

CHAPTER 6.0

CUMULATIVE IMPACTS

6.1 BACKGROUND

Section 15130 of the State CEQA Guidelines requires that an EIR “address cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” According to Section 15065(c), “cumulatively considerable” 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. Based on Section 15130, the discussion of cumulative effects “need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness.”

The evaluation of cumulative impacts is required by Section 15130 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 plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency.”

Since the project, which is the subject of this EIR, involves a Community Plan, the focus of this cumulative analysis is upon cumulative effects that may occur from development in accordance with the proposed Downtown Community Plan in combination with other communities within the County of San Diego. The cumulative effects of projects occurring within the downtown planning area is, in reality, the subject of Section 5.0 this EIR. As discussed in Section 5.0, that analysis is based on the environmental effects that would occur as the proposed downtown planning area is built out.

With a broad focus on the cumulative effects of development within the Community Plan in combination with other communities in the County, it is impossible to identify specific projects to serve as a basis of comparison. Thus, it is necessary, and appropriate, to rely on regional planning documents, in accordance with Section 15130(b)(1)(B), to serve as the basis for the analysis of the cumulative effects of the proposed Plan.

Regional plans prepared by SANDAG, SDAPCD, SDRWQCB, and the City of San Diego form the foundation for this cumulative analysis. Regional planning documents, which are referenced in this cumulative analysis, are summarized in the following discussion. These publications are available for inspection at the agency which prepared the document.

6.1.1 REGIONAL COMPREHENSIVE PLAN

The Regional Comprehensive Plan (RCP) is a long-range planning document that encourages local jurisdictions to address the San Diego region's housing, economic, transportation, environmental and overall quality of life needs. The RCP establishes a planning framework and implementation actions that aim to increase the region's sustainability and encourage "smart growth". The RCP and an accompanying EIR were approved in July 2004 by the San Diego Association of Governments (SANDAG).

To encourage regional sustainability and smart growth, the RCP aims to reduce the number of housing units and residents that are expected to be needed within the region, but are developed outside the region, by 2030. To achieve this, the Plan identifies certain areas in the region as Smart Growth Opportunity Areas (SGOA). Designation of these opportunity areas is intended to provide guidance to local governments, property owners, and service providers as to where smart growth development should occur from a regional perspective, and encourages local jurisdictions to focus attention on these areas as they update their general plans and redevelopment plans. Once these areas are designated by local jurisdictions for development types, densities, and intensities consistent with the goals of this Plan, transportation facility improvements and other infrastructure to these areas will be prioritized. The intended effect of this effort is to attract housing units that are otherwise anticipated to be exported from the San Diego region to Baja California, Riverside County, Orange County and Imperial County by 2030. The RCP redirects those housing units to areas within the region that are located along the existing and proposed regional transportation corridors as well as other locations where compact development is appropriate. A portion of this redirected development will occur in areas of vacant land and a portion will occur as redevelopment and infill development in existing communities.

6.1.2 LAND USE DISTRIBUTION ELEMENT OF THE REGIONAL GROWTH MANAGEMENT STRATEGY

As part of the Regional Growth Management Strategy, the Land Use Distribution Element, which was approved by SANDAG in February 1995, strives to distribute San Diego's future population growth in a manner that maintains and enhances the region's quality of life. Specifically, it recommends that cities revise their general plans to include policies that would focus development in areas with good transit access, improve pedestrian circulation, and provide housing in employment areas.

6.1.3 2030 PRELIMINARY CITIES/COUNTY FORECAST

The long-range forecasts of population, housing, and employment that SANDAG has prepared since the early 1970s are used as a resource by elected officials, planners, academics, and the public. The Preliminary 2030 Cities/County Forecast was released in October 2002. Among other uses, the latest forecast is the basis for the 2030 Regional Transportation Plan (Mobility 2030), which is discussed below, and the Regional Comprehensive Plan.

6.1.4 REGIONAL TRANSPORTATION PLAN (MOBILITY 2030)

MOBILITY 2030 is San Diego's Regional Transportation Plan (RTP) – the blueprint to address the mobility challenges created by regional growth. This long-range plan contains an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system in the San Diego region through the year 2030. The plan's vision for transportation supports the region's comprehensive strategy to promote smarter, more sustainable growth. At the core of MOBILITY 2030 are seven policy goals:

- Mobility – Improve the mobility of people and freight;
- Accessibility – Improve accessibility to major employment and other regional activity centers;
- Reliability – Improve the reliability and safety of the transportation system;
- Efficiency – Maximize the efficiency of the existing and future transportation system;
- Livability – Promote livable communities;
- Sustainability – Minimize effects on the environment; and
- Equity – Ensure an equitable distribution of the benefits among various demographic and user groups.

