

5.12 - LAND USE AND PLANNING

5.12.1 - Introduction

This section addresses the potential impacts stemming from a change in the land use designations as contained in the proposed General Plan Amendment. Information in this section is based upon the following documents:

- New Model Colony, General Plan Amendment, City of Ontario, January 7, 1998.
- NMC Final EIR, City of Ontario, October 1997.

5.12.2 - Existing Conditions

The existing New Model Colony (NMC) General Plan designations for the project site, shown on Exhibit 3-7 NMC Land Use Plan, permit low density residential uses (4.6 dwelling units/acre) on the northerly and westerly portions of the site and a regional commercial center with high density residential on the southerly and easterly portion of the site. The existing General Plan designations provide for 1,268 single-family, detached dwelling units (du) and 1,306,800 square feet (sq ft) of regional commercial use.

Existing Regulations and Standard Conditions

Regional Planning

The Southern California Association of Governments (SCAG) is the regional governing body for the south region including the counties of Orange, Los Angeles, San Bernardino, Riverside, and Imperial. Regional associations of governments were created by the State to guide land use decisions that overlap multiple local jurisdictions by creating joint powers of agreement between these localities, and to provide policy guidance in the region. The SCAG is Southern California's forum for addressing regional issues concerning transportation, the economy, community development and the environment. As a Metropolitan Planning Organization (MPO), SCAG's main responsibilities under State and Federal Law are completing the Regional Transportation Analysis (RTP) and the Regional Housing Needs Assessment (RHNA). The RTP involves preparation of long-range transportation plans and development and adoption of transportation improvement programs that allocate State and Federal funds for highway, transit and other surface transportation projects. While SCAG does not have formal regulatory authority and therefore cannot directly implement land use decisions, SCAG guides land use planning for the Southern California region through intergovernmental coordination and consensus building. As a result, the Rich Haven Specific Plan must be consistent with the regional policies located within the SCAG Regional Comprehensive Plan and Guide. SCAG serves as the regional clearinghouse for projects requiring environmental documentation under State and

Federal law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs.

Regional Planning Policy-Jobs/Housing Balance

The SCAG Regional Comprehensive Plan and Guide (RCPG) presents the region's forecasts and policies for dealing with anticipated growth including population, housing, and employment throughout Southern California. Growth projections contained in the RCPG are based on a compilation of county and local projections. RCPG forecasts are then used in the formulation of regional plans dealing with regional air quality, housing, transportation/circulation, and other infrastructure issues.

The concept of jobs/housing balance was originated in the 1989 SCAG Growth Management Plan (GMP). This concept is directed at minimizing commute distances, reducing new infrastructure needs and costs, minimizing traffic congestion, conserving energy and improving air quality. The primary objective has been to promote balanced development at the regional and subregional levels. Balanced development represents a mix of housing and employment opportunities expressed in the form of a ratio of jobs to housing available in a given area. A subregion is theoretically considered in balance if it provides sufficient employment opportunities for population residing within a reasonable commute distance, generally considered as the same subregion. Subregions with employment to housing ratios which reflect the SCAG regional average are generally considered balanced. Areas whose ratios significantly exceed the regional average are considered job rich, while those with ratios significantly below the regional average are considered housing rich.

The balance of jobs and housing in an area, both in terms of the total number of jobs and housing units as well as the type of jobs versus the price of housing, has implications on mobility, air quality and the distribution of tax revenues. A major focus of SCAG's regional planning efforts has been to improve this balance. SCAG (1989) defines the jobs/housing balance as follows:

Jobs and housing are in balance when an area has enough employment opportunities for most of the people who live there and enough housing opportunities for most of the people who work there. The region as a whole is, by definition, balanced. Job-rich subregions have ratios greater than the regional average; housing-rich subregions have ratios lower than the regional average.

Ideally, job/housing balance would...assure not only a numerical match of jobs and housing but also an economic match in type of jobs and housing.

The California Department of Finance reports there were 64,600 jobs in the City of Ontario in the Year 2000 and 78,100 jobs in the Year 2006. The SCAG forecasts indicate that there will be 97,366 jobs in the City in 2010. In 2000, the ratio of jobs to households, was 1.48 in the City of Ontario, as shown in Table 5.12-1. In 2010, the City is expected to have a jobs/housing ratio of 2.0.

