

## **CHAPTER 6 CUMULATIVE EFFECTS**

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### **6.1 INTRODUCTION**

The California Environmental Quality Act (CEQA) requires an Environmental Impact Report (EIR) to analyze cumulative impacts. The purpose of this section of the EIR is to explain the methodology for the cumulative analyses and present the potential cumulative effects of the Alta Oceanside Project (proposed project).

Section 15355 of the CEQA Guidelines defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Section 15130 of the CEQA Guidelines provides guidance for analyzing significant cumulative impacts in an EIR. The discussion of cumulative impacts “need not provide as great detail as is provided for the effects attributable to the project alone,” but instead is to be “be guided by standards of practicality and reasonableness.” (Guidelines § 15130(b).) The discussion should also focus only on significant effects resulting from the project’s incremental effects and the effects of other projects. According to Section 15130(a)(1), “an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.”

Cumulative impacts can result from the combined effect of past, present, and future projects located in proximity to the project under review. Therefore, it is important for a cumulative impacts analysis to be viewed over time and in conjunction with other related past, present, and reasonably foreseeable future developments whose impacts might compound or interrelate with those of the project under review.

### **6.2 METHODOLOGY**

According to Section 15130(b)(1) of the CEQA Guidelines, a cumulative impact analysis may be conducted and presented by either of two methods:

- (A) a list of past, present, and probable activities producing related or cumulative impacts; or
- (B) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document that has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

Due to the differing nature of cumulative effects and the associated cumulative study areas for each environmental topic, the approach method utilized is discussed in each section below.

## 6.3 CUMULATIVE PROJECTS

Based on information provided by the City of Oceanside (City) and the cumulative projects used in the Traffic Impact Analysis prepared by Dudek (Appendix H), a list of cumulative projects under consideration for this analysis is presented in Table 6-1.

**Table 6-1  
Cumulative Projects**

No.	Project Name	Location	Description	Status
1	Marriott Residence Inn	North Coast Highway north of Costa Pacifica Way	117-unit hotel with event space and restaurant.	Approved
2	Oceanside Beach Resort	Between North Pacific Street and North Meyers Street south of Pier View Way	2 resort hotels offering a total of 387 gets rooms and suites	Under construction
3	Block 5	Meyers Street between Civic Center Drive and Pier View Way	35-unit mixed use building with 1,602 square feet of commercial space	Approved
4	Block 20	Meyers Street between Pier View Way and Mission Avenue	29-unit mixed use building with 15,947 square feet of commercial space	Approved
5	Block 18 – Pierside South	Cleveland Street between Pier View Way and Mission Avenue	66-unit mixed use building with 9,875 square feet of commercial space	Construction Complete
6	Block 19 – Pierside North	Cleveland Street between Mission Avenue and Seagaze Drive	101-unit mixed use building with 12,138 square feet of commercial space	Construction Complete
7	Coast Highway Starbucks	North Coast Highway south of Windward Way	Drive thru coffee use and two additional commercial suites	Approved
8	Lot 23	Cleveland Street, between Mission and Civic Center Drive	10,000 square feet of commercial space, 52 residential units, and parking	Under Construction
9	Belvedere Hotel & Residence	Mission Avenue east of North Clementine Street	120-unit hotel and 90 live-work units with 8,000 square feet of commercial space	Approved

## 6.4 CUMULATIVE IMPACT ANALYSIS

### 6.4.1 Aesthetics

Projects contributing to cumulative visual effects include those within the project viewshed. The viewshed encompasses the area within which the viewer is most likely to observe the proposed project and surrounding uses. Therefore, the project viewshed is the geographic extent for the analysis of cumulative impacts to visual resources and aesthetics. Of the surrounding projects currently proposed, only the Marriott Residence Inn is within the same viewshed. Thus, the analysis below focuses on combined changes resulting from the project and the Marriott Residence Inn.

As discussed in Section 5.1, Aesthetics, the proposed project would not substantially impact a scenic vista. Visual resources are identified in Table 5-1, Visual Open Space. Of the visual resources listed, only the San Luis Rey River view is designated as a scenic resource within the project viewshed. Although the proposed project would not result in an impact to these scenic vistas, the proposed project could combine with other projects to result in a cumulative impact. Of the cumulative projects listed in Table 6-1 only the Marriott Residence Inn is within the same viewshed as the proposed project and within the viewshed of the San Luis Rey River. The project in combination with the Marriott Residence Inn would alter the view from the San Luis Rey River Trail to the southeast, but would not significantly alter the scenic value of the river corridor considering both these sites are presently developed along with the adjacent Seacliff condominiums site. As such, the project would have a **less than significant cumulative impact** to scenic vistas.

