

4.10 POPULATION AND HOUSING

This section describes the existing population and housing conditions in and around the project area, as well as applicable policies and regulations related to population and housing, including an analysis of the project’s consistency with the applicable policies and regulations. This section assesses the potential impacts to population and housing as a result of project implementation and includes mitigation measures to reduce potentially significant impacts. Cumulative impacts to population and housing are also evaluated, as well as the project’s contribution to such cumulative impacts. Information within this section was largely derived from the *Downtown Seaside Existing Market Conditions Memorandum* prepared by Bay Area Economics (BAE) (2007), which utilized population and housing data from regional, state, and federal agencies. These sources included the Association of Monterey Bay Area Governments (AMBAG), the California Employment Development Department (EDD), the California Department of Finance (DOF) Demographic Research Unit, and the United States Census Bureau. Related data was also obtained from private sources, such as Claritas, which consolidate and publish data obtained from various public agencies.

4.10.1 ENVIRONMENTAL SETTING

Population Trends

Seaside’s population declined from 38,901 in 1990 to 33,100 by 2000, and rose only slightly to 34,194 by 2007, as shown on **Table 4.10-1**. The population decline is seen as a direct result of the closure of the Fort Ord Army Base in 1994 and the resulting departure of base personnel and other persons directly connected to base operations. This decline accounted for an approximately 12 percent decline in the City’s population and an approximately 15 percent decline for the Monterey Peninsula as a whole. In contrast, during the same period, the State of California’s population grew by 28 percent.

Table 4.10-1 Population Trends, 1990-2008

	<u>1990</u>	<u>2000</u>	<u>2008</u>	Total Change 1990-2007
City of Seaside	38,901	33,100	34,194	(4,707)
Monterey Peninsula	99,222	88,382	84,612	(14,610)
State of California	29,760,021	33,871,648	38,049,462	8,289,441

Source: Claritas, 2007; Bay Area Economics, 2007; DOF, 2008

Note: Populations for 2000 are corrected to reflect a Census Bureau error that excluded a California State University Monterey Bay dormitory population of 1,404.

Regional forecasters project a small increase in population for the City and the Monterey Peninsula by 2035, as shown in **Table 4.10-2** below. Between 2010 and 2035, Seaside’s

population is projected to increase by 883 people, representing growth of 2.5 percent. Between 2010 and 2030, the population of the Monterey Peninsula cities is projected to increase by 5,042 people, or 5.2% percent. Projections for Seaside reflect the relatively built out nature of the City and strict limits on the amount of water that might be available for new residential development.

Table 4.10-2 Population Projections, 2010-2035

	<u>Projections</u>				Total Change	Percent Change,
	<u>2010</u>	<u>2020</u>	<u>2030</u>	<u>2035</u>		
City of Seaside	34,666	35,165	35,017	35,549	883	2.5%
Monterey Peninsula	96,241	99,640	101,283	NA	5,042	5.2%

Source: AMBAG 2008 Population, Housing Unit and Employment Forecast; Bay Area Economics, 2007.

Housing

As of 2008, the DOF estimated a total of 11,257 housing units in Seaside, which is approximately the same number of units as counted in the 2000 Census (11,205). More than 75 percent of these units are single-family homes, 20 percent are within multi-family developments, and the remaining 5 percent are mobile homes. The DOF estimates the City has a vacancy rate of 11.7 percent, which is above the County average of 8.7 percent. This higher vacancy rate reflects continued effects from the closure of Fort Ord and departure of base personnel.

Employment

As shown in **Table 4.10-3**, between 1990 and 2000, the City’s labor force (population over the age of 16) decreased 21 percent, dropping from 29,150 to 23,043 people. As a result, the active labor force shrank 34 percent, going from 22,617 total members in 1990 to 14,970 total members in 2000. The majority of the labor force decrease was accounted for in the loss of military personnel. In 1990, 38 percent of the active workforce was in the armed forces; by 2000 this level dropped to 9.6 percent. The civilian labor force was less impacted by the base closure, losing only 3 percent of its initial numbers. Of the active civilian labor force in 2000, approximately 702 were considered “unemployed”, making Seaside’s unemployment rate approximately 5.2 percent. According to the EDD, the City has experienced a slight increase in employment rates since the 2000 US Census. As of September 2008, the City’s labor force had 16,900 people, of whom 600 were unemployed (a 3.8 percent unemployment rate). ¹²

¹ Labor force information from 1990 and 2000 was obtained from the U.S. Census Bureau Online Census Summary Files. Recent (2008) information was retrieved from the California Employment Development Department, Labor Market Info Data Library.

