

4.13 | POPULATION AND HOUSING

INTRODUCTION

This section of the Draft Environmental Report describes the existing conditions with regard to the current population, demographic characteristics, housing and employment conditions within the Planning Area. It also analyzes the potential impact of implementing the proposed City of Coachella General Plan (Proposed General Plan) as it relates to impacts to population, housing, and employment, proposed General Plan objectives and policies that reduce the identified impacts, and mitigation measures where appropriate.

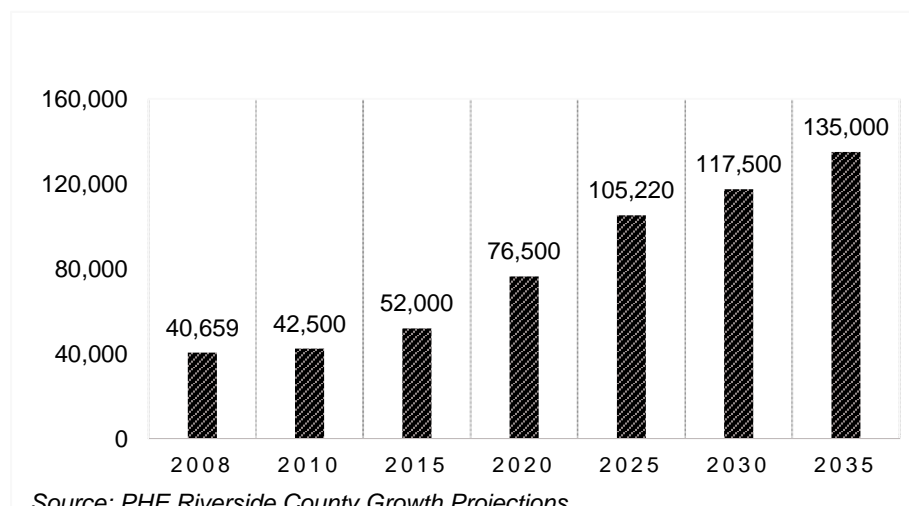
EXISTING CONDITIONS

ENVIRONMENTAL BASELINE SETTING

POPULATION

While Coachella has been a small town since its inception, its population has grown very quickly over the last 10 years. Between 2005 and 2010, the City's population increased by nearly one-third, jumping from 30,879 to 40,704 in only five years. The Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan estimates that Coachella could grow to 70,200 by 2020 and 128,700 by 2035. Furthermore, the population in southeastern Coachella Valley is expected to increase to between 300,000 and 500,000 people within a generation or two. See Figure 4.13-1: Coachella Population Projections for estimated growth trends in the City.

Figure 4.13-2: Coachella Population Projections



HOUSING

According to the Census 2010 data which is the most recent comprehensive population and employment data set available, 40,704 people lived in the City of Coachella's 8,998 occupied housing units. On average, 4.51 persons were living within each occupied housing unit. As compared to the statewide (2.96) and countywide averages (3.2), Coachella had more persons living within each occupied unit. Compared with the County, and Statewide averages, Coachella exhibits significantly higher numbers of unit occupancy which indicates overcrowding. Between 2000 and 2010, the total population of the City of Coachella increased by 17,980 reaching 40,704 in 2010. During this 10-year period, the City's population growth rate of 79.1 percent was higher than the Riverside County rate of 41.7 percent. This population growth increased the demand for housing. Between 2000 and 2010, permits were issued for 4,389 new residential units. Additionally, vast amounts of undeveloped and underdeveloped lands in the City present opportunities for continued housing development.

Approximately 18,530 acres of the City is developed. The City's Planning Area of 45,300 acres is only partially developed, with nearly 27,000 acres undeveloped. Of that undeveloped land, approximately 10 percent of it has been entitled for future development.