Land Use and Environment

Smart Growth and the Regional Comprehensive Plan – the following proposed actions support the RTP goals of Accessibility, Livability, Sustainability, and Equity.

1. ...update local general and community plans and zoning codes to encourage smart growth development and to strengthen the implementation of the Regional Comprehensive Plan.

Integrating Transit – The following proposed actions support the RTP goals of Mobility, Accessibility, Livability, Sustainability, and Equity.

5. Integrate local land use plans and policies with smart growth and the Regional Transit Vision (RTV) principles and goals.

Systems Development

Highways and Arterials – the following actions support the RTP goals of Mobility, Reliability, Efficiency, and Sustainability.

22. Incorporate planned highway network identified in the RTP into local general plans, community plans, and specific project development plans, and reserve appropriate right of way through the subdivision review process and other means.

The Final EIR for the 2030 RTP, Mobility 2030 was certified in April 2003.

6.1.5 DRAFT 2002 CONGESTION MANAGEMENT PROGRAM UPDATE

State Proposition 111, passed by voters in 1990, established a requirement that urbanized areas prepare and regularly update a CMP. The purpose of the CMP is to monitor the performance of the region's transportation system, develop programs to address near-term and long-term congestion, and better integrate transportation and land use planning. SANDAG, as the designated congestion Management Agency for the San Diego region, must develop, adopt and update the CMP in response to six specific legislative requirements. SANDAG, local jurisdictions, and transportation operators (i.e., Caltrans, MTDB, NCTD, etc.) are responsible for implementing and monitoring the CMP.

Local jurisdictions are responsible for collecting and reporting CMP arterial traffic data, preparing Deficiency Plans where required, and implementing the CMP Land Use Analysis Program. In addition, local jurisdictions are responsible for reviewing, approving, and monitoring new development project mitigation.

One element of the existing 1996 CMP that is the direct responsibility of CCDC is the enhanced CEQA review process to conduct traffic impact studies and provide mitigation for large project impacts on the regional transportation system. A large project is defined as generating, upon its completion, an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak-hour vehicle trips.

6.1.6 STATE IMPLEMENTATION PLAN AND REGIONAL AIR QUALITY STRATEGY

The CARB, which is responsible for improving air quality in the state, has established 14 air basins within California. The downtown planning area lies within the San Diego Air Basin (San Diego County), which is monitored by the SDAPCD. In 1979, the EPA required each state to prepare a SIP. A SIP is a compilation of goals, strategies, schedules, and enforcement actions designed to lead the state (including the San Diego Air Basin) into compliance with all federal air quality standards. In order to meet federal air quality standards in California, the CARB required each air basin to develop its own strategy for achieving the national ambient air quality standards. In response, the SDAPCD prepared the RAQS. The measures incorporated into the RAQS are considered to be effective based on the region's projected population growth as well as the projected transportation facilities as incorporated into SANDAG's RTP. The RAQS are a combination of measures affecting car pooling, parking regulations, truck use, and development density and mixes, as well as limitations on stationary sources, such as electric power generation stations, and area sources, such as barbecue lighter fuel burning.

6.1.7 WATER QUALITY CONTROL PLAN FOR THE SAN DIEGO BASIN (9)

As part of its regulatory powers, the SWRCB, in conjunction with the RWQCB, has the responsibility of formulating and adopting long-range policies and objectives for water quality

through the preparation of the Water Quality Control Plan for the San Diego Basin (9) (RWQCB 1994). The San Diego Basin Plan establishes a number of beneficial uses and water quality objectives for surface and groundwater resources.

Beneficial uses are generally defined in the Basin Plan as “the uses of water necessary for the survival or well being of man, plus plants and wildlife.” The plan identifies beneficial uses for the San Diego Bay. See Section 5.9.1.4 for details.

Water quality objectives identified in the Basin Plan are based on established beneficial uses, and are defined as “the limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses.” Water quality objectives are thus derived from beneficial uses, which are based on the ability of given water sources (in terms of water quality) to safely accommodate specific uses.