Table 4.10-3 City Trends in Employment Rates between 1990 and 2000

	1990 Census	2000 Census	2008 CA EDD ^A
Total Possible Labor Force	29,150	23,043	N/A
Active Labor Force	22,617	14,970	16,900
Civilian Labor Force <i>(Percent Active Labor Force)</i>	13,962 <i>(62%)</i>	13,524 <i>(90%)</i>	N/A
Employed	12,973	12,822	16,300
Unemployed <i>(Percent Civilian Labor Force/Unemployment Rate)</i>	989 <i>(7%)</i>	702 <i>(5.2%)</i>	600 <i>(3.8%)</i>
Armed Forces <i>(Percent Active Labor Force)</i>	8,655 <i>(38%)</i>	1,446 <i>(9.6%)</i>	N/A

^A The CA EDD does not provide detailed information for the sub-categories included in the US Census.
Source: US Census, 1990 and 2000; CA EDD, September 2008.

AMBAG employment projections for the City and region are prepared in five year intervals to the year 2030. These projections are based on regional econometric models that approximate employment growth for cities by allocating regional estimates to specific jurisdictions based on available land and policies. The jobs-housing ratio represents the number of jobs available per the number of housing units. A jobs-housing ratio that is greater than one is an indication that there are more jobs than housing units; a ratio that is less than one indicates there are more housing units than jobs. Seaside current job-housing ratio, projected to be 0.70 by 2010, indicates that Seaside has more housing units than jobs. A more balanced jobs-housing ratio (in other words, closer to 1.0) is typically considered desirable by most smaller cities. When the jobs-housing ratio is low, this suggests that residents need to leave the community (perhaps traveling a great distance) to get to jobs. This has the indirect impacts of adding to traffic congestion and contributing to economic “leakage” – a loss of tax revenue on jobs and employment that could potentially accrue to the home city. A ratio that is too high can suggest that a city’s housing is too costly for local workers or that housing is relatively scarce in the community. Seaside’s jobs-housing ratio stands in sharp contrast to that of the Monterey Peninsula as a whole, as shown in **Table 4.10-4**, below. The City of Monterey in particular is a major regional job center employing residents from the Peninsula area and points beyond; it thus has a jobs housing ratio approaching 2.0 (meaning two jobs for every housing unit).

² Obtained online at <<http://www.labormarketinfo.edd.ca.gov/>>; Local Area Profile for the City of Seaside. Information provided by the CA EDD is general, and is not broken into the labor force sub-categories included in the US Census.

Table 4.10-4 Seaside and Monterey Peninsula Employment Projections, 2010-2030

	2010	2015	2020	2025	2030	Total Change 2010-2030	Percent Change 2010-2030
City of Seaside							
Jobs	7,866	8,775	9,683	11,379	13,075	5,209	66.2%
<i>Jobs-Housing Ratio</i>	0.70	0.78	0.86	1.01	1.16	0.49	-----
Monterey Peninsula							
Jobs	66,014	70,786	75,554	81,627	87,699	26,239	32.8%
<i>Jobs-Housing Ratio</i>	1.77	1.85	1.94	2.09	2.24	0.41	-----

Source: Claritas, 2007; BAE, 2007.

As indicated in **Table 4.10-4**, regional economists anticipate significant job growth in Seaside by the year 2030. Jobs within the City are expected to increase from 7,866 in 2010 to 13,075 in 2030, a 66.2 percent increase. This significant growth would elevate the City’s jobs-housing ratio from 0.70 to 1.16. The basis for these job growth projections is the substantial new commercial development envisioned by the Fort Ord Reuse Plan.

