4.10 - Population, Housing, and SCAG Consistency

4.10.1 - Introduction

This section describes the existing setting regarding population and housing and potential effects from project implementation on the site and its surrounding area. In addition, it evaluates the project against the various growth management goals and policies of the SCAG. Descriptions and analysis in this section are based on population and housing information provided by the California Department of Finance, the Southern California Association of Governments, (SCAG) and the City of San Bernardino.

As explained in Section 1, Introduction, where applicable, this project-level DEIR incorporates by reference information and analysis contained in the City of San Bernardino General Plan EIR and the Paradise Hills Specific Plan EIR, certified by the San Bernardino City Mayor and Common Council in 2005 and 1993, respectively. The General Plan EIR contemplated buildout of the General Plan at a programmatic level and concluded that all impacts on population and housing were less than significant after mitigation. The Paradise Hills EIR provided project-level analysis of the smaller Paradise Hills project and scoped out the population and housing topical area and its associated issues during the Initial Study/Notice of Preparation process as effects found not to be significant.

This DEIR accounts for modifications to the baseline conditions that have occurred since certification of the previous EIRs and changes that have increased the size and intensity of the Proposed Project. Accordingly, not all of the conclusions in the previous EIRs are applicable to the Proposed Project, and new analysis is provided for potential impacts not previously considered in those documents. The following analysis will focus on population and housing since the project does not propose any significant non-residential development (e.g., commercial, offices, etc.).

4.10.2 - Environmental Setting

Population, Housing and Employment Estimates

The California Department of Finance estimated the population of the City of San Bernardino to be 205,010 persons as of January 1, 2007. Population and housing characteristics for San Bernardino are summarized in Table 4.10-1. The California Economic Development Department estimated the labor force in San Bernardino to be 87,800 workers as of March 2007. It should be noted that the labor force data for the City of San Bernardino is not adjusted for seasonal employees. San Bernardino’s employment characteristics are summarized in Table 4.10-2.

Historical Population Growth

The population in San Bernardino has grown significantly in recent years. The City’s historic population growth between 1980 and 2007 is summarized in Table 4.10-3. From 1980 to 2000, the City grew by approximately 50 percent. The County grew 91 percent during this same period.
Table 4.10-1: San Bernardino Population and Housing Characteristics (2007)

<table>
<thead>
<tr>
<th>Population</th>
<th>Total Dwelling Units</th>
<th>Occupied Dwelling Units</th>
<th>Average Household Size (Persons per Occupied Household)</th>
</tr>
</thead>
<tbody>
<tr>
<td>205,010</td>
<td>66,486</td>
<td>59,146</td>
<td>3.354</td>
</tr>
</tbody>
</table>


Table 4.10-2: San Bernardino Employment Characteristics (2007)

<table>
<thead>
<tr>
<th>Category</th>
<th>Figure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Labor force</td>
<td>87,800</td>
</tr>
<tr>
<td>Employed persons</td>
<td>81,000</td>
</tr>
<tr>
<td>Unemployed persons</td>
<td>6,800</td>
</tr>
<tr>
<td>Unemployment rate (percent)</td>
<td>7.8%</td>
</tr>
</tbody>
</table>

Source: California Economic Development Department Website 2007.

Table 4.10-3: City of San Bernardino Historic Population Growth (1980-2007)

<table>
<thead>
<tr>
<th>Year</th>
<th>City Population</th>
<th>Average Annual Change</th>
<th>County Population</th>
<th>Average Annual Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>1980</td>
<td>123,429</td>
<td>--</td>
<td>895,016</td>
<td>--</td>
</tr>
<tr>
<td>1990</td>
<td>164,164</td>
<td>+3.3%</td>
<td>1,418,380</td>
<td>+5.8%</td>
</tr>
<tr>
<td>1995</td>
<td>180,700</td>
<td>+0.50%</td>
<td>1,572,650</td>
<td>+1.1%</td>
</tr>
<tr>
<td>2000</td>
<td>185,401</td>
<td>+0.3%</td>
<td>1,709,401</td>
<td>+1.7%</td>
</tr>
<tr>
<td>2007</td>
<td>205,010</td>
<td>+1.5%</td>
<td>2,028,013</td>
<td>+2.7%</td>
</tr>
</tbody>
</table>

Source: California Department of Finance, 2007.

