). Therefore, inherently the analysis contained in Section 4.13 is a cumulative analysis. As shown therein, implementation of each housing strategy would result in a different combination of significant impacts to roadway/freeway segments and intersections throughout the City and surrounding jurisdictions within the cumulative study area. These impacts are expressly set out in Sections 4.13.5.1(c), 4.13.5.1(d), and 4.13.5.1(e) for housing strategies 1 (RM), 2 (BYO), and 3 (MMUP), respectively. Table 4.13-20 shows the significant traffic impacts for the three strategies. These significant impacts likewise represent significant cumulative impacts (see Impacts TRF-1 through TRF-26).

7.2.14 Public Utilities

The study for public utilities is the applicable provider's service area. New development or redevelopment within the service area could result in cumulative impacts associated with additional demands for public utilities, resulting in the need for new or expanded facilities. The following is a summary of the project's contribution to cumulative impacts associated with public utilities.

7.2.14.1 Storm Drain

Adoption of the HEU could contribute to impacts due to increased impervious surfaces throughout the service area, resulting in the potential for greater surface runoff and increased demands on existing storm water. Development consistent with the HEU must adhere to Federal, State, and local regulations, as described in Section 4.8, including local regulatory standards to effectively avoid and/or address potentially significant impacts related to runoff rates and volumes. If future projects need to increase sizing of existing storm drains, this would be reviewed on a project-by-project basis. Compliance with

General Plan policies and local regulations would ensure that the HEU's incremental contribution to storm drain infrastructure impacts would not be cumulatively considerable.

7.2.14.2 Wastewater

Adoption of the HEU could contribute to impacts due to proposed increase in density and intensity of uses throughout the City. Future development consistent with the HEU must comply with General Plan policies requiring documentation from the water district that adequate facilities are available to serve the project. Compliance with General Plan policies and local regulations would ensure that the HEU's incremental contribution to wastewater capacity impacts would not be cumulatively considerable.

7.2.14.3 Water Infrastructure/Water Supply

Adoption of the HEU could contribute to impacts due to proposed increase in density and intensity of uses throughout the City. Future development consistent with the HEU must present service letters from either San Dieguito Water District or Olivenhain Municipal Water District depending on the location of the housing site. This would assure that adequate water supplies are available to support the individual projects. Compliance with General Plan policies and local regulations would ensure that the HEU's incremental contribution to water supply impacts would not be cumulatively considerable.

7.2.14.4 Solid Waste

Adoption of the HEU could contribute to impacts due to proposed increase in density and intensity of uses throughout the City. Future development consistent with the HEU must participate in recycling programs, comply with City General Plan requirements, and the solid waste and recycling ordinance thereby avoiding significant solid waste disposal impacts related to construction and operation under any housing strategy. Compliance with General Plan policies and local regulations would ensure that the HEU's incremental contribution to solid waste impacts would not be cumulatively considerable.