5

5 CUMULATIVE IMPACTS

This section addresses cumulative impacts associated with implementation of the Mobility Element Update (MEU; Project) of the City of Encinitas General Plan. California Environmental Quality Act (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.

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. The methodology and cumulative scope of analysis is summarized in Section 5.1 and additional discussion of the cumulative methodology is detailed in the cumulative analysis for each issue.

5.1 Cumulative Analysis Setting and Methodology

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.

5.1.1 Plans and Programs Evaluated for Determination of Cumulative Impacts

Multiple federal, State, and local planning documents and programs were used to evaluate the MEU's contribution to cumulative impacts. These plans and programs are discussed under the Regulatory Framework subsections throughout Chapter 3.0. Highlighted below are regional and local plans and programs relied upon for the cumulative impact evaluation.

5.1.1.1 San Diego Forward: The 2021 Regional Plan (San Diego Forward) December 2021

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.

5.1.1.2 City of Encinitas General Plan

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

5.1.1.3 City of Encinitas Municipal Code

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

- 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.
- The 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.

5.1.1.4 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.

5.1.2 Projects Evaluated for Cumulative Impacts (Near-Term)

5.1.2.1 The North Coast Highway 101 Streetscape Improvement Project

The North Coast Highway 101 Streetscape Improvement Project includes streetscape, pedestrian, circulation, traffic management, and parking improvements along 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 potentially combine with the traffic effects of the Project, primarily by providing improvements to support reductions in vehicle miles traveled (VMT) per capita.

5.1.2.2 El Camino Real Specific Plan

The El Camino Real Specific Plan (ECRSP) provides a regulatory framework to guide future site-specific development and improvements within the commercial corridor to support revitalization of the Specific Plan Area (SPA) through implementation of streetscape improvements, and objective design standards that would ensure future site-specific development and redevelopment achieve the land use vision and design objectives intended for the SPA and for housing that may be proposed through State legislation. A Zoning Code Amendment, General Plan Amendment, and Local Coastal Plan Update is required to reflect the adoption of the ECRSP.

5.1.2.3 Climate Action Plan Update

The City's Climate Action Plan (CAP) provides a roadmap for reducing GHG emissions through the implementation of various targets, goals, strategies, and measures. The CAP set an ambitious target to reduce emissions by 44% below 2012 levels by 2030. As outlined in the 2018 CAP, the City committed to updating the CAP every five years. The CAP update is in process and will involve the development of an updated baseline greenhouse gas emissions inventory and projection, updated emissions reduction targets, updated emission-reduction goals, and revised or additional measures, as warranted. The City is proposing a 40% reduction in 2016 GHG emission levels by 2030 and an 85% reduction in 2016 GHG emission levels by 2045.

5.1.2.4 Mature Tree Preservation Policy

On December 8, 2021, City Council directed staff to develop objective standards to preserve significant mature trees. Accordingly, City staff has been working to prepare a mature tree preservation policy. Key aspects of the policy include the following:

- Defining a "Mature Tree"
- Developing Mitigation Strategies for Mature Tree Removal
- Developing Standards for Replacement Ratio/Size/Type
- Providing Incentives to Preserve Mature Trees

5.2 Cumulative Effect Analysis

5.2.1 Air Quality

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probably future projects within the cumulative impact area for air quality. Air quality impacts are inherently a cumulative impact because air quality is affected by all pollutant sources in the basin; therefore, the cumulative study area would be considered the San Diego Air Basin (SDAB).

The evaluation of project consistency with the Regional Air Quality Standards (RAQS) is a cumulative analysis by nature because it considers a project's consistency with a regional air quality plan that relies on the land use plans of jurisdictions within the SDAB. As discussed in Section 3.1.5 of Chapter 3, the Project would be consistent with the SANDAG growth projections used to develop the RAQS. Additionally, the MEU contains goals and policies to reduce congestion, thereby improving air quality, and would result in a decrease in VMT compared to VMT with buildout of the existing mobility plan. Therefore, the Project would not obstruct or conflict with implementation of the RAQS, and cumulative impacts would be less than significant.

