

## CHAPTER 3.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the CEQA Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the SEIR includes the following issues, which are addressed in this chapter:

- a. Growth-inducing impacts of the Project (addressed below in Section 3.1);
- b. Environmental effects of the Project found not to be significant through the scoping process, or through further evaluation in the SEIR (addressed below in Section 3.2);
- c. Significant irreversible environmental effects that would be involved in the Project should it be implemented (addressed below in Section 3.3); and,
- d. Significant environmental effects that cannot be avoided if the Project is implemented (addressed below in Section 3.4).

### 3.1 Growth Inducing Impacts

As stated in the 2011 General Plan Update PEIR, the CEQA Guidelines require that an EIR include a discussion of the ways in which a project could directly or indirectly foster population growth or economic development, and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[d]). According to CEQA Guidelines Section 15126.2(d), “it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.” A project may result in the potential to directly and/or indirectly induce growth. Direct growth inducement can result from the construction of new housing that would result in new residents moving to an area. Indirect growth can be induced in a number of ways, including the stimulation of economic activity within the region that would result in the need for additional housing and services to support the new employment demand, or through the elimination of obstacles to growth, including both physical and regulatory obstacles. Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. The 2011 General Plan serves as the applicable land use plan for the unincorporated area of San Diego County and identifies areas intended for future development of varying land uses, in addition to roadways and infrastructure, to accommodate the forecasted population growth. As the 2011 General Plan defines the location, type, and intensity of growth, it is the primary method through which development and growth within a community are regulated.

The 2011 General Plan is intended to accommodate its fair share of growth within the region, as identified by SANDAG in the Regional Comprehensive Plan (RCP). While the proposed Project would not result in unplanned growth, it would be considered growth inducing, similar to buildout of the 2011 General Plan, because it would accommodate population growth within the

unincorporated County, as compared to existing conditions. The Project proposes land use designations that would allow for construction of new housing and other uses that would result in future growth in areas that may be constrained by a lack of infrastructure. For example, buildout of the Village Core Mixed Use and Rural Commercial designations proposed in the Alpine CPA would eventually require extension of water and sewer services from the west and has the potential to indirectly induce growth where development was previously constrained by reliance on groundwater and septic systems. The CEQA Guidelines state that the environmental effects of induced growth are considered indirect impacts of a project and may be considered significant, adverse environmental impacts.

### **3.1.1 Direct Population Growth**

The proposed Project would directly influence the unincorporated County's population by providing land use designations to accommodate 6,245 units, which is 1,959 units beyond what was projected in the 2011 General Plan. Therefore, the development of land uses and infrastructure that would be accommodated by the proposed Project would directly induce population growth. A majority of the increase in potential development would be in the Alpine CPA. The proposed Project would increase the amount of residential units in the Alpine CPA by 2,163 units beyond what was anticipated for that planning area in the 2011 General Plan. Because the eastern portion of the unincorporated County is relatively undeveloped, the accommodated increase in development under the proposed Project would result in a substantial increase in population growth relative to existing conditions as well as beyond what was anticipated in the 2011 General Plan for the Alpine CPA. However as discussed further in Section 2.8.3.2 of this SEIR the proposed Project would be consistent with all of the land use goals and policies identified in the 2011 General Plan. Therefore although the proposed project would result in revisions to the number of dwelling units in the Alpine CPA beyond that anticipated by the 2011 General Plan Update PEIR, the findings of the growth induction analysis in the General Plan Update PEIR remain applicable to the proposed Project. Potential environmental impacts of growth are discussed in Sections 3.1.1 Direct Population Growth; 3.1.2, Employment Growth; 3.1.3 Removing Obstacles to Growth; and 3.1.4 Environmental Impacts of Population Growth, of the General Plan Update PEIR. The information provided in these sections applies equally to the proposed Project and Alpine CPA because the land use designations apply countywide and would be consistent with the goals and policies of the 2011 General Plan.