Interstate 5 (I-5) and State Route 76 (SR-76) are eligible but not designated as State Scenic Highways. The project would not substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Both the proposed project and the approved Marriott Residence Inn are located on previously disturbed land with older buildings and typical ornamental landscaping which do not include any scenic resources visible from the highway locations or otherwise. Therefore, the proposed project would not combine with other projects to result in significant cumulative impacts associated with scenic resources within a scenic highway. As such, the project would have a **less than significant cumulative impact** to State Scenic Highways.

Section 5.1 demonstrates the proposed project is consistent with the applicable regulations, plans and policies regarding scenic quality. The proposed project is designed to meet the intent and requirements of both the Downtown District (DT) zone and modifications allowed under the Density Bonus provisions. The approved Marriott Residence Inn was found to be consistent with applicable regulations, plans, and policies as well. Therefore, the proposed project would not combine with other projects to result in significant cumulative impacts associated with applicable zoning and regulations governing scenic quality. As such, the project would have a **less than significant cumulative impact** to scenic quality.

The project is in a built-up area where night lighting is a common feature. Light sources in the area include street lights, building lighting, security lighting, and sidewalk lighting. Section 5.1 describes the lighting proposed with the project which would not substantially affect day or nighttime views. Both the proposed project and the approved Marriott Residence Inn would be required to comply with Chapter 39 of the City Municipal Code, Light Pollution Regulations, which provides requirements to restrict the permitted use of certain light fixtures emitting into the night sky undesirable light rays which have a detrimental effect on astronomical observation and research. (City of Oceanside 2018). Therefore, the proposed project would not combine with other projects to result in significant cumulative impacts associated with lighting. As such, the project would have a **less than significant cumulative impact** related to lighting.

The project as well as the adjacent developments in the viewshed would be required to comply with the Chapter 39 of the City Municipal Code, Light Pollution Regulations such structures would not create a new source of substantial glare. Therefore, the proposed project would not combine with other cumulative projects or existing development to result in significant glare. As such, the project would have a **less than significant cumulative impact** to glare.

Overall, the proposed project would have a **less than significant** cumulative impact on aesthetics.

## 6.4.2 Agricultural and Forestry Resources

The proposed project site does not include and is not adjacent to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. According to the State Farmland Mapping and Monitoring Program, the site is designated as Urban and Built-Up Land (DOC 2018). In addition, the site is not subject to Williamson Act contract. The project site does not contain any timber or forest resources, and does not meet the criteria for forest land or timberland. As no agricultural farmland or forest land resources are located on or in the vicinity of the site, and the project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. As the project site and surrounding area do not include nor are adjacent to farmland or forest resources and are zoned for urban uses, it would not combine with other projects to result in significant impacts associated agriculture and forestry resources. Cumulative impacts would be **less than significant**.

## 6.4.3 Air Quality

Air pollution is largely a cumulative impact, which is measured cumulatively by air basin. The project is located in the San Diego Air Basin (SDAB), and the San Diego Air Basin is considered the cumulative air quality study area. The SDAB is cumulatively in federal (National Ambient Air Quality Standards; NAAQS) nonattainment area for O<sub>3</sub>, as well as a state (CAAQS) nonattainment area for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The 2016 Regional Air Quality Strategy (RAQS) and state implementation plan (SIP) have been accordingly developed to reduce these emissions. These plans address measures for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality. As described in Section 5.3, the project would have a less-than-significant impact for short-term construction and long-term operations. As such, the project would have a **less than significant** cumulative impact.

Additionally, for the basin, the RAQS serves as the long-term regional air quality planning document for the purpose of assessing cumulative operational emissions in the basin to ensure the SDAB continues to make progress toward NAAQS- and California Ambient Air Quality

Standards (CAAQS)-attainment status. As such, cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality if, in combination, they would conflict with or obstruct implementation of the RAQS. Similarly, individual projects that are inconsistent with the regional planning documents upon which the RAQS is based would have the potential to result in cumulative operational impacts if they represent development and population increases beyond regional projections. As detailed in Section 5.3, the project would be consistent with the RAQS. As a result, the project would not result in a cumulatively considerable contribution to regional O<sub>3</sub> concentrations or other criteria pollutant emissions. Cumulative impacts would be **less than significant**.

