CHAPTER 6
CUMULATIVE EFFECTS

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 Cypress Point 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 Local Transportation Analysis prepared by Linscott Law & Greenspan Engineers (Appendix M), 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	Type of Development	Description	Status
1	Ocean Kamp	North of SR 76 at Mission Avenue, Foussat Street, and Alex Road	Hotel, Multi-Family Residential, Commercial/Retail	150 Hotel Rooms, 350 Residential Dwelling Units, 63,000 square feet of commercial/retail	Under Review
2	Mission Flats	Douglas Drive and SR 76	Multi-Family Residential, Commercial/Retail	137 Residential Dwelling Units, 4,200 square feet of commercial/retail	Approved
3	Oceanpointe Multi-Family	South of SR 76 off Stage Coach Road	Multi-Family Residential	158 residential dwelling units	Approved
4	Alta Oceanside	North Coast Highway and Costa Pacifica Way	Mixed-Use Residential	A proposed 5 story mixed-use development project consisting of 5,615 square feet of ground floor commercial space and a total of 309 residential rental units with 10 of the units being located in a freestanding 10-plex located on the southwest portion of the site.	Approved
5	North River Farms	North River Road and Wilshire Road	Mixed-Use Residential	Proposed development plan to allow a 725-unit residential development with associated agricultural, commercial, and recreational uses on a 177-acre site	Approved
6	Rio Rockwell	Old Grove Road and Frazee Road	Rezone for residential use	Rezone site to allow a 78-unit residential project	Approved
7	Nagata (North River Road Planned Block Development)	North River Road and Calle Joven	Planned Block Development	General Plan Amendment from Limited Industrial (LI) to Medium Density Residential C (RMD-C), Zone Amendment from IL to RM-C-PBD, and adoption of a Planned Block Development to provide for development standards and design guidelines for future development	Under Review
8	Kawano (North River Road Planned Block Development)	North River Road and Calle Joven	Planned Block Development	General Plan Amendment from Limited Industrial (LI) to Medium Density Residential C (MDC-R), Zone Amendment	Under Review

6.4 CUMULATIVE IMPACT ANALYSIS

6.4.1 Aesthetics

The proposed project would contribute to the changing visual character of the area. These visual changes would be most evident for residents in the neighboring residential developments to the east and south, and recreationalists utilizing the San Luis Rey River bike trail. However, cumulative development would not represent a substantial degradation in visual quality or a substantial impediment to scenic views as described in Chapter 4.1 of this EIR. The project would be constructed on an infill site in an area that already consists of residential development and related land uses. Although the project would propose two-story homes adjacent to existing one-story residential development, it would conform to the general aesthetic of the surrounding residential community character, which includes both one and two story single-family and multi-family units. Similar to the proposed project, all cumulative projects are required to participate in the City of Oceanside's design review process, which includes review of the proposed landscaping plan as well as a consistency finding with regard to proposed building design, mass, bulk, and height in the context of the existing landscaping.

The project would introduce a new source of light and glare to the project area. The cumulative projects are also anticipated to contribute new sources of light and glare as projects are constructed. Each cumulative project would be required to address the effects of light and glare on sensitive receptors and provide mitigation as necessary. As described in Section 4.1, Aesthetics, the project site is surrounded by existing transportation corridors, residential uses, and San Luis Rey River. In addition, the project would not be anticipated to result in substantial light and glare because proposed architecture does not include the use of reflective building materials and finishes, reflective lighting structures, metallic surfaces, nor overhead street lighting. In addition, the proposed project and each cumulative project would be required to comply with the City of Oceanside Municipal Code Chapter 39 Light Pollution Regulations. Therefore, cumulative impacts related to visual resources would be less than significant.

6.4.2 Air Quality

Air pollution is largely a cumulative impact and is cumulatively evaluated based on the air basin. The nonattainment status of regional pollutants is a result of past and present development, and SDAPCD develops and implements plans 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. The San Diego Air Basin has been designated as a federal nonattainment area for ozone (O_3), and a state nonattainment area for O_3 and particulate matter (PM_{10}, and $PM_{2.5}$). PM_{10} and $PM_{2.5}$ emissions associated with construction generally

result in near-field impacts. As discussed in Chapter 4.2, the emissions of all criteria pollutants, including PM_{10} and $PM_{2.5}$, would be below the significance levels.