Forecasted Population Growth

The City of San Bernardino is a part of the San Bernardino Association of Governments (SANBAG), which is a regional representative group of the larger SCAG. The City and SCAG have published population growth projections for San Bernardino. San Bernardino’s projections are contained in its General Plan, which was approved by the City in 2005. SCAG’s forecast is contained in Regional Transportation Plan (RTP) of 2004, which provides regional population, employment, and housing forecasts for all of Southern California. There is some variation between the two documents because different growth rates were used. For the purpose of this analysis, SCAG sources will be used to summarize the projected population growth, shown in Table 4.10-4.
### Table 4.10-4: Projected Population Growth (2010-2030)

<table>
<thead>
<tr>
<th>Year</th>
<th>City of San Bernardino</th>
<th>Average Annual Change</th>
<th>County of San Bernardino</th>
<th>Average Annual Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>185,401</td>
<td>--</td>
<td>1,709,401</td>
<td>--</td>
</tr>
<tr>
<td>2010</td>
<td>207,021</td>
<td>+1.2%</td>
<td>2,059,420</td>
<td>+2.0%</td>
</tr>
<tr>
<td>2020</td>
<td>210,672</td>
<td>+0.2%</td>
<td>2,397,709</td>
<td>+1.6%</td>
</tr>
<tr>
<td>2030</td>
<td>214,069</td>
<td>+0.2%</td>
<td>2,713,149</td>
<td>+1.3%</td>
</tr>
</tbody>
</table>


### Housing

#### Existing Housing Supply

The California Department of Finance indicates that there were 66,486 dwelling units in San Bernardino as of January 1, 2007. San Bernardino’s housing supply has increased by 4.9 percent since 2000, as shown in Table 4.10-5.

#### Table 4.10-5: Historical Housing Growth (1980-2007, households)

<table>
<thead>
<tr>
<th>Year</th>
<th>City of San Bernardino</th>
<th>Average Annual Change</th>
<th>County of San Bernardino</th>
<th>Average Annual Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>1980</td>
<td>45,020</td>
<td>--</td>
<td>NA</td>
<td>--</td>
</tr>
<tr>
<td>1990</td>
<td>54,482</td>
<td>+2.1%</td>
<td>484,737</td>
<td>--</td>
</tr>
<tr>
<td>2000</td>
<td>56,330</td>
<td>+0.3%</td>
<td>526,984</td>
<td>+1.5%</td>
</tr>
<tr>
<td>2007</td>
<td>59,146</td>
<td>+0.7%</td>
<td>584,076</td>
<td>+1.6%</td>
</tr>
</tbody>
</table>


#### Future Housing Supply

SCAG projects the City’s number of households will increase from 56,288 in 2000 to 66,734 by 2030, an increase of 18.5 percent over the next 30 years, as shown in Table 4.10-6. By comparison, SCAG estimates the County’s housing stock will increase by 69.2 percent over this same period.

#### Table 4.10-6: Projected Housing Growth (2010-2030, households)

<table>
<thead>
<tr>
<th>Year</th>
<th>City of San Bernardino</th>
<th>Average Annual Change</th>
<th>County of San Bernardino</th>
<th>Average Annual Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>56,288</td>
<td>--</td>
<td>530,498</td>
<td>--</td>
</tr>
<tr>
<td>2010</td>
<td>58,288</td>
<td>+0.4%</td>
<td>618,782</td>
<td>+1.7%</td>
</tr>
<tr>
<td>2020</td>
<td>62,290</td>
<td>+0.7%</td>
<td>756,640</td>
<td>+2.2%</td>
</tr>
<tr>
<td>2030</td>
<td>66,734</td>
<td>+1.0%</td>
<td>897,739</td>
<td>+2.7%</td>
</tr>
</tbody>
</table>

Regional Housing Needs Allocation
State law requires local governments to provide housing for persons of all income ranges. The State has prioritized housing production by requiring cities and counties periodically to update the housing element of their General Plan, which is the document that outlines the community’s long-term growth strategy. The amount of housing that must be accounted for in a local housing element is determined through a process called the Regional Housing Needs Allocation (RHNA). In the RHNA process, the State gives each region a number representing the amount of housing needed based on existing need and expected population growth.

In the six-county Southern California region, SCAG is responsible for assigning each city and county allocation targets for housing by income range. Local governments then revise their housing elements to identify development sites and housing policies that will allow the community to meet its housing needs. SCAG’s last RHNA was issued in 2006 and expires at the end of 2014.