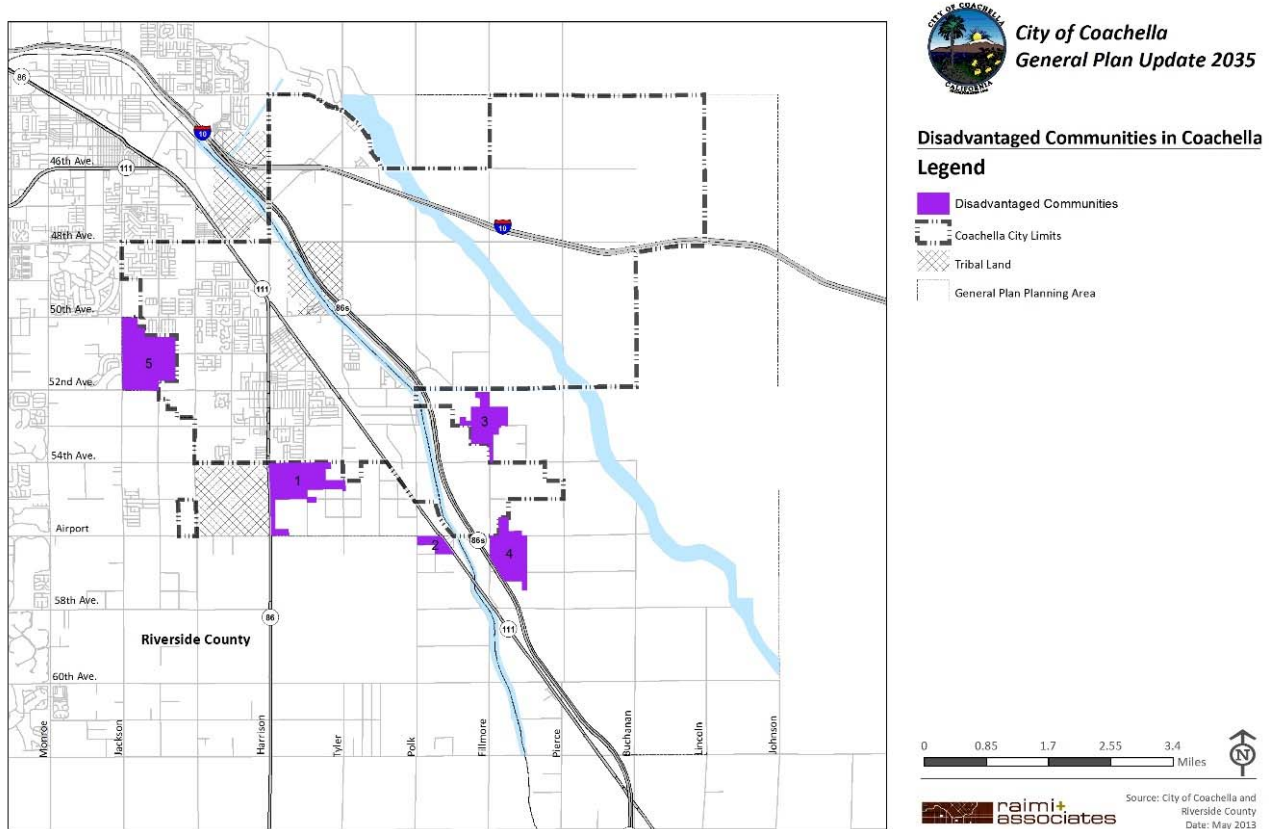
The City is home to five vulnerable communities as defined by SB 244, as shown in Figure 4.13-3: Vulnerable Communities: 1) Shady Lane, 2) Cocopah, 3) Thermal, 4) Fillmore, and 5) Vista Santa Rosa.

1. **Shady Lane.** This community has water and sewer available nearby on 54th street. Water wells in this area have a high mineral content, and there is no stormwater management infrastructure in the Shady Lane community. Additionally, this neighborhood is so dense that septic is no longer viable and it needs to be connected to the wastewater treatment system.
2. **Cocopah.** The nearest water and sewer facilities are between one and two miles away from the community. The water quality is adequate and is supplied through private wells. Septic capacity and quality is considered adequate, as the community is low in density, and low in overall wastewater demand. In addition, there are current plans for water and sewer infrastructure improvements upon development of the La Entrada Specific Plan.