As described in Chapter 4.2 of this EIR, construction of the project would result in the temporary addition of pollutants to the local SDAB caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). The project's construction emissions were estimated using CalEEMod and compared to the San Diego Air Pollution Control District (SDAPCD) Thresholds of Significance. It was determined that no direct construction impacts are expected, and mitigation measures for criteria pollutants and fugitive dust from construction are not required. The project applicant has indicated that as a design feature, all diesel equipment would be Tier 4 with DPF and that the grading contractor would follow Best Management Practices (BMPs) for grading as it relates to minimizing air quality emissions and would comply with all SDAPCD rules and regulations. Therefore, the project's air pollutant emission impact during construction is determined to be less than significant.

The project would generate criteria pollutant emissions during operation from area, energy, and mobile sources. The emissions were estimated using CalEEMod and compared to SDAPCD's significance thresholds for operation. It was determined that the project would not exceed the mass emissions significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ during operation, and therefore, project operational impacts are determined to be less than significant.

Regarding air quality plan consistency and anticipation of cumulative air quality impacts in local air quality planning, the Regional Air Quality Strategy (RAQS) relies on San Diego Association of Governments (SANDAG) growth projections based on population, vehicle trends, and land use plans developed by the cities and by the County of San Diego as part of the development of their general plans. As such, projects involving development that is consistent with the growth anticipated by local plans would be consistent with the RAQS. However, if a project involves development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality. The proposed project would be consistent with the existing General Plan land use designation and zoning for the site (City of Oceanside 1986); therefore, the proposed project would be consistent with the RAQS.

Similar to the project, cumulative projects would be required to prepare an Air Quality Assessment to determine potential impacts related to air quality. As the project would not exceed SDAPCD's mass daily significance thresholds during construction or operation, the cumulative project impact would be less than significant.

6.4.3 Biological Resources

Cumulative impacts concerning biological resources are planned for and addressed in adopted habitat conservation plans, natural community conservation plans, and other applicable approved conservation plans for the purposes of protecting biological resources. Generally, if a project is consistent with applicable conservation plans, the project would not result in cumulatively considerable biological resource impacts. In an effort to avoid and minimize cumulative impacts to sensitive biological resources throughout San Diego County, the City of Oceanside participates in a regional conservation planning effort, the North San Diego County Multiple Habitat Conservation Program (MHCP). This planning effort provides a regional plan for preservation and mitigation of sensitive biological resources within San Diego County. General biological resource core areas as well as essential wildlife linkages are outlined in this plan. The Oceanside Subarea Plan further addresses specific preserve areas, implementation techniques, and management parameters unique to land within the City consistent with the MHCP. This program addresses cumulative biological efforts on a jurisdictional and regional level for MHCP-covered species in the MHCP Plan Area.

The proposed project was assessed to ensure consistency with the City of Oceanside MHCP Draft SAP by reviewing the applicable SAP standards against the proposed project. The proposed project is located adjacent to the City's SAP Hardline Preserve and WCPZ that includes the SLR River corridor that supports a variety of native wildlife including listed bird species; the project site does not support narrow endemic species or wetlands but is located adjacent to wetland habitat.

As analyzed in Chapter 4.3 of this EIR, implementation of the proposed project would result in 7.0 acres of direct impacts to non-native grassland (MHCP/SAP Habitat Group E) due to vegetation clearing, grubbing, and grading construction activities. Although the on-site non-native grassland has limited biological function and value, it is considered to be a sensitive habitat type; therefore, project impacts to non-native grassland would be considered potentially significant and would require mitigation measures to reduce impacts to a level below significance. Implementation of mitigation measure **MM-BIO-1** would be required.