6.2 SIGNIFICANT CUMULATIVE IMPACTS

6.2.1 AIR QUALITY

6.2.1.1 Impact

Impact AQ-A.1
Increase in mobile source
emissions

As discussed in Section 5.8, the San Diego Air Basin is currently classified by the US EPA as a non-attainment area for ozone and PM₁₀. All new development in the San Diego Air Basin compounds these problems by creating more emissions. New development within the downtown planning area would be no exception, creating long-term air emissions related primarily to increased vehicular use and short-term dust during construction. Because the San Diego Air Basin already is impacted, any new development would have a significant cumulative impact on regional air quality. Thus, implementation of the proposed Downtown Community Plan would result in a significant cumulative air quality impact. Although the cumulative impact would be significant, the proposed Plan would concentrate development in an area which is well served by transit and offers a variety of opportunities to work and live in the same area.

Impact AQ-B.1
Construction Emissions

As discussed in Section 5.8, emissions related to construction activity are considered short-term sources as their duration is limited to the period of construction at any single site within downtown. However, depending on the number and proximity of individual construction activities, the construction air emissions could constitute a significant cumulative impact.

6.2.1.2 Mitigation

Impact AQ-A.1 Increase in mobile source emissions

Federal, state and local regulations mandate as well as recommend measures to be incorporated by subsequent development within the Air Basin are anticipated to be incorporated into future development within downtown, as appropriate.

Impact AQ-B.1 Construction Emissions

Federal, state and local regulatory mandates as well as recommended measures are anticipated to be incorporated during subsequent construction activities, as appropriate.

6.2.1.3 Significance of Impact After Mitigation

Impact AQ-A.1 Increase in mobile source emissions

Level of Significance After Mitigation: Significant

Although the proposed Plans and Ordinances would promote non-vehicular travel (e.g. walking and cycling) and implement smart growth principles, implementation of these measures would not be sufficient to reduce cumulative impacts to below a level of significance.

Impact AQ-B.1 Construction Emissions**Level of Significance After Mitigation: Significant**

While implementation of dust and construction equipment emission controls would reduce emissions, at certain times they may not be sufficient to reduce cumulative impacts to below a level of significance when a number of construction projects are occurring simultaneously.

6.2.2 CULTURAL-HISTORICAL RESOURCES**6.2.2.1 Impacts**

Impact CULHIST-A.1
Impacts to Historical
Resources

The demolition or substantial alteration of significant historic resources in combination with the loss of similar resources in the region would result in a cumulatively significant historical impact.

Historic resources continue to be lost within San Diego County, and any loss of these resources due to buildout of the Downtown Community Plan could result in a significant cumulative impact.

Impact CULHIST-B.1
Impacts to Archaeological
Resources

Impacts to important archaeological sites associated with redevelopment could combine with the loss of other important archaeological resources in the region and result in a significant cumulative impact.

6.2.2.2 Mitigation

Impact CULHIST-A.1 Impacts to historical resources

No measures beyond those required by federal, state and local regulations as well as proposed goals and policies are within the control of CCDC or future individual developments in accordance with the proposed Plans and Ordinances. Therefore, there are no additional mitigation measures for cumulative historic resource impacts.

Impact ~~CULHIST~~-B.1 Impacts to archaeological resources

No measures beyond those required by federal, state and local regulations as well as proposed goals and policies are within the control of CCDC or future individual developments in accordance with the proposed Plans and Ordinances. Therefore, there are no additional mitigation measures for cumulative archaeological resource impacts.

6.2.2.3 Significance of Impact After Mitigation**Impact ~~CULHIST~~-A.1** Impacts to historical resources**Level of Significance After Mitigation: Significant**

As indicated above, no measures can be applied which would reduce potential cumulative historical impacts to below a level of significance. Thus, potential impacts are considered significant and unmitigable.

Impact ~~CULHIST~~-B.1 Impacts to archaeological resources**Level of Significance After Mitigation: Significant**

As indicated above, no measures can be applied which would reduce potential cumulative archaeological impacts to below a level of significance. Thus, potential impacts are considered significant and unmitigable.

