

4.11 Population and Housing

This section of the EIR addresses potential population and housing impacts from future buildout of the Housing Element Update (HEU) housing sites. Data for this section was obtained from 2000 and 2010 Census Data (SANDAG 2015a); SANDAG estimates (SANDAG 2015b and 2015c); SANDAG Series 12 forecasts (SANDAG 2015e); as well as San Diego Forward (SANDAG 2015d) and the associated 2010–2020 Regional Housing Needs Assessment (RHNA; SANDAG 2011).

4.11.1 Existing Conditions

4.11.1.1 Population, Housing, and Employment Trends

SANDAG is the metropolitan planning organization (MPO) responsible for developing demographic projections, including population, household, and employment projections, for the 19 jurisdictions in the County, including the City of Encinitas. SANDAG is required to update these forecasts every four years. The regional and City of Encinitas population and housing trends are discussed further below.

a. Population

Region

The current (2015) estimated population in the San Diego region is 3,227,496 people (Table 4.11-1; SANDAG 2015b). Per the SANDAG forecasts (SANDAG 2015e), the regional population is expected to increase to 3,535,000 by 2020 and to 4,026,131 by 2035. Thus, the regional population is expected to grow 19.8 percent over the next 20 years. This equates to a future growth rate of approximately 0.99 percent per year. The future forecasted growth rate is higher than the 0.91 percent per year growth rate experienced annually over the last 10 years.

City of Encinitas

As shown in Table 4.11-2, the City is currently estimated to have a population of 61,518 people, which is 2 percent of the regional population (SANDAG 2015c). The City's population is forecasted to increase by 12,750 to 74,268 people by the year 2035 (SANDAG 2015e). This 17.2 percent increase over 20 years equates to a growth rate of 0.86 percent per year. Compared to the growth between 2000 and 2010 (2.53 percent over 10 years; 0.25 percent per year); the future 2015 to 2035 City population growth rate is forecasted to more than triple (SANDAG 2015a, 2015c, and 2015e).

**Table 4.11-1
Regional Population and Future Population Forecasts**

Unit	Census		Change from 2000 to 2010		Estimated	Forecasted				Change from 2015 to 2035	
	2000	2010	Numeric	Percent	2015	2020	2025	2030	2035	Numeric	Percent
Total Population	2,813,833	3,095,313	281,480	9.1%	3,227,496	3,535,000	3,703,824	3,870,000	4,026,131	798,635	19.8%
Household	2,716,820	2,993,347	276,527	9.2%	3,120,296	3,405,068	3,567,068	3,725,900	3,873,175	752,879	19.4%
Group Quarters - Civilian	55,687	58,369	2,682	4.6%	64,786	76,336	83,160	90,504	99,360	34,574	34.8%
Group Quarters - Military	41,326	43,597	2,271	5.2%	42,414	53,596	53,596	53,596	53,596	11,182	20.9%
Total Housing Units	1,040,149	1,158,076	117,927	10.2%	1,183,211	1,262,488	1,318,944	1,369,807	1,417,520	234,309	16.5%
Single-Family	628,652	697,470	68,818	9.9%	711,646	728,566	740,960	750,022	755,477	43,831	5.8%
Multiple Family	364,636	417,965	53,329	12.8%	428,943	493,243	538,333	581,143	624,419	195,476	31.3%
Mobile Homes	46,861	42,641	-4,220	-9.9%	42,622	40,679	39,651	38,642	37,624	-4,998	-13.3%
Occupied Housing Units	994,677	1,086,865	92,188	8.5%	1,126,873	1,200,966	1,257,010	1,309,474	1,357,084	230,211	17.0%
Single-Family	605,810	662,928	57,118	8.6%	684,498	695,483	708,694	719,623	725,994	41,496	5.7%
Multiple Family	345,351	385,183	39,832	10.3%	403,451	467,321	511,037	553,415	595,559	192,108	32.3%
Mobile Homes	43,516	38,754	-4,762	-12.3%	38,924	38,162	37,279	36,436	35,531	-3,393	-9.5%
Overall Vacancy Rate	16.1%	6.1%	-10.0%	-163.1%	4.8%	4.9%	4.7%	4.4%	4.3%	-0.5%	-11.7%
Single-Family	3.6%	5.0%	1.4%	27.4%	5.5%	4.5%	4.4%	4.1%	3.9%	-1.6%	-40.9%
Multiple Family	5.3%	7.8%	2.5%	32.3%	6.2%	5.3%	5.1%	4.8%	4.6%	-1.6%	-34.1%
Mobile Homes	7.1%	9.1%	2.0%	21.5%	7.1%	6.2%	6.0%	5.7%	5.6%	-1.5%	-27.6%
Persons per Household	2.73	2.75	0.02	0.8%	2.77	2.84	2.84	2.85	2.85	0.09	3.0%