4.10.2 REGULATORY SETTING

California Relocation Assistance Act

The California Relocation Assistance Act, Government Code § 7260, et seq., establishes uniform policies to provide for the fair and equitable treatment of people displaced from their homes or businesses as a direct result of state and/or local government projects or programs. The Act requires that comparable replacement housing be made available to displaced persons within a reasonable period of time prior to the displacement. Displaced persons or businesses are assured payment for their acquired property at fair market value. Relocation assistance in the form of advisory assistance and financial benefits would be provided at the local level. This includes aid in finding a new home location, payments to help cover moving costs, and additional payments for certain other costs. The City formally adopted these and related additional guidelines regarding relocation assistance in Resolution 07-06.

It should be noted that on June 3, 2008, California voters approved Proposition 99, which amended the California Constitution so that local governments are prohibited from using eminent domain authority to acquire an owner-occupied residence for the purposes of conveying it to a private recipient, with limited exceptions.³ Proposition 99 applies only to

³ Full text of Proposition 99, obtained online at <<http://www.smartvoter.org/2008/06/03/ca/state/prop/99/#text>>. Last accessed November 19, 2008.

owner-occupied residences. Cities may still use eminent domain authority to convey non-residential property to other private parties.

California Coastal Act

The California Coastal Act⁴ sets forth standards used by the California Coastal Commission (Commission) in its coastal development permit decisions and for the review of local coastal programs (LCPs) prepared by local governments and submitted to the Commission for approval. These policies are also used by the Commission to review federal activities that affect the coastal zone. Coastal cities and counties must incorporate these policies into their individual LCPs.⁵ As of January 2009, most of the project area is outside of the Coastal Zone, excepting a strip of land along the west side of Del Monte Boulevard, which is in the Coastal Zone and thus subject to the California Coastal Act.

The Coastal Act includes provisions relevant to housing. Section 30007 stipulates that nothing in the Coastal Act shall interfere with any state or federal requirements for the provision of low and moderate income housing, replacement housing, relocation benefits, or any other housing related obligation.

Affordable Housing

Affordable housing is typically defined as housing whose total costs to a lower income household equal no more than 30 percent of its gross monthly income. Total costs included in this 30 percent would include mortgage or rent payments, insurance, property taxes, utilities, and associated costs.

Monterey County has a requirement that housing developers include a certain percentage of affordable housing units in their projects. This Inclusionary Housing Program provides home ownership opportunities for households who have very low, low, and moderate household incomes. The amount of income a household can earn and still be eligible for the Inclusionary Housing Program depends on the current median income for Monterey County as adjusted for household size, the number of people in the household, and the amount of liquid and property assets held by that household.

The City has adopted the County Inclusionary Program into its Municipal Code (Chapter 17.31, Affordable Housing Requirements). According the affordable housing requirements of the City, each residential development, including a condominium conversion, shall be designed and constructed to provide at least twenty percent of the total units as inclusionary units restricted for occupancy by moderate-, low- or very low-income households. The number of inclusionary

⁴ Public Resources Code, Title 20

⁵ A certified LCP consists of the combination of a certified Land Use Plan (LUP) and a certified Implementation Plan. As of January 2009, the City of Seaside has a certified LUP and is in the process of preparing an Implementation Plan for future certification by the Coastal Commission. The Coastal Commission will retain regulatory oversight in the vicinity of the project area until the LCP is certified.

units required for a particular project is determined at the time of tentative or parcel map approval, or, for developments not processing a map, prior to issuance of a building permit.

Another program offered within the City is the Housing Choice Voucher Program (formerly known as Section 8 Housing). This Program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own housing, including single-family homes, townhouses and apartments. Housing choice vouchers are administered locally by public housing agencies (PHAs). The PHAs receive federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the voucher program. The City has participated in the Section 8/Housing Choice Voucher Program since 2004.

Regional Housing Needs

AMBAG is responsible for determining the “fair share” of regional housing need for each jurisdiction in Monterey and Santa Cruz. To this end, AMBAG has prepared a Regional Housing Needs Allocation or RHNA for each city and the counties, effective for the period of January 1, 2007 through June 30, 2014. The number is based on a methodology that incorporates factors such as vacancy rates, potential growth rates (population, jobs, and household formation rates) and demolition of existing housing stock. Each jurisdiction is asked to show in its subsequent housing element update that the number of new housing units at various income levels can be achieved over the appropriate time frame. Seaside’s RHNA number for the current housing element cycle is 598 units, of which 49 percent are required to be affordable housing. The RHNA numbers for the current housing element cycle also require 42 percent of the housing units be allocated to above moderate income households or market rate housing (42 percent).