6.2.3 HYDROLOGY/WATER QUALITY**6.2.3.1 Impacts**

Impact WQ-A.1 Surface Water Pollution

Since urban runoff has already adversely impacted water quality in San Diego Bay, the addition of any pollutants in urban runoff discharged into the Bay would result in a cumulatively significant impact to water quality. As discussed in Chapter 5.9, San Diego Bay is currently experiencing water quality problems caused by urban development within its watershed. Mandatory compliance with federal state and local regulations regarding short-term and long-term control of urban runoff and erosion would serve to reduce the direct impacts of future development on hydrology/water quality. In addition, the Plan would include policies to reduce urban runoff and associated pollutants generated from future development activities. Although existing regulations, Plan policies and implementation of mitigation measures contained in Chapter 5.9 would reduce direct water quality impacts to below a level of significance, cumulative water quality impacts would be unavoidable.

With respect to hydrology, the Downtown Community Plan would not result in substantial modification to the area's drainage basin. As the Plan would result in the same or less surface runoff from that which presently occurs, the Plan would not substantially contribute to existing impacts to the storm drain system.

6.2.3.2 Mitigation

Impact WQ-A.1 Surface Water Pollution

No measures exist beyond those required by federal, state and local regulations as well as proposed goals and policies are within the control of CCDC or future individual developments in accordance with the proposed Plans and Ordinances. Therefore, there are no additional mitigation measures for cumulative water quality impacts.

6.2.3.3 Significance of Impact After Mitigation

Impact WQ-A.1 Surface Water Pollution

Level of Significance After Mitigation: Significant

As indicated above, no measures can be applied which would reduce potential cumulative water quality impacts to below a level of significance. Thus, potential impacts are considered significant and unmitigable.

6.2.3 LAND USE COMPATIBILITY

6.2.4.1 Impacts

<p>Impact LU-B.5 Transient Impacts</p>
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Increased development activities downtown would combine with those expected in surrounding neighborhoods to displace homeless populations encouraging them to move into less active areas in surrounding neighborhoods.

6.2.4.2 Mitigation

Impact LU-B.5 Transient Impacts

As discussed in Chapter 5.1, no measures beyond those already being implemented by social service and charity organizations in the downtown area exist.

6.2.4.3 Significance of Impact After Mitigation

Impact LU-B.5 Transient Impacts

Level of Significance After Mitigation: Significant

Existing programs offered to the homeless have not proven completely effective in meeting the needs of the homeless population. As there are no other measures identified, cumulative impacts from migration of homeless into surrounding neighborhoods is considered significant and unmitigable.

6.2.5 NOISE

6.2.5.1 Impacts

<p>Impact NOI-A.1 Traffic Noise Increase</p>

Traffic noise increases on nine of the grid street segments would significantly increase with the addition of traffic from the proposed Community Plan in combination with other new sources of traffic.

As discussed in Section 5.7, increased automobile trips related to new development within the downtown planning area would combine with automobile trips on grid streets to cause nine segments to increase by more than 3 dB(A) or exceed 65dB(A).

The additional traffic to the freeways was determined to not be significant.

No major new stationary noise sources are anticipated to result from implementation of the proposed Downtown Community Plan. Construction noise would create short-term noise levels, but would not be additive with other construction noise within the region. Furthermore, construction noise would adhere to controls established by the City's Noise Abatement and Control Ordinance.

6.2.5.2 Mitigation

Impact NOI-A.1: Traffic noise increase

No feasible mitigation measures are available to reduce the significant increase in traffic noise on affected roadway segments. In most cases, insufficient room exists to construct a noise attenuation wall to reduce exterior traffic noise and, if feasible, the wall would only protect ground level areas. While buildings within the affected area could be retrofitted to attenuate the effects of the noise increase, implementation of such a mitigation strategy is not considered feasible given the expected cost and complexity associated with undertaking such a program. As the impact would be aggregate in nature, the obligation to carry out this program would not fall upon any single development. Lastly, existing property owners must consent to the retrofit. As some owners may choose not to allow the retrofitting, the impact could remain unmitigated.

6.2.5.3 Significance of Impact After Mitigation

Impact NOI-A.1 Traffic Noise Increase

Level of Significance After Mitigation: Significant

As indicated above, no measures can be applied which would reduce potential cumulative traffic noise increases to below a level of significance. Thus, potential impacts are considered significant and unmitigable.

6.2.6 TRAFFIC/CIRCULATION/PARKING

6.2.6.1 Impacts

Impact TRF-A.1.1

Impacts to grid streets

The increased traffic volumes from buildout of the proposed Plan in combination with other increases in traffic would result in a significant cumulative impact on two intersections. The intersections of First Avenue and Elm Street as well as 13th Street and K Avenue would experience significant cumulative impacts.