### **3.1.2 Employment Growth**

In addition to direct growth, additional indirect growth could occur as new businesses are established or existing businesses expand, thus creating new sources of employment. Increased industrial, commercial, and residential development typically generates a secondary or indirect demand for other services, such as groceries, entertainment, and medical services that will stimulate economic activity. The development of new uses consistent with those under the

proposed Project would result in secondary demand for goods and services. Economic growth would also result in additional population growth as new jobs are created and employees create an increased demand for housing in the region. Both employment and population growth would be accommodated under the proposed Project through the proposed intensification of development in town centers in communities throughout the unincorporated County.

2011 General Plan Land Use Element Policy LU-1.2 prohibits leapfrog development that is inconsistent with the Community Development Model. Leapfrog development consists of village densities located away from established villages or outside established water and sewer service boundaries that require new infrastructure and develop new housing that directly or indirectly induce growth. Policy LU-3.3 requires new large developments to establish a complete neighborhood which includes a neighborhood commercial center within easy walking distance of surrounding residences. Policy LU-11.1 encourages the location of commercial, office, and industrial development in village areas with high connectivity and accessibility from surrounding residential neighborhoods. Policies LU-11.2 and LU-11.7 require that commercial, office, and industrial development is located, scaled, and designed to be compatible with the unique character of the community and residential development. These policies require concurrent residential and commercial development. As discussed further in Section 2.8.3.2 of this SEIR the proposed Project would be consistent with all of the land use goals and policies identified in the 2011 General Plan. Therefore, although the proposed Project would result in growth inducement due to increased employment opportunities, the proposed Project would be consistent with the 2011 General Plan land use framework, as well as policies identified in the Land Use Element, which would guide development so that employment opportunities and associated housing demand would be developed consistent with each other.

### **3.1.3 Removing Obstacles to Growth**

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing impact. A discussion of the potential effects of the proposed Project on physical or regulatory obstacles to growth is provided below.

#### **3.1.3.1 *Physical Obstacles to Growth***

A physical obstacle to growth typically involves the lack of public service infrastructure. The proposed Project would trigger growth if it would result in infrastructure with excess capacity, or, if it would remove an obstacle to growth in an area, such as providing infrastructure that was previously not available. Implementation of the proposed Project would allow for the development of land uses that would ultimately require the extension of roadways, sewer, water, and energy services throughout the unincorporated County. Increased road access and infrastructure, such as water and sewer service, would occur under the proposed Project; however, this type of development would be limited in the rural areas of the County to be consistent with the natural and human-made environment. The existing infrastructure in the

unincorporated County is not adequate to support the growth accommodated under the proposed Project and therefore presents an obstacle to growth.

The 2011 General Plan includes goals and policies that would ensure that road improvements and extensions included in the proposed Project Mobility Element roadway amendment, and development of new public services and infrastructure, are provided consistent with development accommodated by the 2011 General Plan land use framework. The proposed land use changes in Alpine will require changes to the 2011 General Plan Mobility Element for the Alpine Community to either increase the number of travel lanes on certain roads or accept certain segments to operate at a deficient Level of Service (LOS) of E or F.

The proposed Project would be consistent with all goals and policies in the 2011 General Plan. Policy H-1.3 of the 2013 General Plan Housing Element encourages the development of housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available. Land Use Element Policy LU-9.4 prioritizes infrastructure improvements and the provision of public facilities for villages and community cores, consistent with the intensity of development allowed by the proposed Project land use map. This policy avoids providing more infrastructure than is necessary to accommodate planned growth. Policy LU-12.1 requires the provision of infrastructure, facilities, and services concurrent with new development. Providing infrastructure concurrent with development instead of prior to development allows for the appropriate amount of infrastructure to be provided. Policy LU-14.4 prohibits the extension of sewer facilities outside of village boundaries which would have the potential to induce unplanned growth and be inconsistent with the 2011 General Plan. Although the 2011 General Plan provides a framework for infrastructure that would minimize unplanned growth, new and expanded infrastructure would support planned growth proposed by the proposed Project. Therefore, the proposed Project would remove an existing obstacle to growth in order to accommodate new development that would induce population growth in the region.