Seaside General Plan

The 2004 Seaside General Plan identifies the projected future population of the City and provides policies, actions and programs intended to assure adequate housing for all citizens. The Housing Element of the General Plan addresses the quantity and variety of housing, the provision of affordable housing, the distribution and condition of available housing, the projected need for new construction, and constraints on the provision of housing. As of early 2009, Seaside is in the process of updating its Housing Element for the period 2007-2014, based on the most recent RHNA numbers.

The Seaside General Plan includes a number of policies pertinent to consideration of the proposed project, identified below.

Goal H-1: *Maintain a range of housing opportunities to address the existing and projected needs of the community.*

Policy H-1.1: Maintain a variety of housing types, sizes, and prices throughout the city to increase housing choice and ensure that households of all types and income levels have the opportunity to find suitable ownership or rental housing.

Policy H-1.3: Encourage the construction of high-density, well designed housing and residential commercial mixed use projects.

Policy H-1.4: Maintain a geographic dispersal of units affordable to very-low, low- and moderate-income households throughout the City.

***Goal H-2:** Maintain and improve existing neighborhoods and housing.*

Policy H-2.5: Ensure that units produced for very-low, low- and moderate-income households are maintained as affordable units through deed restrictions and other reasonable programs.

***Goal H-3:** Use public-private partnerships and collaborative efforts to ensure that all segments of the community have access to safe and decent housing that meets their special needs.*

Policy H-3.1: Participate in programs assisting in the production and conservation of adequate, safe, and attractive housing affordable to very-low, low- and moderate-income households and other special needs groups.

Policy H-3.5: Facilitate the development and provision of affordable housing through regulatory incentives, density bonuses, and other financial assistance.

Policy H-3.6: Support collaborative partnerships of nonprofit organizations, affordable housing developers, major employers and for profit developers to support the production of a variety of affordable housing opportunities in Seaside.

Project Consistency

The West Broadway Avenue Urban Village Specific Plan is a planning document and, by its adoption, the City or the Agency is not making a decision to commence acquisition of properties in the planning area. If and when the City or Agency begins to consider property acquisitions, numerous steps, including notice and public hearings, will be undertaken before any decision on acquisition is made.

Implementation of the project could result in the displacement of existing residences and people. As discussed under Impact 4.10-3, should the existing residential properties be purchased in the free market and/or developed at higher density by the current residents thereof, no displacement effect would occur. However, should the City utilize an eminent domain proceeding in the purchase of residential properties within the project area, the City would be required to comply with the State of California's Relocation Assistance Act and Proposition 99. As such, owner-occupied residences could not be acquired by the City through

eminent domain authority and subsequently conveyed to a private entity, maintaining consistency with the California Relocation Assistance Act.

Additionally, the portion of the project area inside the Coastal Zone does not include any housing and the Coastal Act provisions regarding replacement housing would therefore not apply.

The project would also maintain consistency with Monterey County's affordable housing regulations through Specific Plan policies which guide the development of adequate affordable housing. Under proposed Specific Plan policies ECON-1, HC-1, and HC-2, the project would increase the variety of housing types and stock of affordable housing, including apartments, townhomes, lofts, and senior housing, within a quarter-mile of the future transit center and within the wider project area. Furthermore, the project would require the use of affordable housing set-aside funds (collected from new development tax increment fees) to be used for either rental or for-sale housing for low and moderate income households. Available set-aside funds generated by the redevelopment of the project area could be used for mixed-income developments in the project area. Affordable housing would be provided in quantities consistent with the City's inclusionary program, as may be in place at the time development permits or subdivision approvals are obtained.

More specifically, Specific Plan policy LIB-2 calls for the consideration of an 80 unit senior housing project within the library/mixed use development area. Implementation of these policies would help advance the City's General Plan policies H-1.1 and H-1.4.

The project would incorporate financial assistance programs through the provision of affordable housing set-aside funds. These funds would be used to facilitate the development of affordable housing through the implementation of financial assistance programs, thereby making the project consistent with General Plan policies H-2.5, H-3.1, and H-3.5. Furthermore, Specific Plan policy ECON-1 requires the redevelopment of the project area to be in accordance with any policies regarding affordable housing, blight, and economic revitalization.

