4.0 Other CEQA Considerations

This chapter discusses additional topics statutorily required by the California Environmental Quality Act (CEQA). The topics considered include energy conservation, significant irreversible changes to the environment and irretrievable commitment of resources, and environmental effects found not to be significant, and therefore do not require in-depth analysis in the EIR.

4.1. Energy Conservation

The assessment of energy conservation in accordance with Appendix F of the CEQA Guidelines revolves around the key question of whether the proposed project would result in wasteful, inefficient, and unnecessary consumption of energy or construct new or retrofitted buildings that would have excessive energy requirements for daily operation. This includes an analysis of short-term operations (i.e., construction) and long-term operations. Long-term operational energy use and consumption associated with the project includes fuel consumption of vehicles, electricity and natural gas consumption by residents, and energy consumption related to water delivery.

4.1.1. Electricity/Natural Gas Services

San Diego Gas & Electric (SDG&E) provides electrical and natural gas services to the project site. SDG&E is a regulated public utility that provides energy service to 3.6 million people through 1.4 million electric meters and 873,000 natural gas meters in San Diego County and southern Orange County (SDG&E 2016).

4.1.2. Energy Usage

Energy usage is typically quantified using the British thermal unit (BTU). Total energy usage in California was 7,684 trillion BTUs in 2013 (the most recent year for which this specific data is available), which equates to an average of 201 million BTUs per capita. Of California's total energy usage, the breakdown by sector is 38 percent transportation, 24 percent industrial, 19 percent commercial, and 19 percent residential.

Electricity and natural gas in California are generally consumed by stationary users such as residences and commercial and industrial facilities, whereas petroleum consumption is generally accounted for by transportation-related energy use (US Energy Information Administration [EIA] 2015). In 2016, net taxable gasoline sales (including aviation gasoline) in California accounted for 15,297,030,909 gallons of gasoline (California Board of Equalization [BOE] 2017).

The electricity consumption attributable to residential and nonresidential land uses in San Diego County from 2008 through 2015 is shown in **Table 4.1-1**. As indicated, residential and nonresidential demand have both remained relatively constant, with no substantial increase, even with an increase in population.

Table 4.1-1 Nonresidential and Residential Electricity Consumption in San Diego County, 2008–2015

Year	Nonresidential Electricity Consumption (in millions of kilowatt-hours)	Residential Electricity Consumption (in millions of kilowatt-hours)
2015	12,863.83	6,917.35
2014	13,039.60	6,864.20
2013	12,623.47	6,802.31
2012	12,654.79	6,907.24
2011	12,333.06	6,689.53
2010	12,379.46	6,598.79
2009	12,747.27	6,768.03
2008	13,096.64	6,898.18

Source: California Energy Consumption Data Management System (ECDMS) 2016

The natural gas consumption attributable to residential and nonresidential land uses in San Diego County from 2008 through 2015 is shown in **Table 4.1-2**. Residential and nonresidential demand have both remained relatively constant, even with an increase in population.

Table 4.1-2 Nonresidential and Residential Natural Gas Consumption in San Diego County, 2008–2015

Year	Nonresidential Natural Gas Consumption (in millions of therms)	Residential Natural Gas Consumption (in millions of therms)
2015	208.87	255.63
2014	205.03	256.58
2013	219.50	318.31
2012	203.50	311.18
2011	201.91	326.95
2010	222.87	337.91
2009	206.14	308.75
2008	216.67	324.69

Source: ECDMS 2016

Daily automotive fuel consumption in San Diego County from 2008 to 2016 is shown in **Table 4.1-3**. As shown, automotive fuel consumption has declined in the county since 2008.

Table 4.1-3 Daily Automotive Fuel Consumption in San Diego County, 2008–2016

Year	On-Road Automotive Fuel Consumption (gallons)	Off-Road Automotive (Construction Equipment) Fuel Consumption (gallons)
2016 (projected)	1,506,267,791	15,668,459
2015	1,505,387,064	15,927,675
2014	1,502,480,693	15,609,189
2013	1,494,606,968	15,151,711
2012	1,512,684,107	14,655,332
2011	1,535,247,710	14,152,118
2010	1,560,165,410	16,744,876
2009	1,555,620,379	20,154,418
2008	1,592,503,052	26,662,726

Source: California Air Resources Board, EMFAC2014

4.1.3. Regulatory Setting

The following is a description of state and local environmental laws and policies that are relevant to the CEQA review process.