### **3.1.3.2 *Regulatory Obstacles to Growth***

The elimination or change in regulatory processes, including existing plans, policies and ordinances, would potentially result in the removal of restrictions to growth, which would allow for new or increased population growth to occur. The proposed Project would include a revision to the Zoning Ordinance, which would have the potential to remove an obstacle to growth in the unincorporated County. As discussed further in Section 2.8.3.2 of this SEIR, the proposed Project involves a GPA to designate former FCI lands with land use categories consistent with the Guiding Principles and Policies of the adopted 2011 General Plan. In addition, the Project involves proposed changes in land use designations for approximately 400 acres of private lands adjacent to former FCI lands to ensure that the uses anticipated for these lands are consistent with the changes proposed for the former FCI lands. The proposed Project assigns land use designations in the Alpine CPA that require the expansion of the SDCWA boundary to provide

imported water and sanitary sewer services. While buildout of the proposed Project land use designations within the Alpine CPA would involve expansion of the SDCWA to allow for extension of utilities to accommodate future development, unplanned growth would not occur because the eastern portion of the Alpine CPA is surrounded by CNF lands that will remain undeveloped after buildout of the proposed Project. Both the proposed Project land use designations and the adopted 2011 General Plan designations anticipate growth to the east of existing communities within Alpine. The effect of these regulatory changes would result in the removal of obstacles to growth. While removal of these regulatory obstacles may induce growth in some areas compared to growth allowed under existing regulatory processes, new growth would be consistent with the 2011 General Plan and would not be unplanned growth.

### **3.1.4 Growth Inducing Impacts Conclusion**

As described above, the proposed Project would be considered growth-inducing because it would accommodate new residential development that would result in direct inducement of population growth, and an increase employment opportunities and removal of obstacles to growth that would indirectly induce population growth in the region. Therefore, the proposed Project would have the potential to result in adverse physical environmental effects due to population growth. Environmental impacts of the proposed Project were evaluated in Sections 2.01 through 2.15 of this SEIR and significant impacts were identified and mitigated to the extent feasible. Any direct and cumulative impacts that would not be mitigated to below a level of significance are identified in Section 3.4, Significant and Unavoidable Impacts.

### **3.2 Environmental Effects Found Not to be Significant**

Section 15128 of the CEQA Guidelines requires that an EIR “contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.”

As described in Section 1.1.2, SEIR Review Process, the County of San Diego has engaged the public in the preparation of the environmental document through publication of the Notice of Preparation (NOP) and subsequent public review period and scoping meeting to allow for input from the public, affected agencies, and interested organizations. Comments received during the public scoping period have been considered in the process of identifying issue areas that should receive attention in the SEIR. The contents of this SEIR were prepared in accordance with the CEQA Guidelines and with consideration for public and agency input received during the scoping process. Issues that were found to have no impact or less-than-significant impacts do not need to be addressed further in this SEIR. Based on the comments received from the NOP and the results of the scoping process, a determination was made that the SEIR must contain a comprehensive analysis of all environmental issues identified in Appendix G of the CEQA Guidelines, with exception of the following:

- Geology and Soils: The 2011 General Plan Update PEIR determined that potential impacts with regard to geology and soils would be less than significant, and no mitigation measures were required. As existing conditions and future development activities with regard to geology and soils that were considered and evaluated in the 2011 General Plan Update PEIR remain the same as for the Project areas, the analysis and findings given in the 2011 General Plan Update PEIR are applicable to the proposed Project, and therefore, were not further discussed in detail in the SEIR.
- Population and Housing: The 2011 General Plan Update PEIR provides an evaluation of potential impacts with regard to population and housing, displacement of housing, or displacement of people resulting with buildout of the 2011 General Plan. Through this analysis, no significant impacts were identified, and no mitigation measures were required. As the 2011 General Plan provides the framework for future planned growth within the unincorporated County, and the proposed Project allows for future development on the former Project areas consistent with the County's planned growth, the analysis and findings given in the 2011 General Plan Update PEIR with regard to population and housing are applicable to the proposed Project, and therefore, were not further discussed in detail in the SEIR.