As part of the financial implementation of the project, the RDA is expected to enter into various Exclusive Negotiating Agreements (ENAs) for publically-owned properties, leading to their sale or long-term ground lease for new development through public/private partnerships. Certain partnerships may include the redevelopment of properties as affordable housing units, thereby making the project consistent with General Plan policy H-3.6.

4.10.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Methodology

The impact discussion focuses on the direct growth in population and housing associated with the project, and analyzes the community impacts resulting from the displacement of homes and relocation of current residents. The project's potential to induce population growth is also

assessed in terms of the creation of new employment opportunities, and an evaluation of potential impacts to the City's job-to-housing ratio is included.

The purpose of this section is to provide a general understanding of how implementing the project could affect population growth and housing demand. While these impacts would not cause a direct physical change to the environment, it is important to understand the project's effect on population and housing for the following reasons:

- Population growth generated by the project could create indirect impacts, such as increased traffic, air quality, noise and increased demand for public services. CEQA requires the evaluation of indirect impacts. These impacts are discussed in the respective sections of this Draft EIR relating to those issues.
- Understanding the impacts to population and housing from implementing the project will help assess the adequacy of the policies intended to provide a balance between employment growth and the availability of housing to meet the needs of current and future workers.
- Understanding the impacts to housing demand from implementing the project will help assess the adequacy of local policies intended to provide additional affordable housing for low- and moderate-income households.

Significance Criteria

The following discussion compares growth associated with the project with area population forecasts. The physical impact on the environment from the population growth associated with project implementation (i.e., additional traffic, noise, etc.) and the associated mitigation measures are described in other topical sections of this EIR. In accordance with the *CEQA Guidelines* Appendix G, population and housing impacts are considered significant if the project would:

- a) Induce substantial population growth in the area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure);
- b) Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere.

Project Impacts

Impact 4.10-1: Implementing the project would allow development of up to 410 new housing units, which would directly induce population growth. (Significant)

The project proposes development of 494 dwelling units, representing a net increase of 410 dwelling units in an area of the City that currently contains 84 dwelling units. Assuming new housing units have an average household size similar to current units, the new housing units

would increase the City's population by approximately 1,312 persons,⁶ resulting in a total 2030 Seaside population of approximately 35,506⁷ persons.

In its review of the project for consistency with local population projections, AMBAG used a horizon year of 2035. AMBAG projects that by that year, Seaside's population would be 35,549. AMBAG concluded on this basis that the project would be consistent with the regional population forecast.⁸

Notwithstanding, as further discussed in **Section 4.14, Utilities**, there is currently not enough water to serve all development associated with the project. Projects that would supplement regional water supply are in process, but cannot at this time be relied upon as a dedicated source of water to serve the project. **Mitigation Measure 4.14-1** (in **Section 4.14, Utilities**) would limit new development in the project area to an amount that could be served by the currently available water supplies. No further development could proceed until additional water sources for the project are secured. Therefore, changes in population would not occur until additional water sources for the project are secured.

Significance After Mitigation: Less than Significant.

Impact 4.10-2: Implementation of the project would create new businesses and employment opportunities, which could directly induce population growth in the City of Seaside. (Less than Significant)

Economic forecasts prepared alongside the Specific Plan estimate that non-residential development associated with the project would generate about 1,000 new permanent jobs. Temporary construction jobs would also be fostered by development activity associated with project buildout.

Permanent jobs would be associated with proposed new retail, office, and hotel development. The two largest sources of employment would be new office and retail uses, some of which would be opportunities well-suited for second wage earners in households, youth, and others. The office jobs are expected to provide a broader range of opportunities, from administrative work to more skilled professional positions.

With the introduction of new employment opportunities, there is a potential that an increase in population could occur. However, the City currently has an excess amount of housing, with a vacancy rate of approximately 11.7 percent, and an unemployment rate comparable to national and state averages.

⁶ Projected increase calculated using 3.2 persons per household (3.2 x 410= 1,312).

⁷ Projected increase plus current DOF population estimates (34, 194 + 1,312 = 35,506)

⁸ Correspondence from David Roemer, AMBAG, February 13, 2009.

