INTRODUCTION

This section of the Draft EIR examines the potential for the Plan to result in environmental impacts related to changes in population and housing. The analysis relies on information from the California Department of Finance (DOF); California Employment Development Department (EDD); Southern California Association of Government's (SCAG) 2016 Regional Growth Forecasts; SCAG's Final Regional Housing Needs Assessment Final Allocation Plan (2014–2021) (RHNA); and the City of Rancho Cucamonga 2010 General Plan and 2013–2021 Housing Element.

ENVIRONMENTAL SETTING

Regulatory Framework

a. State

California Housing Element Law

California planning and zoning law requires each City and County to adopt a General Plan for future growth (California Government Code Section 65300). This Plan must include a Housing Element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the State level, the Housing and Community Development Department (HCD) estimates the relative share of California's projected population growth that would occur in each County based on DOF population projections and historical growth trends. These figures are compiled by HCD in a Regional Housing Needs Assessment (RHNA) for each region of California. Where a regional council of governments exists, HCD provides the RHNA to the council. Such is the case for the City of Rancho Cucamonga, which is a member of SCAG. The council, in this case SCAG, then assigns a share of the regional housing need to each of its cities and counties. The process of assigning shares gives cities and counties the opportunity to comment on the proposed allocations. HCD oversees the process to ensure that the council of governments distributes its share of the State's projected housing need.

Each City and County must update its General Plan Housing Element on a regular basis (generally, every 8 years). Among other things, the Housing Element must incorporate policies and identify potential sites that would accommodate the City's share of the regional housing need. Before adopting an update to its Housing Element, the City or County must submit the draft to the HCD for review. The department will advise the local jurisdiction whether its Housing Element complies with the provisions of California Housing Element Law. The councils of governments are required to assign regional housing shares to the cities and counties within their region on a similar 8-year schedule. At the beginning of each cycle, HCD provides population projections to the councils of governments, who then allocate shares to their cities

and counties. The shares of regional need are allocated before the end of the cycle so that the cities and counties can amend their housing elements by the deadline.

b. Regional and Local

Southern California Association of Governments

SCAG represents Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties; it is the federally recognized Metropolitan Planning Organization (MPO) for this region, which encompasses more than 38,000 square miles. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and State law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the Southern California region's MPO, SCAG cooperates with the Southern California Air Quality Management District (SCAQMD), the California Department of Transportation (Caltrans), and other agencies in preparing regional planning documents. SCAG has developed regional plans to achieve specific regional objectives.

SCAG is also responsible for the designated Regional Transportation Plan (RTP), including its Sustainable Communities Strategy (SCS; together, RTP/SCS) component pursuant to Senate Bill 375. The primary goal of the RTP is to increase mobility for the region's residents and visitors, as well as for commerce and goods movement. As part of the 2016–2040 RTP/SCS, SCAG prepared the Regional Growth Forecast, which contains a set of socioeconomic projections. Categorized by County and City, the report includes historical data from 2012, as well as projections of population, housing, and employment for 2040. The socioeconomic estimates and projections in the Growth Forecast are used for federal- and Statemandated long-range planning efforts, such as the RTP, the Air Quality Management Plan (AQMP), the Regional Transportation Improvement Program (RTIP), and the RHNA. The estimates also provide guidance to local governments in planning for jobs and housing. The Plan's consistency with the applicable policies of the 2016 RTP/SCS is provided in **Section 4.10: Land Use and Planning** of this Draft EIR.

City of Rancho Cucamonga General Plan

Government Code Section 65300 et seq. requires that each County and City prepare and adopt a comprehensive, long-term Plan for its future development, often called the General Plan. The General Plan, which serves as the blueprint for planning and development in the City and indicates the community's visions for the future, must contain seven elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. The City's existing General Plan was adopted in 2010.