As discussed in Section 4.7.4, Impacts Analysis, the project would have potential impacts related to construction-generated cancer risk (**Impact AQ-1**) and operations (**Impact AQ-2**). The project would include **MM-AQ-1**, **MM-AQ-2a** and **MM-AQ-2b** to reduce these potential impacts to below a level of significance. The nearest cumulative project construction activity would be the Marriott Residence Inn, located immediately north of the project site. It is presumed that all reasonably foreseeable cumulative projects would be required to conform to existing regulations with respect to avoidance, minimization, and mitigation of air quality impacts during construction, similar to the project. As diesel particulate matter and other air quality pollutant emissions from construction vehicles at this cumulative project site are temporary and localized, cumulative impacts would be **less than significant**.

#### **6.4.4 Biological Resources**

Cumulative impacts consider the potential regional effects of a project and how a project may affect an ecosystem or one of its members beyond the project limits and on a regional scale. The cumulative biological study area consists of the coastal area of the North County Multiple Species Conservation Plan (MSCP) (City of Oceanside 2010), as it represents the regional area with similar habitats and species as the project site.

As discussed in Section 4.1.1, Existing Conditions, no special-status plant or wildlife species have a high or moderate potential of occurrence and therefore are not expected to occur on the project site. In addition, the site does not include jurisdictional habitats. The project would also avoid indirect impacts to native habitats through compliance with City's standard measures and other regulations. The project would have potential direct impacts related to nesting birds (**Impact BIO-1**), raptor foraging (**Impact BIO-2**), indirect impacts to nesting birds (**Impact BIO-3**) and sensitive non-native grassland habitat (**Impact BIO-4**). The project would include **MM-BIO-1** and **MM-BIO-2** to reduce these potential impacts to below a level of significance in compliance with the Migratory Bird Treaty Act (MBTA), MSCP and Oceanside Subarea Plan.

The proposed project's contribution to cumulative impacts would be related to nesting birds and non-native grassland in combination with other projects impacts to these resources within the City would not be cumulatively considerable with the incorporation of measures required by the MSCP, Oceanside Subarea Plan, and other applicable regulations (see Section 4.1.2). Like the project, all reasonably foreseeable cumulative projects within this area would also be required to conform to existing regulations with respect to avoidance, minimization, and mitigation of impacts to sensitive habitat, achieving no-net-loss of wetlands and like/kind replacement for impacts to sensitive habitat that cannot be avoided. In conclusion, the proposed project's contribution to cumulative impacts to biological resources would be **less than significant**.

## 6.4.5 Cultural Resources

### 6.4.5.1 Historic Resources

Considering the historical uses of the site are limited to local relevance and do not rise to the regional level, the historic resources cumulative study area is limited to the City. As discussed in Section 4.2.1.3, record searches determined that there are no historical resources found within the project site pursuant of CEQA Section 15064.2 nor the City's Historical Preservation Ordinance. The project would not contribute to a cumulative significant historical resources impact. Therefore, the project would have **no cumulative impact** to historic resources.

### 6.4.5.2 Archaeological Resources

Cumulative development may potentially impact archaeological resources as a result of projects within the City and in nearby areas. The cumulative study area is coastal San Diego County within the Luiseño and Kumeyaay Native American traditional cultural boundaries.

The project site contains one, isolate prehistoric flaked stone tool. There is the potential to discover more surface or subsurface artifacts during ground-disturbing activities. As indicated in Section 4.2.4, there is potential for the project to result in impacts to unknown significant subsurface archaeological resources based on the isolate located on-site and general archaeological sensitivity of the area. The project would implement **MM-CUL-1** to reduce potentially significant impacts to archaeological resources to below a level of significance. Identification of cultural resources within the APE and mitigation of potentially significant adverse impacts would be handled on a project-by-project basis. It is presumed that all reasonably foreseeable cumulative projects would be required to conform to existing regulations with respect to avoidance, minimization, and mitigation of impacts similar to the project. Therefore, impacts would be assessed and mitigated pursuant to CEQA, and those projects within the City's jurisdiction would be reviewed by the City's project review and approval process. Consistent with CEQA and other applicable laws, monitoring programs would be required of all cumulative projects with potential to impact archaeological resources. Overall, the project's contribution to the cumulative loss of archaeological resources would be **less than significant**.

### 6.4.5.3 Human Remains

Cumulative projects located in a region would have the potential to result in impacts associated with human remains due to grading, excavation or other ground-disturbing activities. All cumulative projects are assumed to comply with Section 7050.5 of the California Health and Safety Code, and California Public Resources Code, Section 5097.98 that require proper treatment of human remains. As discussed in Section 4.2.4, the project is not known to have human remains and, based on records search, is not expected to contain human remains. The project would also comply with the aforementioned regulations addressing inadvertent human remain finds. As no impact to human remains is expected to occur as a result of the project, the project would have **no cumulative impact** contribution towards a cumulative human remains impact.