The construction of new developments within the project area would increase temporary construction jobs in the area. As buildout of the project is expected to occur gradually over a 20 year period, construction related employment would be similarly dispersed over time. Local construction companies are likely to find ample pools of employable personnel in the local area, based on current and projected employment trends.

Due to the fact there is currently a surplus unemployed workforce within the City, it is likely that the current residents would fill the majority of these new positions. Any additional population growth induced by the creation of new businesses could be supported by the available housing and new housing planned as part of the project. Furthermore, the creation of new jobs would beneficially impact the jobs-to-housing ratio within the projected trends in included in **Table 4.10-4**. Because new employment opportunities generated by the implementation of the Specific Plan would impact the jobs-to-housing ratio within the projected trend, and because new jobs are likely to be filled mostly by current residents, the creation of these new businesses is not expected to induce a population growth that would have a significant impact on the City.

Moreover, the project would concentrate new growth in a compact urban form, which would help further the City's goal to promote a mixture of land uses and a balance of jobs and housing to support a community in which people can live, work, shop, and play⁹. Therefore, impacts related to population growth would be less than significant and no mitigation is required.

Impact 4.10-3: Implementation of the project would displace existing residences and people and could necessitate the construction of replacement housing elsewhere. (Less than Significant)

The project would provide a new zoning designation for lands currently containing a total of 84 residential dwelling units. The project would redesignate these lands for higher density residential uses. This redesignation would not directly result in any residential displacement, but would foreseeably have indirect displacement effects over the long term. To the extent any such existing residential properties are sold on the free market by current owners with the intent of demolishing existing housing in order to build new housing at a higher density, significant displacement effects would not occur. Such a sale of an existing property and its redevelopment at a higher density would not constitute displacement; the seller of any such property would benefit from the sale of such property and/or its potential redevelopment. However, in situations where all of the above conditions are in place except that the housing is currently renter-occupied, a limited displacement effect could occur, particularly if large numbers of people and/or housing units are involved. However, as of 2008, the City has a relatively large percentage of vacant housing units (nearly 12 percent, comprising both rental and for-sale housing) which would be available to renters currently living in the project area.

The City acknowledges that the potential displacement of even a single housing unit would have potentially large effects on the people living there. However, the overall displacement potential

⁹ Seaside General Plan, Land Use Element, Goal LU-1.

of the project is limited in number and would be spread over the 20 year time frame of the project. At maximum, there is the potential the City could seek to acquire through eminent domain and thus displace each of the 84 residential households in the project area.

Significant displacement impacts might occur if the City used its eminent domain authority to purchase lands containing existing housing units for conveyance to a third party developer to facilitate land development consistent with the project. Should the City begin to consider the utilization of eminent domain proceedings to acquire residential properties within the project area, the City will be required to undertake additional steps and procedures, including providing notice and hearings. In such an event, the City would be required to comply with the State of California Relocation Assistance Act (RAA) and other provisions as set forth in City of Seaside Resolution 07-06 during the property acquisition process. Compliance with these policies would provide relocation benefits to any displaced residents, including:

- Financial compensation for acquired properties;
- Assistance in locating and obtaining suitable replacement housing; and
- Information on federal and state programs that may provide further assistance.

With adherence to these existing laws and regulations, potential relocation impacts of the project would be reduced to a less than significant level. No further mitigation is required.

Cumulative Impacts

The area for cumulative population and housing impact analysis is the project area and the City of Seaside. The methodology used for evaluating cumulative impacts related to population and housing utilizes the 2004 Seaside General Plan and General Plan EIR.

Population growth in Seaside, as well as in all Monterey Peninsula communities, is limited by the availability of water. Seaside and surrounding communities have set firm limits on future growth tied to demonstrated availability of water. Other projects proposed in the City of Seaside would directly and indirectly contribute to population increases; each of these projects would be reviewed by appropriate jurisdictions for demonstration of available water resources. As new development would not proceed until availability of water resources was demonstrated (at both project and cumulative levels), the total impact would be less than significant.

In terms of residential displacement, most other developments anticipated in the Seaside area would be on undeveloped, vacant, or underutilized sites, where the potential to result in displacement of residences is minimal. Where displacement would be necessary, existing state laws and local ordinances would reduce the impact of potential displacement impacts to a less than significant level. The total impact of the project and cumulative projects relative to residential displacement is therefore not significant.