The Housing Element of the General Plan is intended to provide a greater understanding of housing needs in Rancho Cucamonga, and to provide guidance to the decision-making process in all matters related to housing. The document analyzes existing and future-housing needs, develops a problem-solving strategy, and provides a course of action towards achieving Rancho Cucamonga's housing goal. The 2013–2021 Housing Element of the Rancho Cucamonga General Plan addresses the housing needs of the City for the planning period through 2021. The following Housing Element goals, objectives, and policies are relevant to the Plan:

- Objective HE-1.1: Ensure a wide range of housing alternatives and enable the City to achieve its share of the RHNA through the utilization of land use distribution and development standards to encourage a mix of housing types, including mobile homes and apartments, within a variety of price ranges.
 - Policy HE-1.1.1: Provide opportunities for a variety of housing types through implementation of the Land Use Plan, Development District Map, and Community Plans.
- Goal HE-2: Provide housing opportunities that meet the needs of all economic segments of the community including very low, low-, and moderate-income households and special needs groups.
 - Objective HE-2.1: Protect and expand the range of housing opportunities available by location, price, and tenure to low- and moderate-income households.

The 2013–2021 Housing Element indicates that the City can realistically accommodate 5,866 net housing units through pending projects and its Vacant Uncommitted Residential Land Inventory and Mixed-Use sites inventory. This capacity is more than adequate to accommodate the City's 2014–2021 RHNA of 848 units, which includes 209 units for very low-income households, 141 units for low income households, 158 units for moderate-income households, and 340 units for above moderate-income households. Available residential sites in the City include vacant sites, mixed use areas and pending projects that can accommodate as many as 1,054 units for low- and extremely low/very low-income households and 4,812 units for moderate and above moderate-income households, for a total capacity for 5,866 new units. The City has capacity to meet its RHNA goal of 848 units, with an excess capacity of 5,018 units. Since there are no specific sites that may accommodate dwelling units for moderate-income households, the City has a shortfall of sites for meeting its moderate income RHNA goal; however, there is a surplus of sites for

lower income units that can make up for this deficit and allow the City to meet its moderate income RHNA goal.¹

In addition, the City permits accessory dwelling units on lots zoned for single-family uses and all second units must meet the general standards of the zoning district. The City's allowance of accessory dwelling units provides the community with expanded housing choices within single-family areas.²

Table 4.13-1: City of Rancho Cucamonga General Plan Buildout Summary presents a projection of the growth allowed by the General Plan through the 2030 planning horizon year. The Plan Area includes approximately 305 acres currently located within the City and 4,088 acres located within the City's Sphere of Influence (SOI).

	Baseline: 2009 ^a			General P	lan Builc	lout: 2030		
	City	SOI	Total	City	SOI	Total	Change (Total only)	Percent Change
Dwelling Units	55,608	91	55,699	62,196	1,057	63,253	7,554	13.6%
Population	179,200	300	179,500	200,400	3,400	203,800	24,300	13.5%
Non- Residential Square Feet	80,030,000	0	80,030,000	99,797,000	0	99,797,000	19,767,000	24.7%
Employment	77,350	0	77,350	103,040	0	103,040	25,690	33.2%

Table 4.13-1City of Rancho Cucamonga General Plan Buildout Summary

Source: City of Rancho Cucamonga, General Plan, Chapter 2: Managing Land Use, Community Design, and Historic Resources (May 2010). ^a 2009 Baseline data is based on Existing Land Use Geographical Information Systems land use data. Note: SOI = Rancho Cucamonga Sphere of Influence

The City's General Plan anticipates annexation of 4,088 acres of the Plan Area located in the City's SOI and accounts for growth in residential units and population in the SOI Area based on the City's General Plan land use designations for this area. In addition, the Plan Area includes 305 acres within the current City limits, a portion of which is designated for residential uses.

The City's General Plan would allow development of up to 660 residential units with an associated population of approximately 2,000 persons on the 305 acres currently within the City. The General Plan also projects development of 1,057 units in the City's SOI with an associated population of 3,400. The

¹ City of Rancho Cucamonga 2013-2021 Housing Element (2014).

² City of Rancho Cucamonga 2013-2021 Housing Element (2014).

4,088 acres proposed for annexation accounts for 69 percent of the 5,927 acres located in the City's SOI. Based on this percentage, the portion of the projected growth associated with the annexation area would be 729 units approximately 2,346 persons. The total population growth projected in the City's General Plan for the portion of the Etiwanda Heights Neighborhood and Conservation Plan (EHNCP) in the City and portion of the SOI proposed for annexation is approximately 4,346 persons.