### 6.4.6 Energy

Potential cumulative impacts on energy would result if the proposed project, in combination with past, present, and future projects, would result in the wasteful or inefficient use of energy. This could result from development that would not incorporate sufficient building energy efficiency features, would not achieve building energy efficiency standards, or would result in the unnecessary use of energy during construction and/or operation. The cumulative projects within the areas serviced by the energy service providers would be applicable to this analysis. Projects that include development of large buildings or other structures that would have the potential to consume energy in an inefficient manner would have the potential to contribute to a cumulative impact. Projects that would mostly include construction, such as transportation infrastructure, could also contribute to a cumulative impact; however, the impact of these projects would be limited because they would typically not involve substantial ongoing energy use.

The amount of electricity used during construction would be minimal; typical demand would stem from the use of electrically powered hand tools and several construction trailers by managerial staff during the hours of construction activities. Natural gas is not anticipated to be required during construction of the project. Any minor amounts of natural gas that may be consumed as a result of proposed project construction would be temporary and negligible and would not be wasteful, inefficient, or unnecessary or have an adverse effect.

As described in Section 5.4, the proposed project would not involve wasteful, inefficient, or unnecessary use of energy and would be consistent with Title 24. The California Emissions Estimator Model (CalEEMod) estimated that the project would consume 2,635,110 kWh of electricity annually. Compared with the City's annual electricity consumption, the anticipated increase in consumption associated with one year of project operation is approximately 0.40% of the City's use. Overall, the project would not result in excessive electricity usage and would not contribute to a cumulative sensitive energy use impact. It is also noted that cumulative projects would be subject to Title 24 and California Green Building (CALGreen) requirements similar to

the project, which includes energy efficiency standards to minimize the wasteful and inefficient use of energy. In consideration of cumulative energy use, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Thus, the proposed project would not contribute to a cumulative impact to the wasteful or inefficient use of energy. As such, the proposed project would have a **less than significant** cumulative impact.

#### **6.4.7 Geology and Soils**

Due to the nature of geology and soils, geologic and soils impacts are limited to a localized area. The cumulative geologic study area would be limited to the project site and immediately surrounding properties. The adjacent Rodeway Inn property is proposed to be redeveloped with hotel uses via the Marriott Residence Inn project, however, no geologic impacts are anticipated considering both the proposed project, surrounding project are required to comply with the CBC and other regulations (see Section 4.3.2, Regulatory Setting). Cumulative geology and soil impacts would be **less than significant**.

The project would result in potentially significant direct impacts to paleontological resources, as the site contains old Paralic Deposits formations with a high paleontological sensitivity. As discussed in Section 4.3.1.3, old Paralic Deposits formation occurs in other areas within the City of Oceanside, San Luis Rey River corridor and northern San Diego County. Similar to the project, projects within San Diego County are subject to a CEQA Statutes and Guidelines and would be required to reduce significant impacts to this formation to a less than significant level. The proposed project **MM-GEO-1** would minimize impacts to a less-than-significant level and would preserve the information provided by paleontological finds. Projects in the County with potential impacts to this formation, such as the Adjacent Marriott Inn & Suites project, would be subject to a similar mitigation to reduce potential impacts. Overall, the proposed project contribution towards a cumulative impact would be **less than significant**.

#### **6.4.8 Greenhouse Gas Emissions**

Due to the global nature of the assessment of greenhouse gas (GHG) emissions and the effects of global climate change, impacts can currently only be analyzed from a cumulative impact context; therefore, this EIR's analysis in Section 5.5, Greenhouse Gas Emissions, includes the assessment of both project and cumulative impacts. Under CEQA, a project would have a significant cumulative impact caused by the combined impact of past, present, and probable future projects if its incremental impact represents a "cumulatively considerable" contribution to such cumulative impacts (14 CCR 15064(h)).

Construction of the project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. However, GHG emissions generated during construction of the project would



be short-term in nature, lasting only for the duration of the construction period (26 months), and would not represent a long-term source of GHG emissions. Therefore, cumulative impacts would be **less than significant**.