After further study and environmental review in this SEIR, direct, indirect, and cumulative impacts of the proposed Project would be less than significant or could be reduced to less-than-significant levels with mitigation measures for the following issue areas:

- Cultural Resources;
- Land Use; and
- Recreation

### **3.3 Significant Irreversible Environmental Changes**

Section 15126.2(c) of the CEQA Guidelines defines an irreversible impact as an impact that uses nonrenewable resources during the initial and continued phases of a project. Irreversible impacts can also result from damage caused by environmental accidents associated with a project. Irretrievable commitments of resources should be evaluated to ensure that such consumption is justified. As stated in the 2011 General Plan Update PEIR, Section 15126.2(c) of the CEQA Guidelines describes significant irreversible environmental changes that would be caused by a project as:

*Uses of nonrenewable resources during the initial and continued phases of a project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses.*

*Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

Generally, a project would result in significant irreversible environmental changes if:

1. The primary and secondary impacts would generally commit future generations to similar uses;
2. The project would involve a large commitment of nonrenewable resources;
3. The project involves uses in which irreversible damage would result from any potential environmental accidents associated with the project; or
4. The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Implementation of the proposed Project would accommodate future development that would result in the conversion of presently undeveloped land to residential and commercial uses. Development consistent with the proposed Project would constitute a long-term commitment to these land uses. Additionally, irreversible changes would likely occur due to future excavation, grading, and construction activities associated with future land uses consistent with the 2011 General Plan. Although the environmental impacts of these changes can generally be addressed by mitigation measures, the potential for disturbance would represent an irreversible change. Restoration of the region to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Renewable, nonrenewable, and limited resources would likely be consumed as part of future development consistent with the proposed Project would include, but are not limited to oil, gasoline, lumber, construction aggregates, asphalt, surface water and groundwater, energy, steel, and similar materials. Development of land uses consistent with the proposed Project would require the consumption of lumber, aggregates, asphalt, steel, and other construction materials. Both construction and operation of land uses would require the consumption of oil, gasoline, water, and energy. For example, construction equipment would require oil and gasoline for operation, and residents of new housing units in the County would consume energy and water during daily activities.

In addition, development of the proposed Project would result in increased demand on public services and utilities (see Section 2.11, Public Services, and Section 2.14, Utilities and Service Systems). This increased demand would require expansion of infrastructure that would result in the irreversible conversion of land similar to other development types and would also result in the permanent commitment of resources such as water and energy by making these resources available to more consumers. The proposed Project would also result in significant unavoidable effects related to air emissions (see Section 2.3, Air Quality). Long-term impacts would also result from an increase in vehicular traffic and associated noise emissions (see Section 2.13,

Transportation and Traffic, and Section 2.10, Noise). Additional development that would occur under the proposed Project could result in the loss of significant historical resources (see Section 2.5, Cultural Resources) or important farmland or forestry resources (see Section 2.2, Agricultural and Forestry Resources) as lands containing these resources are converted to other land uses. Additionally, besides increasing consumption of mineral resources for development, new development has the potential to make mineral resource deposits unavailable for future extraction by placing structures on top of resources or by developing land uses that would be incompatible with extraction operations in the vicinity of known mineral deposits (see Section 2.9, Mineral Resources).