SOURCE: SANDAG Census Data (SANDAG 2015a), SANDAG Forecasts (SANDAG 2015b), and SANDAG Series 12 Model (SANDAG 2015e).

**Table 4.11-2
City of Encinitas Population and Future Population Forecasts**

Unit	Census		Change from 2000 to 2010		Estimated	Forecasted				Change from 2015 to 2035	
	2000	2010	Numeric	Percent	2015	2020	2025	2030	2035	Numeric	Percent
Total Population	58,014	59,518	1,504	2.53%	61,518	68,551	71,219	73,153	74,268	12,750	17.2%
Household	57,455	58,990	1,535	2.60%	60,990	67,829	70,356	72,098	73,012	12,022	16.5%
Group Quarters	559	528	-31	-5.87%	528	722	863	1,055	1,256	728	58.0%
Total Housing Units	23,843	25,481	1,638	6.43%	25,818	26,331	27,339	27,895	28,135	2,317	8.2%
Single-Family	17,713	20,685	2,972	14.37%	20,998	21,326	21,536	21,753	21,897	899	4.1%
Multiple Family	5,358	4,020	-1,338	-33.28%	4,081	4,251	5,053	5,390	5,490	1,409	25.7%
Mobile Homes	772	776	4	0.52%	739	754	750	752	748	9	1.2%
Occupied Housing Units	22,830	24,082	1,252	5.20%	24,792	25,288	26,292	26,877	27,120	2,328	8.6%
Single-Family	7,018	19,577	2,559	13.07%	20,183	20,532	20,769	21,021	21,168	985	4.7%
Multiple Family	5,114	3,778	-1,336	-35.36%	3,907	4,064	4,833	5,161	5,258	1,351	25.7%
Mobile Homes	698	727	29	3.99%	702	692	690	695	694	-8	-1.2%
Overall Vacancy Rate	4.44%	5.81%	1.37%	23.63%	3.97%	3.96%	3.83%	3.65%	3.60%	-0.37%	-10.4%
Single-Family	3.92%	5.35%	1.43%	26.73%	3.88%	3.72%	3.56%	3.37%	3.33%	-0.55%	-16.6%
Multiple Family	4.55%	6.02%	1.47%	24.42%	4.26%	4.40%	4.35%	4.25%	4.23%	-0.03%	-0.8%
Mobile Homes	9.58%	6.31%	-3.27%	-51.82%	5.01%	8.22%	8.00%	7.58%	7.22%	2.21%	30.7%
Persons per Household	2.52	2.45	-0.07	-2.72%	2.46	2.68	2.68	2.68	2.69	0.23	8.6%

SOURCE: SANDAG Census (SANDAG 2015a), SANDAG Estimation (SANDAG 2015b), and SANDAG Series 12 Model (SANDAG 2015e).

b. Housing

Region

The San Diego region is currently (2015) estimated to have 1,183,211 housing units, including 711,646 single-family (60 percent), 428,943 multi-family (36 percent), and 42,622 mobile homes (4 percent). The current regional vacancy rate is 4.8 percent. Considering the number of people living in a household and the number of occupied housing units, the persons per household regional average is 2.77 (SANDAG 2015b).

By 2035, the regional housing supply is forecasted to increase to 1,417,520, which would be 16.5 percent growth over 20 years or 0.83 percent increase per year (SANDAG 2015e). Compared to the 2000 to 2010 period when population increased 9.1 percent over 10 years (0.91 percent per year) (SANDAG 2015a), the future housing growth rate in the region is expected to decrease. Over the last 10 years, housing growth percentage rates were similar between single-family and multi-family units (SANDAG 2015a). However, the future 2035 anticipated housing unit growth is expected to involve a much higher percent increase in multi-family homes (32.3 percent increase of multi-family units between 2015 and 2035) than single-family homes (5.7 percent increase of single-family units between 2015 and 2035) (SANDAG 2015e). Overall, 83 percent of the new housing units in the region would be multi-family units.

