
SUMMARY

This chapter describes the County of San Diego (County) Climate Action Plan (CAP), an associated General Plan Amendment to the County's General Plan and revision to the associated mitigation monitoring and reporting program (hereafter these two actions collectively refer to as [GPA]), a threshold of significance for greenhouse gases (GHG), and a revised Guidelines for Determining Significance for Climate Change (Guidelines). All actions constitute the "project." In addition, the Guidelines reference the Report Format and Content Requirements, as discussed below. The project requires a Supplemental Environmental Impact Report (Draft SEIR) as described below.

This chapter provides a brief description of the CAP, project objectives, alternatives to the CAP, areas of controversy, and issues to be resolved. In addition, **Table S-1** at the end of this chapter provides the following information: 1) the direct and cumulative impacts that would occur from implementation of the CAP; 2) the significance of impacts before mitigation; 3) the recommended mitigation measures that would avoid or reduce significant environmental impacts; and 4) the significance of impacts after mitigation measures are implemented.

S.1 Project Synopsis

S.1.1 Project Location

The County of San Diego is in the southwestern corner of the State. The County is bordered by the Pacific Ocean to the west, Orange County at the northwest corner, Riverside County to the north, Imperial County to the east, and the Republic of Mexico to the south.

The planning area for the project is the same planning area considered for the 2011 GPU, which encompasses all unincorporated land in the County of San Diego, as well as all County facilities and operations, which are in unincorporated areas and incorporated cities. The unincorporated County is composed of 3,570 square miles and represents 84 percent of the total land area in the County.

S.1.2 Project Description

S.1.2.1 *Project Background*

In August 2011, the County adopted a comprehensive update to the County's General Plan, and certified a Program Environmental Impact Report (2011 GPU PEIR), which assessed the potential environmental effects of implementing the 2011 GPU. Within the 2011 GPU, the County adopted goals and policies aimed at reducing countywide community GHG emissions, which are those emissions generated within the unincorporated communities of the County. Further, the County adopted mitigation measures identified in the 2011 GPU PEIR that called for the preparation of a Climate Change Action Plan designed to reach specified GHG reduction targets from community and local government operations, modifications to the Guidelines to provide guidance on

the evaluation of GHG impacts and determine a project's consistency with the CAP, and adoption of a GHG Threshold to reduce GHG emissions. The County's local government operations include County facilities and operations located both within the unincorporated communities of the County, as well as the incorporated cities (e.g., County Administrative Center and County Operations Center).

In June 2012, the County adopted the 2012 CAP and an Addendum to the 2011 GPU PEIR. On November 7, 2013, staff approved Guidelines for Determining Significance for Climate Change. Following the approval of the 2012 CAP, the Sierra Club filed suit challenging the approval and the adequacy of the associated environmental review. In a ruling issued on October 29, 2014 (*Sierra Club v. County of San Diego*, 231 Cal. App. 4th 1152 [2014]), the Fourth District Court of Appeal held that the 2012 CAP did not meet the description set forth in the adopted mitigation measure (2011 GPU PEIR Mitigation Measure CC-1.2) and that a supplemental EIR was needed for the plan.

In response to the court's decision and considering state legislative changes that have occurred since preparation of the 2012 CAP, the County is proceeding with preparation of the CAP and this Draft SEIR.

This CAP and the targets and strategies identified are based upon updated statewide GHG reduction targets, and as such necessitate changes to Goal COS-20 and Policy COS-20.1 of the 2011 GPU and mitigation adopted in the 2011 GPU PEIR, Mitigation Measures (MM) CC-1.2, CC-1.7, and CC-1.8. The changes to the goal and policy would require a GPA to the 2011 GPU.

Goal COS-20 and Policy COS-20.1 were originally adopted to reduce cumulative GHG emissions within the unincorporated County to 1990 levels by 2020 to be consistent with the statewide goal established by Assembly Bill (AB) 32 (the California Global Warming Solutions Act of 2006). The statewide goal set the standard to be achieved and the policy established the mechanism by which the goal would be accomplished (i.e., through a CAP or other similar GHG reduction plan). Since adoption of the 2011 GPU, new legislative standards have been set that require jurisdictions to consider emissions reductions beyond 2020. These requirements are now incorporated into the revised goal and policy of the 2011 GPU (additional discussion of changes provided below).

Mitigation Measures CC-1.2, CC-1.7, and CC-1.8 identified in the 2011 GPU PEIR called for the preparation of a Climate Change Action Plan designed to reach specified GHG reduction targets from community and local government operations, modifications to the Guidelines to provide guidance on the evaluation of GHG impacts considering current regulatory requirements and determine a project's consistency with the CAP, and adoption of a GHG Threshold. These mitigation measures were developed to make the previous CAP consistent with regulatory requirements adopted at that time. The proposed modifications to these measures would update the regulatory requirements and goals that would be achieved by each of these actions, to make them current with existing regulatory requirements. As described below, the modifications would continue to require the same or more stringent requirements for the reduction of GHG emissions

The Draft SEIR prepared for the CAP and associated actions serves four discrete purposes:

- 1) The Draft SEIR provides a program-level analysis of the CAP and targets and strategies described therein;
- 2) The Draft SEIR evaluates the proposed amendment to the General Plan goal and policy referenced above, and evaluates the amendment of three mitigation measures;
- 3) The Draft SEIR evaluates the proposed County Guidelines for Determining Significance for Climate Change including the adoption of a GHG Threshold and revision of the Report Format and Content Requirements; and
- 4) The Draft SEIR supplements the 2011 GPU PEIR in accordance with CEQA Guidelines Section 15163.

S.1.2.2 Project Objectives

Section 15124 of the CEQA Guidelines requires an EIR to include a statement of objectives sought by the project. The objectives assist the County, as lead agency, in developing a reasonable range of alternatives to be evaluated in the EIR. The project objectives also aide decision makers in preparing findings or, if necessary, a statement of overriding considerations. The statement of objectives also includes the underlying purpose of the project.

The fundamental purpose of the project is to reduce County GHG emissions consistent with state legislative requirements through implementation of a CAP, which includes strategies and measures to reduce community and County local government operations (County operations) GHG emissions. Community emissions refer to those GHG emissions generated because of activities within the unincorporated County. County operations GHG emissions refer to those GHG emissions generated by County facilities and operational activities throughout the County, including facilities and operations located within incorporated cities, as described in the CAP. The GPA would implement the necessary changes to the County's General Plan to incorporate the CAP and the state GHG legislative requirements. The GHG Threshold and Guidelines provide direction on determining a project's significance as it relates to GHG emissions and determining whether a project would be consistent with the County's CAP.