Existing Conditions

Regional

In 2012, the total population within the SCAG region was approximately 18.3 million, with approximately 5.9 million households.³ Within the SCAG region, approximately 2.1 million residents and 615,000 households were located within the County of San Bernardino in 2012. The population and housing growth forecast for the SCAG Region and the City of Rancho Cucamonga between 2020 and 2040 are shown in **Table 4.13-2: SCAG 2016-2040 RTP/SCS Growth Forecasts**. The forecast projects a population of approximately 204,300 within the City of Rancho Cucamonga in 2040, an increase of 30,400 from the 2020 population of 173,000, or an increase of approximately 17.5 percent, being added to the subregion between 2020 and 2040. The forecast projects approximately 73,100 households within the City of Rancho Cucamonga in 2040, an increase of 16,000 from 2020, or an increase of approximately 28 percent. Last, the forecast projects approximately 104,600 jobs within the City of Rancho Cucamonga in 2040, which results in 22,300 new jobs, or an increase of approximately 27 percent.

Table 4.13-2 SCAG 2016-2040 RTP/SCS Growth Forecasts

	Region Wid	e Forecasts	City of Rar	icho Cucamonga	Forecasts	
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,000	173,900	198,300	204,300
Households	6,458,000	7,325,000	7,412,300	57,100	70,200	73,100
Employment	8,414,000	9,441,000	9,871,500	82,300	101,800	104,600

4.13-5

Source: SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy [2016 RTP/SCS] (April 2016).

³ SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (April 2016).

City of Rancho Cucamonga

Population

The City of Rancho Cucamonga incorporated in 1977 with a population of approximately 44,600 persons. From 1990 to 2000, the City's population grew by an average of 2.6 percent per year to 127,743 persons by 2000. From 2000 to 2010, population growth was an average of 2.9 percent per year to 165,269 persons by 2010. In comparison, from 1990 to 2000, the population of the County of San Bernardino increased by 2.1 percent annually. From 2000 to 2010, the County population increased by 1.9 percent annually.

As shown in **Table 4.13-3: City of Rancho Cucamonga Population—Census Data and Forecasts**, as of January 2018, the California DOF estimated the City's population at 176,671, slightly above the SCAG RTP/SCS 2020 population forecast for the City. This includes 173,862 persons in households and 2,809 persons in group quarters (which includes prisons, jails, dormitories, convalescent homes, group homes, and other similar facilities). San Bernardino County had a January 2018 population of 2,174,938 persons.⁴

There are approximately four homes located in the Rural/Conservation Area (RCA), which account for an approximate resident population of 12 people.

By comparing the existing population in the City with the General Plan buildout projection of 203,800 residents by 2030, there would be an increase in population of approximately 27,129 residents in the next 12 years.

US Census Change, 2000-2019				DOF	SCAG 202	16-2040 RT	P/SCS Grov	wth Fored	asts	
	2000	2010	Total	%	2018	2020	2035	2040	Total	%
City of Rancho Cucamonga	127,743	165,269	37,526	2.9	176,671	173,900	198,300	204,300	30,400	2.0

Table 4.13-3 City of Rancho Cucamonga Population—Census Data and Forecasts

Sources: US Census Bureau, American FactFinder; and SCAG RTP/SCS (April 2016).

Notes: DOF = California Department of Finance; SCAG = Southern California Association of Governments.

^a DOF calculates provisional population estimates based on the Housing Unit Method, which incorporates 2010 US Census data.

⁴ California Department of Finance, "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011–2018 with 2010 Census Benchmark" (2017).

Housing

The number of total and occupied housing units, vacant units, and vacancy rates from US Census data and DOF estimates are shown in **Table 4.13-4: City of Rancho Cucamonga Housing Units and Vacancy Rates**—**Census Data and DOF Projections**.

The City's 2010 housing stock consisted of 56,618 units, of which approximately 96 percent, or 54,383 units were occupied. The vacancy rate within the City was 2,235 units, or approximately 4 percent. As of January 2018, the California DOF estimates that there are 59,318 housing units in the City. Of these, 56,298 dwelling units were occupied, which translates to a vacancy rate of 3.3 percent. The City's average household size is approximately 3.03 persons per household. For the City, there are currently four residential dwelling units within the Plan Area. SCAG forecasts approximately 73,100 households by 2040.