The NMC GPA included 504 acres and 5,505,984 sq ft of commercial/industrial development including 2,123,500 sq ft of Regional Commercial of which 1,306,800 sq ft are located on the site of the proposed project. The NMC GPA did not address job creation; however, in the NMC GPA EIR there is a statement indicating that the 10.6 million square feet of commercial, office and industrial buildings would generate 31,200 jobs based on 250 square feet of building space per employee. (NMC EIR at page 5.1-11.) However, the source of this figure is not provided; and, the Fiscal Impact Analysis conducted in 1997 contained in Appendix B to the NMC EIR uses figures ranging from 375 to 658 square feet per employee. A more recent study for a nearby area, cited below on Table 5.12-2 indicates a figure of 500 sf per employee. Accordingly, Table 5.12-2 provides an estimate of the number of jobs associated with the commercial land uses included in the NMC GPA. The 25,438 jobs and the 31,188 du included in the NMC GPA produces 0.84 jobs per household (assuming a 3 percent vacancy rate in housing). This is approximately 48 percent less than the 1.76/1 projected for the City in 2010.

Table 5.12-1: Housing and Job Projections

	Census and CA DoF Data	Projections	Projections	Percentage Change	
	2000	2010	2020	2000-2010	2010-2020
Households					
City of Ontario	43,525.0	48,749.0	69,473.0	12.0%	42.5%
San Bernardino County	528,594.0	640,917.0	789,375.0	21.2%	23.2%
Employment					
City of Ontario	64,600.0	97,366.0	122,204.0	50.72%	25.51%
San Bernardino County	703,800.0	852,025.0	1,007,013.0	21.06%	18.19%
Jobs/Household Ratio					
City of Ontario	1.48/1	2.0/1	1.76/1	—	—
San Bernardino County	1.33/1	1.33/1	1.28/1	—	—
Notes: CA DoF = Department of Finance					
Source: SCAG 2004 Regional Transportation Plan Growth Forecast Report, and California Department of Finance.					

Table 5.12-2: New Model Colony Projected Employment

Commercial Land Use Type	Square Feet*	Employment Factor**	Employment
Neighborhood	1,045,440	1 job per 500 sq ft	2,091
Community	392,040	1 job per 500 sq ft	784
Retail	326,700	1 job per 500 sq ft	653
Office	442,134	1 job per 250 sq ft	1,769
Regional	2,123,550	1 job per 500 sq ft	4,247
Hotel/Conference	609,840	1 job per 1,000 sq ft	610
Light Industrial/Manufacturing	1,006,236	1 job per 1,500 sq ft	3,435
Business Park	4,146,912	1 job per 350 sq ft	11,849
Total	10,092,852		25,438
Notes: * Table 3-3 NMC GPA ** MBA, Chino Preserve EIR, Projected Fiscal Impacts, Stanley R, Hoffman, 2001. sq ft = square feet Source: MBA, Chino Preserve EIR, Projected Fiscal Impacts, Stanley R, Hoffman, 2001.			

City of Ontario Zoning

The Rich Haven Specific Plan has been developed in accordance California Government Code Section 65450, et seq, and the City of Ontario Development Code (Municipal Code section 13.) The Site Development Standards Summary in the Specific Plan sets forth the standards for development of all uses within the Rich Haven Community. Regulations are proposed for residential, mixed-use/commercial, and open space uses. Any land use proposal not specifically covered by the provisions of the Specific Plan are subject to Section 9-1.1300 of the City of Ontario Development Code.

New Model Colony General Plan

As a result of the action by the City in 1999 to annex the area now identified as the NMC and identify this land for future urban development, this area is now beginning to transition from the predominantly agricultural land uses to urban uses (see Exhibit 3-7). The existing agricultural land currently occupies approximately 89 percent of the total NMC land area (8,200 acres) and virtually all of this will be converted to urban uses except for approximately 200 acres of agricultural land that will be retained by the Southern California Agricultural Land Foundation. Residential land uses, now representing approximately 3 percent, will represent 63 percent of the entire NMC. Commercial land uses, now representing less than 1 percent, will represent 6 percent of the entire NMC. Similarly, industrial land uses, now representing less than 1 percent, will represent 4 percent of the entire NMC. Institutional/public land uses, now representing approximately 6 percent, would increase to 11 percent of the entire NMC. In addition, amenity land uses such as the Village Green, lakes, a golf

course, and trails, which are currently not represented in the NMC, would represent approximately 14 percent of the entire NMC.