No special status plant species or narrow endemic species were identified on site, and none have at least a moderate potential to occur on site based predominately on the lack of potentially suitable habitat, soil, and/or other conditions. In addition, no other special status plant species were determined to have at least a moderate potential to occur within the project site. Furthermore, No special status wildlife species were observed and/or detected within the proposed project site and none have at least a moderate potential to occur on site predominately based on the lack of potentially suitable habitat and/or conditions on site. However, the three federally listed species (i.e., vireo, rail, and flycatcher) that occur off site within the adjacent

riparian habitat in the San Luis Rey River channel are well documented within the flood control channel that is separated from the project property by an elevated levee hosting a public bikeway. The proposed project would be required to incorporate the City of Oceanside MHCP Draft SAP consistent measures outlined in Chapter 4.3 to control elevated noise or fugitive dust during the vireo, rail, and flycatcher breeding season to avoid any adverse effects to breeding vireo, rail, and flycatcher within the San Luis Rey River habitat located adjacent to the project site; and implementation of **MM-BIO-2** and **MM-BIO-3** would further ensure avoidance of inadvertent direct impacts to sensitive habitat outside the proposed project footprint.

The project proposes to remove and replace a portion of a storm water pipeline and associated outfall within a relatively small area along the eastern edge of the adjacent Preserve. This has the potential to disturb habitat along a CDFW non-wetland jurisdictional streambank. However, project construction would include incorporation of BMPs outlined in the Biological Resources Technical Report, Geotechnical Report, and Drainage Study; construction activities would be monitored by a qualified biologist; the area would be revegetated to pre-impact condition following construction; and mitigation measures **MM-BIO-1** through **MM-BIO-4** would be implemented. With incorporation of these measures, the project is expected to be consistent with this conditionally allowed use in the adjacent Preserve.

The MHCP was designed to compensate for the loss of biological resources throughout the program's region; therefore, projects that conform to the MHCP as specified by the City of Oceanside SAP and implementing ordinances would not result in cumulatively considerable impacts for those biological resources adequately covered. Although the proposed project would result in impacts to 3.5 acres of non-native grassland, project implementation of proposed mitigation measures **MM-BIO-1** through **MM-BIO-4** outlined in Chapter 4.3 would ensure project and cumulative impacts would be reduced to a level of less than significant, and conflict with the City's MHCP SAP would not occur. Each cumulative project would be required to prepare a Biological Resources Study to evaluate project-specific impacts.

6.4.4 Cultural Resources

As discussed in Chapter 4.4, Cultural Resources, there is the potential for archaeological and paleontological resources to occur in the underlying sediments beneath the fill material. Monitoring on site during grading and excavation activities would reduce potential impacts to less than significant levels. Cultural and paleontological resources are localized and generally unique at each site. All significant cultural and paleontological resources associated with the proposed project and other cumulative projects would be mitigated on a project-by-project basis; therefore, cumulative impacts to the region's known and yet-to-be-discovered cultural and paleontological resources would be less than significant.

6.4.5 Energy

The project site is located in an area that is served by existing utilities and public services. The proposed project would result in an increase in local consumption of both electricity and natural gas. However, the project's energy demands would be consistent with the anticipated level of economic development and growth in the region, and SDG&E would have sufficient available capacity to serve the proposed project. Further the project would incorporate energy-efficient elements to ensure that energy consumption of the proposed project would not be wasteful or inefficient, as outlined in Chapter 3 and Chapter 4.5 of this EIR. Similarly, development of the cumulative projects listed in Table 6-1, Cumulative Project List, would be required to assess project-specific impacts related to energy consumption and include design measures consistent with the most recent building code as it relates to energy use, Therefore, the proposed project, in combination with cumulative projects, would not have a cumulative impact on energy.

6.4.6 Geology and Soils

Geotechnical conditions are unique to each site and are not cumulatively related. Approved projects and those under review are subject to soils and stability analysis and cannot be constructed unless each project is determined to be geotechnically feasible. Therefore, based on the analysis provided in Chapter 4.6, there would be no cumulative impacts associated with slopes and soil stability. With regard to seismicity, the project and any future development would expose additional property and people to ground shaking from earthquakes. However, this impact can be mitigated by compliance with the California Building Code's seismic requirements. Therefore, no significant cumulative impacts related to geology issues would occur.