City of Encinitas

The City currently (2015) is estimated to have approximately 25,818 housing units, consisting of 20,998 single-family (81 percent), 4,081 multi-family (16 percent), and 739 (3 percent) mobile homes. Compared to the region, the City has a higher percentage of single-family units and a lower percentage of multi-family units. The current overall vacancy rate is 3.97 percent. Based on the number of occupied units and the household populations, the number of people per household is currently estimated to be 2.46 (see Table 4.11-2; SANDAG 2015c).

4.11.2 Regulatory Framework

4.11.2.1 Senate Bill 375 and Assembly Bill 1233

Senate Bill 375 (SB 375), the Sustainable Communities and Climate Protection Act, was approved in 2008. SB 375 focuses on reducing greenhouse gas emissions, as discussed further in Section 4.6.2. As a part of this effort, this act requires that regional housing needs be addressed in conjunction with regional transportation in order to integrate housing, land use, and transportation planning together. In the San Diego Region, this unified regional planning effort is completed by SANDAG via San Diego Forward.

SB 375 also requires the RHNA be completed every eight years and, if a jurisdiction does not meet this requirement, penalties may be incurred in accordance with SB 375 and Assembly Bill 1233. As the City of Encinitas did not meet this requirement, the City must address its deficit for the previous housing element cycle (2005–2010). See the below RHNA discussion.

4.1.1.2.2 San Diego Forward

San Diego Forward (SANDAG 2015d) is a comprehensive regional planning document that sets the vision for the future of the San Diego Region and includes various planning document components to guide future improvements to meet that vision. As stated by SANDAG and in accordance with SB 375, the strategy set forth in San Diego Forward is to “focus housing and job growth in the urbanized areas where there is existing and planned infrastructure, protect sensitive habitat and open space, invest in a network that gives residents and workers transportation options that reduce GHG emissions, promote equity for all and implement the Plan through incentives and collaboration.” In addition to transportation, greenhouse gas, sustainable communities strategy and other specific guidance, San Diego Forward addresses regional growth and housing needs utilizing regional growth forecast and the Regional Housing Needs Assessment. The regional SANDAG growth information¹ is included under Section 4.11.1.1 above, and the RHNA is discussed further below.

4.11.2.3 Regional Housing Needs Assessment

High housing cost and affordable housing is a known issue of the region as well as for the City. To respond to state population and household growth, and to ensure the availability of decent affordable housing for all income groups, the State enacted a law that requires SANDAG and other councils of governments to periodically distribute the State identified housing need for their regions. As discussed in Section 3.2, local jurisdictions are required by State law (Government Code Section 65580 et seq.) to plan for their fair share of projected housing reconstruction needs in their region over a specified planning period. Housing unit construction goals are set by the State Department of Housing and Community Development and allocated to cities through regional planning agencies. Housing and Community Development is responsible for determining this regional need, initiating the process by which each region must then distribute their share of statewide need to all jurisdictions within its region. Future regional housing needs are calculated in terms of the following three factors:

1. The number of units needed to accommodate forecast population growth;
2. The number of units needed to replace demolition due to attrition in the housing stock (i.e., fire damage, obsolescence, redevelopment, and conversion to non-housing uses); and
3. Maintenance of an ideal vacancy rate for a well-functioning housing market (i.e. vacancy allowance);

¹Note that the SANDAG forecasts utilized in San Diego Forward were for the 2012 to 2050 period, and the SANDAG information above is based on the current 2015 estimate to the 2035 forecast. The time period utilized for this analysis is appropriate considering the 2015 estimate data is the most current available information for the existing conditions and that the proposed Housing Element is intended to address buildout through 2035. Thus, also note that the numeric values identified in the San Diego Forward discussions may differ, but the trends identified by both analyses are consistent.

After a RHNA Determination has been made, a regional RHNA Plan must be developed. State Housing Element law (Government Code Section 65584 (d)) states that the RHNA Plan shall be consistent with four objectives:

1. Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in all jurisdictions receiving an allocation of units for low and very low income households.
2. Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.
3. Promoting an improved intraregional relationship between jobs and housing.
4. Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category.