The NMC General Plan Amendment envisioned primarily low density (4.6 du/acre) on 4,434 acres of the total 8,202-acre site. The NMC included multi-family residential on another 762 acres including the town center. In total, the NMC includes 5,196 acres where residential development is permitted. The NMC General Plan Amendment forecast a total buildout of 31,188 du of which 20,306 would be single-family and 10,792 would be multi-family.

A total of 842 acres was forecast for commercial/office/industrial use. Total commercial development was forecast on 504 acres with 5,505,984 sq ft. Of that total, Regional commercial land use in the NMC was forecast for 195 acres and 2,123,550 sq ft of development. Industrial land use was forecast for 338 acres and 5,153,148 sq ft.

The NMC includes an Overview and Structure calling for “a place of diversity” to include “all uses that are typically found in sustainable communities.” This includes nearly every category of land use except very dense, high-rise residential. The vision for the NMC was founded on:

- Its functional role.
- Uses to be accommodated.
- Physical form and character of development.
- Livability of its places.
- Quality of life for residents.
- Its relationship to the greater Ontario community.
- Its economic performance.

The NMC Plan shows three major nodes. Regional commercial nodes are at the east and west ends and a major center/town center/college node is in the middle. High-density residential (18 du/ac) is placed around the perimeter of regional commercial centers or in nodes near green belts or along major thoroughfares. Similarly, medium density residential (12 du/ac) and is generally located in nodes near green spaces and major thoroughfares. The NMC General Plan does not provide background on why specific amounts of certain land use were chosen or why certain land uses were located. For example, there is no discussion of jobs/housing balance or the need to provide a certain amount of amenities for a certain population. There is no discussion of keeping higher density residential uses near thoroughfares or employment areas to reduce vehicle trips and promote transit use. Additionally, there is no discussion of balancing the NMC with two large regional commercial centers at the east and west ends.

NMC General Plan Amendment Policies

The NMC General Plan Amendment envisioned the adoption of individual Specific Plans for each development to complement the City's existing zoning code. To guide the development of these Specific Plans, the NMC GPA contained various Objectives and Policies that are intended to achieve the "vision" for the NMC planning area. The Rich Haven Specific Plan document in Section 9 lists each of the policies from the NMC GPA. There are five parts consisting of the five elements of the General Plan Amendment including Community Development; Infrastructure; Aesthetic; Cultural, Open Space and Recreational Resources; Natural Resources; and Hazards. The General Plan Policies are discussed in more detail in the Project Impact section below.

One objective of the NMC GPA was to provide some flexibility in adjusting land uses and density with subsequent Specific Plans, provided that such adjustments did not result in infrastructure capacities being exceeded beyond levels anticipated in the GPA and NMC Infrastructure Master Plans. This intent is evidenced by "Development Capacity" footnotes 7 and 8 on Table 3-4 (Planning Subareas Development Capacity) of the NMC General Plan, which allow for increased du within NMC Planning Subareas provided that the total number of vehicle trips attributable to the development of commercial, office and other principal land uses are not exceeded.

5.12.3 - Thresholds of Significance

According to the Initial Study, the project could have a significant impact on Land Use and Planning if it would:

Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Other thresholds included in the CEQA Guidelines related to dividing an established community and conflicting with habitat or natural community conservation plans were considered in the Initial Study and impacts were found less than significant.

In addition, SCAG (1993) views significant impacts as those, which would:

Result in population, housing, and employment growth inconsistent with the regional level of growth projected under the Southern California Association of Government's Regional Comprehensive Plan.

5.12.4 - Project Impacts

The proposed project includes approval of zoning documents in the form of a Specific Plan, subdivision maps, grading permits, street improvement plans, final site plans, development agreements and other related actions for properties located with the New Model Colony. Each future development application with the Rich Haven Specific Plan area will be reviewed by the City for consistency with its Development Code. This will ensure that future projects are consistent with the provisions of the relevant planning programs.