6.4.7 Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions are said to result in an increase in the Earth's average surface temperature, commonly referred to as "global climate change." Global climate change is a cumulative impact; a project contributes to this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective (CAPCOA 2008). This approach is consistent with that recommended by the California Natural Resource Agency, which noted in its Public Notice for the proposed CEQA amendments that the evidence before it indicates that in most cases, the impact of GHG emissions should be considered in the context of a cumulative impact, rather than a project-level impact (CNRA 2009a). Similarly, the Final Statement of Reasons for Regulatory Action for amendments to the CEQA Guidelines confirms that an EIR or other environmental document must analyze the incremental contribution of a project to GHG levels and determine whether those emissions are cumulatively considerable (CNRA 2009b).

Construction of the project would result in GHG emissions, which are primarily associated with the use of off-road construction equipment, on-road vendor trucks, and worker vehicles. The construction GHG emissions as calculated in CalEEMod are shown in Chapter 4.7, Table 4.7-3. Total cumulative or combined construction emissions (from 2023 and 2024) that are generated prior to operations will ultimately contribute to yearly emission levels of the project as a whole. Because of this, it is acceptable to average the total construction emission over a 30-year period which represents an average lifecycle of a project. GHGs related to construction are shown in Table 4.7-3. Based on this, it is expected that the 30-year average would be 17.18 MT CO_2e per year. Operational GHG emissions generated from area, energy, mobile, solid Waste, and water uses was also calculated using CalEEMod. Operational emissions from the proposed project would also include amortized construction emissions from Table 4.7-3. Based on these findings, combined operational and construction GHG emissions would generate approximately 531.48 Metric Tons of CO_2e each year during a typical operational year. The expected operational emissions for the proposed project would generate roughly 3.29 MT CO_2e/SP. Additionally, the project would not exceed the City's 900 MT CO_2e screening threshold.

Additionally, as outlined in Chapter 3 of this EIR, the project would incorporate sustainability design features to reduce potential energy and water usage, promote pedestrian and bicycle travel, and reduce potential greenhouse gas emissions. These sustainability features include solar systems for each home within the development, installation of 90% light-emitting diode (LED) lighting or other high-efficiency lightbulbs, energy star or equivalent energy efficient appliances, low-flow water fixtures and appliances, drought-tolerant landscaping and water efficient irrigation systems on-site, and bicycle parking.

Furthermore, as outlined in Chapter 4.7, Tables 4.7-5 and 4.7-6, the project would not interfere with implementation of any GHG reduction goals for 2030 or 2050 because the project would not exceed the 900 MT CO_2e threshold of significance for GHG emissions impacts. The project would not conflict with SB 32 and EO S-3-05.

Project impacts related to GHG emissions were determined to be less than significant. Development of the cumulative projects listed in Table 6-1, Cumulative Project List, would emit GHGs during construction and operation that could result in a potential cumulative impact and all cumulative projects would similarly be required to prepare a GHG Study to analyze project-specific impacts and provide any necessary mitigation measures.

6.4.8 Hazards and Hazardous Materials

Past, current, and reasonably foreseeable projects in the region will result in the use and transport of incrementally more oils, greases, and petroleum products for operation purposes. Although these could be subject to accidental spillage, there is no quantifiable cumulative effect since accidents are

indiscriminate events, not related or contributory to one another. Provided that individual projects adhere to current laws governing storage, transportation, and handling of hazardous materials, no significant cumulative hazards or threats to human health and safety are anticipated.

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 project proposes residential development, which is not typically considered a source of substantial hazardous materials. See Chapter 4.8, Hazards and Hazardous Materials, for additional details.

Similar to the proposed project, cumulative projects would be required to analyze specific impacts related to hazards and hazardous materials as well as remediate any hazardous conditions that could occur.

Proposed project impacts related to hazards and hazardous materials were determined to be less than significant, and therefore the project would not combine within any cumulative projects in a manner that would increase potential exposure to hazards. Therefore, cumulative impacts would be less than significant.