The CAP, GPA, GHG Threshold, and Guidelines (project) intend to achieve the following objectives:

- Reduce community and County operations GHG emissions to meet the County's GHG reduction targets for 2020 and 2030, and provide a mechanism to meet the County's projected 2050 goal;

- Identify GHG reduction strategies and measures that reduce GHG emissions from activities in the unincorporated areas and address the challenges of a changing climate and improve resilience over the long term;
- Update the County's General Plan and General Plan Update PEIR to incorporate and reflect the GHG reduction targets, strategies, and measures of the CAP for the reduction of GHG emissions because of buildout of the General Plan;
- Provide Guidelines that include a GHG threshold for determining significance related to GHG emissions and provide guidance to the community on how to achieve consistency with the CAP and utilize CEQA streamlining tools for analysis of GHG emissions pursuant to the requirements of CEQA Guidelines Section 15183.5(b)(2) or as subsequently amended;
- Prepare a County baseline GHG emissions inventory, which includes community and County operations emissions, and analyze the potential growth of these emissions over time; and,
- Establish a comprehensive approach to reduce County GHG emissions by incorporating feasible and effective GHG emission reduction measures.

S.1.2.3 CAP Contents

The CAP contains eight chapters which are briefly summarized below:

- Executive Summary: Summarizes the key information contained in the CAP.
- Chapter 1- Introduction: This chapter introduces the document, describes the purpose and context of the plan, and identifies the regulatory framework related to global GHG emissions.
- Chapter 2- Greenhouse Gas Emissions Inventory, Projections, and Reduction Targets: This chapter provides detailed accounting of GHG emissions from activities within the unincorporated areas, and from County local government operations. It includes a discussion of the primary sources and annual levels of GHG emissions and establishes a 2014 baseline. Projections of GHG emissions and reduction targets are described and the resultant emissions gap between projected emissions and reduction targets are calculated.
- Chapter 3- Greenhouse Gas Reduction Strategies and Measures: This chapter outlines overarching GHG reduction strategies and details specific strategies and supporting measures to be implemented by the County to achieve its GHG reduction targets. The strategies and measures focus on locally-based actions to reduce GHG emissions in various categories as a complement to legislative actions taken by the State or federal government.

- Chapter 4- Climate Change Vulnerability, Resiliency, and Adaptation: This chapter summarizes the expected effects of climate change vulnerability assessment, summarizes the County's current capacity to adapt to climate-related impacts and considers how likely and how quickly impacts will occur, and identifies resiliency and adaptation strategies to reduce these impacts.
- Chapter 5- Implementation and Monitoring: This chapter describes the set of actions that comprise the implementation strategy, possible funding mechanisms, the monitoring and compliance program, and an overview of the CEQA tiering/streamlining options for future projects.
- Chapter 6- Public Outreach and Engagement: This chapter describes the public outreach and engagement strategy, and outlines ongoing engagement and education actions, as well as regional collaboration strategies.
- Chapter 7 Glossary of Terms, Acronyms, and References: This chapter provides a list of terminology and acronyms used within the document, and references and data that were used in preparation of the CAP.

Key components of the CAP include the Baseline GHG Emissions Inventory; GHG Emissions Projections; GHG Emissions Reductions Targets; GHG Emissions Reduction Strategies and Measures; Climate Change Vulnerability, Resiliency, and Adaptation Assessment and Strategies; Implementation and Monitoring Approach; and Public Outreach Strategy. Each key component is summarized below.

S.1.2.4 General Plan Amendment

As previously mentioned, the Draft SEIR will also evaluate an associated GPA to the 2011 GPU. Because the project would revise mitigation measures that would result in policy changes, the Draft SEIR evaluates the environmental effects related to the revised 2011 GPU Goal COS-20 and Policy COS-20.1 and revisions to the 2011 GPU PEIR mitigation measures CC-1.2, CC-1.7, and CC-1.8, as described below.

The 2011 GPU Goal COS-20 set a target to reduce local GHG emissions to 1990 levels by 2020 to be consistent with the statewide goal established by AB 32. To meet this goal, the County adopted the following goal and policy within the 2011 GPU (see pages 5-38 and 5-39 of the 2011 GPU, County of San Diego, 2011a):

GPU Goal COS-20 (Governance and Administration)

Reduction of local GHG emissions contributing to climate change that meet or exceed requirements of the Global Warming Solutions Act of 2006.

GPU Policy COS-20.1 (Climate Change Action Plan)

Prepare, maintain, and implement a climate change action plan with a baseline inventory of GHG emissions from all sources; GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures.

The 2011 GPU PEIR incorporated a mitigation measure (CC-1.2) which, in combination with other identified mitigation measures, would achieve the GPU Goal COS-20 and Policy COS-20.1 of reducing cumulative GHG emissions within the unincorporated County to 1990 levels by 2020. The same mitigation measure also established a 2020 target for County operations (see page 2.17-30 of the 2011 GPU PEIR, County of San Diego, 2011b):

GPU EIR Mitigation Measure (MM) CC-1.2

Prepare a County Climate Change Action Plan with an update baseline inventory of GHG emissions from all sources, more detailed GHG emissions reduction targets and deadlines; and a comprehensive and enforceable GHG emissions reduction measures that will achieve a 17% reduction in emissions from County operations from 2006 by 2020 and a 9% reduction in community emissions between 2006 and 2020. Once prepared, implementation of the plan will be monitored and progress reported on a regular basis.

The 2011 GPU and 2011 GPU PEIR MM CC-1.2 did not address GHG reductions or GHG reduction goals beyond 2020 for emissions from unincorporated communities (community emissions) or County operations. County operational emissions are tracked and monitored annually through the Climate Registry Information System (CRIS-Climate Registry), which assists the County in tracking reductions in response to reduction actions being implemented.

The 2011 GPU PEIR MM CC-1.7 requires the County to incorporate CARB's recommendations for climate change CEQA thresholds into the County Guidelines for Determining Significance for Climate Change. If CARB does not release the recommendations, then the County is required to prepare its own threshold(s).

GPU PEIRMM CC-1.7

Incorporate the CARB's recommendations for a climate change CEQA threshold into the County Guidelines for Determining Significance for Climate Change. These recommendations will include energy, waste, water, and transportation performance measures for new discretionary projects in order to reduce GHG emissions. Should the recommendation not be released in a timely manner, the County will prepare its own threshold. (see pages 2.17-30 and 2.17-31 of the 2011 GPU PEIR, County of San Diego, 2011b)

The 2011 GPU PEIR MM CC-1.8 requires the County to revise the County Guidelines for Determining Significance based on the CAP.

GPU PEIR MM CC-1.8

Revise County Guidelines for Determining Significance based on the Climate Change Action Plan. The revisions will include guidance for proposed discretionary projects to achieve greater energy, water, waste, and transportation efficiency. (see page 2.17-31 of the 2011 GPU PEIR, County of San Diego 2011b).

The County has determined that the 2011 GPU Goal COS-20 and Policy COS- 20.1, and 2011 GPU PEIR Mitigation Measure CC-1.2 need to be updated to reflect the requirements of SB 32 (as amended, Pavley_California Global Warming Solutions Act of 2006: emissions limit), which requires statewide GHG emission reductions to 40 % below the 1990 levels by 2030. Further, modifications to the 2011 GPU PEIR Mitigation Measures CC-1.7 and CC-1.8 are needed (see discussion above in Section 1.2.1). These proposed changes are evaluated as part of this Draft SEIR. The proposed changes are as follows and are shown in underline (underline) for new text and ~~strikeout~~ for deleted text.