3. **Thermal.** Thermal does not have storm drain facilities. This area is included in the Coachella Valley Water District and receives water and wastewater sewer through the district.
4. **Fillmore Street.** This community has adequate well and septic facilities due to low density and low treatment demand. Like the rest of the City, there are no stormwater facilities in the area.
5. **Vista Santa Rosa.** Water wells in this community are depleted. There is also no sewer or storm drain infrastructure. However, septic treatment is adequate.

The clusters of mobile home parks in some vulnerable communities can largely be attributed to residents that work in the Coachella Valley agricultural industry and live in the region year-round. According to the 2006 Coachella Valley Farm Workers Study, 40% of survey respondents reported living in mobile homes. Furthermore, the average number of people living in mobile homes was 5.8 people in 2007. Not only are many of the mobile homes not readily connected to water and sewer utilities, they are also very overcrowded.

Figure 4.13-3: Vulnerable Communities

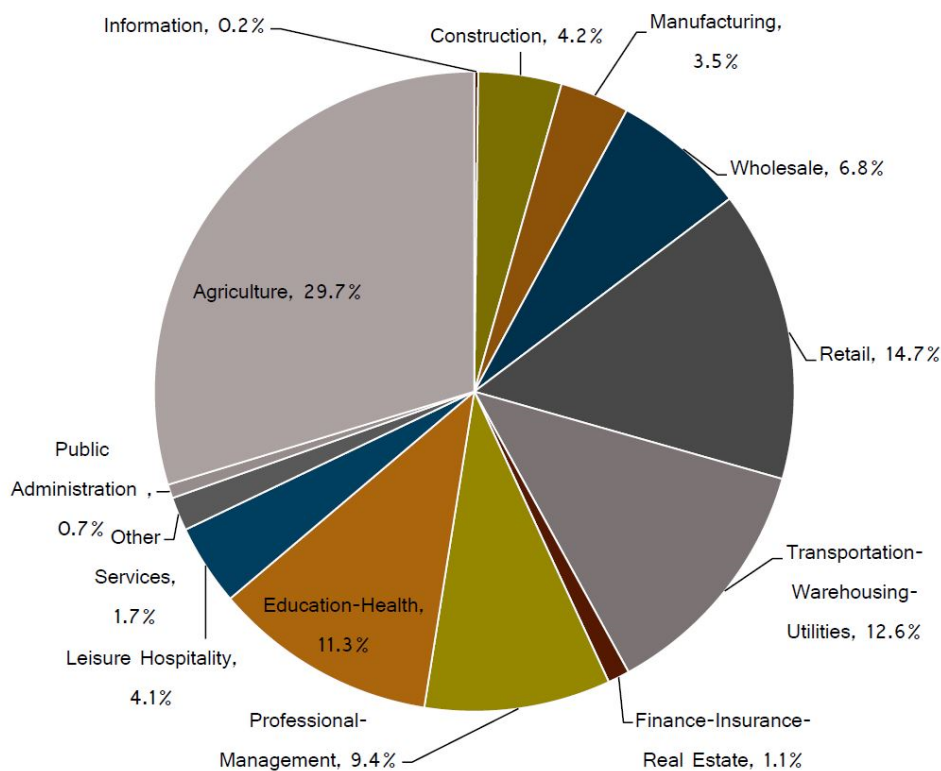


Source: City of Coachella, May 2013.

EMPLOYMENT

According to the SCAG Coachella City Profile, in 2010, the Agriculture sector was the largest job sector, accounting for 29.7% of total jobs in the City (See figure 4.13-3). Other large sectors included Retail (14.7%), Transportation-Warehousing-Utilities (12.6%), and Education-Health (11.3%). In March 2012, the unemployment rate in Coachella was higher than neighboring communities and county and statewide averages. The California Employment Development Department reported the unemployment rate in Coachella was 20%, higher than the California unemployment rate (11%) and the Riverside County rate (12.7%). Figure 4.13.5 shows the unemployment for cities in the Coachella Valley, Riverside County and statewide in March 2012. Between 2006 (before the recession) and 2012, the unemployment rate in Coachella rose 169%, increasing from 8% to 20%. Similarly in Riverside County over the same period, the unemployment rate increased 169%, from 5% to 12.7%. The City has aligned its goals with the conservation of agriculture lands to ensure a stable agricultural economy, a vibrant industry in the Coachella Valley Region.