The project would generate operational GHG emissions from area sources (landscape maintenance equipment), energy sources (natural gas and electricity consumption), mobile sources (vehicle trips), water supply and wastewater treatment, and solid waste. However, based on the service population (SP) of 891 people, the project would result in GHG emissions of approximately 2.97 MT CO<sub>2e</sub>/SP/yr. Thus, the project's estimated GHG emissions would not exceed the 3.6 MT CO<sub>2e</sub>/SP/yr and the project's GHG emissions would have a **less than significant** cumulative impact

The project was shown to be consistent with San Diego Association of Governments' (SANDAG) Regional Plan (SANDAG 2015), the City of Oceanside General Plan, and the goals of Senate Bill 32 and Executive Order S-3-05. Therefore, the project would not conflict with an applicable plan adopted for the purpose of reducing GHG emissions, and plan consistency impacts would have a **less than significant** cumulative impact

#### 6.4.9 Hazards and Hazardous Materials

Cumulative impacts related to hazards and hazardous materials would result from projects that combine to increase exposure to hazards and hazardous materials. Therefore, the geographic context considered for potential cumulative impacts related to hazards and hazardous materials is localized and limited to the immediate surrounding area. As shown in Table 6-1, only the Marriott Residence Inn is adjacent to or in close proximity to the project site.

During construction of the proposed project, there is potential for release of hazardous materials related to storage, transport, use, and disposal from construction debris, landscaping, and commercial products. However, the proposed project would be required to adhere to federal, state, and local laws, such as California's Occupational Safety and Health Administration (CalOSHA) requirements, Hazardous Waste Control Act, California Accidental Release Prevention (CalARP), and the California Health and Safety Code, which regulate the management and use of hazardous materials, which are intended to minimize risk to public health associated with hazardous materials. The proposed project proposes residential and commercial development, which is not typically considered a source of substantial hazardous materials. See Section 5.6, Hazards and Hazardous Materials, for additional details.

Cumulative projects would be required to remediate any hazardous conditions that could combine with the less than significant hazardous material impacts of the project. Specifically, the Marriott Residence Inn would also be subject to federal, state, and local regulations that avoid significant impacts related to hazardous materials (City of Oceanside 2010a). Therefore, the proposed project combined with the cumulative projects provided in Table 6-1 would result in a **less than significant** cumulative impact related to hazards and hazardous materials.

As discussed in Section 5.6, the adopted emergency plans applicable to the project area consists of the Multi-Jurisdictional Hazard Mitigation Plan for San Diego County (County of San Diego 2018a) the San Diego County Emergency Operations Plan (County of San Diego 2018b) and the City of Oceanside Emergency Plan (Oceanside Fire Department 2009). In addition, the City has developed a tsunami evacuation map (City of Oceanside n.d.). The project would not impede on implementation of these plans, nor cumulatively combine with other proposed developments in a manner that would affect the implementation of these plans. Thus, the project would have **less than significant** impacts related to impairing implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

According to the California Department of Forestry and Fire Protection's (CAL FIRE's) Very High Fire Hazard Severity Zones (VHFHSZ) in LRA (Local Responsibility Area) map, the project site is not located within or adjacent to a VHFHSZ (CAL FIRE 2009). The project site is located within an urbanized and developed area of the City. The project site does not contain and is not adjacent to wildlands where there is risk for wildfire. The project would not combine within any cumulative projects in a manner that would increase potential wildfire exposure. Therefore, cumulative impacts would be **less than significant**.

#### **6.4.10 Hydrology and Water Quality**

As described in Section 5.7, the project is located within the San Luis Rey Hydrologic Unit (903), within the Lower San Luis Hydrologic Area (903.1) and the Mission Hydrologic Sub-Area (903.11) of the Water Quality Control Plan for the San Diego Basin (California Regional Water Quality Control Board 2016). The cumulative study area for hydrology and water quality is the Mission Hydrologic Sub-Area.

Considering the downstream waters are impaired by the listed pollutants and the proposed project potential pollutants, the potential cumulative pollutants of concern are sediment, nutrients, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, bacteria and viruses, and pesticides (Section 5.7). As detailed in Section 5.7, the project would reduce its pollutant contribution towards these downstream waters in compliance with local, state, and federal regulations. Cumulative projects would similarly be required to comply with these requirements, and would also be required to provide a Stormwater Quality Management Plan for operations and Stormwater Pollution Prevention Plan for construction. Therefore, the proposed project would result in a **less than significant** contribution towards cumulative water quality impacts.

The proposed project would not use groundwater during construction or operation. Thus, the project would not contribute to any cumulative groundwater impacts and would have **no cumulative impact** related to groundwater.

During construction, the project has potential to result in exposed soils or changes in runoff that could result in erosion or siltation. This potential impact would be avoided through the implementation of best management practices (BMPs) during construction, as detailed in Section 5.7 and Appendix L. During operations of the project, the site surfaces would be covered by pavement or landscaping with a drainage system designed to adequately convey runoff to the stormwater system. All surface runoff would be controlled in a manner to avoid erosion and sedimentation in accordance with regulations (see Section 5.7). It is noted that cumulative projects would also be subject to federal, state, and local regulations concerning runoff flows and stormwater quality. In conclusion, the project would have a **less than significant** contribution towards cumulative erosion and sedimentation impacts to the watershed.