GPU Goal COS-20 (Governance and Administration)

Reduction of local community-wide (i.e., unincorporated County) and County Operations GHG-greenhouse gas emissions contributing to climate change that meet or exceed requirements of the Global Warming Solutions Act of 2006, as amended by Senate Bill 32 (as amended, Pavley. California Global Warming Solutions Act of 2006: emissions limit).

GPU Policy COS-20.1 (Climate Change Action Plan)

Prepare, maintain, and implement a climate change action plan with a baseline inventory of GHG emissions from all sources; GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures. Climate Action Plan for the reduction of community-wide (i.e., unincorporated County) and County Operations greenhouse gas emissions consistent with the California Environmental Quality Act (CEQA) Guidelines Section 15183.5.

GPU EIR Mitigation Measure (MM) CC-1.2

Prepare a County Climate Change Action Plan with an updated baseline inventory of GHG emissions from all sources, more detailed GHG emissions reduction targets and deadlines; and a comprehensive and enforceable GHG emissions reduction measures that will achieve a 17% reduction in emissions from County operations from 2006 by 2020 and a 9% reduction in community emissions between 2006 and 2020. Once prepared, implementation of the plan will be monitored and progress reported on a regular basis. Climate Action Plan for the reduction of community-wide (i.e., unincorporated County) and County Operations greenhouse gas emissions consistent with State legislative targets, as described in General Plan Goal COS-20, and consistent with CEQA Guidelines Section 15183.5 or as amended, as referenced in General Plan Policy COS-20.1. As

described in Section 15183.5, the key elements of the Climate Action Plan would include:

“CEQA Guidelines Section 15183.5(b)(1):

(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

- (A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- (B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
- (C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- (D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- (E) Establish a mechanism to monitor the plan’s progress toward achieving the level and to require amendment if the plan is not achieving specified levels;
- (F) Be adopted in a public process following environmental review.”

Once prepared, implementation of the Climate Action Plan will be monitored and progress reported on a regular basis, as follows:

- o Implementation Monitoring Report – prepared annually;
- o Greenhouse Gas Emissions Inventory – updated every two years; and
- o Climate Action Plan – updated every five years.

GPU EIR MM CC-1.7

Incorporate the California ARB’s recommendations for a climate change CEQA threshold into the County Guidelines for Determining Significance for Climate Change. These recommendations will include energy, waste, water, and transportation performance measures for new discretionary projects in order to reduce GHG emissions. Should the recommendation not be released in a timely manner, the County will prepare and adopt its own threshold for GHG emissions and shall include this threshold in the County Guidelines for Determining Significance for Climate Change.

GPU EIR MM CC-1.8

Revise Prepare County Guidelines for Determining Significance for Climate Change (Guidelines) based on the Climate Change Action Plan. The revisions Guidelines will include guidance for identify the specific actions proposed discretionary projects will need to take to achieve greater energy, water, waste, and transportation efficiency demonstrate consistency with the Climate Action Plan pursuant to Section 15183.5 of the CEQA Guidelines or as amended, as described in the 2011 General Plan Update Program EIR Mitigation Measure CC-1.2, as amended.

S.1.2.5. Guidelines for Determining Significance for Climate Change

The project includes the preparation of the Guidelines document which includes the following components:

- a) GHG Threshold: Establishes the County's Threshold of Significance for evaluation of GHG impacts as noted below. Adoption of a GHG Threshold is considered as a separate discretionary action.
- b) CAP Requirements: This section discusses the requirements for projects to demonstrate compliance with the CAP and the streamlining provisions that may be applicable under CEQA.
- c) CAP Consistency Review Checklist: An appendix to the Guidelines will contain a checklist that will include reduction measures to be implemented by proposed discretionary projects and will be used to determine consistency with the CAP.

The Guidelines would be brought forward to the County's Board of Supervisors (Board) for approval as a separate document from the CAP, but are to be considered concurrently with the CAP. The Guidelines will include a GHG Threshold of Significance of general applicability, and is to be considered for approval by the Board per CEQA Guidelines Section 15064.7. The proposed threshold of significance is "consistency with the CAP" which would be determined through the "CAP Consistency Review Checklist (Checklist)." Consistency with the CAP will be the only threshold of significance for County projects.

All discretionary projects that are subject to CEQA, no matter the size of the project, would be evaluated for consistency with the CAP. The Checklist has been incorporated as an appendix to the Guidelines, and would be the mechanism that is utilized to demonstrate compliance with the CAP. The determination of consistency with the CAP would be evaluated utilizing the following two approaches:

- First Approach: If the project is consistent with the County's General Plan, then the project could use the CEQA streamlining provision, CEQA Guidelines Section 15183.5, which would allow the project to tier from and incorporate by reference the GHG emissions analysis presented in the Draft SEIR, upon certification. To show consistency with the CAP, the project would be required to implement

applicable GHG reduction measures as adopted in the CAP and outlined in the Checklist.

- **Second Approach:** If the project is not consistent with the 2011 GPU and would require a GPA, then the project may not qualify for the CEQA streamlining provision and would be required to prepare a project-specific GHG emissions analysis. If the project is requesting a GPA but not requesting an increase in density or intensity beyond that assigned by the 2011 GPU, then the project could achieve consistency with the CAP by implementing applicable GHG reduction measures as adopted in the CAP and outlined in the Checklist. The analysis conducted in the Checklist should demonstrate how the project would achieve consistency with the CAP through implementation of the measures outlined in the Checklist.

Refer to Section 2.7, Greenhouse Gas Emissions, of this Draft SEIR for a complete description of the GPA process for evaluating GHG emissions.

The requirements of the project-specific GHG emissions analysis are outlined in the Report Format and Content Requirements document, which the Guidelines reference. The Report Format and Content Requirements document provides technical direction to future project applicants on preparing GHG analyses for discretionary projects being processed by Planning & Development Services (PDS), but do not contain a threshold of significance. The Report Format and Content Requirements ensure that the adequate information for analyzing GHG emissions are provided and ensure the quality, accuracy, and completeness of GHG analysis. Because the Report Format and Content Requirements do not provide a threshold of significance and are merely provided for format for how reports should be written, there would be no physical impact on the environment and, therefore, they are not evaluated in this SEIR.

S.2 Summary of Significant Impacts and Mitigation Measures

Table S-1, *Summary of Significant Impacts and Mitigation Measures*, summarizes the results of the environmental analysis completed for the project. Table S-1 also includes mitigation measures proposed to reduce or avoid the environmental effects, with a conclusion as to whether the impact has been mitigated to below a level of significance. Detailed analyses of significant environmental impacts are discussed in Chapter 2.0, and effects found not to be significant during preparation of the Draft SEIR are found in Chapter 3.0.