Regional Planning-Housing and Employment Growth Consistent with SCAG RCP

The proposed project would generate new homes and jobs. New employment would be created in several ways. The 889,200 sq ft of commercial area would generate new jobs for a variety of service and retail workers. Additionally, the necessary infrastructure and services for the project would provide jobs for educators, government, public safety, and utility workers. The City of Ontario now employs 1,000 full time and 300 part time employees and the proposed project would require increases in many categories. Residential service personnel such as landscapers, plumbers, decorators, cleaners, and others would be required. Table 5.12-3 provides estimates of jobs of various types, based on the forecast development, and standard ratios of sq ft per employee. Total employment from the planned mix of commercial and service activities is estimated to be 2,063 jobs.

Table 5.12-3: Rich Haven Projected Employment

Employment Type	Generation Factor	Employment Total
Commercial-Professional	1 per 500 sq ft	1,778
Education	1 per 15 students	153
Government	1 per 300 residents	47
Residential Service Workers	1 per 50 dwelling units	85
Total Employment		2,063
Notes: sq ft = square feet Source: MBA, Chino Preserve EIR, Projected Fiscal Impacts, Stanley R, Hoffman, 2001.		

The proposed project would increase the number of dwelling units and decrease the commercial square footage in comparison to the existing NMC General Plan designation. The project would add 2,988 du and remove 677 jobs from the forecast totals thereby lowering the jobs/housing ratio in the City, the NMC project area and within the Rich Haven project area as explained below and shown on Table 5.12-4.

The jobs/housing balance in the City of Ontario would be decreased. In the year 2020, the City is forecast to have 69,473 du and 122,204 jobs. That produces a jobs/housing ratio of 1.76/1 (Table 5.12-1). This forecast assumes development of the NMC. With the changes contemplated by the proposed GPA, jobs in the City would be reduced to 121,527 and du would be increased to 72,467. That would be a jobs/housing ratio of 1.68/1, or 5 percent lower than the 1.76/1.

The jobs/housing ratio within the NMC would be reduced by 14 percent with implementation of the proposed project. The project would add 2,988 du and remove 677 jobs from the forecast totals within the NMC. The new total for the NMC would include 34,176 du and 24,761 jobs. That produces 0.72 jobs per household. In comparison to the forecasted 0.84 jobs per household in the original NMC, that would be a reduction of 14 percent.

The jobs/housing ratio within the project area would change be reduced by 77 percent with implementation of the proposed project. The jobs housing ratio for the existing General Plan designation on the project site with 2,730 jobs and 1,230 occupied du (3 percent vacancy) would be 2.22 jobs per household. The project would add 2,991 du and remove 677 jobs from the forecasts for the project area. The new total for the project area would include 4,131 du (3 percent vacancy) and 2,063 jobs. That produces 0.50 jobs per household, or 78 percent lower than the 2.22 jobs per household.

Table 5.12-4: Year 2020, Jobs/Housing Balance Impacts

	City of Ontario	NMC AREA	Rich Haven Project Area
Without Proposed Project			
Employment	122,204.0	25,438.0	2,730.0
Occupied Dwelling units	69,473.0	31,188.0	1,230.0
Jobs/Housing Ratio	1.76/1	0.84/1	2.22/1
With Proposed Project			
Employment	121,527.0	24,761.0	2,063.0
Occupied Dwelling units	72,464.0	34,179.0	4,131.0
Jobs/Housing Ratio	1.68/1	0.72/1	0.5/1
Change Due to Project	-5.0%	-14.0%	-78.0%

As shown in Table 5.12-4, the reduction of commercial space and the increase of dwelling units would decrease the jobs-housing balance in the project area by 77 percent, in the NMC by 14 percent and in the City by 5 percent. Accordingly, the proposed project would reduce the jobs housing

balance and would therefore be inconsistent with the SCAG RCP. This is a significant impact of the proposed project.

New Model Colony General Plan Consistency

As indicated below in Table 5.12-5, the proposed General Plan Amendment would result in an increase of 2,994 dwellings units and a decrease of 458,000 sq ft of regional commercial space in comparison to the Existing NMC General Plan Amendment.