#### **6.4.11 Land Use and Planning**

Although land use and planning impacts tend to be localized, and specific impacts are tied either directly or indirectly to specific action, the proposed project may have the potential to work in concert with other past, present, or future projects to either cause unintended land use impacts, such as reducing available open space or to accommodate increased growth that may result in more intensive land uses. Therefore, the geographic context for cumulative analysis is the policy area, which in this case is the City.

The proposed project and related cumulative projects in the immediate vicinity are subject to the goals and policies of the City's General Plan and other planning documents, as applicable. The proposed project, in combination with other related cumulative projects, would not disrupt or divide the existing community, as stated in Section 5.8, Land Use and Planning.

Prior to approval, the proposed project, and all related cumulative projects, must be found consistent with the City's General Plan and other applicable City planning documents (see Section 5.8). The cumulative projects requiring General Plan Amendments also would require approval by the City. Consistency with the City's applicable General Plan policies (and any other applicable planning documents) would ensure compliance and orderly development of the proposed project and other related cumulative projects. Therefore, the proposed project would not contribute to a cumulatively considerable impact concerning conflicts with applicable plans, policies, and regulations. Cumulative project impacts related to land use and planning would be **less than significant**.

#### **6.4.12 Mineral Resources**

As described in Section 5.9, Mineral Resources, the proposed project is not within a designated mineral resource area (City of Oceanside 1989; Public Resources Code, Sections 2710–2796). Thus, the proposed project would have no impact on known mineral resources of value and would not result in the loss of availability of locally-important mineral resource recovery sites.

Therefore, the proposed project would not contribute to a cumulatively considerable impact concerning mineral resources. The project would have **no cumulative impact** to mineral resources.

### 6.4.13 Noise

The geographic context for cumulative construction and stationary noise analysis would be areas immediately surrounding the project site, because construction and operational noise primarily affects areas in the vicinity of the project site. As such, only the Marriott Residence Inn has potential to cumulatively combine construction and operational stationary noise impacts with the project. Cumulative roadway noise impacts are discussed in Section 4.4, as the traffic noise analysis was completed based on General Plan buildout year 2035 conditions.

#### 6.4.13.1 Construction

Project site construction activity (e.g., site prep near the northwest corner) could be as close as 25 feet to the nearest Seacliff condominiums façade. The nearest Marriott Residence Inn construction activity would be a minimum of approximately 125 feet away from the Seacliff condominiums. Assuming for purposes of this analysis that the construction activities for the proposed project and the Marriott Residence Inn are similar and thus have essentially comparable noise emission levels, due to the greater distance of the Marriott Residence Inn from the receiver, the Marriott Residence Inn construction activities would result in a less than 3 dB contribution to concurrent project construction noise levels and that change would not be perceivable by the human ear.<sup>1</sup> As such, the proposed project would have a direct construction noise impact to adjacent residences as identified in Section 4.4, but would result in a **less than significant cumulative construction noise impact**.

#### 6.4.13.2 Operations

As operational stationary noise is measured at the property line of receiving locations and is based on on-site noise generation only, operational stationary noise impacts would not be cumulative in nature.

As detailed in Section 4.4, the proposed project's traffic-related impacts would result in a three dB or less increase (rounded to whole numbers) along area roadways. Therefore, the

<sup>1</sup> This logarithmic combination of the two construction noise levels at these different distances can be expressed as follows:

$L_{cons} - 20 \cdot \text{LOG}(25) = L_{cons} - 28 \text{ dB}$  at the Seacliff façade; and

$LMRI - 20 \cdot \text{LOG}(125) = LMRI - 42 \text{ dB}$  at the Seacliff façade,

$L_{cons}$  is the proposed project aggregate construction noise source level, and  $LMRI$  is the aggregate construction noise source level associated with the Marriott Residence Inn. The values in parentheses are the distances between each of these two concurrent projects and the common nearest Seacliff receptor position. Per acoustical principles, if  $L_{cons}$  and  $LMRI$  are the same, then the resulting 14 dB lower sound level of the Marriott Residence Inn construction noise at the Seacliff façade will make its contribution not cumulatively considerable.

increase in noise associated with cumulative traffic or operational on-site noise would not be cumulatively considerable and would be **less than significant**.