S.3 Areas of Controversy

A Notice of Preparation (NOP) was distributed on October 20, 2016 for a 30-day public review and comment period (refer to Appendix A for the NOP). Public comments were received through November 21, 2016 and reflect concern or controversy over a number of environmental issues. A public scoping meeting was held on November 3, 2016 at the San Diego County Operations Center at 5520 Overland Avenue. The NOP, written comments received during the NOP review period, and a summary matrix of the written comments are included in Appendix A.

A total of 21 communications were received on the NOP from state agencies, groups and organizations, and individuals. State agencies include the California Office of Planning and Research, Native American Heritage Commission, and California Department of Fish and Wildlife. Groups and organizations include the Resource Conservation District of Greater San Diego County, Pala Band of Mission Indians, Climate Action Campaign, Boulevard Community Planning Group, Backcountry Against Dumps, STAY COOL for Grandkids, San Diego Unified Council of PTAs, Endangered Habitats League, Southwest Wetlands Interpretive Association, SANDAG- Intergovernmental Review, San Diego Regional Chamber of Commerce, California Native Plant Society- San Diego Chapter, Cleveland National Forest Foundation, Save Our Forest and Ranchlands, San Diego Foundation, and Sierra Club- San Diego Chapter.

Issues raised in the NOP comment letters include concerns regarding the following issue areas:

CAP Approach/Implementation

- Address SB 375 and SB 32 GHG reduction targets
- Climate stabilization targets
- Use of efficiency metric
- Economic and environmental justice concerns
- Procedures for addressing GPAs
- GHG reduction measures and funding
- CAP monitoring and implementation
- Renewable energy targets
- Waste reduction targets
- Climate adaptation strategies
- Large-scale renewable energy
- Alternative transportation modes
- Housing and land use strategies to reduce GHG emissions

SEIR Approach/Process

- Approach to baseline
- Approach to processing GPAs
- Public process
- Tiering approach under CEQA 15183.5
- Mitigation measures
- Physical effects from climate change
- NOP contents and distribution
- SB 18 and AB 52 consultation

Issues raised within these letters are evaluated in this Draft SEIR in Chapters 2.0 through 4.0.

S.4 Issues to be Resolved by the Board of Supervisors

The County of San Diego Board of Supervisors (Board) serves as the decision-making body for the project. Prior to the Board taking final action on any project-related issues, recommendations will be developed by the Planning & Development Services Department and the Planning Commission. In developing these recommendations and rendering a decision, the County will consider input provided by the public, other agencies, the community planning groups, and advisory groups. Additionally, the decisions of the Planning Commission and Board are made in public hearings at which public comment is invited. The following is a description of issues related to the project that must be resolved by the Board prior to or at the time of project approval and Final SEIR certification:

- Final Composition of the CAP,
- General Plan Amendment Text,
- Guidelines for Determining Significance for Climate Change Text, and
- Benefits of the Project Compared to Environmental Risk.

Additionally, the Board must consider the significant effects of the project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. In addition, the Board must determine whether significant effects related to aesthetics, agricultural resources, air quality, biological resources, cultural resources, greenhouse gas emissions, hazards and hazardous materials, hydrology, land use, noise, transportation and tribal cultural resources can be reduced further. Finally, the Board must determine whether any of the project alternatives would substantially reduce the significant effects associated with aesthetics, agricultural resources, air quality, biological resources, cultural resources, greenhouse gas emissions, hazards and hazardous materials, hydrology, land use, noise, transportation and tribal cultural resources while still meeting key project objectives. The Board must respond to each significant effect identified in this Draft SEIR by making “Findings” for each significant effect. Preparation of a Statement of Overriding Considerations (explaining the overriding value of the project despite adverse effects) would be required for any remaining significant and unmitigated impacts.

S.5 Project Alternatives

In accordance with Section 15126.6(a) of the CEQA Guidelines, an EIR must describe a range of reasonable alternatives to the project which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. Section 15126.6(a) also provides that an EIR need not consider every conceivable alternative to a project. Instead, the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation, but is not required to consider alternatives that are infeasible. There is no ironclad rule governing the nature or scope of the alternatives to be discussed in an EIR, other than the “rule of reason.” CEQA Guidelines Section 15126.6(f) states that “the range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only

those alternatives necessary to permit a reasoned choice.” “The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.”

The following discussion covers a reasonable range of feasible alternatives that focuses on avoiding or substantially lessening the significant effects of the project, even if these alternatives would not attain all the project objectives or would be costlier. According to the CEQA Guidelines, there are many factors that may be considered when addressing the feasibility of alternatives, such as environmental impacts, site suitability as it pertains to various land use designations, economic viability, availability of infrastructure, regulatory limitations, and jurisdictional boundaries. An EIR need not consider an alternative whose effects cannot be reasonably identified, whose implementation is remote or speculative, or one that would not achieve most of the basic project objectives. However, CEQA requires that a No Project Alternative be included in the range of alternatives and the Environmentally Superior Alternative be identified.

The purpose of project alternatives is to foster meaningful public participation and informed decision-making. According to the CEQA Guidelines Section 15126.6(d), discussion of each alternative should be sufficient “to allow meaningful evaluation, analysis, and comparison with the proposed project,” but need not be as detailed as that conducted for the project. Therefore, the significant effects of each alternative are discussed in less detail than those of the project, but in enough detail to provide decision-makers perspective and a reasoned choice among alternatives to the project.

If the environmentally superior alternative is the “No Project” Alternative, then Section 15126(e)(2) of the CEQA Guidelines requires identification of another environmentally superior alternative. Based upon impact comparison between the project and evaluated alternatives, the Enhanced Direct Investment Program Alternative has been identified as the environmentally superior alternative. Below is a brief description of the alternatives. A full analysis of each alternative and impact comparisons is provided in Chapter 4.0.

S.5.1 No Project Alternative

The No Project Alternative assumes that the CAP, GPA, GHG Threshold, and Guidelines would not be adopted or implemented. As a result, the County would not adopt strategies, measures, and supporting efforts to reduce GHG emissions in accordance with state-legislated reduction targets. Existing conditions for each environmental issue as described in Chapters 2.0 and 3.0 of this Draft SEIR would be unchanged.

Under the No Project Alternative, none of the GHG reduction measures or supporting efforts set forth by this CAP would be implemented to reduce GHG emissions from buildout of the 2011 GPU. While new development in the County would continue to be reviewed for project consistency with screening levels established by the guidance provided by California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change White Paper (2008), energy efficiency and GHG reduction measures at the level anticipated under the CAP would likely not be implemented without the CAP requiring them. While individual projects would need to demonstrate compliance with

applicable regulations, a mechanism by which the County could enforce reductions (i.e., CAP Consistency Checklist) and ensure communitywide targets could be met, would not be in place. The County also would not have a tracking and monitoring system in place to monitor its progress towards achieving state reduction targets. Without a CAP, individual projects would be responsible for demonstrating GHG reductions on a project-by-project basis through a variety of mechanisms (e.g., design features, offsets, incentives). Also, as stated in the CAP, Chapter 3, the County is projected to meet the 2020 target as required in the 2011 GPU. Under the No Project Alternative, the County would not have a program in place to meet the legislative reduction targets in SB 32 of 40% below 1990 levels by 2030. In addition, without a CAP in place, the No Project Alternative would not achieve any of the SEIR's project objectives and would not provide a streamlining mechanism for future development projects to evaluate their GHG impacts.