Figure 4.13-4: Coachella Employment Sectors



Source: SCAG, (2011). Profile of the City of Coachella.

Table 4.13-1: Regional Unemployment Rates

REGION	UNEMPLOYMENT RATE MARCH 2012
COACHELLA	20.0%
INDIO	13.8%
PALM DESERT	7.6%
RIVERSIDE COUNTY	12.7%
CALIFORNIA	11.0%

REGULATORY SETTING

FEDERAL

UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION POLICIES ACT OF 1970 (UNIFORM ACT)

The Uniform Act, passed by Congress in 1970, is a Federal Law that establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Uniform Act's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects. Section 49 Code of Federal Regulations Part 24 is the government-wide regulation that implements the act.

Displacement, Relocation Assistance, and Real Property Acquisition for Housing and Urban Development ("HUD") and HUD-Assisted Programs

Section 104(d) of the Housing and Community Development ("HCD Act") Act provides minimum requirements for federally funded programs or projects when units that are part of a community's low-income housing supply are demolished or converted to a use other than lower moderate-income dwellings.

Section 104(d) requirements include:

- Replacement, on a one-for-one basis, of all occupied and vacant occupiable low- or moderate-income dwelling units that are demolished or converted to a use other than low or moderate-income housing in connection with an activity assisted under the HCD Act, and
- Provision of certain relocation assistance to any lower-income person displaced as a direct result of the following activities in connection with federal assistance:
 - Demolition of any dwelling unit, or
 - Conversion of a low- or moderate-income dwelling unit to a use other than a low- or moderate-income residence.

Section 104(d) requirements are triggered by the use of HOME, Community Development Block Grant (CDBG), Section 108 Loan Guarantee, or Urban Development Action Grant (UDAG) funding in a project involving the demolition or conversion of low- or moderate-income housing.

STATE

California Relocation Statute – Government Code Section 7260

The California Relocation Statute (the Statute) is a California law that establishes minimum standards for state funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Statute's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for state-funded projects. The Statute is intended for the benefit of displaced persons, to ensure that such persons receive fair and equitable treatment and do not suffer disproportionate injuries as the result of programs designed for the benefit of the public as a whole. Title 25, Division 1, Chapter 6 of the California Code of Regulations provides the regulatory guidelines to enforce the Statute.

Title 25 Division 1 Chapter 6 Subchapter 1 – Relocation Assistance and Real Property Acquisition

This section of Title 25 provides guidelines to assist public entities in the development of regulations and procedures implementing Government Code Section 7260. The guidelines are designed to carry out the following policies of Section 7260:

- 1) To ensure that uniform, fair and equitable treatment is afforded persons displaced from their homes, businesses, or farms as a result of the actions of a public entity in order that such persons shall not suffer disproportionate injury as a result of action taken for the benefit of the public as a whole; and
- 2) In the acquisition of real property by a public entity, to ensure consistent and fair treatment for owners of real property to be acquired, to encourage and expedite acquisition by agreement with owners of such property in order to avoid litigation and relieve congestion in courts, and to promote confidence in public land acquisition.

State Housing Policies

State policies affecting land use regulations in cities throughout California are included in housing policies as established by the Housing Element of the City of Coachella Proposed General Plan. The Housing Element is the primary policy document regarding the development, rehabilitation, and preservation of housing for all economic segments of the population within a jurisdiction and is required by law. Accordingly, the Housing Element identifies and analyzes the existing and projected housing needs and states goals toward providing sufficient housing. The element contains policies, quantified objectives, and implementation programs for the preservation, improvement, and development of housing in the Planning Area. The Housing Element of the Planning Area is being proposed separately from the CGPU being analyzed in this Environmental Impact Report.

State law sets out a process for determining each local jurisdiction's fair share of regional housing needs, called the Regional Housing Needs Determination (RHND). As a first step in the process, the State Department of Housing and Community Development assigns each regional council of governments a needed number of new housing units for that region, including affordable housing.