#### 6.4.14 Population and Housing

The geographic context for the analysis of cumulative impacts associated with population and housing consists of the City, which is consistent with how population is addressed and planned for via the City of Oceanside General Plan and Regional Housing Needs Assessments (RHNA).

As discussed in Section 5.10, the project would potentially generate an additional 866 residents within the City. This contribution towards City growth would be consistent with the SANDAG growth projections, as well as the City's in RHNA goals. The surrounding area is also identified for redevelopment per the General Plan and Coast Highway Vision and Strategic Plan, including the proposed Marriott Residence Inn. In addition, the proposed utility and infrastructure improvements associated with the project would not induce additional growth beyond what has been planned for. Overall, the proposed project would not induce substantial unplanned population growth in the City, and would have a **less than significant cumulative** impact.

#### 6.4.15 Public Services

The geographic context for the analysis of cumulative impacts associated with public services consists of the City, because fire protection, police protection, recreation, and other public services are provided by the City, and school services are provided by OUSD within the City.

As described in Sections 6.4.14 and 5.11, the intensity of development proposed by the project is consistent with and therefore contemplated by the General Plan and the growth projections utilized to plan for future public service needs. As disclosed in Section 5.11, Public Services, there are various public service facility improvements that are planned within the City; however such improvements have been planned independently of the project and will proceed independent of the project. The City has an established public facility development impact fee program (Municipal Code Chapter 32B and 32C) that provides funding for future public service improvements via the City's capital improvement program. This program is intended to address the incremental increase in demand for public services such as police, fire and recreation generated by new development. Specifically, Municipal Code Section 32C.4 states "[t]he purpose of this chapter is to insure that the quality of life of all residents is protected as new development occurs, and that the ability of the city to provide public facilities for the benefit of the city as a whole exists." While the proposed project would contribute to the cumulative demand for public services as contemplated by the General Plan, the project would provide for developer impact fees intended to offset this demand, and would not significantly contribute to the cumulative demand for additional facilities or facility improvements that would lead to significant physical environmental effects. The CEQA Guidelines specifically recognize that requiring a project to implement or fund its fair share of a measure designed to mitigate a cumulative impact is an effective way to address the project's contribution to the impact. 14 Cal Code Regs §15130(a)(3).

Therefore, the proposed project would not result in a cumulatively considerable impact to public services, and impacts would be **less than significant**.

#### **6.4.16 Recreation**

The geographic context for the analysis of cumulative impacts associated with recreation consists of the City, because recreational facilities are provided by the City. The proposed project would contribute a direct permanent increase to the population of the City and increase the demand for recreational areas. Therefore, the proposed project would contribute to an increase the use of existing nearby parks and recreational trails. However, the proposed project would provide a minimum of 200 square-feet of usable open space on site per residential unit in compliance with this City code. The project would also provide payment of park fees, as applicable (City of Oceanside 2019). Therefore, the proposed project would not result in the deterioration of existing neighborhood or regional parks because park and open space, meeting what is required by the City, would be provided by the proposed project. Because other residential projects would be subject to these same fees, impacts would not be cumulatively considerable. The project's cumulative impact to recreation would be **less than significant**

#### **6.4.17 Transportation**

A cumulative traffic impact analysis was conducted for the proposed project as part of the Traffic Impact Study (TIA) prepared by Dudek included as Appendix H to this EIR. Refer to Section 4.5 for full analysis regarding the cumulative Buildout Year (2035) plus Project scenarios. In summary, the project would result in two significant cumulative impacts to roadway segments; North Coast Highway, Costa Pacifica Way to SR-76, and North Coast Highway, Harbor Drive to Costa Pacifica Way. All other cumulative transportation impacts of the project would be less than significant. To mitigate these impacts, widening of the roadway segments beyond the existing Collector Road designation to a Secondary Collector would be required. As discussed further in Section 4.5.6, such widening mitigation is not feasible due to a variety of factors. Thus, MM-TRF-1 and MM-TRF-2 are proposed as potentially feasible mitigation measures. Although the magnitude of the reduction is not quantifiable, the TIA's analysis demonstrates that the improvements would reduce the project impact to these segments consistent with the General Plan Circulation Element mitigation measure policy. These measures include median and other traffic flow improvements. However, as the improvements would not increase the capacity of the roadway segments, these impacts would remain **significant** after mitigation per the City's significance criteria.

As mentioned above and detailed in Section 4.5.4, the project would be consistent with plans and guidelines related to transportation. Thus, the project would not contribute to a cumulative transportation impact related to plan or policy inconsistency and cumulative impacts would be **less than significant**.