As stated in the General Plan Update PEIR, the CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the proposed Project. As described in Section 2.6, Hazards and Hazardous Materials, implementation of the proposed Project would allow for the development of land uses that may store, use, or dispose of hazardous materials. Additionally, businesses using hazardous materials may expand or increase to accommodate the projected population growth under implementation of the proposed Project. Compliance with the following applicable federal, State and local hazardous materials regulations would avoid irreversible environmental damage related to the accidental release of hazardous materials: the Chemical Accident Prevention Provision, Emergency Planning and Community Right-to-Know Act, the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the California Health and Safety Code, California Code of Regulations Title 23, the Aboveground Petroleum Storage Act, California Accidental Release Prevention Program, the California Emergency Services Act, and the County Consolidated Fire Code.

### **3.4 Significant and Unavoidable Impacts**

As stated in the 2011 General Plan Update PEIR, CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects. Specifically, Section 15126.2(b) states:

*Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reason why the project is being proposed, notwithstanding their effect, should be described.*

Significant, unavoidable adverse impacts are identified and described for several environmental issues in Chapter 2.0, Significant Environmental Effects of the proposed Project, and are summarized below; however, despite these unavoidable effects, the proposed Project is being pursued because the land use designations across FCI lands need to be assigned consistent with existing 2011 General Plan goals and policies. Additional reasons in support of implementation

of the proposed Project and objectives, are given in Chapter 1.0, Project Description, Location, and Environmental Setting, of this SEIR.

The CEQA Guidelines state that after a lead agency considers an EIR, the lead agency may decide whether to approve or carry out the project (Section 15092). If a project is determined to have unavoidable adverse environmental effects, the lead agency may approve the project only when it finds that specific economic, legal, social, technological, or other benefits of the project outweigh such effects. Additionally, Section 15093 requires that the lead agency document and substantiate any such determinations in a “Statement of Overriding Considerations” as a part of the administrative record.

- **Aesthetics (Section 2.1)**

- **Issue 3 – Visual Character or Quality**

- **Direct Impact:** Implementation of the proposed Project would accommodate intensified development, especially in town centers, which has the potential to result in the degradation of, or substantial change in, the existing visual character or quality of communities throughout the unincorporated County. The 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct and cumulative impacts to visual character and quality, but not to below a level of significance.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with visual character and quality. 2011 General Plan Implementation Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to visual character and quality, but not to below a level of significance.

- **Issue 4 – Light or Glare**

- **Direct Impact:** The proposed Project would have the potential to result in increased light within the County that would adversely affect day or nighttime views. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct and cumulative impacts associated with increased light, but not to below a level of significance.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with increased light. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would

reduce cumulative impacts to nighttime lighting, but not to below a level of significance.

- **Agricultural and Forestry Resources (Section 2.2)**

- **Issue 1 – Direct Conversion of Agricultural Resources**

- **Direct Impact:** Implementation of the proposed Project would result in the direct conversion of 48.5 acres of agricultural resources to non-agricultural land uses. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to conversion of farmland, but not to below a level of significance.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with the conversion of farmland to non-agricultural use. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to conversion of farmland, but not to below a level of significance.

- **Issue 3 – Indirect Conversion of Agricultural Resources**

- **Indirect Impact:** Implementation of the proposed Project would redirect high density growth into areas containing agricultural resources and potentially cause some indirect conversion of agricultural resources to non-agricultural use because of incompatibility between development accommodated by the proposed Project and existing agricultural activity. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the 2011 General Plan Update PEIR would reduce indirect impacts from the conversion of farmland, but not to below a level of significance.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with the indirect conversion of farmland to non-agricultural use. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to indirect conversion of farmland, but not to below a level of significance.

- **Issue 4 – Direct and Indirect Loss or Conversion of Forestry Resources**

- **Direct Impact:** Implementation of the proposed Project would result in the direct loss or conversion of forestry resources because a majority of development proposed within the Project areas will not be subject to environmental review in

which the direct loss or conversion of forestry resources can be quantified; development would be permitted with ministerial permits and thus is not subject to environmental review. Implementation of the 2011 General Plan and mitigation measures would reduce impacts, but not to a level less than significant, impacts with respect to direct loss or conversion of forestry resources would remain significant and unavoidable.