Regulatory Framework
Regional - SCAG Consistency
SCAG sent an NOP comment letter that outlined its various growth management goals and policies. They requested that the EIR examine the Proposed Project in light of those goals and policies. The following is an analysis of each goal and its related policies:

Local – City of San Bernardino General Plan
The City’s General Plan contains a number of goals and policies that apply to the Proposed Project. The Housing Element of the City’s General Plan contains the following goals and policies related to new housing, population, and regional growth management:

Goal 3.1: “Facilitate the development of a variety of types of housing to meet the needs of all income levels in the City of San Bernardino.”

- Policy 3.1.1 Accommodate the production of new housing units on currently vacant or underutilized land at densities and standards designated in the Land Use Element of the General Plan.

Analysis: The other policies of this goal (3.1.2 through 3.1.7) address infill or central city housing. The proposed UHSP project is not a designated affordable housing project per se, however, it does contain a wide range of densities and housing types (3.1 to 20 units per acre) which will help meet the housing needs of many segments of the home buying public, including CSUSB faculty. Therefore, the project is consistent with this goal and its applicable policies.

The other goals and policies of the Housing Element focus on the provision of affordable housing and infill development, or development in the central part of the City. Therefore, they are not applicable to the proposed UHSP project.

The Economic Development Element of the City’s General Plan contains the following goal and policy relative to the Proposed Project (i.e., it deals with Cal State San Bernardino):
Goal 4.5: “Identify and attract new employment types/land uses that complement the existing employment clusters and foster long-term economic growth.”

- **Policy 4.5.6** Capitalize on the unique educational and research assets of the City by facilitating growth of technology businesses and related industry around California State University, San Bernardino (CSUSB). This would include the potential business/tech park that would abut CSUSB. This facility would serve as a new economic and employment hub in the north end of the City.

Analysis: While this goal and policy are not directly related to the UHSP project, it is clear the City considers CSUSB as an important part of the community (e.g., employment, education, cultural opportunities, etc.). The UHSP project will provide 60 units of housing dedicated to CSUSB faculty and, therefore, supports this goal relative to the university.

Methodology
Impacts on population and housing were assessed by reviewing existing and anticipated population and housing figures provided by the California Department of Finance, the City of San Bernardino General Plan, and SCAG. The Proposed Project’s impacts were evaluated by determining their consistency with these estimates and projections.

4.10.3 - Thresholds of Significance
According to the CEQA Guidelines’ Appendix G, Environmental Checklist, to determine whether impacts to population and housing are significant environmental effects, the following questions are analyzed and evaluated. Would the project:

a.) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

b.) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c.) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

In addition to these criteria, SCAG requested in their NOP comment letter that the Proposed Project be evaluated against the various SCAG growth management policies.

4.10.4 - Project Impacts and Mitigation Measures
This section discusses potential impacts associated with the development of the project and provides mitigation measures where appropriate. Impacts related to population growth are analyzed below.
Growth Inducement

Impact POP-1: The Proposed Project would induce substantial population growth beyond regional population forecasts.

Impact Analysis

This impact assesses the Proposed Project’s potential to induce substantial population growth. There are two types of population growth: direct and indirect. Direct population growth occurs from the development of new residential units. Indirect population growth occurs from the creation of new employment opportunities or the removal of a barrier to growth (e.g., the extension of urban infrastructure to an undeveloped area).

The Proposed Project has the potential to induce direct and to a limited degree indirect population growth. The Proposed Project contains 980 residential units that are expected to eventually support a total of 3,283 residents based on an average household size of 3.35 persons per household, which is the current household size based on data from the California Department of Finance. The project does not contain any significant commercial uses so no contributions to the City’s labor force are expected.

The project site is in somewhat of an outlying area (i.e., not in an urban setting with existing or planned suburban development surrounding it), but it is in an area designated for urban uses by the General Plan and the University District Specific Plan. While a number of utilities are in the general area, the project will require the construction of new water lines, sewer lines, natural gas and electrical connections, as well as a new loop road connection between Campus Parkway and Little Mountain Drive. It is not likely these improvements will lead to accelerated or additional development in this area due to the constraints on adjacent land, the proximity to the national forest and San Andreas Fault, etc.