6.4.9 Hydrology and Water Quality

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). Within this Hydrologic Sub-Area, downstream impaired 303(d) listed water bodies include the Pacific Ocean Shoreline, San Luis Rey River Mouth impaired by enterococcus, total coliform, indicator bacteria; and San Luis Rey River and Lower Stream impaired by chloride, enterococcus, fecal coliform, phosphorus, total dissolved solids, total nitrogen, toxicity, and indicator bacteria. Total Maximum Daily Loads (TMDLs) have been accordingly established to address these pollutants for these impaired water bodies. Considering the downstream waters are impaired by these pollutants, the potential pollutants of concern that may be generated by the project based on the proposed residential use are sediment, nutrients, organic compounds, trash and debris, oxygen demanding substances, bacteria and viruses, and pesticides.

The project, in conjunction with other future projects, may affect water quality on a cumulative scale; however, future projects are required to comply with applicable federal, state, and city

regulations for stormwater and construction discharges, including the application of BMPs, which would reduce cumulative impacts to water quality to a level below significance. As outlined in Chapter 4.9 of this EIR, implementation of the proposed project would not result in impacts related to water quality, drainage and stormwater capacity, flooding, or groundwater. The project would implement BMPs and project-specific measures outlined in the project-specific SWQMP and SWPPP to reduce potential effects. The project would be in compliance with state and city water quality standards. Thus, the project would not combine with existing urban runoff or that of cumulative projects. Compliance with stormwater standards would preclude a cumulatively considerable contribution to downstream water quality.

6.4.10 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 project site is zoned RS-Single family residential, corresponding with the City of Oceanside's General Plan designation of SFD-R. Proposed development would be consistent with the City's land use and zoning designations for the site, and the proposed project would be in compliance with the Surplus Lands Act which requires that 15% of the proposed homes, or 8 units, be affordable (which is one (1) more affordable unit than the 7 required under the density bonus, as described in Chapter 3 of this EIR).

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. As analyzed in response to Threshold 2) in Chapter 4.10, and as outlined in Table 4.10-1, the project would not conflict with any applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. 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. Similar to the proposed project, final site plans of all cumulative projects would be subject to review and approval by the City. Therefore, cumulative project impacts related to land use and planning is determined to be less than significant.

6.4.11 Noise

Cumulative noise impacts could occur as a result of excess temporary construction and/or long-term operational noise from the combination of cumulative project noise sources. As described in Chapter 4.11 of this EIR, the proposed project would not result in significant construction or operational noise impacts, and would not result in generation of excessive groundborne vibration. Although all of the projects in the cumulative projects list could result in significant noise impacts related to construction and/or operations, these projects would be required to comply with the same regulations pertaining to noise levels and exposure to noise and vibration. These regulations would ensure that noise impacts would remain below a level of significance. Additionally, not all projects would be in construction during the same time, and not all cumulative projects would result in significant operational noise impacts, based on the proposed land use. Similar to the proposed project, cumulative projects would be required to prepare a Noise Study to assess project-specific noise impacts. Therefore, the proposed project, in combination with the cumulative projects, would not result in a significant cumulative noise impact.

6.4.12 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 Chapter 4.12, the project would construct 54 residential units, which would have the potential to house approximately 151 people, based on the City's Housing Element of an average household size of 2.8 persons per dwelling unit (City of Oceanside 2013). The City's General Plan has designated the project site as Single Family Detached Residential (SFD-R) and the project site is zoned RS-Single family residential. The proposed project would be consistent with the designated land use and zoning for the site. Further, implementation of the proposed project would be consistent with the SANDAG growth projections, as well as the City's RHNA goals. Therefore, although the proposed project would directly lead to additional growth within the City, the increase of approximately 151 people at the project site is considered to be nominal, and this growth has been accounted for in the City's General Plan.

The project would not lead to indirect growth, as the project does not propose substantial infrastructure improvements that would allow for additional unplanned growth in the area. It is noted that the surrounding area has already been developed for residential uses, and land that has not been developed is designated as Open Space, limiting further substantial development of the area. Therefore, the proposed project would not induce substantial unplanned population growth in an area, and would not result in cumulative impacts to population and housing.

6.4.13 Public Services

As detailed in Chapter 4.13, Public Services and Facilities, the proposed project would involve an incremental increase in demand for public services. As analyzed in Chapter 4.12, the project would be adequately served by existing police and fire protection services, as well as existing school and park facilities, and would not require new or expanded facilities to serve the site that would cause physical environmental impacts.