With regards to emissions of criteria pollutants, as discussed in Section 3.1.6, representative construction emissions would be less than the applicable thresholds for all criteria pollutants. As the individual project thresholds are designed to help achieve attainment with cumulative basin-wide standards, they are also appropriate for assessing the Project's contribution to cumulative impacts. Therefore, because emissions would be less than the individual project-level thresholds, and because all projects are required to adhere to existing regulations, Project construction would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant, and impacts related to construction emissions would be less than significant. The Project would result in a decrease in VMT and associated operational air quality emissions when compared to the no-Project condition, due to a mobility network that supports multimodal transportation. The analysis of operational emissions is cumulative in nature because the traffic assumptions used in the analysis include cumulative traffic associated with regional growth. Therefore, the Project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant during operation.

Construction diesel particulate matter emissions, carbon monoxide (CO) hot spots, and odors are generally localized impacts that do not have regional or cumulative considerations. Due to the limited scope and duration of construction activities required for mobility improvements, the limited amount of time equipment would be located adjacent to any specific sensitive receptor, and the implementation of the In-Use Off-Road Diesel-Fueled Fleets Regulation, potential construction activities associated with implementation of the Project would not expose sensitive receptors to substantial pollutant concentrations. The Project is also not anticipated to result in a CO hotspot or generate odors that affect a substantial number of people.

Therefore, the incremental effects of the Project, in combination with projected growth, would not be cumulatively considerable, and the cumulative impact would be less than significant.

5.2.2 Greenhouse Gas Emissions and Climate Change

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for greenhouse gas (GHG) emissions. The issue of global climate change is inherently a cumulative issue, as GHG emissions of individual projects cannot be shown to have a material effect on global climate change. Impacts would be cumulative in nature if they lead to a substantial increase in GHG emissions, when combined with other developments.

As discussed, the framework for assessing GHG emissions in the state has been created through Assembly Bill (AB) 32, Senate Bill (SB) 32, Executive Order (EO) S-3-05, and the 2017 and 2022 Scoping Plans. Local GHG emissions are addressed through San Diego Forward, the City's General Plan/Local Coastal Program, the Climate Action Plan (CAP), the Active Transportation Plan, and the Modal Alternatives Project. If a project demonstrates that it is sufficiently reducing its overall GHG emissions consistent with statewide goals, the project's impact can be determined not to be cumulatively considerable as it would contribute to the state's GHG emission reduction targets. As discussed in Section 3.2.5 of Chapter 3, the Project would result in a less-than-significant impact related to construction GHG emissions. Further, regional GHG emissions would decrease compared to both baseline year 2016 conditions and a year 2050 no-Project condition. Therefore, the Project would result in a less-than-significant cumulative impact related to generating GHG emissions.

Additionally, as discussed in Section 3.2.6, the Project would be consistent with all State, regional, and local GHG-reduction plans including the 2017 and 2022 Scoping Plans, San Diego Forward, and the City's CAP. The Project would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing the emission of GHGs.

Therefore, the incremental effects of the Project, in combination with projected growth, would not be cumulatively considerable, and the cumulative impact would be less than significant.

5.2.3 Noise and Vibration

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for noise. The analysis of vehicle traffic noise provided in Section 3.3.7 is cumulative in nature because the traffic assumptions used in the analysis include cumulative traffic associated with regional growth. The analysis considers noise impacts associated with the anticipated year 2050 growth within the region and incorporates the proposed roadway reclassifications that would result in a change in daily roadway segment volumes to accommodate this future growth. The Project would not introduce new land uses. As discussed in Section 3.3.7, compared to baseline year 2016 noise levels, the Project's buildout would result in an estimated cumulative change in noise levels of 2.6 dB or less. Therefore, the Project's cumulative vehicle noise impacts would be less than significant.

Construction activities associated with mobility-related improvement projects would require equipment that would generate noise and ground-borne vibration. Construction noise and vibration are generally localized impacts that do not have regional or cumulative considerations. Adherence to

Section 9.32.410 of the City's Municipal Code would avoid or reduce construction noise and vibration impacts. Future improvement projects would be subject to CEQA evaluation, and any necessary project-specific noise-reduction strategies would be developed at that time. Impacts would be less than significant.

Therefore, the incremental effects of the Project, in combination with projected growth, would not be cumulatively considerable, and the cumulative noise impact would be less than significant.

5.2.4 Land Use and Planning

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for land use.

With regards to physical division of a community, as discussed in Section 3.4.6., the MEU does not propose to expand, extend, or change the width of any existing roadways within the City. Therefore, because no new connections would be established that would potentially cause the physical division of an established community, implementation of the Project would not contribute to a cumulative impact related to physical division of community. The Project would not result in a cumulatively considerable impact related to the physical division of the community.