The City’s General Plan indicates that 132 acres of the project area is designated RL, 3.1 dwelling units per acre; and 124 acres are designated RS, 4.5 dwelling units per acre (Exhibit 4.10-1). At complete buildout, according to the General Plan, the project site has the potential to accommodate approximately 966 units. This represents almost the same gross number of planned units as the 980 units proposed in the Specific Plan.
Direct or indirect population growth is only considered substantial if it exceeds projections contained in local or regional planning documents and population forecasts. In this case, the applicable planning and population forecast documents are the City of San Bernardino General Plan and the SCAG 2004 RTP projections. The 2004 RTP SCAG figures were based on the land use plan for the City of San Bernardino at the time the projections were made (i.e., approx. mid 2003).

The new General Plan land use plan does take the University Hills project into account, however, the 2004 SCAG RTP figures were based on the previous City General Plan which was in turn based on the Paradise Hills Specific Plan, so the SCAG figures do not reflect the currently proposed University Hills project.

The UHSP project proposes 980 units, which is more than allowed under the PHSP (504 units). It should be noted that buildout of the UHSP project would not exceed the maximum number of units calculated City-wide for the RL and RS categories, which would make the project at least somewhat consistent with the City’s Genera Plan buildout projections. However, the DEIR concludes that the UHSP substantial increase in units compared to the already allowed PHSP units represents a potentially significant impact to population and housing growth. No mitigation is available to reduce the UHSP impact on population and housing growth.

**City of San Bernardino General Plan**
The City of San Bernardino General Plan anticipates significant growth in San Bernardino between 2010 and 2020 (i.e., the project is planned to occupy over a ten-year period). The General Plan projects the population will increase by 3,651 persons during this period. With the UHSP project’s population estimate of 3,283 persons, the UHSP project would represent almost all (almost 90 percent) of the projected growth in the City from 2010 to 2020, therefore, this represents a potentially significant growth impact although it does not induce growth beyond the General Plan’s projections. No mitigation is available to reduce the UHSP impact on population growth.
Exhibit 4.10-1
General Plan Land Use

Source: City of San Bernardino General Plan (2005).

Project Site Boundary

General Plan Land Use Designations

- Residential (3.1 du/ac) [132 acres]
- Residential (4.5 du/ac) [124 acres]
- Open Space [148 acres]
- Hillside Management Overlay & Foothill Fire Zone Overlay A & B
**SCAG Projections**

SCAG projects the City’s housing stock will grow by 4002 units from 2010 to 2020, and the proposed UHSP project represents almost a quarter of this planned growth. In addition, the UHSP project proposes almost twice as many units (980 versus 504) than included in the PHSP. However the total build out of the City’s General Plan has the potential to house approximately 966 units. Therefore, the total difference between the UHSP and the City’s General Plan buildout would be approximately two (2) percent. For a worst case scenario, the SCAG projections were calculated at 504 units.

Although forecasted population growth in San Bernardino for 2010 is projected to exceed the SCAG projections, the proposed UHSP project would significantly exacerbate this condition by adding an additional 476 units (980 – 504) or 12 percent of growth. SCAG population numbers are the basis for other regional plans (e.g., regional housing allocation strategies), and population growth in excess of the forecast represents a significant growth inducement impact. No mitigation is available to reduce this impact to a less than significant level; therefore, growth inducement beyond the SCAG local and regional forecasts is a significant unavoidable impact of the Proposed Project.

**Regional Housing Needs Allocation**

The Proposed Project would add 980 housing units to the City’s housing supply, including 60 units dedicated to faculty housing for CSUSB. According to SCAG’s Final Regional Housing Need Allocation Plan, the total number of households needed in the City of San Bernardino for the period from 2006 to 2014 is 5,687 so the Proposed Project would help contribute 17 percent towards the City’s RHNA allocation. The preceding analysis determined that the Proposed Project was consistent with the applicable goals and policies of the City relative to housing. Therefore, the Proposed Project’s residential development would be consistent with local housing strategies.

**Level of Significance Before Mitigation**

Potentially significant impact.

**Mitigation Measures**

No mitigation is available.

**Level of Significance After Mitigation**

Significant unavoidable impact.

**Displace Existing Homes**

| Impact POP-2: | The Proposed Project will not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. |

**Impact Analysis**

The Proposed Project site does not contain any occupied residences, so development will have no impact on existing housing.
**Level of Significance Before Mitigation**
No impact.

**Mitigation Measures**
No mitigation is needed.

**Level of Significance After Mitigation**
No impact.

**Displace Existing Population**

| Impact POP-3: | The Proposed Project will not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. |

**Impact Analysis**
The Proposed Project does not contain any occupied residences, so development will have no impact on existing population.