RELATED GENERAL PLAN POLICIES

HOUSING ELEMENT

Farmworker Housing Policy

Mobile home parks, which are largely occupied by farmworkers, may become displaced if the land they occupy is developed. The existing Housing Element of the General Plan (Certified in 2009) includes a policy to seek housing funding specifically for development of Farmworkers. Under this policy, the City will; “work with non-profit and for-profit developers of affordable housing to apply [annually] for funding for farmworker housing through the USDA Section 515 Rural Housing Program, HCD’s Joe Serna Farmworker Housing Grant Program and others that may become available.” (Housing Element of the General Plan, 2009). This policy impact will lead to the increase in supply of affordable housing for farmworker households and lessen the impact of displacement if farmworker residents become displaced if the land they occupy is developed.

Affordable Housing Policies

In addition to the stand-alone policy for farmworker housing, the City also maintains a rigorous Affordable Housing Program which includes a policy to; increase the supply of affordable housing for large families, extremely low-income households, special needs households, seniors and farmworker households. (Housing Element of the General Plan, 2009) To accomplish the, the City; works with non-profit and for-profit developers of affordable housing to apply for available funding sources such as MHP, Joe Serna Farmworker Housing Grant Program, CalHome, Low Income Housing Tax Credits and tax-exempt bonds. The City also takes actions necessary to expedite processing and approvals for such projects. Furthermore, the City employs a Density Bonus provision which allows Density increased in exchange for the development of affordable housing.

Secondary Dwelling Units

Secondary dwelling units (in-laws, mobile homes, etc.) are commonly occurring in the City due in part to housing demand caused by rapidly increasing population and greater economic returns to land owners renting out these units as investment properties. Secondary dwelling units increase available housing stock at no cost to the City. Secondary dwelling units are included in the Zoning Ordinance policy revision that eliminates the need for Conditional Use Permit or other discretionary approvals in all residential zones, in accordance with State law which allows and encourages second dwelling units [only] where appropriate. (Housing Element of the General Plan, 2009) While secondary dwelling units (mobile homes) may be replaced if the land they occupy is developed for the General Plan, opportunities to develop further secondary dwelling units remain.

Land Provision Policy

The current Housing Element took into account the rapidly increasing population in the City. As such, the City developed a land provision policy to set aside land necessary to accommodate future housing needs. (Housing Element of the General Plan, 2009) According to this policy, the City; shall schedule anticipated project annexations in cooperation with individual developers for projects located within the City’s Sphere of Influence to provide the land necessary to accommodate future housing needs. The development planned for in the Proposed General Plan was already planned for and accommodated by the Policies in the existing Housing Element.

ENVIRONMENTAL IMPACTS AND MITIGATION

SIGNIFICANCE CRITERIA

The following thresholds for determining the significance of impacts related to population and housing are contained in the environmental checklist form contained in Appendix G of the most recent update of the California Environmental Quality Act (CEQA) Guidelines. A significant impact would occur with full implementation of the proposed General Plan if it would:

- Induce substantial population growth in an area, either directly or indirectly;
- Displace substantial numbers of existing housing necessitating the construction or replacement housing elsewhere; and/or
- Displace substantial numbers of people necessitating the construction of replacement housing elsewhere.

POPULATION GROWTH

Impact 4.13-1: Would the Project induce substantial population growth in an area, either directly or indirectly?

Significance: Less than significant.

An impact relative to induced population growth in an area might occur if the project would induce population growth in an area not otherwise identified for or expecting growth. This growth could be induced directly by proposing new homes and businesses or indirectly through the provision of new infrastructure. Growth projected under the CGPU timeline would more than double the current Planning Area population. However, the CGPU has been prepared to respond to the growth demand projected for Coachella as described by SCCAG and the Riverside County Center for Demographics Research. It is also the goal of the CGPU to ensure that this new growth will occur in a manner that has less environmental impact than that of recent development occurring under the existing General Plan.