State of California Framework

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24)

Title 24 was established by the California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and establish energy efficiency standards for residential and nonresidential buildings.

As can be seen in **Table 4.1-1**, total electricity demand in San Diego County from 2008 through 2015 remained relatively stable, even in the wake of population growth. The 2016 Title 24 standards, which are expected to improve energy efficiency by approximately 20 percent compared to the 2013 standards, took effect on January 1, 2017.

California Green Building Standards

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the

topics of planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2016 and went into effect January 1, 2017.

City of Escondido Climate Action Plan

The Escondido Climate Action Plan (E-CAP) was designed under the premise that the City and the community it represents are uniquely capable of addressing emissions associated with sources under the City's jurisdiction. According to the E-CAP, Escondido consumed 652,737,784 kilowatt-hours in 2010 in addition to 40,833,330 therms of natural gas (Escondido 2013, page 3-6). Through the E-CAP, the City has established goals and policies that incorporate environmental responsibility into daily energy use, among other sectors. According to the E-CAP, by using energy more efficiently Escondido will keep dollars in the local economy, create new green jobs, and improve the quality of life in the community.

Energy use in buildings represents the second largest source of emissions in Escondido. The E-CAP contains three policy provisions that directly address energy use in residential land uses (Escondido 2013). Specifically, these three policy provisions address energy efficiency requirements, renewable energy requirements, and energy efficiency retrofits. Refer to **Section 2.6, Greenhouse Gas Emissions**, for a discussion of the project's consistency with the E-CAP.

4.1.4. Evaluation

Considerations for energy conservation evaluation in an EIR include:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project, including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
- The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- The effects of the project on peak and base period demands for electricity and other forms of energy.
- The degree to which the project complies with existing energy standards.
- The effects of the project on energy resources.
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

The impact analysis focuses on the three sources of energy that are relevant to the proposed project: (1) electricity (including energy required for water delivery, sanitary sewer, and solid waste disposal), (2) natural gas, and (3) transportation fuel for vehicle trips associated with new development as well as the fuel necessary for project construction.

The analysis of electricity/natural gas usage is based on California Emissions Estimator Model (CalEEMod) which quantifies energy use for occupancy. The CalEEMod model printouts are included in **Appendix 2.6** of this EIR. Modeling was based primarily on the default settings in the computer program for San Diego County, as well as on the Safari Highlands Ranch (SHR) transportation impact analysis (Linscott, Law & Greenspan 2017; **Appendix 2.12**).

The amount of operational fuel use was estimated using the California Air Resources Board's (CARB) EMFAC2014 computer program, which projects typical daily fuel usage in San Diego County. The amount of total construction-related fuel use was estimated using ratios in the Climate Registry (2016) General Reporting Protocol for the Voluntary Reporting Program, Version 2.1. The total construction-related fuel use was amortized over the construction period (5 years).

Energy consumption associated with the proposed project is summarized in **Table 4.1-4**.

Table 4.1-4 Proposed Project Energy Consumption

Energy Type	Annual Energy Consumption	Percentage Increase Countywide
Electricity Consumption[1]	7,078,271.4 kilowatt-hours	0.04%
Natural Gas Consumption[1]	159,734.7 therms	0.03%
Automotive Fuel Consumption[2]		
Project Construction	132,118 gallons	0.84%
Project Operations	622,447 gallons	0.04%

Sources:
1. California Emissions Estimator Model (CalEEMod v. 2016.3.1)
2. California Air Resources Board, EMFAC2014.
Notes: The project increases in electricity and natural gas consumption are compared with all of the residential and nonresidential buildings in San Diego County in 2015. The project increases in automotive fuel consumption are compared with the projected countywide fuel consumption for 2016. See **Appendix 2.6** for emission model outputs.

As shown in **Table 4.1-4**, the project would constitute an approximate 0.04 percent increase in countywide annual electricity consumption and an approximate 0.03 percent increase in annual natural gas consumption attributable to all residential and nonresidential buildings in San Diego County. The use of on-road automotive fuel (Project Operations) would increase in the county by 0.04 percent, while the use of off-road automotive fuel (Project Construction) would increase by 0.84 percent.

Construction Phase Energy Use

During construction, the project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels to power construction vehicles and other energy-consuming equipment would be used during site clearing, grading, and construction. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Project construction equipment would be required to comply with the latest US Environmental Protection Agency (EPA) and CARB engine emissions standards. These

emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption.