Table 5.12-5: General Plan Amendment Land Use Changes within Project Area

Existing NMC General Plan Subareas	Proposed General Plan Planning Areas	Gross Acres	Existing NMC General Plan Permitted Uses within project area	Proposed General Plan Permitted Uses within project area	Proposed Changes in Permitted Uses
6	PA 1-6	110.6	495 sq ft du	503 du	+8 du
12	PA 7-12	194.6	773 sq ft du	1,976 du	+1,203 du
19	PA 20, 21A, and 21B	160.0	0 du 1,306,800 sq ft of regional commercial	1,777 du 889,200 sq ft regional commercial	+1,777 du -458,000 sq ft regional commercial
Total			1,268 du	4,256 du (+336%)	+2,988 du
Total Regional Commercial			1,306,800 sq ft	889,200 sq ft (-65%)	-417,600 sq ft
Notes: sq ft = square feet du = dwelling unit					

Table 5.12-6 compares the proposed changes in land uses to those contained in the complete NMC General Plan Amendment. This table shows that the changes in the proposed General Plan Amendment would add 9.6 percent to the total dwelling units, subtract 8.3 percent from the available commercial and add 9.6 percent to the project population of the NMC.

Table 5.12-6: General Plan Amendment Land Use Changes within NMC

Existing NMC General Plan		Proposed GP Amendment	
General Plan Land Use	Permitted Development	Proposed change	Percentage Change
Residential	31,188 du	+2,988 du	+9.6% du
Commercial	5,505,984 sq ft	-417,600 sq ft	-7.58% sq ft

Table 5.12-6 (Cont.): General Plan Amendment Land Use Changes within NMC

Existing NMC General Plan		Proposed GP Amendment	
General Plan Land Use	Permitted Development	Proposed change	Percentage Change
Industrial	5,153,148	0	0
Population	101,845 persons	+9,908 persons	+9.73% persons
Notes: sq ft = square feet du = dwelling unit			

The number of dwelling units and commercial square footage in the proposed Rich Haven specific plan is consistent with the policies contained in the Sphere of Influence General Plan Amendment and Environmental Impact Report prepared for the New Model Colony. The proposed Specific Plan Land Use Plan includes low-density residential, medium density residential, high-density residential and regional commercial/mixed use areas. With the exception of the medium- and high-density residential uses, the Specific Plan land uses were anticipated for the project site in the NMC Sphere of Influence General Plan Amendment. A General Plan Amendment (GPA) is required, however, to change the NMC General Plan land use designation for Subarea 12 from 4.6 du/acre average density to 12.0 du/acre and 18.0 du/acre average densities, allowing for a transfer of density/trips from the adjacent Regional Commercial District. This requirement for a GPA, in and of itself, does not represent a conflict with an adopted plan that would result in a significant environmental effect. However, land use and policy issues associated with this Amendment, the range of residential densities proposed, transfer of density and trips, and the mixed-use overlay on the Regional Commercial District are considered below.

In terms of the vision for the NMC, the land use impacts of these changes are not significant. The project will increase development density, by replacing relatively large lot single-family development with smaller lot and multi-family development. The area for Regional Commercial use remains at 160 total acres, but it is estimated that only 62.8 acres of those 160 acres would be used for commercial development if the minimum amount of 889,200 sq ft were developed. However, these changes are consistent with the vision for the NMC. The proposed land use changes are similar in all respects to the imperatives of the NMC. Each of the bulleted items listed above in the Existing Conditions section is fulfilled (particularly economic performance) with the proposed changes contained in the General Plan Amendment. The functional role remains the same and the uses to be accommodated are consistent with the General Plan. The physical form and character of development, the livability of the development, quality of life for residents and its relationship to the greater Ontario community remain of the highest quality. The economic performance of the land will also remain high as the proposed General Plan amendment meets the financial goals of the applicant.

NMC General Plan Policies

The Rich Haven Specific Plan in Section 9 lists each of the policies from the New Model Colony General Plan that are intended to achieve the “vision” for the NMC planning area. There are five parts consisting of the five elements of the General Plan Amendment including Community Development; Infrastructure; Aesthetic; Cultural, Open Space and Recreational Resources; Natural Resources; and Hazards. The consistency of the proposed project with each of the policies is discussed in the Specific Plan Policy Matrix in Section 9 of the Specific Plan where it indicates that the proposed project either fully complies with or is Not Applicable to nearly every one of the stated policies.

The Policy Matrix in the Specific Plan encompasses 59 pages and is available for review in the document which is incorporated by reference. For the sake of brevity, Table 5.12-7 discusses only those policies where the Policy Matrix indicates that the proposed project only partially complies with a stated policy.