As discussed in Section 3.0, Project Description, the Planning Area is expected to grow to a total population of 135,000, by 2035. The City currently has 9,903 housing units, a population of 40,704, and approximately 5,831 jobs. This growth is anticipated as follows:

Table 4.13-2: Incremental 2035 Growth

PARAMETER	Incremental Growth by 2035
SINGLE FAMILY DWELLING UNITS	15,205
MULTI-FAMILY DWELLING UNITS	18,264
SINGLE FAMILY POPULATION	53,219
MULTI-FAMILY POPULATION	41,094
RETAIL (SQ. FT.)	10,431,312
OFFICE (SQ.FT)	3,746,701
INDUSTRIAL (SQ.FT)	5,220,111

The City has enough undeveloped land to accommodate generations of growth and has long anticipated growing into a mid-sized City. These expectations align with the growth projections for the region as a whole. SCAG's 2012 RTP/SCS forecasts that the City will have a population of 128,700 in 2035, which is approximately 4.9 percent less than the CGPU population projections. The SCAG forecasts and the CGPU projections are considered reasonably similar estimates for 2035.

Accordingly, the City's CGPU provides for a framework of growth for the development of the entire City. The City's approach to development as proposed by the CGPU would focus new development in High Priority Development Areas and Growth Expansion Areas, and prohibit development of land in Subareas 15 and 16 until the growth areas are at least 60% developed. In fact, if the CGPU is implemented as proposed, all of the growth anticipated to occur in Coachella by 2035 could be accommodated without any development in Subarea 16. This approach would result in the conservation of approximately 3,600 acres of land and help make efficient use of the City's existing and future infrastructure.

Thus, the new growth is expected to unfold in an incremental pattern as development projects continue to be built in the Planning Area. The proposed CGPU has been developed in consideration of these growth trends and the resulting goals and policies intend to harness this growth and mitigate any negative externalities associated it. While the entirety of the CGPU is intended to layout the framework for orderly development into a midsize City and mitigate the impacts of growth, the first two goals of the Land Use and Community Character Element present a series of policies specifically focused on establishing the orderly growth of the City, as follows:

Goal 1. Development Regulations. A land development and regulatory system that reinforces the City's desire to grow from a small town to a medium sized city in a sustainable and orderly manner.

- 1.1 **City limits.** Establish and maintain a city limit for Coachella that allows for a realistic amount of future growth.
- 1.2 **Annexation.** Allow the annexation of new land into the City when at least 60 percent of the land within the city limits is built with urban uses or permanently preserved open space.
- 1.3 **Sphere of influence.** Establish and maintain a Sphere of Influence that identifies the long-term growth plans of the City. The Sphere of Influence may encompass an area that accommodates more growth than the time horizon of the General Plan.
- 1.4 **Planning area.** Establish and maintain a Planning Area that allows Coachella to communicate to adjacent jurisdictions about potential the impact of Growth on the City.
- 1.5 **Subareas.** Establish and utilize a system of subareas to efficiently plan and manage the City's growth. Each area of the City and Sphere of Influence shall be included in a subarea. All development and policy decisions shall conform to the vision and policies for that Planning Area, in addition to the citywide goals and policies. See Figure 3-24 for a map of the City's subareas.
- 1.6 **General plan designations.** Establish and maintain a system of General Plan designations that:
 - Provides flexibility for land developers to determine the best use of their land within the bounds of the vision for the subarea, particularly in undeveloped areas of the City.

- Regulates the form and character of new development to ensure the development that does occur is complete with a diversity of uses so residents don't have to drive long distances to access goods and services, connected to the Downtown and other parts of the City via multiple modes of transportation, and compact so that areas are walkable and pedestrian-friendly. The exception to the above shall be Resort developments which may be developed as isolated projects separate from the rest of the City.
- Uses the development process to enhance the character and identity of Coachella.

- 1.7 **Specific Plans.** Utilize specific plans as strategic entitlement tools when considering unique projects that bring exceptional value to the community. Periodically review existing, un-built specific plans for relevance and the potential for needed updates.

Goal 2. Growth and Development. The successful transformation of Coachella from a small town into a medium-sized, full-service City that is a major economic center for the Coachella Valley.