By comparing the existing number of housing units in the City with the General Plan buildout projection of 63,253 units by 2030, there would be an increase of approximately 3,935 residential units in the next 12 years.

Table / 12_/

			Table 4.13-4			
City of Rancho Cucamonga Housing Units and Vacancy Rates—Census Data and DOF Projections						
	Households	Housing Units	Occupied Housing Units	Vacant Housing Units	Vacancy Rate (percent)	Persons per Household
2010 US Census Data	54,383	56,618	54,383	2,235	3.9	2.98
2018 DOF Estimates	-	59,318	57,365	1,953	3.3	3.03
2012 SCAG Projection	55,400	_	_	_	_	_
2040 SCAG Projection	73,100	_	_	_	_	_

Sources: US Census Bureau, American FactFinder; California DOF, "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011–2018 with 2010 Census Benchmark" (2017); SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (April 2016).

4.13-7

Note: DOF = California Department of Finance; "-" indicates there is no available data.

Employment

According to the California EDD, Rancho Cucamonga's January 2019 labor force consisted of 97,700 persons, of which 94,400 persons were employed and 3,300 persons were unemployed.⁵ This translates to the City's unemployment rate of 3.4 percent. This compares with an unadjusted unemployment rate of 4.5 percent and 4.8 percent for the County of San Bernardino and the State of California during the same period, respectively.

SCAG's 2016 Regional Growth Projections for the City show 82,300 jobs by 2020 and 104,600 jobs by 2040, as shown in **Table 4.13-5: SCAG Employment Forecasts.** Based on the City's estimated employment force of 94,400 persons in January 2019, it is assumed the current employment in the City exceeds SCAG projections for 2020. However, by comparing the number of jobs in the City in early 2019 with the General Plan buildout projection of 103,040 jobs by 2030, there would be an increase of approximately 8,640 jobs in the next 15 years.

Table 4.13-5SCAG Employment Forecasts

Adopted City of Rancho Cucamonga Forecasts					
Year 2020	Year 2035	2040			
82,300	101,800	104,600			

Source: SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy [2016 RTP/SCS] (April 2016).

ENVIRONMENTAL IMPACTS

Methodology

This analysis considers population, housing, and employment growth that would occur with implementation of the Plan and whether this growth is within local or regional forecasts; whether it is considered substantial with respect to remaining growth potential in the City, as articulated in the City's General Plan and regional forecasts; and/or whether it would result in the displacement of housing or people necessitating the construction of replacement housing elsewhere.

⁵ California Employment Development Department (EDD). Monthly Labor Force Data for Cities and Census Designated Places (CDP), (December 2018).

Thresholds of Significance

To assist in determining whether the proposed Plan would have a significant effect on the environment, the City finds the proposed Plan may be deemed to have a significant impact related to population and housing if it would:

Threshold POP-1:	Induce substantial unplanned population growth in an area, either directly (for
	example, by proposing new homes and businesses) or indirectly (for example,
	through extension of roads or other infrastructure).

Threshold POP-2:Displace substantial numbers of existing people or housing, necessitating the
construction of replacement housing elsewhere.

Project Impact Analysis

Threshold POP-1:Induce substantial unplanned population growth in an area, either directly (for
example, by proposing new homes and businesses) or indirectly (for example,
through extension of roads or other infrastructure).

Population and Housing

Adopted projections provide benchmarks for evaluating the potential population and housing impacts from implementation of the Plan, particularly with respect to assessing associated growth.

Full development of the uses that would by allowed by the Plan would increase the City's resident population and housing stock. The Plan would permit development of up to 2,900 housing units to be built in the Neighborhood Area (NA) and 100 homes on private property in the RCA as defined by the Plan. The Plan also includes a Transfer of Development Rights program that would allow the voluntary transfer development rights from private property in the RCA to the NA. With the Plan's proposed development of up to a total of 3,000 dwelling units, the City's population would increase by approximately 9,090 residents based on an average household size of 3.03 persons per household.