- **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with the loss or conversion of forestry resources. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts related to air quality violations, but not to below a level of significance.
- **Air Quality (Section 2.3)**
  - **Issue 2 – Air Quality Violations**
    - **Direct Impact:** The proposed Project would have the potential to result in a significant violation of an air quality standard because emissions of criteria pollutants associated with new development consistent with the proposed Project would exceed the screening-level thresholds for air pollutants. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to air quality violations, but not to below a level of significance.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with the violation of air quality standards. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts related to air quality violations, but not to below a level of significance.
  - **Issue 3 – Non-Attainment Criteria Pollutants**
    - **Direct Impact:** The proposed Project would have the potential to result in a direct cumulatively considerable net increase in pollutants for which the SDAB is listed as non-attainment. The SDAB is considered a nonattainment area for ozone and respirable particulate matter. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct and cumulative impacts related to non-attainment criteria pollutants, but not to below a level of significance.

- **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with non-attainment of criteria pollutants (specifically O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>). 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts related to non-attainment criteria pollutants, but not to below a level of significance.
- **Issue 4 – Sensitive Receptors**
  - **Direct Impact:** The proposed Project would have the potential to result in exposure of sensitive receptors to diesel particulate matter. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to sensitive receptors, but not to below a level of significance.
  - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with air quality (diesel emissions) impacts to sensitive receptors. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to sensitive receptors, but not to below a level of significance.
- **Biological Resources (Section 2.4)**
  - **Issue 1 – Special Status Plant and Wildlife Species**
    - **Direct Impact:** The proposed Project would have the potential to result in significant impacts to special status species and their habitats. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to special status species, but not to below a level of significance.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact associated with special status species until a comprehensive NCCP is in place for the long-term protection of special status plant and wildlife in North County and East County. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to special status species, but not to below a level of significance.
  - **Issue 2 – Riparian Habitat and Other Sensitive Natural Communities**

- The proposed Project would have the potential to result in significant impacts to riparian habitat and other sensitive natural communities. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct and cumulative impacts to riparian and other sensitive habitats, but not to below a level of significance.
  - **Cumulative Impact – Riparian Habitat and Other Sensitive Natural Communities:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact associated with riparian habitat and other sensitive natural communities until a comprehensive NCCP is in place for the long-term protection of riparian and other sensitive habitats in North County and East County. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to riparian habitat and other sensitive natural communities, but not to below a level of significance.
- **Issue 4 – Wildlife Movement Corridors and Nursery Sites**
- **Direct Impact:** The proposed Project would have the potential to result in significant impacts to wildlife movement corridors and nursery sites. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to wildlife corridors and nursery sites, but not to below a level of significance.
  - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact associated with wildlife movement corridors and nursery sites until a comprehensive NCCP is in place for the long-term protection of wildlife corridors and nursery sites in North County and East County. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to wildlife movement corridors and nursery sites, but not to below a level of significance.
- **Hazards and Hazardous Materials (Section 2.6)**
- **Issue 7 – Wildland Fires**
- **Direct Impact:** Implementation of the proposed Project would result in land uses that allow development in areas that are prone to wildland fires. This is due to the fact that the majority of the unincorporated County is located in very high or extreme fire threat hazard areas. Implementation of the proposed Project would result in a potentially significant impact from the exposure of people or structures

to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts related to wildland fires, but not to below a level of significance.

- **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with loss of life and property associated with wildland fires. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to wildland fires, but not to below a level of significance.