S.5.2 Enhanced Direct Investment Alternative

Under this alternative, the CAP, GPA, GHG Threshold, and Guidelines would be adopted and implemented, similar to the project. However, this alternative would pursue a greater level of direct investment projects in exchange for eliminating the renewable energy program component of GHG Reduction Measure E-2.1. By eliminating the renewable energy program component, this alternative would eliminate the induced demand for potentially larger and a greater number of large-scale renewable energy systems. While large-scale renewable energy systems could still be developed and their associated impacts could occur, this alternative would eliminate the induced demand for these systems; thereby reducing the total number of systems that would occur within the County.

All other GHG reduction measures set forth by the CAP would be implemented in the same manner and level as the project, except for Measure T-4.1 (Direct Investment Program). The renewable energy program proposed under the project would result in 90% renewable energy resources for the unincorporated County. The large-scale renewable energy component of this measure would account for a reduction of 227,423 MTCO_{2e} in 2030. Under this alternative, the desired GHG emissions reductions targets of the CAP would be achieved by implementing a greater number of direct investment projects. Direct investment projects include projects implemented in compliance with established protocols including but not limited to: biomass conversion to energy or soil application projects (i.e., conversion of biomass waste to fuel for electricity generation, or conversion of forestry and agricultural residues to soil compost), boiler efficiency upgrades (i.e., implementing retrofits to increase thermal efficiency in natural-gas fired boilers or process heaters), coastal wetlands creation projects (i.e., restoring degraded wetlands to recapture soil carbon stock), reforestation projects (i.e., planting of trees to recapture CO₂ sinks), compost additions to rangeland projects (i.e., increasing soil carbon sequestration and improving quality of soils), organic waste digestion projects (i.e., diverting organic waste and/or wastewater to a biogas control system), livestock management projects (i.e., installing biogas control systems for manure management on dairy cattle and swine farms), and winterization projects (i.e., energy efficiency upgrades to buildings). See Appendix B of the Draft SEIR for a range of the potential protocols that may be used for direct investments in local projects.

These programs would require the County to invest more heavily in direct investment projects than currently proposed under the project to achieve greater emission reductions. The emissions reductions from the enhanced direct investment would replace the emissions reductions that would have been provided by the renewable energy program. Through this investment, the County would need to generate and retire additional carbon offset credits to make up the emissions reductions that would otherwise be achieved through the renewable energy program. For this to occur, the County would need to investigate if sufficient direct investment opportunities are available locally to generate an additional 227,423 MTCO_{2e} of reductions.

Under this alternative, the County would reduce community-wide and County operations GHG emissions in compliance with state-legislated targets. Upon approval, new development in the County would be reviewed for consistency with the CAP, GHG Threshold, and Guidelines and may be eligible for a streamlined environmental review under CEQA Guidelines Section 15183.5. All energy efficiency measures would be implemented as described under the CAP, which would result in a reduction in county-wide energy consumption. The renewable energy program would not be implemented, which would reduce the construction and operational impacts of large-scale renewable energy facilities that were induced by the program. However, some level of construction and operational impacts for large-scale renewable energy facilities would still occur because construction of these facilities would be allowable subject to the County's ordinances, policies, and standards. Finally, the County would be able to meet the targets established under SB 32 legislation provided that sufficient opportunities to generate the requisite amount of local direct investments are available. The Enhanced Direct Investment Program Alternative would achieve all project objectives.

S.5.3 100% Renewable Energy Alternative

This alternative would result in the implementation of the CAP with increased reliance upon renewable energy to meet the reduction targets in the CAP for 2030. This alternative assumes that 100% of the energy consumed in the unincorporated County would be produced from renewable sources. The project in comparison assumes 90% renewable energy consumption (GHG Reduction Measure E-2.1). This would be achieved in the same manner as the CAP, with increased reliance on large-scale solar photovoltaic, wind, and geothermal facilities, and small-scale residential wind and solar sources.

Under this alternative, the County would reduce community-wide and County operations GHG emissions in compliance with state-legislated targets. Upon approval, new development in the County would be reviewed for consistency with the CAP, GHG Threshold, and Guidelines, and may be eligible for a streamlined environmental review under CEQA Guidelines Section 15183.5. All energy efficiency measures would be implemented as described under the CAP, which would result in a reduction of energy consumption and the production of associated GHG emissions. In this scenario, the amount of GHG emissions reductions that would be achieved by the County would meet the targets established under SB 32 legislation. Therefore, the 100% Renewable Energy Alternative would achieve all project objectives.

S.5.4 Increased Solid Waste Alternative

This alternative would result in the implementation of the CAP with increased reliance upon solid waste diversion to achieve additional GHG reductions. Currently, GHG Reduction Measure SW-1.1 would result in 57,103 MTCO_{2e} in GHG reductions by 2030. This alternative assumes that the County would achieve a 5% increase in the diversion rate of solid waste county-wide by 2030. This would further accelerate the reduction that would occur over the life of the project and would provide approximately 74,572 MTCO_{2e} in additional GHG reductions by 2030. To achieve this increased diversion rate, the County would devote additional resources to expanding the capacity of its solid waste diversion facilities. This could require the expansion of existing facilities or the construction of new facilities to handle the solid waste to meet the increased diversion rate.

Upon approval, new development in the County would be reviewed for consistency with the CAP, GHG Threshold, and Guidelines and may be eligible for a streamlined environmental review under CEQA Guidelines Section 15183.5. All energy efficiency measures would be implemented as described under the CAP, which would result in a reduction of energy consumption and the production of associated GHG emissions. Under this alternative, the County would reduce community-wide and County operations GHG emissions in compliance with state-legislated targets, would meet the 2020 and 2030 reduction goals of the CAP, and would achieve additional GHG reductions compared to the project. These additional GHG reductions would reduce the gap of emission reductions needed to meet the 2050 reduction goal. Therefore, the Increase Solid Waste Diversion Alternative would achieve all project objectives and would further reduce GHG emissions in the County. With additional GHG reductions, this alternative would reduce the gap to the 2050 GHG reduction goal compared to the project.

S.5.5 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires that if an EIR determines that the No Project Alternative is environmentally superior to the project, the EIR must identify an environmentally superior alternative among the other alternatives considered. The No Project Alternative would not be environmentally superior to the project because it would not meet SB 32 reduction targets and would not reduce any of the projects significant environmental impacts. Therefore, this alternative would result in a new significant GHG impact that was not previously identified for the project.

Based on review of the other alternatives considered, the County has determined that the Enhanced Direct Investment Program Alternative would be environmentally superior to the project because it would reduce significant and unavoidable impacts related to the induced demand for large-scale renewable energy systems while still achieving both the primary objective of GHG emissions reductions consistent with SB 32 and all other supporting project objectives.