Impact TRF-A.1.2

Impacts to surrounding streets

The increased traffic volumes could result in significant congestion on major streets in the surrounding neighborhoods. Build-out of the proposed Downtown Community Plan in combination with other new trips on surrounding roadways would have a cumulatively significant impact on several roadways. The following street segment already operates at LOS F and would experience significant cumulative impacts as a result of buildout of downtown under the proposed Plan: 28th Street (between Harbor Drive and Broadway).

Impact TRF-A.2.1

Increased freeway traffic

Buildout traffic volumes would have a significant impact on the freeways serving downtown. Impacts would occur on both freeway segments and ramps. Interstate 5 between SR-94 and Pershing Drive would experience a cumulatively significant impact as would SR 163 between I-5 and Washington Avenue. The northbound onramps to I-5 at B Street and Eleventh Street would experience significant cumulative impacts as would the southbound onramp to I-5 at Grape Street.

Impact TRF-D.1

Inadequate parking supply

Buildout of downtown could create a significant parking impact due to the potential for demand to exceed supply in combination with new parking demand generated in the surrounding neighborhoods.

6.2.6.2 Mitigation

Impact TRF-A.1.1: Impacts on grid streets

As discussed in Chapter 5.2, implementation of the improvements identified in Table 5.2-20 would potentially reduce the cumulative impacts to below a level of significance. However, as pedestrian considerations may conflict with these improvements, the impacts may not be able to be reduced to below a level of significance.

Impact TRF-A.1.2: Impacts to surrounding streets

Implementation of roadway improvements such as restriping and/or widening may be able to reduce cumulative impacts on surrounding roadways. Subsequent monitoring required by Mitigation Measure TRF-A.1.1-1 would determine appropriate improvements.

Impact TRF-A.2.1: Increased freeway traffic

Implementation of Mitigation Measures TRF-A.2.1-1 and 2 would help reduce the cumulative impacts from downtown traffic by promoting regional planning and funding for improving freeways which serve downtown. However, as construction of improvements to freeways are beyond the control of the City of San Diego, CCDC and future development, the cumulative impacts on freeways are considered significant and not mitigated. Improvements are at the discretion of Caltrans.

Impact TRF-D.1: Inadequate parking supply

The demand for parking at buildout would exceed the amount of parking supply that would be created solely from conforming to the parking requirements of the proposed PDO. While public and/or private parking facilities may be constructed to fulfill the shortfall resulting from simple compliance with the PDO parking regulations, no guarantee exists that this would occur.

6.2.6.3 Significance of Impact After Mitigation**Impact TRF-A.1.1** Impact on grid streets.**Level of Significance After Mitigation: Significant**

Although roadway improvements appear feasible to reduce cumulative impacts at two grid intersections. Adverse effects on pedestrians or cyclists could cause these improvements to not be carried out. Thus, impacts on downtown intersections are considered cumulatively significant and potentially unmitigable.

Impact TRF-A.1.2 Impact on surrounding streets.**Level of Significance After Mitigation: Significant**

Although improvements may subsequently be identified to reduce cumulative impacts on surrounding streets, no assurances exist that they would be feasible and/or implemented. Therefore, impacts are considered cumulatively significant and potentially unmitigable.

Impact TRF-A.2.1 Increased freeway traffic.**Level of Significance After Mitigation: Significant**

Impacts to the freeway system are considered significant and unmitigable for several reasons. First, CCDC and the City of San Diego do not have jurisdiction to improve the freeway system. Second, adjacent land uses severely constrain the ability of Caltrans to implement major modifications to the freeway system.

Impact TRF-D.1 Excessive parking demand.

Level of Significance After Mitigation: Significant

While public and/or private parking facilities may be constructed to fulfill the shortfall resulting from simple compliance with the PDO parking regulations, no guarantee exists that this would occur. Thus, parking impacts are considered significant and unmitigable.

6.3 NON-SIGNIFICANT CUMULATIVE IMPACTS

6.3.1 ENERGY

Although buildout of the proposed Plan would increase demand for both electricity and natural gas, SDG&E has indicated that it has planned for the future population of the downtown area and would be able to serve the needs of the future population. Thus, implementation of the proposed Downtown Community Plan would not result in a significant cumulative impact on energy.