- **Hydrology and Water Quality (Section 2.7)**

- **Issue 1 – Water Quality Standards and Requirements**

- **Direct Impact:** The development of future land uses as designated in the proposed Project would contribute pollutants such as sediments, hydrocarbons and paints in quantities that would otherwise significantly degrade surface water quality. It is also anticipated that non-point source pollutants, resulting from development of future land uses as designated with the proposed Project, would otherwise degrade surface water quality. Additionally, the proposed Project would result in potentially significant impacts to water quality from proposing land uses in groundwater dependent areas that are currently experiencing groundwater contamination. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to water quality standards and requirements, but not to below a level of significance.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with water quality standards and requirements. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to water quality standards and requirements, but not to below a level of significance.

- **Issue 2 – Groundwater Supplies and Recharge**

- **Direct Impact:** There are multiple areas in the unincorporated County that are currently experiencing groundwater supply and recharge impacts. Implementation of the proposed Project would allow land uses and development to occur in these

areas, thereby worsening an already unsustainable groundwater supply. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to groundwater supplies and recharge, but not to below a level of significance.

- **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with groundwater supplies and recharge. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to groundwater supplies and recharge, but not to below a level of significance.

- **Mineral Resources (Section 2.9)**

- **Issue 1 – Mineral Resource Availability**

- **Direct Impact:** The Project proposes land uses in areas designated MRZ-2, MRZ-3, or those areas underlain by Quaternary alluvium that would be incompatible with these resources and would result in the loss of availability of known or suspected mineral resources that would be of value to the region and the residents of the State. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to mineral resource availability, but not to below a level of significance.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with mineral resource availability. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to mineral resource availability, but not to below a level of significance.

- **Issue 2 – Mineral Resource Recovery Sites**

- **Direct Impact:** The Project proposes potentially incompatible land uses that would have the potential to encroach on areas where mines are active or where future resource recovery sites would have otherwise been permitted. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to mineral resource recovery sites, but not to below a level of significance.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region

associated with mineral resource recovery sites. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to mineral resource recovery sites, but not to below a level of significance.

- **Noise (Section 2.10)**

- **Issue 3 – Permanent Increase in Ambient Noise Level**

- **Direct Impact:** Traffic on new roadways or roadway improvements, as well as operation of new agricultural operations and other noise-generating uses, under the proposed Project would permanently increase ambient noise and would result in a potentially significant impact. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to permanent increase in ambient noise levels, but not to below a level of significance.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with permanent increases in ambient noise levels. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts associated with permanent increases in ambient noise, but not to below a level of significance.

- **Public Services (Section 2.11)**

- **Issue 2 – School Services:** The proposed Project is projected to increase housing and population within the unincorporated County, which would result in an increase in school enrollment. To maintain acceptable service ratios, the construction of new or expanded school facilities would be required. The construction of these facilities would have the potential to result in significant environmental impacts; however, the construction of school facilities is not under the jurisdiction of the County. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to school services, but not to below a level of significance.
  - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with environmental effects from the construction of school facilities. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts associated with school services, but not to below a level of significance.

- **Transportation and Traffic (Section 2.13)**

- **Issue 1 – Unincorporated County Traffic and Level of Service Standards**

- **Direct Impact:** Based on analyses of trip generation and forecast deficiencies in the 2011 General Plan, it was determined that Alpine would be the only community with a potential for significant traffic-related impacts as a result of implementation of the proposed Project. One Mobility Element classification change is proposed to for an impacted segment of Willows Road, east of Viejas Casino Road to the Interstate 8 on-ramp. For the remaining impacted segments, no classification changes are proposed beyond the current classification shown in the 2011 General Plan. Deficient LOS E or F operations would be accepted for seven new road segments along Alpine Boulevard, South Grade Road, Viejas Casino Road and Willows Road. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to unincorporated County traffic and LOS standards, but not to below a level of significance.
- **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with traffic and LOS in the County. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to impacts to unincorporated County traffic and LOS standards, but not to below a level of significance.