The 100% Renewable Energy Alternative would result in greater GHG reductions, and, therefore, lesser GHG impacts, compared to the project because this alternative would have a greater amount of county-wide energy demands generated from renewable

energy resources. This alternative would also help close the gap to the 2050 reduction goal because of the additional GHG reductions; however, this impact would remain significant and unavoidable. While GHG impacts would be less, overall impact conclusions for all other resource categories would be the same as the project and this alternative could increase the magnitude of these impacts because a greater number of large-scale renewable energy projects would be required.

The Increased Solid Waste Diversion Alternative would result in greater GHG reductions, and, therefore, lesser GHG impacts, compared to the project because this alternative would have a greater amount of waste diversion within the county. This alternative would also help close the gap to the 2050 reduction goal because of the additional GHG reductions; however, this impact would remain significant and unavoidable. While GHG impacts would be less, overall impact conclusions for other resource categories would be the same as the project for aesthetics, agricultural resources, cultural resources, hazards and hazardous materials, hydrology and water quality, and noise. In addition, this alternative would result in greater impacts to air quality, biological resources, transportation, and tribal cultural resources. Overall, this alternative would result in environmental tradeoffs compared to the project.

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
2.1 Aesthetics				
<p><u>1. Scenic Vistas/Scenic Resources</u> Implementation of GHG Reduction Measures E-1.1, E-2.1 and E-2.4 that would result in the development of small-scale wind turbines would potentially result in direct and cumulative impacts to scenic vistas because of the introduction of new vertical elements within the viewshed of a scenic vista, or affect scenic resources through the removal or alteration of a scenic resource during the course of development (AES-1, AES-2).</p> <p>Implementation of GHG Reduction Measure E-2.1 that would result in the development of large-scale renewable energy systems would potentially result in direct and cumulative impacts to scenic vistas because of the introduction of tall vertical elements into the viewshed, or affect scenic resources by allowing large renewable energy facilities to be constructed near the viewshed of a scenic resource (AES-3, AES-4).</p>	Potentially Significant	Potentially Significant	<p>CAP Mitigation Measure M-AES-1: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Visual Resources and Dark Skies and Glare shall be applied. When aesthetic impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: siting/location considerations; minimizing development and grading of steep slopes; natural screening and landscaping; undergrounding utilities; inclusion of buffers; and lighting restrictions.</p>	Significant and Unavoidable
<p><u>2. Visual Character or Quality</u> Implementation of GHG Reduction Measures E-1.1, E-2.1 and E-2.4 that would result in the development of small-scale wind turbines would potentially result in direct and cumulative impacts to visual character or quality because of the potential for increased visual contrasts, view blockage, or skylining from sensitive viewing locations (AES-5, AES-6).</p> <p>Implementation of GHG Reduction Measure E-2.1 that would result in the development of large-scale renewable energy systems would potentially result in direct and cumulative impacts to visual character or quality because of the allowable height, increased visual contrasts, view</p>	Potentially Significant	Potentially Significant	See CAP Mitigation Measure M-AES-1	Significant and Unavoidable

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
blockage, or skylining from sensitive viewing locations (AES-7, AES-8).				
<p><u>3. Light and Glare</u> Implementation of GHG Reduction Measure E-2.1 that would result in the development of large scale renewable energy systems would potentially result in direct and cumulative impacts to light and glare because of the need for safety lighting and the introduction of infrastructure that may emit some glare (AES-9, AES-10).</p>	Potentially Significant	Potentially Significant	<p>See CAP Mitigation Measure M-AES-1</p> <p>CAP Mitigation Measure M-AES-2 Require that a Lighting Mitigation Plan be prepared as part of the MUP discretionary review process for all large-scale renewable energy projects. The Lighting Mitigation Plan would demonstrate that the design and installation of all permanent lighting for large wind turbines or large geothermal stacks ancillary facilities is such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. The Lighting Mitigation Plan would demonstrate consistency with the Light Pollution Code (Section 59.100 et al.) and Sections 6322 and 6324 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky do not result in a detrimental effect on astronomical research and to ensure reflected glare and light trespass is minimized.</p> <p>CAP Mitigation Measure M-AES-3 Require that a Shadow Flicker Study be prepared as part of the MUP discretionary review process for all wind turbine projects. The Shadow Flicker Study would utilize a shadow flicker model run to determine the potential shadow flicker that could occur at sensitive receptors within 2,000 meters (6,562 feet) of the proposed turbines. For wind turbine projects, because some receptors may lie within 60° due north of the turbines, outside of the sun's path at any given point in the year, these receptors may be excluded from the study. Beyond 2,000 meters, the human eye would not be able to discern a shadow cast from a wind turbine for example. The modeling should utilize many different inputs, including:</p> <ol style="list-style-type: none"> 1) Real Data <ul style="list-style-type: none"> • Actual coordinates of turbines • Actual coordinates of receptors • Actual topographic data 	Significant and Unavoidable

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
			2) Conservative Assumptions <ul style="list-style-type: none"> • Specifications of the turbines being considered with the highest hub height and longest rotor diameter • 100% turbine operation • No vegetative screening • Receptors can be impacted from all directions (i.e., "greenhouse mode") 3) Realistic Features <ul style="list-style-type: none"> • Actual wind data from a local meteorological tower to account for the percentage of time wind blows from each direction • National Weather Service sunshine probability data to approximate average cloud cover. 	
2.2 Agriculture and Forestry Resources				
<p><u>1. Direct or Indirect Conversion of Agricultural Resources</u> Implementation of GHG Reduction Measure E-2.1 that would result in the development of large scale renewable energy systems would potentially result in direct and cumulative impacts to direct or indirect conversion or agricultural resources because of size and magnitude of projects and unknown locations for future projects (AG-1, AG-2).</p>	Potentially Significant	Potentially Significant	<p>CAP Mitigation Measure M-AGR-1: During the environmental review process for future MUPs for large-scale renewable energy projects, the County Guidelines for Determining Significance for Agricultural Resources shall be applied. When impacts to Farmland are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management.</p>	Significant and Unavoidable
<p><u>2. Conflict with Agricultural or Forest Zoning</u> Implementation of GHG Reduction Measure E-2.1 that would result in the development of large scale renewable energy systems would potentially result in direct and cumulative impacts to Williamson Act contracts and agricultural zoning because at a programmatic level it is not possible to ensure that zoning conflicts would not occur (AG-3, AG-4).</p>	Potentially Significant	Potentially Significant	See CAP Mitigation Measure M-AGR-1	Significant and Unavoidable