**Level of Significance Before Mitigation**
No impact.

**Mitigation Measures**
No mitigation is needed.

**Level of Significance After Mitigation**
No impact.

**SCAG Consistency**

| Impact POP-4: | The Proposed Project is consistent with the goals and policies of the Southern California Association of Governments (SCAG) relative to growth management. |

**Impact Analysis**
The following evaluates the Proposed Project against SCAG’s growth management policies (from their NOP comment letter dated August 13, 2007 – See Appendix A):

**Consistency with Regional Comprehensive Plan and Guide Policies**
“The Growth Management Chapter (GMC) of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable”:

**Policy 3.01**
“The population, housing, and jobs forecasts, which are adopted by SCAG’s Regional Council and that reflect local plans and policies should be used by SCAG in all phases of implementation and review”.

---

*University Hills Specific Plan - City of San Bernardino*

*Draft Environmental Impact Report*
Regional Growth Forecasts
“The DEIR should reflect the most current adopted SCAG forecasts, which are the 2004 RTP (April 2004) Population, Housing, and Employment Forecasts. The adopted forecasts for your region, subregion, and adjoining un-incorporated area, and city are as follows”:

**Adopted SCAG Region-wide Forecasts**

<table>
<thead>
<tr>
<th>SCAG Forecast</th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>19,208,661</td>
<td>20,191,117</td>
<td>21,137,519</td>
<td>22,035,416</td>
<td>22,890,797</td>
</tr>
<tr>
<td>Households</td>
<td>6,072,578</td>
<td>6,463,402</td>
<td>6,865,355</td>
<td>7,263,519</td>
<td>7,660,107</td>
</tr>
<tr>
<td>Employment</td>
<td>8,729,192</td>
<td>9,198,618</td>
<td>9,659,847</td>
<td>10,199,776</td>
<td>10,527,202</td>
</tr>
</tbody>
</table>

**Adopted SANBAG Forecasts**

<table>
<thead>
<tr>
<th>SCAG Forecast</th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>2,059,420</td>
<td>2,299,700</td>
<td>2,397,709</td>
<td>2,558,729</td>
<td>2,713,149</td>
</tr>
<tr>
<td>Households</td>
<td>618,782</td>
<td>686,584</td>
<td>758,640</td>
<td>826,669</td>
<td>897,739</td>
</tr>
<tr>
<td>Employment</td>
<td>770,877</td>
<td>870,491</td>
<td>972,243</td>
<td>1,074,861</td>
<td>1,178,890</td>
</tr>
</tbody>
</table>

**Adopted City of San Bernardino Forecasts**

<table>
<thead>
<tr>
<th>SCAG Forecast</th>
<th>2010</th>
<th>2015</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>207,021</td>
<td>208,860</td>
<td>210,672</td>
<td>212,404</td>
<td>214,069</td>
</tr>
<tr>
<td>Households</td>
<td>58,288</td>
<td>60,211</td>
<td>62,290</td>
<td>64,440</td>
<td>66,734</td>
</tr>
<tr>
<td>Employment</td>
<td>99,337</td>
<td>110,056</td>
<td>120,965</td>
<td>131,943</td>
<td>143,045</td>
</tr>
</tbody>
</table>

**Analysis:** The Proposed Project is expected to generate 3,283 new residents from 980 new housing units based on a household size of 3.35 persons per dwelling unit. The project contains essentially no commercial uses so it will generate only an incidental number of new employees, so the project will not conflict with SCAG employment projections. The Proposed Project represents almost all of the City’s growth forecast for 2010 to 2020, the expected move-in period of the project. It does not exceed the forecasts, so the project is generally consistent with the most current regional growth forecasts of SCAG (RTP 2004) as outlined in Policy 3.01; however, approval of the UHSP project would incrementally reduce or preclude growth in any other part of the City, if the City’s growth rates were to stay within the SCAG projections.

**Policy 3.03** The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region’s growth policies.
Analysis: The Proposed Project will fund a variety of infrastructure improvements; including road extensions, new water and sewer lines, as well as two new reservoirs which will help balance water pressure and service throughout this portion of the City. Therefore, the project is consistent with policy 3.03.

GMC Policies Related to the RCPG Goal to Improve the Regional Standard of Living
The Growth Management goals to develop urban forms that enable individuals to spend less income on housing costs, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the Proposed Project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

Policy 3.05  Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.