- **Issue 2 – Rural Road Safety**

- **Direct Impact:** The proposed Project would increase trips on roads in rural areas that are not developed to current road safety standards and would add traffic to roads with slow moving agricultural equipment. Additional traffic resulting with the proposed Project could also contribute to road safety conflicts with alternative transportation (pedestrians and bicyclists) and at grade railroad crossings. In addition, there may be older rural roadways surrounding some of the Project areas that would not be adequate by existing roadway standards. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to rural road safety, but not to below a level of significance.
- **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with rural road safety. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would

reduce cumulative impacts to rural road safety, but not to below a level of significance.

- **Utilities and Service Systems (Section 2.14)**

- **Issue 4 – Adequate Water Supplies**

- **Direct Impact:** Implementation of the proposed Project would increase the number of housing units and populations served within the service areas of SDCWA-member water districts and groundwater dependent water districts. Although multiple planning documents exist to ensure a reliable water supply is available for future growth within the county, issues such as cutbacks in imported water and unprecedented drought years were unaccounted for in these documents. Proposed density in Alpine would necessitate an extension of the CWA boundary and provision of imported water to support increased density. This increased demand on imported water supply is not currently accounted for in water planning documents. Additionally, some groundwater basins throughout the County would be impacted upon buildout of the proposed Project. This would result in some groundwater dependent water districts having a potentially inadequate water supply. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to water supplies, but not to below a level of significance.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with adequate water supplies. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to water supplies, but not to below a level of significance.

- **Issue 6 – Sufficient Landfill Capacity**

- **Direct Impact:** If additional landfills are not constructed and existing landfills are not expanded, it is estimated that the County will run out of physical landfill capacity by 2016. Therefore, the development of future land uses as designated in the proposed Project would have the potential to be served by landfills with insufficient capacity to accommodate future solid waste disposal needs. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce direct impacts to landfill capacity, but not to below a level of significance.

- **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with sufficient landfill capacity. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts to landfill capacity, but not to below a level of significance.
- **Global Climate Change (Section 2.15)**
  - **Issue 1 – Compliance with California GHG Reduction Goals**
    - **Direct Impact:** Although, future development consistent with the proposed Project would meet the state-adopted target embodied in AB 32 for 2020, future development consistent with the proposed Project would result in substantial levels of incremental GHG emissions in 2020, 2030 and 2050. The regulations, implementation programs (General Plan Update goals/policies) described in this impact analysis, and mitigation measures from the General Plan EIR are presented in Section 2.15.4 (Mitigation) of this SEIR. Implementation of regulations, General Plan Update implementation programs, and General Plan Update PEIR mitigation measures would reduce the Project’s GHG emissions. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would continue to reduce the Project’s GHG emissions beyond 2020, but not to below a level of significance beyond 2020.
    - **Cumulative Impact:** The proposed Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with GHG emissions. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts, but not to below a level of significance.
  - **Issue 2 – Potential Effects of Global Climate Change on the Proposed Project**
    - **Direct Impact:** There is substantial evidence that human-induced increases in GHG concentrations in the atmosphere have led to increased global average temperatures (climate change) through the intensification of the greenhouse effect. Within the Project areas, the majority of land is undeveloped or consists of dispersed, rural residential development. Potentially significant impacts regarding climate change risks may occur for development consistent with the proposed Project, such as water supply constraints, wildland fire risks, and ecosystem degradation. Direct impacts would be reduced by the regulations, implementation programs (General Plan Update goals/policies) and mitigation measures from the

## OTHER CEQA CONSIDERATIONS

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General Plan Update PEIR, which are presented in Section 2.15.4 (Mitigation) of this SEIR, but not to below a level of significance.

- **Cumulative Impact:** Similar to direct impacts, cumulative impacts regarding climate change risks may occur for development consistent with the proposed Project. 2011 General Plan Goals and Policies combined with the mitigation measures identified in the General Plan Update PEIR would reduce cumulative impacts, but not to below a level of significance.