The San Bernardino County General Plan would permit development of approximately 3,500 to 4,500 units in the City's SOI Area. With approval and implementation of the Plan, this growth would occur in the City under the Plan as opposed to occurring under the County's jurisdiction. The number of residential units 3,000, and associated growth in population, that would occur as a result of the Plan would be less than would occur if the Plan Area is not annexed and is developed under County jurisdiction

As previously discussed, the total population growth projected in the City's General Plan for the portion of the EHNCP in the City and the portion of the SOI proposed for annexation is approximately 4,346

4.13 Population and Housing

persons. This portion of the 9,090 population growth associated with the Plan (approximately 48 percent) is consistent with City's General Plan population projection, which is consistent with the 2016-2040 RTP/SCS growth forecast of 204,300 for the City's population in 2040. The total increase in the City's population that would be associated with the Plan is 9,090, approximately 4,744 persons above the projections in the City's General Plan for the Plan Area. This portion of the population growth associated with the Plan would be beyond the growth included in the 2016-2040 RTP/SCS growth forecasts.

SCAG is currently preparing the 2020-2045 RTP/SCS and draft growth forecasts for this planning period have been developed. This forecast was developed based on local input, received between late 2017 and early 2019, on preliminary growth forecasts prepared by SCAG. This draft forecast includes projected growth in the 4,088-acre annexation area based on input from San Bernardino County. Specifically, the current draft forecast includes approximately 1,600 households with a population of 4,900 and 300 jobs in the NA, reflecting the County's plans to sell this surplus property for development. The population growth associated with the portion of the Plan Area currently in the City, approximately 2,000, and the growth in the annexation area included in the draft growth forecast, 4,900, totals 6,900, which is approximately 76 percent of the 9,090 growth in population projected for the 3,000 residential units the Plan would allow.

It should be noted that the maximum 3,000 housing units that would be allowed by the Plan would assist the City of Rancho Cucamonga in meeting State-mandated fair share housing production targets as outlined in SCAG's RHNA. As discussed previously, the City has a shortfall of sites for meeting its moderate income RHNA goal; however, there is a surplus of sites for lower income units. The proposed new neighborhoods would include attached and detached single family. Live/Work Units and Shopkeeper Units would also be allowed, along with carriage houses (residential space above garages) in some areas of the Plan, and the potential for other accessory dwelling units pursuant to State law and local ordinances. These housing units would provide options to meet the City's existing housing needs and are conducive to housing opportunities for a wide variety of income levels.

The goals and policies of the City's Housing Element support the development of housing within the Plan Area through implementation of the Plan. The Plan is consistent with the City's overarching Housing Element goal to provide opportunities and incentives for the provision of a variety of housing types for all economic segments wishing to reside in the community regardless of race, religion, sex, or income group.

Because the growth in population projected for the Plan is not fully accounted for in the 2016-2040 SCAG growth forecasts, this growth is considered inconsistent with these forecasts. The additional increment of population growth that would be generated by the Plan, 4,744 persons, may result in the City's population exceeding the 2040 population growth forecast of 204,300 by approximately 2 percent. Because the Plan

may result in the City's population exceeding the 2040 population forecast for the City, which could result in additional environmental impacts not addressed by regional plans, this impact is considered significant. As discussed in **Table 4.10-1** in **Section 4.10: Land Use**, the Plan is consistent with the goals of the RTP/SCS.

Employment

The Plan would generate short-term construction jobs. Construction jobs would be created while site improvements and structures are under construction, varying from planning area to planning area as the components of the Plan are implemented. Detailed construction employment estimates are not available at this stage of the planning process for the Plan. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely, to any significant degree, to relocate to an area as a consequence of the job opportunities presented by the Plan. The construction industry differs from most other industry sectors in several important ways that are relevant to potential impacts on population:

- There is no regular place of work. Construction workers commute to job sites that change many times during a year. These often, lengthy daily commutes are made possible by the off-peak starting and ending times of the typical construction work day.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills.
- The work requirements of most construction projects are also highly specialized, and workers are employed on a job site only if their skills are needed to complete a phase of the construction process.

Thus, it is reasonable to assume that construction-related employees associated with the Plan would already be accounted for within regional employment growth forecasts. Employment growth resulting from construction of the Plan would be a less than significant impact.