SANDAG has developed a RHNA Plan to address the housing needs of the San Diego region. Future housing need is assessed by each City or County jurisdiction. The RHNA Plan is based on the land use pattern in the 2050 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) and the 2050 Regional Growth Forecast, in accordance with Senate Bill 375. This recent legislation, Senate Bill (SB) 375, as well as SB 575, affects the RHNA allocation process. The main changes in this cycle included not only the integration of the RHNA process with the RTP and SCS, but also the length of the housing element cycle. The fifth cycle for the San Diego region covers an eight-year time period from 2013 to 2021. Prior to SB 375, past housing elements were on a five-year cycle. Because a jurisdiction's Housing Element is required to be regularly revised pursuant to a statutory schedule and tied to the RHNA process, preparing updates to this document helps local agencies consider housing and land-use strategies that closely reflect changing local needs, resources, and conditions.

The Fifth Housing Element Cycle (2013–2021) RHNA (SANDAG 2011) identifies an additional 161,980 housing units will be needed within the San Diego region to provide adequate housing through 2050. This regional housing need includes 64,150 units of lower income housing. The City has been assigned a total of 2,353 of these units for the 2013 to 2021 period, distributed into the following income (MFI) categories:

Very Low income units	0–50 percent of Area MFI	587
Low income units:	51–80 percent of Area MFI	446
Moderate income units:	81–120 percent of Area MFI	413
Above Moderate income units:	> 120 percent of Area MFI	907

As the City does not have a State-approved Housing Element as required, the City is subject to a carryover penalty per Assembly Bill 1233 (see above). This penalty is 253 lower income units from the previous Housing Element cycle. Thus, the total very low income to low income units required is 1,283.

The City has capacity to accommodate moderate and above-moderate income category RHNA assignments. The City does not have an adequate residential lands inventory to meet the lower income category housing needs obligation.

4.11.2.4 Encinitas Housing Element

The Encinitas Housing Element, last adopted in 1992, identifies the housing goals and policies for the City, which are partially based on the 1990 RHNA and associated Series 7 forecasting. As indicated above, the City does not currently have a state-certified Housing Element. The goals of the currently adopted Housing Element are:

1. Providing a range of housing types for existing and future residences;
2. Providing safe housing for all people;
3. Preserving exiting housing stock and promoting quality workmanship; and
4. Providing affordable housing. In addition, the Housing Element identifies housing needs, housing opportunities sites, and housing challenges.

The adopted Housing Element identifies that the City has two main ways to provide an increase in residential units; development of vacant land, or adding residences to underdeveloped residential or mixed-use sites (also known as “recycling”).

4.11.3 Significance Determination Thresholds

Consistent with Appendix G of the CEQA Guidelines and based on the initial project scoping, impacts related to population and housing would be significant if the HEU project would:

1. Unduly concentrate population growth to an area not capable of supporting it; or
2. Displace substantial numbers of existing housing or people through redevelopment, necessitating the construction of replacement housing elsewhere.

It is noted that growth inducement is discussed in Chapter 6 of this EIR.

4.11.4 Methodology

As discussed in the introduction, population and housing data was obtained from the 2000 and 2010 Census (SANDAG 2015a), SANDAG 2015 estimates (SANDAG 2015b and 2015c), SANDAG Final Series 12 – 2050 Regional Growth Forecast (SANDAG 2015e), as well as the most recent 2010–2020 RHNA (SANDAG 2011). This information was compared to the forecasted growth under the proposed project to determine the change in population and housing as a result of the project. To determine if this change was significant, the analysis then assesses if the potential population and housing change would result in physical environmental effects related to the area not being capable of supporting such growth or if the project would displace housing in a manner that would require replacement housing elsewhere.

4.11.5 Issue 1: Population Growth

Would the project unduly concentrate population growth to an area not capable of supporting it?