Policy 3.09  Support local jurisdictions’ efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.

Policy 3.10  Support local jurisdictions’ actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.

Analysis: The project clubhouse will have minor service support uses; however, the project proposes only residential uses on the property. The location of the project does not support commercial or other non-residential uses, so the project is generally consistent with these goals.

GMC Policies Related to the RCPG Goal to Improve the Regional Quality of Life
The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance the quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of live. The evaluation of the Proposed Project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

Policy 3.11  Support provisions and incentives created by local jurisdictions to attract housing growth in job-rich subregions and job growth in housing-rich subregions.

Policy 3.12  Encourage existing or proposed local jurisdictions’ programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.
Policy 3.13  Encourage local jurisdictions’ plans to maximize the use of existing urban areas accessible to transit through infill and redevelopment.

Policy 3.17  Support and encourage settlement patterns which contain a range of urban densities.

Policy 3.18  Encourage planned development in locations least likely to cause adverse environmental impacts.

Policy 3.19  Support policies and actions that preserve open space areas identified in local, state, and federal plans.

Policy 3.20  Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.

Policy 3.21  Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.

Policy 3.22  Discourage development or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.

Policy 3.23  Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recover plans.

Analysis: The project site is not suited or well located to support non-residential uses. The site is not located near rail transit facilities. The UHSP will include a transit circulation plan, extend the current bus transit and stop/transfer stations to the Proposed Project site. The project will participate in a shuttle program with CSUSB so project residents can access the campus, which has regional bus connections. The project does propose a wide range of housing densities and clusters development while preserving Badger Canyon and its attendant resources. The site does not contain significant archaeological or cultural resources. The site does contain a number of physical conditions that cause risk, including the presence of the San Andreas Fault, steep slopes, native vegetation with high fire potential, and lack of access at present. The proposed UHSP project is designed to minimize the threat of various risks onsite through Best Management Practices and State and local building codes. Therefore, the Proposed Project is consistent with this goal and its policies.

GMC Policies Related to the RCPG Goal to Provide Social, Political, and Cultural Equity
The Growth Management goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and reaching equity among all segments of society. The evaluation of the Proposed Project in relation to the policy
stated below is intended to guide direction for the accomplishment of this goal and does not infer regional mandates and interference with local land use powers.

**Policy 3.24** Encourage the efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.

**Policy 3.27** Support the local jurisdictions and other service providers in their efforts to develop sustainable communities and provide equally to all members of society, accessible and effective services such as public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.

**Analysis:** The proposed UHSP project is not a designated affordable housing project, however, it does contain a wide range of densities and housing types (3.1 to 20 units per acre) which will help meet the housing needs of many segments of the home buying public, including CSUSB faculty. Therefore, the project is consistent with this goal and its applicable policies.

**Air Quality Chapter**

The Air Quality Chapter core actions related to the Proposed Project include:

**Policy 5.11** Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional, and local) consider the air quality, land use, transportation, and economic relationships to ensure consistency and minimize conflicts.

**Analysis:** Section 4.2, *Air Quality and Greenhouse Gas Emissions*, evaluates the potential impacts of the project on air quality and finds that the project will have both short- and long-term significant impacts. This is mainly due to the size and location of the project relative to the daily emission thresholds established by the South Coast Air Quality Management District. While these impacts are mitigated to the extent feasible, this will be a **significant impact** of the project.

**Open Space and Conservation Chapter**

The Open Space and Conservation Chapter core actions related to the Proposed Project include:

**Policy 9.1** Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.

**Policy 9.2** Increase the accessibility to open space lands for outdoor recreation.

**Policy 9.3** Promote self-sustaining regional recreation resources and facilities.

**Policy 9.4** Maintain open space for adequate protection of lives and properties against natural and manmade hazards.
Policy 9.5  Minimize potentially hazardous developments in hillside, canyons, area susceptible to flooding, earthquakes, wildfires, and other known hazards, and areas with limited access for emergency equipment.

Policy 9.6  Minimize public expenditure for infrastructure and facilities to support urban types of uses in area where public health and safety cannot be guaranteed.

Policy 9.7  Maintain adequate viable resource production lands, particularly lands devoted to commercial agriculture and mining operations.

Policy 9.8  Develop well-managed viable ecosystems or know habitats of rare, threatened, and endangered species, including wetlands.