As detailed in Section 3.4.7, the MEU was assessed for impacts related to conflicts with any land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect. The MEU was assessed for consistency with State plans and policies, including the Complete Streets Act and SB 743, regional plans and policies, including San Diego Forward, and local plans, including the Local Coastal Program and adopted General Plan. It was concluded that implementation of the MEU would result in less -than -significant environmental impacts associated with conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The MEU would be consistent with applicable plans and policies adopted for the purpose of avoiding or mitigating an environmental effect and there are no known cumulative projects that would be inconsistent with applicable plans or policies potentially contributing to a cumulative impact.

Implementing MEU Policy 3.1 would ensure subsequent projects within the City address consistency with the Land Use and Housing Element by ensuring the mobility system accommodates planned growth including areas identified in the Land Use Element, Housing Element, and adopted specific plans. Therefore, the incremental effects of the Project, in combination with projected growth elsewhere in the cumulative study area, would be less than cumulatively considerable, and the cumulative impact would be considered less than significant.

5.2.5 Public Services and Facilities

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probably future projects within the cumulative impact area for public services and facilities. The cumulative study area would be considered the City.

The increase in demand for public services and facilities are typically a result of an increase in growth and the construction of new buildings. As detailed in Section 3.5.5, as the MEU is a policy document that does not induce growth and does not propose the construction of new public service facilities, there would be a less-than-significant impact related to adverse physical impacts on the environment associated with the need for new public service facilities or the need for new or physically altered public facilities.

Subsequent projects implemented in accordance with the MEU must adhere to the General Plan policies related to the avoidance of environmental impacts and must comply with applicable development regulations that are intended to address the demand for public services that result from development. As population growth occurs in the City and the need for new facilities is identified, any future construction of public facilities would be subject to separate environmental review at the time design plans are available. Therefore, impacts would be less than significant, and no mitigation is required.

Therefore, the incremental effects of the Project, in combination with projected growth within the City, would not be cumulatively considerable, and the cumulative impact would be less than significant.

5.2.6 Transportation and Circulation

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probably future projects within the cumulative impact area for transportation and circulation. For this issue, a cumulative impact would occur if buildout consistent with the MEU, coupled with the growth of neighboring jurisdictions, including growth anticipated under the 2021 Regional Plan and the ECRSP, would result in increases in VMT. In addition to the plan projections, implementation of the Highway 101 Project is considered as a cumulative project.

As detailed in Chapter 3.6, Transportation and Circulation, implementation of the MEU would not result in a significant impact to transportation and circulation. Overall City VMT per capita is estimated to be higher than the regional average without the Project. As detailed in the City's VMT Guidelines (Appendix E; City of Encinitas 2023b), the City is considering programmatic VMT mitigation strategies to provide a mechanism to reduce individual project VMT, which would support City-wide reductions in VMT per capita. On a project-by-project basis, as individual discretionary development projects are proposed that identify a significant VMT impact, feasible mitigation measures would be required to support reductions in VMT. As detailed in Section 3.6.2.3, the City's VMT Guidelines identify screening levels and significance thresholds for transportation impacts under CEQA related to VMT for discretionary/entitlement projects.

The City's significance thresholds and specific VMT metrics used to measure VMT impacts by land use type are identified below:

- Residential: 15% below the existing City-wide average.
- Employment (includes all employment types: office, commercial, hotel, industrial): At or below the regional average.
- Mixed-Use: Each project component is evaluated per the appropriate metric based on land use type (e.g., residential, employment, and retail).
- Regional Retail, Regional Recreational, or Regional Public Facilities: A net increase in total regional VMT using the boundary method (City of Encinitas 2023b).

If an individual project is not screened out from the requirement for a VMT analysis or does not meet one of the above thresholds of significance, a significant VMT impact would result. Individual development projects in the City would need to ensure VMT is reduced to a less than significant impact, to the extent feasible, to support citywide VMT reductions and implementation of the MEU policy framework. The Project, consistent with the MEU framework, would not increase trip generation in the Planning Area, but instead would reclassify roadways to accommodate future growth. Future multimodal transportation improvements would not contribute to the cumulative VMT impact identified for City buildout, and future cumulative development that supports the implementation of the MEU network would likewise reduce VMT. Furthermore, the VMT per capita with the proposed MEU would not increase above the projected VMT per capita for the existing mobility network. As a result, the Project would decrease VMT, and future VMT impacts would result in a less than cumulatively considerable impact relative to transportation and circulation.