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
<p><u>3. Direct and Indirect Conversion or Loss of Forest Land</u> Implementation of GHG Reduction Measure E-2.1 that would result in the development of large scale renewable energy systems would potentially result in direct and cumulative impacts to direct or indirect conversion or loss of forest land because at a programmatic level, it is not possible to ensure that no impacts to forest resources would occur (AG-5, AG-6).</p>	Potentially Significant	Potentially Significant	<p>See CAP Mitigation Measure M-AGR-1 CAP Mitigation Measure M-AGR-2: During the environmental review process for future MUPs for large-scale renewable energy projects, the County Guidelines for Determining Significance for Agriculture and Biological Resources shall be applied. When impacts to forest land are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management.</p>	Significant and Unavoidable
2.3 Air Quality				
<p><u>1. Conformance to Regional Air Quality Strategy</u> The proposed project would not result in significant impacts related to compliance with the Regional Air Quality Strategy.</p>	Less than Significant	Less than Significant	No mitigation required.	Less than Significant
<p><u>2. Conformance to Federal and State Air Quality Standards</u> Implementation of GHG Reduction Measure T-2.1 and Supporting Measures that would result in the development of bicycle, pedestrian, and park-and-ride infrastructure improvements would potentially result in direct and cumulative impacts to air quality standards because construction emissions may lead to short-term air emissions such that air quality standards are exceeded (AIR-1, AIR-2). Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts to air quality standards because construction emissions may lead to short-term air emissions such that air quality standards are exceeded (AIR-3, AIR-4). Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable</p>	Potentially Significant	Potentially Significant	<p>CAP Mitigation Measure M-AQ-1: During the environmental review process for future discretionary permits for projects implemented under the CAP, the County Guidelines for Determining Significance for Air Quality shall be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: dust control efforts; grading or fuel use restrictions; use of modified equipment; and restrictions on vehicle idling time.</p>	Significant and Unavoidable

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
<p>energy systems would potentially result in direct and cumulative impacts related to air quality standards because construction emissions may lead to short-term air emissions such that air quality standards are exceeded (AIR-5, AIR-6).</p> <p>Implementation of GHG Reduction Measure SW-1.1 which would result in the development of new or expanded waste facilities would potentially result in direct and cumulative impacts related to air quality standards because construction emissions may lead to short-term air emissions such that air quality standards are exceeded (AIR-7, AIR-8).</p>				
<p>3. Non-attainment of Criteria Pollutants</p> <p>Implementation of GHG Reduction Measure T-2.1 and Supporting Measures that would result in the development of bicycle, pedestrian, and park-and-ride infrastructure improvements would potentially result in direct and cumulative impacts to criteria air pollutants because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-9, AIR-10).</p> <p>Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts to criteria air pollutants because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-11, AIR-12).</p> <p>Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy systems would potentially result in direct and cumulative impacts related to criteria air pollutants because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-13, AIR-14).</p>	Potentially Significant	Potentially Significant	<p>See CAP Mitigation Measure M-AQ-1</p> <p>CAP Mitigation Measure M-AQ-2: Coordinate with SDAPCD in implementing pending Rule 67.25 to reduce emissions and odors from composting operations. The rule is expected to establish best management practices for chipping and grinding of green waste to produce materials for composting or other uses, and to better manage stockpile operations to reduce emissions.</p>	Significant and Unavoidable

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
<p>Implementation of GHG Reduction Measure SW-1.1 which would result in the development of new or expanded waste facilities would potentially result in direct and cumulative impacts related to criteria air pollutants because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-15, AIR-16).</p>				
<p><u>4. Sensitive Receptors</u> Implementation of GHG Reduction Measure T-2.1 and Supporting Measures that would result in the development of bicycle, pedestrian, and park-and-ride infrastructure improvements would potentially result in direct and cumulative impacts to sensitive receptors because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-17, AIR-18). Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts sensitive receptors because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-19, AIR-20). Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy systems would potentially result in direct and cumulative impacts related to sensitive receptors because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-21, AIR-22). Implementation of GHG Reduction Measure SW-1.1 which would result in the development of new or expanded waste facilities would potentially result in direct and cumulative impacts related to sensitive receptors because construction</p>	<p>Potentially Significant</p>	<p>Potentially Significant</p>	<p>No feasible mitigation available.</p>	<p>Significant and Unavoidable</p>

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
emissions may lead to short-term air emissions such that standards are exceeded (AIR-23, AIR-24).				
<p><u>5. Odors</u></p> <p>Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative odor impacts because the types of projects that could be considered may include heavy construction equipment and project locations are unknown (AIR-25, AIR-26).</p> <p>Implementation of GHG Reduction Measure SW-1.1 which would result in the development of new or expanded waste facilities would potentially result in direct and cumulative odor impacts from construction and operations of waste facilities (AIR-27, AIR-28).</p>	Potentially Significant	Potentially Significant	<p>See CAP Mitigation Measure M-AQ-1</p> <p>See CAP Mitigation Measure M-AQ-2</p> <p>CAP Mitigation Measure M-AQ-3: The County shall use the policies set forth in the CARB's Land Use and Air Quality Handbook as a guideline for siting new sources of odor related to solid waste.</p> <p>CAP Mitigation Measure M-AQ-4: Require project applicants to conduct an odor impact analysis and incorporate control measures including but not limited to rapid incorporation of food waste and biweekly turnover to maintain aerobic conditions for open systems, and wet or dry scrubbers or bioscrubber systems on enclosed structures to reduce impacts.</p>	Significant and Unavoidable
2.4 Biological Resources				
<p><u>1. Candidate, Sensitive, or Special-Status Species</u></p> <p>Implementation of GHG Reduction Measures T-2.1, SW-1.1, A-1.2 and their Supporting Efforts, could result in new or expanded park-and-ride facilities, new or expanded pedestrian and bicycle improvements, new or expanded solid waste facilities, and improvements related to agricultural equipment and could result in cumulative impacts to special-status species because projects could contribute to the disturbance or loss of special status species or their habitats (BIO-1).</p> <p>Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts to special-status species because the construction</p>	Less than Significant	Potentially Significant	<p>CAP Mitigation Measure M-BIO-1: During the environmental review process for future MUPs for large-scale renewable energy projects, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts to biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise.</p> <p>CAP Mitigation Measure M-BIO-2: Update the County Guidelines for Determining Significance for Biological Resources to include, or incorporate by reference, recommendations from the California Department of Fish and Wildlife, the Avian Power Line Interaction Committee, the USFWS Draft Guidance, and the California Energy Commission (e.g., California</p>	Significant and Unavoidable

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
<p>nursery sites because projects could occur outside of regional conservation plan areas (BIO-15, BIO-16). Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts to wildlife movement corridors and nursery sites because the construction of projects could disturb corridors and nurseries where regional conservation plans are not in place (BIO-17, BIO-18). Implementation of GHG Reduction Measures E-1.1, E-2.1, E-2.2, E-2.3, E-2.4, and Supporting Efforts could result in energy efficiency retrofits on existing residential, new non-residential structures, and County facilities including rooftop or ground-mounted photovoltaic solar arrays or small wind turbines, modern mechanical systems, and large-scale renewable energy systems. These measures could result in potentially significant direct and cumulative impacts to wildlife movement corridors and nurseries because of the ability to develop outside of regional conservation plans (BIO-19, BIO-20).</p>	<p>Potentially Significant</p> <p>Potentially Significant</p>	<p>Potentially Significant</p> <p>Potentially Significant</p>		
<p><u>5. Local Policies, Ordinances, Adopted Plans</u> The proposed project would not result in significant impacts related to compliance with the policies, ordinances, or plans.</p>	<p>Less than Significant</p>	<p>Less than Significant</p>	<p>No mitigation required.</p>	<p>Less than Significant</p>
<p><u>6. Habitat Conservation Plans and NCCPs</u> The proposed project would not result in significant impacts related to compliance with habitat conservation plans and NCCPs.</p>	<p>Less than Significant</p>	<p>Less than Significant</p>	<p>No mitigation required.</p>	<p>Less than Significant</p>