Analysis: The site contains a number of physical conditions that cause risk, including the presence of the San Andreas Fault, steep slopes, native vegetation with high fire potential, and lack of access at present. The proposed UHSP project is designed to minimize the threat of various risks onsite to the degree practical. In addition, the project is designed to cluster development away from areas of risk or in areas with sensitive resources such as Badger Canyon. Furthermore, the City’s standard for parkland is 5 acres per 1,000 residents; full buildout of the Specific Plan would result in the need to provide 16.4 acres of open space/parkland or an equivalent fee in lieu of dedicated parkland. UHSP exceeds the City’s requirement and provides approximately 247 total acres of open space, public and private parkland, and trails. For these reasons, the Proposed Project is consistent with this goal and its policies.

Water Quality Chapter Recommendations and Policy Options
The Water Quality Chapter goals related to the Proposed Project include:

Policy 11.07  Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.

Analysis: Due to the Proposed Project’s elevation, reclaimed water is not presently available. However, the project incorporates sustainable development design, which will retain and recharge local runoff back into the ground before it can flow offsite and must be contained in man-made channels. Therefore, the project is consistent with this goal.

Regional Transportation Plan
The 2004 Regional Transportation Plan (RTP) also has goals and policies that are pertinent to this Proposed Project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents.
and affected by socio-economic, geographic, and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the Proposed Project. Among the relevant goals and polices or the RTP are the following:

**Regional Transportation Plan Goals**

RTP G1 Maximize mobility and accessibility for all people and goods in the region.

RTP G2 Ensure travel safety and reliability for all people and goods in the region.

RTP G5 Protect the environment, improve air quality, and promote energy efficiency.

RTP G6 Encourage land use and growth patterns that complement our transportation investments.

**Analysis:** Omnitrans San Bernardino transit stop is located three fourths of a mile away form the club house. The project site is not located near rail transit facilities, however bus transit will be extended to the UHSP, and the project will participate in a shuttle program with CSUSB so project residents can access the campus, which presently has regional bus connections. The project does propose a wide range of housing densities and clusters development near the main loop road, and contains a network of paseos, trails, and sidewalks, which will promote non-vehicular travel onsite and offsite.

**Growth Visioning**

The fundamental goal of the Compass Growth Visioning effort is to make the SCAG region a better place to live, work, and play for all residents, regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region’s mobility, livability and prosperity. The following “Regional Growth Principles” are proposed to provide a framework for local and regional decision-making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

**Principle 1:** Improve mobility for all residents.
GV P1.2 Locate new housing near existing jobs and new jobs near existing housing.

**Principle 2:** Foster livability for all communities.
GV P2.1 Promote infill development and redevelopment to revitalize existing communities.

GV P2.2 Promote developments which provide a mix of uses.

GV P2.3 Promote “people scaled” walkable communities.

GV P2.4 Support the preservation of stable, single-family neighborhoods.

**Principle 3:** Enable prosperity for all people.
GV P3.1 Provide, in each community, a variety of housing types to meet the housing needs of all income levels.

GV P3.3 Ensure environmental justice regardless of race, ethnicity, or income class.

GV P3.5 Encourage civic engagement.
Principle 4: Promote sustainability for future generations.
GV P4.1 Preserve rural, agricultural, recreational, and environmentally sensitive areas.
GV P4.2 Focus development in urban centers and existing cities.
GV P4.3 Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.
GV P4.4 Utilize “green” development techniques.

Analysis: The project proposes a wide range of housing densities that will serve a large segment of the housing market. The project clusters development near the main loop road, and contains a network of paseos, trails, and sidewalks which will promote non-vehicular travel onsite and offsite. The proposed UHSP project incorporates sustainable development design. Therefore, the Proposed Project is consistent with these principles and their policies.

Conclusion
All feasible measures needed to mitigate any potentially negative regional impacts associated with the Proposed Project should be implemented and monitored, as required by CEQA.

Analysis: The DEIR mitigation measures will reduce potential impacts from the project to less than significant levels in most cases, or, to the extent practical in the case of air quality.

This analysis concludes that the Proposed Project is generally consistent with these policies except for the provision of employment in a housing rich sub-region. The DEIR concludes that these inconsistencies mean the project will have a significant impact relative to growth inducement and minor inconsistencies with regional growth policies.

Level of Significance Before Mitigation
Significant impact.

Mitigation Measures
No feasible mitigation is available to eliminate this impact.

Level of Significance After Mitigation
Significant and unavoidable impact.