The projects in the cumulative project list could contribute to a cumulatively considerable use of public services, including land development projects that will allow considerable growth in the Cities of Oceanside. However, these projects would be required to analyze such project-specific impacts to public services, and availability of services. In addition, the cumulative projects and the proposed project would each be required to pay development impact fees, school facilities fees, and in-lieu park fees, as stipulated by the City of Oceanside Municipal Code and California Government Code Section 65996. These regulations would ensure that impacts would remain below a level of significance. Therefore, the proposed project, in combination with the cumulative projects, would not result in a cumulative considerable impact related to public services and facilities.

6.4.14 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.

As described in Chapter 3 of this EIR, Project Description, approximately 24% of the project site is planned as open space. A total of approximately 27,023 square-feet of common open space is proposed, which consists of central green space, and the north and south sides of the eastern landscaped area. Each residence would have a private backyard, which would provide a total of approximately 49,140 square-feet of private open space within the project site (approximately 910 square-feet per residence). Overall, a total of 76,163 square-feet of useable open space would be provided by the project. Three hundred (300) square-feet of open space per unit is required by the City, and the project proposes 1,410 square-feet of open space per unit.

The City's parks and recreation facilities consist of 15 community and 17 neighborhood parks, one regional park, three recreation centers (Junior Seau Community Center, Joe Balderamma Recreation Center, and Melba Bishop Recreation Center), a YMCA and Boys and Girls Club, two senior centers, five skateparks, two pools, and Oceanside's 3.5 miles of beach, harbor and the pier. Residents can also enjoy more than 115 acres of school play areas as provided through Memorandums of Understanding (MOUs) with the Oceanside Unified School District. The

closest neighborhood park to the project site is the 4-acre Fireside Park located approximately 0.50 mile south of the project site. The closest community parks to the project site include 19-acre Buddy Todd Park, located approximately 2 miles south of the project site; 27-acre Libby Lake Park, located 2 miles northeast of the project site; and 29-acre Mance Buchanon Park, located approximately 2.5 miles northeast of the project site. The 75-acre Guajome Regional Park is located approximately 3.8 miles east of the project site. Additionally, the San Luis Rey River Trail is located adjacent to the project to the north and the west. The trail runs 7.2 miles adjacent to the San Luis Rey River with 10 access points for pedestrians and cyclists (City of Oceanside 2019).

According to the City's General Plan – Community Facilities Element, the City's goal is to provide a minimum of five acres of developed "community parks" per 1,000 residents within the City (City of Oceanside 1990). As described above, the City currently has a total of 797.7-acres of existing parkland. As of 2019, the population within the City of Oceanside was 175,389, resulting in a parkland service ratio of 4.5 acres per 1,000 residents. While this is below the current standard of 5 acres per 1,000 residents, the existing inventory includes only two acres of the 465-acre El Corazon Specific Plan area. Planned development of El Corazon Park will result in an additional 210 acres of parkland. With completion of El Corazon Park, the parkland service ratio will increase to 5.7 acres per 1,000 residents (City of Oceanside 2021).

Although the project would potentially increase the utilization of existing parks and recreational facilities within the City; it is determined that the combination of proposed project open space amenities on site, existing park and recreational facilities in the area, and proposed future recreational facilities within the City would adequately serve future residents of the project site. Additionally, the project developer would be responsible for applicable Development Services Department Impact Fees. Such fees for new residential development within the City go towards facilities such as (but not limited to) parks, public facilities, and schools. Furthermore, the increase of approximately 151 people at the project site is considered nominal, and this growth has been accounted for in the City's General Plan.

In accordance with the City's Municipal Code, Chapter 32D, cumulative projects would be required to either 1) create dedicated park land within or partly within the project site, whose acreage would be determined by the City, 2) dedicate land usable for recreation purposes in addition to paying a portion of the park impact fee, or 3) pay the entire park impact fee. Therefore, it is determined that the project would not result in cumulative impacts to recreation facilities within the City.