6.3.2 GEOLOGY AND SEISMICITY

The major geologic hazards associated with the downtown planning area are related to seismic groundshaking. Impacts associated with future development under the proposed Community Plan would be site-specific and not additive. In addition, potential direct impacts to future development would be reduced to below a level of significance through implementation of policies contained in the Health and Safety Chapter of the Community Plan, including the implementation of all seismic-safety development requirements. Therefore, implementation of the proposed Plan would not result in cumulative impacts related to geology and seismicity.

6.3.3 HAZARDOUS MATERIALS

Implementation of the proposed Community Plan would result in the redevelopment of obsolete, deteriorated, and dilapidated structures. The development of new structures or rehabilitation of older structures in accordance with the Health and Safety Chapter of the proposed Community Plan, as well as existing local, state, and federal requirements would assure that toxic and hazardous materials contamination in the soil and groundwater would be remediated. In addition, asbestos-containing building materials and lead paint would be removed prior to demolition or rehabilitation of older structures. These improvements are considered a positive effect on the health, safety, and welfare of the inhabitants of these structures. Consequently, the proposed Plan would not result in significant cumulative impacts.

6.3.4 LAND USE POLICY CONFORMANCE

As discussed in Chapter 5.1, the proposed Community Plan would be consistent with the goals of the Regional Comprehensive Plan in promoting “smart growth.” The Downtown Community Plan’s neighborhood concept would result in pedestrian-oriented and -scaled neighborhoods, each focused

on a mixed-use center and a park. The mixed-use center would be located within a relatively short walking distance of employment and housing, to make neighborhood amenities accessible without the use of a car. In addition, smart growth would be achieved with the proposed increase in intensity of uses. Downtown would maximize its infill development potential by encouraging multi-story residential, office, and mixed uses in appropriate areas, in anticipation of local transit improvements. Thus, the proposed Downtown Community Plan would respond to the regional land use goals established by SANDAG for the region and minimize cumulative impacts on land use.

6.3.5 PALEONTOLOGICAL RESOURCES

As discussed in Section 5.12, buildout under the proposed Community Plan could impact paleontological resources. These resources are associated with the San Diego and Bay Point formations, which are found under a large portion of the downtown planning area. In combination with other development in paleontologically-rich areas of the County, additional losses of important fossil records could occur. However, implementation of the proposed monitoring and recovery program would reduce impacts to below a level of significance. Therefore, the Plan's contribution to the cumulative impact of paleontological resources would be less than significant.

6.3.6 POPULATION/HOUSING

At buildout of the Downtown Community Plan, the residential population would be anticipated to increase over three times to a total population of approximately 89,100. The adverse physical changes associated with population increases on a cumulative level are issue-specific and are addressed in this section. However, on a regional level, population growth downtown would have beneficial environmental consequences. For example, the proposed increase in intensity and density of development as well as the mixed-use emphasis would locate residents within walking distance of parks, services, employment and other service amenities. In addition, transit opportunities would be available downtown to residents to further promote alternative forms of transportation. Region-wide, this would have positive traffic and air quality affects. Furthermore, the planned increase in residential population in an already urban environment would focus development away from agricultural and biologically-sensitive open space lands. Finally, this type of development would be consistent with development goals of the Land Use Distribution Element of the Regional Growth Management Strategy and Mobility 2030. Therefore, the cumulative impact to population would be less than significant.

The San Diego area is currently experiencing a shortage in the regional housing supply. At buildout, the proposed Downtown Community Plan would contribute an additional 38,500 housing units over existing housing stock downtown (an increase of 260%). Therefore, the proposed Plan would have a beneficial effect on regional housing supply. In addition, there are no anticipated major conversions of planned residential land to non-residential uses within the downtown planning area. As a result, significant cumulative impacts on downtown housing are not anticipated.

6.3.7 VISUAL QUALITY

As discussed in Section 5.6, views of San Diego Bay and the San Diego-Coronado Bay Bridge would be most affected by future development in the East Village neighborhood. Development in

the neighborhoods surrounding downtown would not lie between viewpoints and these visual resources. Thus, no cumulatively significant impacts to view corridors would occur.

6.3.8 PUBLIC FACILITIES AND SERVICES

No significant physical impacts on the environment can be identified as part of the evaluation of the proposed Community Plan because such an exercise is considered speculative pursuant to Section 15145.