4.11.5.1 Impacts

As detailed in Chapter 3, Project Description, there are three Housing Element strategies that could be implemented; “Ready Made” (Strategy 1), “Build Your Own” (Strategy 2), and “Modified Mixed Use Places” (Strategy 3). Below is an analysis of each of those strategies.

a. Housing Strategy 1 - Ready Made (RM)

Housing strategy 1 (RM) would provide capacity for an additional 1,911 residential units within the City. Based on the 2020 forecasted 2.68 persons per household (SANDAG 2015e), the housing strategy 1 (RM) would result in a population increase of 5,121 people (Table 4.11-3). As illustrated in Figure 3-5a, housing strategy 1 (RM) would result in population growth mainly in the western area of the City, along the Interstate 5 corridor. Future development under housing strategy 1 (RM) would occur in urbanized locations in close proximity to existing infrastructure (roads, utilities) and served by fire and other emergency responders.

**Table 4.11-3
Population Growth - Housing Strategy 1 (Ready Made)**

Site	Parcel Area (Net)	Existing Residential Units	Existing Plan Yield	Proposed Residential Yield ¹	Increase in Units	Increase in Population ²
C-2	10.57	1	89	317	316	847
C-3	4.87	-	-	97	97	260
C-7	0.55	-	-	11	11	29
L-1	5.21	6	65	126	120	322
L-2	2.15	-	27	43	43	115
L-4	1.89	-	6	57	57	153
L-5	1.69	1	5	51	50	134
L-6	5.45	4	16	164	160	429
NE-4	18.9	-	-	378	378	1,013
O-2	4.8	-	10	96	96	257
O-5	1.6	1	7	48	47	126
O-6	1.5	-	4	38	38	102
OE-1	2.31	5	43	46	41	110
OE-4	4	-	-	80	80	214
OE-5	12.17	-	183	243	243	651
OE-7	4.5	1	-	135	134	359
Totals	82.16	19	455	1,930	1,911	5,121

¹The yield is based on maximum density allowed. As buildout density is expected to be lower than the maximum allowed, this number is considered conservative.

²Based on the 2020 forecasted 2.68 persons per household (SANDAG 2015e). As the Housing Element Update would include a variety of unit sizes and the forecasted persons per household rate is based primarily on larger single-family unit types, the persons per household rate of future development is expected to be less than the forecasted rate. Thus, this population increase estimate is considered conservative.

As addressed further in Section 4.12, Public Services and Facilities and Section 4.14 Public Utilities, future projects implemented in accordance with the HEU Strategy 1 would adhere to the General Plan goals and policies; pay development impact fees (e.g., sewer fees, fire mitigation fee, storm water fees), and comply with applicable development regulations that are intended to address the demand for public services and facilities that results from development. Ultimately, all future projects would be required to provide a will-serve letter from the service provider in conjunction with their application to ensure adequate services and utilities are available. Thus, the housing strategy 1 (RM) population growth would be within an area capable of supporting it.

b. Housing Strategy 2 - Build Your Own (BYO)

The housing strategy 2 (BYO) would provide capacity for an additional 1,844 residential units within the City. Based on the 2020 forecasted 2.68 persons per household, this increase in units would result in an increase of 4,942 people (Table 4.11-4). As indicated in Figure 3-5b, housing strategy 2 (BYO) would result in population growth mainly in the central area of the City (east of Interstate 5). Future development under housing strategy 2 (BYO) would occur in urbanized locations in close proximity to existing infrastructure (roads, utilities) and served by fire and other emergency responders.

Site	Parcel Area (Net)	Existing Residential Units	Existing Plan Yield ¹	Proposed Residential Yield	Increase in Units	Increase in Population ²
C-2	10.57	1	89	317	316	847
L-1	5.21	6	65	126	120	322
L-7	7.50	0	7	60	60	161
NE-1	10.20	0	0	188	188	504
NE-3	10.00	0	0	300	300	804
NE-7	9.05	0	0	181	181	485
O-2	4.80	0	10	96	96	257
O-4	4.00	0	9	80	80	214
O-5	1.60	1	7	48	47	126
OE-2	7.25	0	0	145	145	389
OE-7	4.50	1	0	90	89	239
OE-8	11.09	0	0	222	222	595
Totals	85.77	9	187	1,853	1,844	4,942

¹The yield is based on maximum density allowed. As buildout density is expected to be lower than the maximum allowed, this number is considered conservative.

²Based on the 2020 forecasted 2.68 persons per household (SANDAG 2015e). As the Housing Element Update would include a variety of unit sizes and the forecasted persons per household rate is based primarily on larger single-family unit types, the persons per household rate of future development is expected to be less than the forecasted rate. Thus, this population increase estimate is considered conservative.