Additionally, construction building materials may include recycled materials and products originating from nearby sources in order to reduce the costs of transportation. The project applicant has indicated that reasonable efforts will be made to use recycled materials in construction of the proposed project, as appropriate and as available. With increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive and that there is a significant cost-savings potential in green building practices and materials.

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than nonrecycled materials. The incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes, and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ reasonable energy conservation practices in the interest in minimizing the cost of doing business.

As indicated in **Table 4.1-4**, the project's fuel consumption from construction would be 132,118 gallons, which would temporarily increase off-road fuel use in the county by 0.84 percent. As such, project construction would not represent a substantial increase in demand for local or regional energy supplies. As noted above, construction fuel use would be temporary and would cease upon completion of project construction. No unusual project characteristics would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or state. Therefore, it is expected that construction fuel consumption associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

Operational Phase (Long-Term) Energy Use

Transportation Energy Demand

Pursuant to the federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NTSA) is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States.

Table 4.1-4 estimates the daily fuel consumed by vehicles traveling to and from the project site. As indicated in the table, operation of the proposed project is estimated to consume approximately 622,447 gallons of fuel per year, which would increase countywide automotive fuel consumption by 0.04 percent. Therefore, as the project's limited contribution to fuel

consumption would be minimal, the project would not result in any unusual characteristics that would result in substantial or excessive long-term fuel consumption within the county.

Building Energy Demand

The proposed project would consume energy for interior and exterior lighting, heating, ventilation, and air conditioning (HVAC), refrigeration, electronics systems, appliances, and security systems, among other things. The proposed project would be required to comply with 2016 Title 24 Building Energy Efficiency Standards, which establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Adherence with the aforementioned state and federal regulations guide reductions for long-term operation energy use.

The SHR Specific Plan proposes a number of energy efficiency and sustainability standards that have been crafted to ensure that the proposed project would not result in the inefficient, wasteful, or unnecessary consumption of building energy. As depicted in **Table 4.1-4**, project-related building energy would represent a 0.04 percent increase in electricity consumption and a 0.03 percent increase in natural gas consumption over the current countywide usage.

Additionally, as stated in **Chapter 1.0, Project Description**, of this EIR, SHR homeowners would have the option to upgrade to advanced water recycling systems, water-recycling dishwashers, "greywater" heat recovery systems, efficient air ventilation and purification systems, and/or "fuel forward" garages with electric vehicle chargers for electric and hybrid vehicles or compressed natural gas (CNG) fueling stations for natural gas-powered cars. Such measures would further decrease electricity and natural gas consumption that would result with project implementation.

Additionally, all homes would be pre-wired for optional installation of solar panels. Other energy-saving features to be incorporated into the proposed development include drought-tolerant landscaping, and low water and recycled water irrigation systems.

Conclusion

Future development would be subject to compliance with applicable federal, state, and local energy and building regulations. The project does not involve any unusual characteristics that would result in excessive long-term operational demand for electricity or natural gas. As shown in **Table 4.1-4**, the increase in electricity, natural gas, and automotive fuel consumption over existing conditions is negligible. For the reasons described above, the proposed project would not place a substantial new demand on regional energy supply or require significant additional capacity; significantly increase overall electricity demand in the county; cause wasteful, inefficient or unnecessary consumption of energy during project construction, operation, and/or maintenance; or preempt future energy development or future energy conservation.

4.2. Significant Unavoidable Impacts and Irreversible Changes to the Environment

Through analysis provided in this EIR, it was determined that the proposed project has the potential to generate significant environmental impacts with regard to the following issue

areas: air quality, biological resources, cultural resources, greenhouse gas emissions, noise, traffic and circulation, utilities and service systems, and wildfire hazards.

Of those issue areas, mitigation measures are identified to reduce all impacts to less than significant levels for biological resources, cultural resources, greenhouse gas emissions, utilities and services systems, and wildfire hazards.

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. Implementation of the proposed project would result in significant and unavoidable impacts to air quality (construction phase only), noise (operational phase only), and traffic.

Unavoidable temporary impacts to air quality are a result of the project's direct and cumulative generation of construction emissions (volatile organic compounds [VOC] and nitrogen oxides [NOx]) in exceedance of San Diego Air Pollution Control District (SDAPCD) thresholds, even with the implementation of mitigation measures.