In regard to operation, the proposed non-residential development allowed under the Plan would create new employment opportunities for residents living within the Plan Area, as well as for those living within the City and surrounding area. The Shops & Restaurant Zone would allow up to a maximum of 180,000 square feet of non-residential development, which would generate approximately 415 employment opportunities.⁶

⁶ The Shops and & Restaurant Zone is comprised of approximately 18,000 feet of office uses, 24,300 square feet of restaurant uses, and approximately 137,700 square feet of retail uses. The employee generation was calculated based on approximately 250 square feet per employee for office uses, approximately 350 square feet per employee for restaurant uses, and approximately 500 square feet per employee for retail uses.

These employment opportunities that would be provided by the Plan would increase the City's employment force of approximately 94,400 persons to 94,816 persons at buildout (an increase of approximately 0.4 percent). The Plan's estimated number of generated jobs would represent a negligible amount of the total employment growth projected in the City and County in future years (5 percent of the projected employment in the City at buildout in 2030, and 0.2 percent of SCAG's forecasted employment in the County by 2035). The growth in employment associated with the Plan is considered consistent with the SCAG 2016-2040 RTP/SCS Growth Forecast.

Threshold POP-2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The Plan Area currently contains four existing residential dwelling units which would remain as part of the Plan within the RCA. As such, no existing people or housing would be displaced as part of implementation of the Plan. Impacts would be less than significant.

CUMULATIVE IMPACTS

Cumulative impacts occur when incremental impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area to create a cumulatively considerable impact. The cumulative study area for population and housing is the County of San Bernardino. Development of the Plan and other projects in the City of Rancho Cucamonga and in San Bernardino County would lead to increases in population, housing, and employment. The Plan would involve development of up to a maximum of 3,000 residential units, with approximately 9,090 new residents, and approximately 415 employment opportunities. Implementation of the Plan, in combination with other development projects in the unincorporated County areas, adjacent jurisdictions, and the City of Rancho Cucamonga in accordance with the adopted General Plan, would contribute to future population, housing, and employment growth within the area. A list of these related projects is found in Table 3.0: Related Projects in Section 3.0: Environmental Setting of this Draft EIR. As discussed previously, approximately 48 percent of the population growth of 9,090 that would be generated by the Plan, 4,346 persons, is accounted for the SCAG RTP/SCS 2016-2040 Growth Forecasts. The remaining population growth of 4,744 is not accounted for the 2016-2040 Growth Forecasts. The draft 2020-2045 RTP/SCS Growth Forecasts account for approximately 76 percent of the population growth that would be generated by the Plan. The additional increment of population growth that would be generated by the Plan not accounted for in the 2016-2040 RTP/SCS Growth Forecasts may result in population growth exceeding current forecasts, which may contribute to cumulative impacts.

As previously discussed, the City's General Plan anticipates annexation of the Plan Area and accounts for growth in residential units and population in the SOI Area based on the City's General Plan land use designations for this area. With approval of the Plan and annexation of this area to the City, this growth would occur in the City under the Plan as opposed to occurring under the County's jurisdiction. Additionally, the Plan's cumulative housing and population impact provides benefits for regional housing goals that promote housing production, and General Plan Housing Element goals regarding the mixture of residential densities.

MITIGATION MEASURES

The potential inconsistency of the population growth that would be generated by the Plan with the SCAG RTP/SCS 2040 population growth forecast for the City of Rancho Cucamonga could be mitigated by reducing the amount of residential units allowed by the Plan. This would not feasibly meet the basic objectives of the EHNCP as presented in **Section 2.0: Project Description**.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Because the growth in population projected for the Plan is not fully accounted for in the 2016-2040 SCAG growth forecasts, this growth is considered inconsistent with these forecasts. The additional increment of population growth that would be generated by the Plan, 4,744 persons, may result in the City's population exceeding the 2040 population growth forecast of 204,300 by approximately 2 percent. Because the Plan may result in the City's population exceeding the 2040 population exceeding the 2040 population exceeding the 2040 population forecast for the City, which could result in additional environmental impacts not addressed by regional plans, this impact is considered significant.