As with the housing strategy 1 (RM), future projects implemented in accordance with housing strategy 2 (BYO) would adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations intended to address the demand for public services and facilities that results from development. Ultimately, all future projects would be

required to provide a will-serve letter from the service provider in conjunction with their application to ensure adequate services and utilities are available. Thus, the housing strategy 2 (BYO) population growth would be within an area capable of supporting it.

c. Housing Strategy 3 (Modified Mixed Use Places)

The housing strategy 3 (MMUP) would provide capacity for an additional 3,166 residential units within the City. Based on the 2020 forecasted 2.68 persons per household (SANDAG 2015e), this increase in units would result in an increase of 8,485 people (Table 4.11-5). As indicated in Figure 3-5c, this housing strategy would result in population growth scattered throughout the City, with no particular areas of concentration. Future development under Housing Strategy 3 (MMUP) would occur in urbanized locations in close proximity to existing infrastructure (roads, utilities) and served by fire and other emergency responders.

Site	Parcel Area (Net)	Existing Residential Units	Existing Plan Yield ¹	Proposed Residential Yield	Increase in Units	Increase in Population ²
C-1	9.35		-	187	187	501
C-2	10.57	1	89	317	316	847
C-6	4.6	-	4	138	138	370
L-7	7.5	-	7	60	60	161
CBHMG-1	0.77	-	-	23	23	62
ALT 2	17.55	17	237	309	292	783
NE-1	10.2	-	-	188	188	504
NE-7	9.05	-	-	181	181	485
ALT 3	14.56	-	-	291	291	780
O-2	4.8	-	10	96	96	257
O-3	4.87	-	-	97	97	260
O-4	4	-	9	80	80	214
ALT 4	6.19	3	13	186	183	490
OE-1	2.31	5	43	46	41	110
OE-4	4	-	-	80	80	214
OE-7	4.5	1	-	135	134	359
ALT 5	11.27	3	54	338	335	898
ALT 6	3.1	-	-	93	93	249
ALT 7	21.02	65	342	416	351	941
Total	150.21	95	808	3,261	3,166	8,485

¹The yield is based on maximum density allowed. As buildout density is expected to be lower than the maximum allowed, this number is considered conservative.

²Based on the 2020 forecasted 2.68 persons per household (SANDAG 2015e). As the Housing Element Update would include a variety of unit sizes and the forecasted persons per household rate is based primarily on larger single-family unit types, the persons per household rate of future development is expected to be less than the forecasted rate. Thus, this population increase estimate is considered conservative.

As with housing strategies 1 (RM) and 2 (BYO), future projects implemented in accordance with housing strategy 3 (MMUP) would adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations intended to

address the demand for public services and facilities that results from development. Ultimately, all future projects would be required to provide a will-serve letter from the service provider in conjunction with their application to ensure adequate services and utilities are available. Thus, housing strategy 3 (MMUP) population growth would be within an area capable of supporting it.

4.11.5.2 Significance of Impacts

Future projects implemented in accordance with any of the HEU strategies would be required to adhere to the General Plan, provide required development impact fees, and comply with applicable development regulations. Ultimately, all future projects would be required to provide a will-serve letter from the service provider in conjunction with their application to ensure adequate services and utilities are available. Thus population growth associated with the HEU would be within an area capable of supporting it; impacts would be less than significant. Overall, there would be no inherent differences in impacts among the housing strategies.

4.11.6 Issue 2: Displacement of People

Would the project displace substantial numbers of existing housing or people through redevelopment, necessitating the construction of replacement housing elsewhere?

4.11.6.1 Impacts

Buildout of the housing sites would accommodate an increase in population over the existing condition. The majority of new development anticipated on housing sites is expected to intensify existing development and result in additional housing units. While people may be displaced during redevelopment, it would be temporary considering buildout of the housing sites would accommodate the projected population for the City through 2035. Therefore, displacement of people associated with implementation of the HEU would be less than significant.

4.11.6.2 Significance of Impacts

The HEU would result in an increase in housing units in the City. While a temporary loss of existing housing could occur during construction, it would not necessitate the construction of replacement housing elsewhere. Impacts would be less than significant. Overall, there would be no inherent differences in impacts among the housing strategies.