- 2.1 **Population and employment growth.** Allow the City to grow from its current population of approximately 40,000 and 5,800 jobs to a maximum of 135,000 and 32,000 jobs by 2035.
- 2.2 **Character and identity.** Strive to maintain Coachella's existing small-town character, identity and cultural diversity as development occurs in the future.
- 2.3 **Urban design as identity.** Recognize the City can differentiate itself from other Coachella Valley cities through urban design practices such as the development of complete neighborhoods, preservation of agriculture and open space, pedestrian-oriented design and sustainable development practices.
- 2.4 **Natural context.** Retain the City's natural infrastructure and visual character derived from topography, farmlands and waterway corridors.
- 2.5 **High quality construction and architecture.** Require high-quality and long-lasting building materials on all new development projects in the City. Encourage innovative and quality architecture in the City with all new public and private projects.
- 2.6 **Architectural diversity.** A diversity of architectural styles is encouraged, particularly those that have their roots in the heritage of Southern California and the Desert Southwest.
- 2.7 **Climate-appropriate design.** Require architecture, building materials and landscape design to respect and relate to the local climate, topography, history, and building practices.
- 2.8 **Growth and development evaluation.** Every five years, review and adjust, as needed, the General Plan's population and employment capacities to meet changes in economic and demographic conditions.
- 2.9 **Infill development.** Promote and provide development incentives for infill development and redevelopment of existing properties.

- 2.10** **Contiguous development pattern.** Encourage and incentivize development to occur contiguous to, or proximate to, existing built areas to facilitate delivery of City services and minimize “leapfrog” development not connected to existing urbanized areas.
- 2.11** **New growth.** Continue to plan for future expansion and new growth on previously undeveloped areas.
- 2.12** **High priority development areas.** Identify subareas 5, 6, 7, 8, 9, 10, and 11 as Priority Growth Areas to be targeted for growth through City policies and actions and to receive priority for funding, community facilities and services.
- 2.13** **Growth expansion areas.** Identify subareas 12 and 14 as future Growth Expansion Areas. During the time horizon of the General Plan, growth that occurs in these areas shall conform to the following criteria and characteristics.
- Minimum size of proposed development projects must be over 100 acres
 - Residential areas must be developed as one or more complete neighborhoods that contain a mix of housing types, sufficient parks and open spaces, necessary community facilities and services with access to retail and other goods and services.
 - Development must be connected to the existing City via a network of multi-modal streets and non-motorized trails.
 - All infrastructure connecting the new development to the existing City must be paid by the project sponsor using the City’s infrastructure specifications.
 - Financing plans for on-going operation and maintenance of streets, roads, parks and other community facilities and services that do not increase taxes or reduce services for existing residents must be approved and in place.
- 2.14** **Reserve development areas.** Subareas 15 and 16 shall be maintained as reserve development areas. These areas shall maintain their current land or agricultural use until the identified High Priority Development Areas and Growth Expansion Areas are at least 60 percent developed with urban uses or preserved open spaces.
- 2.15** **Steep slopes.** Limit development and grading in areas with slopes greater than 20 percent and limit the density and intensity of development in areas with slopes of between 10 and 19 percent.
- 2.16** **Range of uses.** Through Specific Plans, Planned Developments, or other similar master planning processes, allow the designations shown on the General Plan Designation Map to be adjusted within the ranges set forth for each policy area in large, undeveloped areas of the City so long as the visions of the General Plan and the applicable subarea is met.
- 2.17** **Parks and open space.** Establish parks and open space as allowed uses within all General Plan Designations.
- 2.18** **Open space conservation.** Establish mechanisms to provide for the conservation of resource land that is not yet conserved if it falls within one of the following categories:
- Flood plain, including Special Flood Hazard Areas.
 - Open Space to be acquired.
 - Wildlife corridors.

- Legacy farmland.
- Riparian areas.
- Areas of cultural significance.
- Seismic or geological hazard areas.
- Legacy viewsheds.