Table 5.12-7: Consistency with NMC General Plan Amendment Policies

Relevant Policy	Compliance with Policy
1.4 Housing Diversity/Quality	
Policy 1.4.3 Provide for an overall average density of 4.6 units per gross acre in areas designated as “Residential-Low Density” by the NMC General Plan Land Use Plan, within which a variety of parcel sizes and housing types are allowed. Densities may be varied throughout a planning subarea, as long as the average density is not exceeded. (I-7, I-8 and I-10.)	The NMC General Plan provides for 1,268 du on 350.6 acres designated as Residential-Low Density for a gross density of 3.62 du/acre. The Proposed Project provides 2,482 units on the same 350.6 acres for a gross density of 7.1 du/acre. However, the proposed project reduces commercial development and fulfills the intent of the NMC General Plan through the Trip Budget Concept. Impacts are less than significant.
1.6 Schools	
Policy 1.6.4 Include provisions to promote the consolidation of school campuses sharing common facilities such as play fields, gymnasiums, auditoriums, and other facilities, where feasible. (I-7 and I-10.)	The Rich Haven Specific Plan includes a site for a potential Middle School on Haven Avenue at a distance too far from the existing Colony High School to promote consolidation of school campuses. However, the Middle School site is located across a street from a park that could be used in conjunction with the middle school recreation areas.

Table 5.12-7 (Cont.): Consistency with NMC General Plan Amendment Policies

Relevant Policy	Compliance with Policy
	The consolidation of school facilities may be desirable in some instances and may lead to some economies of scale, but it is not typically accomplished. Combining middle school and high school campuses has been avoided in the Los Angeles Unified School District New Construction program because of the difficulties of mixing the two age groups. The lack of school consolidation in the Rich Haven Specific Plan is not considered a significant impact.
1.9 Regional Centers	
Policy 1.9.4 Accommodate buildings at a height of 1 to 3 stories, with 4 stories allowed for mixed use structures. This would accommodate a maximum floor area ratio of 0.5:1 for commercial/office uses and 2.0:1 for mixed use buildings. Sports stadium/arena, hotel/conference facilities, and other “specialty” uses may require additional height. (I-7 and I-10.)	The Rich Haven Specific Plan Development Regulations for Regional Commercial and anchor (page 3-55) provides for FARs of 0.75:1 for Commercial/Office and 3.5:1 for Mixed Use Buildings. The Maximum overall FAR would be 2.0:1. The additional FAR permits design flexibility, and impacts are not significant.
3.1 Housing	
Policy 3.1.1 Provide for the development of and estimated 20,396 single-family and 10,792 multi-family dwelling units to sustain sound economic development. (I-16.)	The Rich Haven Specific Plan alters the NMC ratio that included 1,268 single-family units in the project area by providing 1,128 single-family units on medium size and small lots and by providing 3,131 attached dwelling units. However, this is accomplished through use of the Trip Budget Concept which was envisioned in the NMC GPA and therefore impacts are less than significant.
8.1 Schools	
Policy 8.1.11 Locate preschool and day-care facilities in appropriate areas throughout the Sphere of Influence to meet the needs of a growing population. Require specific planned areas to designate sites for day-care facilities. (I-7 and I-10.)	While the Specific Plan does not specifically locate preschool and day care facilities, they are a permitted use within all the residential areas. Impacts are less than significant.
10.1 Fire Protection and Emergency Medical Service	
Policy 10.1.2 Require that a total of three fire stations be incorporated within the “Neighborhood Centers,” “Town Center,” or other activity nodes. (I-7 and I-10.)	The Rich Haven Specific Plan locates these facilities in the mixed-use area. Impacts are less than significant.

Cumulative Impacts

The land use changes contained in this project are consistent with the NMC General Plan and EIR. The relocation of residential units within the project area and the trade out of commercial for residential development based on vehicle trip count were anticipated. There are no other related

projects at this time that, taken together with this one, would create cumulative land use impacts. Related projects in the area such as adjacent Specific Plans are being developed consistent with the NMC General Plan. No cumulative impacts would occur.

The proposed project will have a significant adverse impact to the jobs-housing balance in relation to the NMC General Plan. However, the related projects listed in Chapter Three do not include conversions of commercial uses to residential uses. Therefore, the impacts to the jobs-housing balance are limited to this project and there is no cumulative impact.

Mitigation Measures

No mitigation is available for the impacts related to the jobs-housing balance other than selection of an alternative project.

Level of Significance After Mitigation

The jobs/housing balance impacts are significant and unavoidable. A Statement of Overriding Considerations will be required.