Unavoidable impacts to noise are a result of project-generated traffic noise that would exceed established noise thresholds. Such effects would be limited to nearest residential yards fronting onto Cloverdale Road (estimated 4 homes located between Rockwood Road and San Pasqual Valley Road). Addressing traffic noise at these receivers typically takes the form of noise barriers (e.g., sound walls). While the placement of sound walls along affected streets could reduce resulting noise at certain residential locations, the City of Escondido cannot ensure feasible implementation of noise barriers, as they would fall under County of San Diego jurisdiction and would also likely require property owner approval. Such barriers are therefore deemed infeasible for the purposes of this EIR.

Unavoidable impacts relative to traffic and circulation would occur along an already failing (LOS F) street, Felicita Avenue/17th Avenue from Escondido Boulevard to Juniper Street. The project applicant would be required to pay a fair share toward the City of Escondido Capital Improvement Project: Felicita and Juniper from Escondido to Chestnut widening project, per the *Fiscal Year 2008/2009 Five Year Capital Improvement Program and Budget*.

Based on the fair share calculations, the project's contribution to this improvement are estimated to be 4.1 percent. Implementation of the recommended mitigation measures would partially mitigate the near-term direct impact and fully mitigate the cumulative impact along this street segment to below a level of significance. Therefore, direct impacts would remain significant and unavoidable.

CEQA Guidelines Section 15126.2(c) describes significant irreversible environmental changes 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 non-use thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as access improvements that provide access to a previously inaccessible area) generally commit future generations to similar uses. Additionally,*

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.

The on-site physical effects of project implementation on the environment are addressed in **Section 2.0** of this EIR. In general, conversion of the project site from predominantly vacant land, with some sensitive habitat areas, to urbanized uses (paved roadways and graded lots with structures and landscaping) would represent a permanent, irreversible loss of some existing aesthetic and biological resources.

As such, long-term irreversible environmental changes would include a change in the land use and visual character of the site (undeveloped to developed); modification of drainage patterns that would alter on-site hydrology; an increase in local and regional traffic and associated air pollutants, greenhouse gas emissions, and noise levels; an increase in the volumes of solid waste and wastewater generated in the area; and an increase in water consumption.

As detailed above, project construction and maintenance of the buildings and infrastructure proposed would require the commitment of energy, natural resources, and building materials. Nonrenewable and limited resources that would be consumed with project development would include oil, natural gas, gasoline, lumber, sand and gravel, asphalt, water, steel, and similar materials. Nonrenewable fuels would be used by construction equipment, haul trucks, and worker vehicles. Nonrenewable energy also would be expended during the harvesting and mining of natural resources such as wood and aggregate and during the subsequent manufacturing of construction materials such as wood framing and concrete. This commitment of resources and energy would be commensurate with that of other projects of similar size but would nevertheless be irretrievable. Post-construction consumption of nonrenewable resources would include the use of electricity, natural gas, and water by project residents and visitors. This energy use would be a long-term commitment and irretrievable.

4.3. Effects Determined to Be Not Significant

This section addresses areas of no impact for the project and the Sphere of Influence (SOI) changes.

4.3.1. Agriculture and Forestry Resources

Threshold: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

The SHR project site does not contain any active farmland, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As shown in the California Department of Conservation (2014) California Important Farmland Finder, the project site is designated as Other Land and Grazing Land. Since the project would not convert designated farmland, **no impact** would occur.

As stated above, the SOI update does not necessarily authorize physical development until annexation, and therefore would not result in direct physical changes to the environment that

may lead to the conversion of Farmland to a nonagricultural use, if such conditions are present on affected SOI lands. Indirect physical changes in the environment associated with the SOI update are speculative and not reasonably foreseeable. Subsequent actions would require project-level CEQA analysis and determination prior to any physical development, at which time project-specific mitigation measures or alternatives would be identified.

Threshold: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The SHR project site and surrounding land uses are not zoned for agricultural use, nor are they covered under a Williamson Act contract. The project site is zoned Specific Plan (SP) and the project site is located in Specific Plan Area #4 (Valley View SPA #4). Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. **No impact** would occur.

The Sphere of Influence update does not necessarily authorize physical development until annexation, and therefore would not result in direct physical changes to the environment that may lead to a conflict with existing zoning for agricultural use or a Williamson Act contract, if such conditions are present on affected SOI lands. Indirect physical changes in the environment associated with the SOI update are speculative and not reasonably foreseeable. Subsequent actions would require project-level CEQA analysis and determination prior to any physical development, at which time project-specific mitigation measures or alternatives would be identified.