According to current trends and growth projections by SCAG, population growth in the City is imminent and will result in a substantial change of size of the City. As such, development will need to occur in order to accommodate the increase in population. As discussed in Section 5, the proposed project would induce growth relative to economic expansion, population growth, precedent setting action, and encroachment into open space. However, the CGPU presents a comprehensive program for managing growth in Coachella so as to minimize inappropriate development patterns and environmental impacts. Additionally, as discussed above and in Section 5, the City's growth levels would remain consistent with SCAG's growth forecasts. Thus, the impacts related to population growth would be less than significant.

Mitigation Measures

No mitigation measures are necessary.

DISPLACEMENT OF HOUSING

Impact 4.13-2: Would the Project displace substantial numbers of existing housing necessitating the construction or replacement housing elsewhere; and/or displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

Significance: Less than significant.

An impact relative to the displacement of housing could occur if a project would displace existing housing or people. The CGPU does not propose displacing existing housing or people. Therefore, the construction of replacement housing as a result of displacement would not be required.

Under the proposed CGPU, there is the possibility that existing land uses might increase in value through increased density or a change in land use and, thus, experience redevelopment into a different or more intense use. While this is highly speculative, it is a remote possibility. If such redevelopment were to occur to existing residential uses, some existing residents might be displaced.

The aforementioned Vulnerable Communities (See Figure 4.13-2) might be especially vulnerable to displacement because the uses are generally unpermitted and/or will offer greater economic returns to the land owners as the city grows. However, this displacement will be offset by the development of the less than 45,000 new housing units which can absorb these displaced populations. Furthermore, residents previously living in housing conditions without connections to water and sewer utilities will benefit from the improved living conditions of properly constructed housing and infrastructure that would occur under the Proposed CGPU.

In addition to growth strategies of the CGPU current regulatory framework also manages displacement of housing and communities. The California Relocation Statute (the Statute) is a California law that establishes minimum standards for state funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Statute's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for state-funded projects. The Statute is intended for the benefit of displaced persons, to ensure that such persons receive fair and equitable treatment and do not suffer disproportionate injuries as the result of programs designed for the benefit of the public as a whole. Title 25, Division 1, Chapter 6 of the

California Code of Regulations provides the regulatory guidelines to enforce the Statute, and can be found listed earlier in this section.

The existing Housing Element includes comprehensive policies to accommodate Coachella's growing population while also protecting affordable housing needs for vulnerable populations such as farmworkers and low-income City residents. The Housing Element is currently in the process of being updated and its forthcoming policies are expected to further support Affordable Housing and the expansion of existing housing options. While the CGPU does not propose the displacement of any housing, should housing be displaced, substantial new housing would be available to accommodate any displaced peoples. Thus, impacts would be less than significant.

Mitigation Measures

No mitigation measures are necessary.

CUMULATIVE IMPACTS

As indicated in Population, Housing, and Employment, although the proposed CGPU forecasts growth in the city and region will continue to grow independent of the implementation of the plan. Further, the CGPU accounts for the population growth and establishes goals and policies to reduce potential growth related impacts. The purpose of the proposed CGPU and Land Use Policy Map is to encourage a compatible pattern of development. The goals and policies direct future growth and development in Coachella, while minimizing potential land use conflicts. Additionally, the goals and policies are designed to preserve and improve existing and future physical development by providing a balance of residential and non-residential development, ensuring that adjacent land uses are compatible with one another, and effectively developing vacant parcels. All future projects under the proposed CGPU would be required to mitigate land use impacts on a project-by-project basis. Therefore the incremental impact of the proposed CGPU, when considered in combination with development within the subregion, would not result in cumulatively considerable land use impacts. In addition, the land use changes anticipated under the proposed CGPU would accommodate the growth projections identified by SCAG; thus cumulative land use impacts are not anticipated. Further, projects within the SCAG region that are regionally significant, as determined by SCAG, would be reviewed for conformity with regional goals for population, housing, employment, mobility and air quality, further reducing potential cumulative impacts to a less than significant level.

SIGNIFICANT AND UNAVOIDABLE IMPACTS

No significant unavoidable impacts relative to population and housing would occur as a result of implementation of the proposed CGPU.

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