The proposed transportation improvements included in the project would also not result in a geometric design feature that would pose as a hazard. As detailed in Section 4.5.4, the project improvements as well as MM-TRF-1 and MM-TRF-2 are intended to improve traffic flow and safety. Thus, the project would not contribute to a cumulative transportation impact related to geometric design hazards and cumulative impacts would be **less than significant**.

#### **6.4.18 Tribal Cultural Resources**

A cumulative impact, in terms of tribal cultural resources, refers to the mounting aggregate effect upon tribal cultural resources due to modern or recent historic land use, such as residential development, and natural processes, such as erosion, that result from acts of man. The issue that must be explored in a cumulative impact analysis is the aggregate loss of tribal cultural resources, including impacts to Traditional Cultural Places.

##### **Historic Resources**

No significant historic tribal resources have been identified on the site or are expected to occur. Thus, the Project would have a **less than significant** cumulative impact related to historic tribal resources.

##### **Tribal Cultural Resource**

Cumulative projects located in the region would have the potential to result in a cumulative impact associated with the loss of tribal cultural resources through development activities that could cause a substantial adverse change in the significance of a tribal resource. Cumulative projects that involve ground-disturbing activities within previously undisturbed soils would have the potential to result in significant impacts to tribal resources. However, these projects would be regulated by applicable federal, state, and local regulations. The loss of tribal cultural resources on a regional level may be adequately mitigated through the data recovery and collection methods specified in these regulations, as their value may also lie in cultural mores and religious beliefs of applicable groups. Therefore, given that all applicable regulations are adhered to, the cumulative destruction of significant tribal cultural resources from planned construction and development projects within the region would have a **less than significant** cumulative impact.

#### **6.4.19 Utilities and Service Systems**

The geographic context for the analysis of cumulative impacts associated with utilities and service systems consists of the City, because the City would provide utilities to the proposed project.

The cumulative projects would result in an increase in water and sewer service demand. Title 24 building requirements that include substantially more efficient fittings for water, which would reduce the demand generated by new development within the City. As the development proposed in the area consists of redevelopment, the change in demand would be reduced considering the increase in efficiencies. As detailed in Section 5.13, the project would not lead to the need for

improved sewer and water facilities beyond those improvements already included in the project. In addition, all future projects would be required to complete similar sewer and water service studies to evaluate impacts to facilities and would be required to provide improvements. As such, the project contribution towards cumulative utility impacts would be **less than significant**.

Citywide water supply planning is completed via the 2015 Urban Water Management Plan (UWMP) (City of Oceanside 2016). The proposed project would be in compliance with the General Plan and Zoning code, and therefore water demand of the project has been already planned for in the City and Regional water supply documents that are based on the buildout of the City. The proposed project would also be subject to the City's water conservation measures and Water Shortage Contingency Plan in the event of a severe drought. While the proposed project would result in an increase in water demand compared to the existing land uses and what was assumed in the 2015 UWMP, the City has sufficient water supplies from available entitlements and resources to serve the proposed project in addition to planned cumulative General Plan buildout growth. Therefore, cumulative impacts related to water demand would be **less than significant**.

The El Sobrante Landfill has a maximum permitted throughput of 16,054 tons per day with estimated remaining capacity of 145,530,000 tons and projected closure date of January 1, 2045 (CalRecycle 2018). The proposed project would generate approximately 0.28 tons of solid waste per day (Appendix I) and would comply with City's Complete Zero Waste Plan (City of Oceanside 2012). Considering the project's minimal contribution towards cumulative waste demands and the city-wide implementation of their waste reduction plan, the proposed project would not contribute significant amounts of solid waste, which would result in the exceedance of landfill capacity; therefore, cumulative landfill impacts would be **less than significant**.

#### **6.4.20 Wildfire**

Refer to Section 6.4.9 for information regarding consistency with adopted emergency and evacuation plans.

Considering the existing urbanization and associated physical barriers preventing the spread of wildfire in the area, the cumulative wildfire study area is limited to the localized area west of I-5. This cumulative study area is not located within a state responsibility area (SRA) or lands classified as VHFHSZ. The majority of this study area is urbanized and is not anticipated to be subject to a high wildfire risk. The project would be in compliance with California Fire Code and the City of Oceanside Municipal Code (see Section 5.6) and cumulative projects, such as the adjacent Marriott Residence Inn, would also be required to comply with such regulations. Cumulatively, the proposed project in combination with cumulative projects would not contribute to an exacerbation of wildfire risks or exposure to significant risks as a result of wildland fires. As such, the project's cumulative impacts related to wildfire would be **less than significant**.