Threshold: Would the project conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

or

Result in the loss of forestland or conversion of forestland to non-forest use?

The SHR project site does not contain any active farmland or forestland, nor does it support trees that could be commercially harvested. These conditions preclude the possibility of the project converting forestland to non-forest use. Therefore, **no impact** would occur.

Actions on the SOI update do not authorize any physical development, prezoning or zone change, and therefore would not result in direct physical changes to the environment or rezoning that may lead to a loss of forestland or timberland, if such conditions exist on affected lands. Indirect physical changes in the environment associated with the SOI update are speculative and not reasonably foreseeable. Subsequent actions would require project-level CEQA analysis and determination prior to any physical development, at which time project-specific mitigation measures or alternatives would be identified.

Threshold: Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forestland to non-forest use?

The SHR project site does not contain any active farmland or forestland, nor does it support trees that could be commercially harvested. These conditions preclude the possibility of the project converting forestland to non-forest use. Therefore, **no impact** would occur.

The SOI update does not necessarily authorize physical development until annexation, and therefore would not result in direct physical changes to the environment that may lead to conversion of farmland to nonagricultural use or cause conversion of forestland to non-forest use on affected SOI lands, if such conditions are present. Indirect physical changes in the environment associated with the SOI update, in Candidate Study Areas 2-7, are speculative and not reasonably foreseeable. Subsequent actions would require project-level CEQA analysis and determination prior to any physical development, at which time project-specific mitigation measures or alternatives would be identified.

4.3.2. Mineral Resources

Threshold: Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The SHR project site has been classified by the California Department of Conservation–Division of Mines and Geology (2016) as an area of Undetermined Resource Significance (MRZ-4). The MRZ-4 zone identifies areas where available information is inadequate for assignment to any other mineral resource zone (California Department of Conservation 2015). Therefore, no potentially significant loss of availability of a known mineral resource of value to the region and the residents of the state will occur as a result of this project. **No impact** would occur.

Actions on the SOI update do not authorize any physical development and therefore would not result in direct physical changes to the environment that may lead to a loss of availability of a known mineral resource of value to the region and the residents of the state, if present on affected SOI lands. Indirect physical changes in the environment associated with the SOI update are speculative and not reasonably foreseeable. Subsequent actions would require project-level CEQA analysis and determination prior to any physical development, at which time project-specific mitigation measures or alternatives would be identified.

Threshold: Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

There are no known locally important mineral resource recovery sites identified on the SHR project site in the City's General Plan or in a specific plan or other land use plan of value to the region or to the residents of the state. Therefore, **no impact** would occur.

Actions on the SOI update do not authorize any physical development and therefore would not result in direct physical changes to the environment that may lead to a loss of availability of a locally important mineral resource recovery site, if present on affected SOI lands. Indirect physical changes in the environment associated with the SOI update are speculative and not reasonably foreseeable. Subsequent actions would require project-level CEQA analysis and determination prior to any physical development, at which time project-specific mitigation measures or alternatives would be identified.

4.3.3. Population and Housing

Threshold: Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

The SHR project would not displace existing housing since the site is currently vacant. The addition of 550 dwelling units would yield a net gain of available housing in Escondido. **No impact** would occur.

The SOI update does not necessarily authorize physical development until annexation, and therefore would not result in direct physical changes to the environment that may lead to development which would result in the displacement of existing housing (if present), thereby necessitating construction of replacement housing elsewhere. Indirect physical changes in the environment associated with the SOI update are speculative and not reasonably foreseeable. Subsequent actions would require project-level CEQA analysis and determination prior to any physical development, at which time project-specific mitigation measures or alternatives would be identified.

Threshold: Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

The SHR project would not displace any existing housing. A total of 550 single-family dwelling units are proposed for development on a currently vacant site. Therefore, the proposed project would not displace housing or people, and **no impact** would occur.

Actions on the SOI update do not authorize any physical development and therefore would not result in direct physical changes to the environment that may lead to development which would displace people (e.g., if existing land uses or residential units are present on-site) or require the construction of replacement housing elsewhere. Indirect physical changes in the environment associated with the SOI update are speculative and not reasonably foreseeable. Subsequent actions would require project-level CEQA analysis and determination prior to any physical development, at which time project-specific mitigation measures or alternatives would be identified.

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