6.4.15 Transportation

Future potential development of the project site in addition to cumulative projects in the study area could result in cumulative impacts related to transportation and circulation. The Traffic

Impact Analysis prepared for the project analyzed cumulative projects in the study area that would add traffic to the local circulation system in the near future, in combination with the proposed project. Cumulative impacts considered in the Traffic Impact Analysis included the Ocean Kamp, Mission Flats, and Oceanpointe Multi-Family cumulative projects outlined in Table 6-1 above. Figure 7-1 in Appendix N to this EIR shows the Cumulative Projects only traffic volumes on the existing street network. As analyzed in Chapter 4.15, implementation of the proposed project would not result in any significant impacts to transportation and circulation in the study area.

It is expected that Traffic Impact Analyses would be prepared for cumulative projects consistent with City Guidelines, to fully analyze project-specific impacts on-site and in the study area, and provide mitigation measures, design features, or improvements recommendations to address any potentially significant impacts. Furthermore, all cumulative projects would be required to comply with applicable City regulations related to transportation and circulation, as the project does. Therefore, it is determined that cumulative impacts to transportation as a result of project implementation would be less than significant.

6.4.16 Tribal Cultural Resources

Each cumulative project subject to AB 52 would require tribal consultation on a case-by-case basis to identify any potential TCRs affected by each cumulative project. It is anticipated that each cumulative project would require mitigation similar to that required of the project to reduce potentially significant impacts to TCRs to a level below significance. With implementation of project-specific mitigation and compliance with applicable regulations related to Tribal Cultural Resources, cumulative impacts would be less than significant.

6.4.17 Utilities and Service Systems

As with public services, cumulative impacts to utilities and services systems would result when projects combine to increase demand for utilities and service systems such that additional facilities must be provided or expanded. As with many other environmental issue areas, impacts to utilities may be less than significant at a project level, but when combined with other projects, effects could lead to a cumulative impact. The proposed project, in combination with cumulative projects, would result in an increase in water demand, wastewater generation, and solid waste generation. As discussed in Chapter 4.17, Utilities and Service Systems, the City of Oceanside, as the provider of wastewater facilities, would confirm availability of adequate wastewater treatment capacity, prior to approval of the proposed project. This, in conjunction with provision of any required developer impact fees proportionate to the increase in demand, would minimize impacts to utilities and service systems. Each cumulative project would be required to provide developer impact fees and undergo similar approval at the discretion of the City of Oceanside. As analyzed in Chapter 4.17, implementation of the proposed project would not result in

significant impacts related to water or wastewater supply or capacity, nor storm drainage and solid waste capacity. The proposed development would be adequately served by existing City facilities and would not require expansion of water, wastewater, storm drain or solid waste facilities. Therefore, it is determined that the project would not result in cumulative impacts to utilities and service systems.

6.4.18 Wildfire

The project area, like all of San Diego County, is subject to seasonal weather conditions that can heighten the likelihood of fire ignition and spread. Fire history is an important component of wildfire analysis. Wildfire history information can provide an understanding of fire frequency, fire type, most vulnerable project areas, and significant ignition sources, amongst others. The California Department of Forestry and Fire (CAL FIRE) maintain the Fire and Resource Assessment Program database, which was used to evaluate the project site's fire history to determine whether large fires have occurred in the project area, and thus the likelihood of future fires. Per the recorded fire history database, the site has not been subject to wildfire (CAL FIRE 2021). Recorded wildfire within 5 miles of the project site range from 167 acres (River fire in 2014) to 15,186 acres (Pulgas-Basoline Complex fire in 2014).

The project site is not located within or adjacent to a State Responsibility Area (SRA) or Local Responsibility Area (LRA) Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2009). The project site is located within an urbanized and developed area of the City. Although the project site borders the San Luis Rey River corridor, this wildland is not in an area subject to high fire risk. The nearest VHRHSZ is a LRA located approximately 0.3 miles southwest of the proposed project site (CAL FIRE 2009). As discussed in Chapter 4.8, Hazards, the project would not conflict with the regional or city emergency response plans, and the City's Fire Department has determined the site would have adequate emergency access.

Final site plans for the proposed project and all cumulative projects would be subject to review and approval by City Fire, prior to project development. All cumulative projects would be required to assess wildfire risk at the development site and in the surrounding area and provide mitigation as necessary. As the project would not result in significant impacts related to wildfire, cumulative impacts are determined to be less than significant.

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