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
2.5 Cultural and Historical Resources				
<u>1. Historical Resources</u> Implementation of GHG Reduction Measures T-2.1, T-4.1, E-1.1, E-2.1, E-2.2, E-2.3, SW-1.1 and Supporting Efforts that would result in bicycle, pedestrian and park-and-ride facilities, direct investment projects, energy efficiency improvements and the introduction of small-scale solar photovoltaic and small wind turbines, or large-scale renewable energy systems, and solid waste facilities could result in potentially significant direct and cumulative impacts related to historical resources because of the possibility of implementing retrofits on historic structures, disturbing historic structures, or changing the setting within which an historic structure is located (CULT-1, CULT-2).	Potentially Significant	Potentially Significant	CAP Mitigation Measure M-CUL-1: For all small-scale wind turbine projects, the County shall provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources. This will be done by reaching out to property owners with identified historic resources to participate.	Significant and Unavoidable
<u>2. Archaeological Resources</u> Implementation of GHG Reduction Measures E-1.1, E-2.1, E-2.2, and E-2.4 which would result in the development of new small-scale wind turbines could potentially result in direct and cumulative impacts related to archaeological resources because they are permitted as an accessory use (if zoning criteria met) and could result in impacts because of ground disturbance (CULT-3, CULT-4).	Potentially Significant	Potentially Significant	No feasible mitigation available.	Significant and Unavoidable
<u>3. Paleontological Resources</u> Implementation of GHG Reduction Measures E-1.1, E-2.1, E-2.2, and E-2.4 which would result in the development of new small-scale wind turbines could potentially result in direct and cumulative impacts related to paleontological resources because they are permitted as an accessory use (if zoning criteria met) and could result in impacts because of ground disturbance (CULT-5, CULT-6).	Potentially Significant	Potentially Significant	No feasible mitigation available.	Significant and Unavoidable

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
<p><u>4. Human Remains</u> Implementation of GHG Reduction Measures E-1.1, E-2.1, E-2.2, and E-2.4 which would result in the development of new small-scale wind turbines could potentially result in direct and cumulative impacts related to human remains because they are permitted as an accessory use (if zoning criteria met) and could result in impacts because of ground disturbance (CULT-7, CULT-8).</p>	Potentially Significant	Potentially Significant	No feasible mitigation available.	Significant and Unavoidable
2.6 Energy				
The proposed project would not result in significant impacts related to energy consumption.	Less than Significant	Less than Significant	No mitigation required.	Less than Significant
2.7 Greenhouse Gas Emissions				
<p><u>1. Generate Significant GHG Emissions</u> Implementation of the CAP would reduce emissions by 2020 and 2030, consistent with legislatively-adopted State targets and would, therefore, not result in a significant impact. However, considering the need for future implementation actions to achieve the emissions reductions necessary to achieve the 2050 goal, the impacts from the CAP are conservatively considered to be significant and unavoidable (GHG-1).</p> <p>Implementation of the CAP, along with GHG emissions described above, in combination with GHG emissions from reasonably foreseeable GPA projects, would result in a significant cumulative impact (GHG-2).</p>	Potentially Significant	Potentially Significant	<p>CAP Mitigation Measure M-GHG-1: The County shall require in-process and future GPAs to reduce their emissions to ensure that CAP emission forecasts are not substantially altered such that attainment of GHG reduction targets could not be achieved. Project applicants for in-process and future GPAs could accomplish this through two options, as outlined below:</p> <p><u>Option 1 (No Net Increase):</u> GPA project applicants shall achieve no net increase in GHG emissions from additional density above the 2011 GPU. Applicants shall be required in their respective CEQA documents to quantify the GHG emissions from their projects that exceed the GHG emissions for the 2011 GPU density or intensity forming the basis of the CAP emission forecasts (i.e., projections). This increase in emissions shall be reduced through on-site design features and mitigation measures and off-site mitigation, including purchase of carbon offset credits by the applicant. Applicants shall demonstrate compliance with relevant CAP measures as identified in the “CAP Consistency Review Checklist” in addition to all feasible on-site design features and mitigation measures. Off-site mitigation, including purchase of carbon offset credits, would be</p>	Less than Significant

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
			<p>allowed after all feasible on-site design features and mitigation measures have been incorporated.</p> <p>For example, if 400 residential units were allowed under the 2011 GPU and a GPA proposes 500 residential units, the emissions for the additional 100 units would be calculated and offset through compliance with the CAP Consistency Review Checklist and additional feasible on-site measures and off-site measures, including the use of carbon offsets. The emissions associated with the allowable density of 400 units would be mitigated through compliance with the CAP Consistency Review Checklist.</p> <p>The County will consider, to the satisfaction of the Director of Planning & Development Services (PDS), the following geographic priorities for GHG reduction features, and GHG reduction projects and programs: 1) project design features/on-site reduction measures; 2) off-site within the unincorporated areas of the County of San Diego; 3) off-site within the County of San Diego; 4) off-site within the State of California; 5) off-site within the United States; and 6) off-site internationally.</p> <p>Geographic priorities would focus first on local reduction features (including projects and programs that would reduce GHG emissions) to ensure that reduction efforts achieved locally would provide co-benefits. Depending on the carbon offset project utilized, co-benefits may include reductions in criteria air pollutants, toxic air contaminants, energy demand, water consumption, health benefits, social benefits, and economic benefits. The GPA applicant or its designee shall first pursue offset projects and programs locally within unincorporated areas of the County of San Diego to the extent such direct investment projects and programs are available and are financially feasible, as reasonably determined by the Director of PDS.</p> <p>If carbon offset credits are provided as mitigation, the GPA applicant, or its designee, shall purchase and retire carbon offsets in a quantity sufficient to offset the net increase from GHG emissions above the density or intensity allowed in the 2011 GPU. This includes all GHG emissions from construction (including sequestration loss from vegetation removal) and operations.</p>	

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
			<p>For the net increase of construction and operations GHG emissions, prior to County's issuance of the project's first grading permit (for construction GHG emissions) or first building permit (for operations GHG emissions) the GPA applicant, or its designee, shall provide evidence to the satisfaction of the Director PDS that the project applicant or its designee has purchased and retired carbon offsets in a quantity sufficient to offset the net increase of construction and operations GHG emissions generated by the project. Operations emissions may be offset in phases, commensurate with the overall phasing of the project.</p> <p>Carbon offset credits must be purchased through any of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard, (ii) any registry approved by CARB to act as a registry under the state's cap-and-trade program, (iii) through the CAPCOA GHG Rx and the SDAPCD, or (iv) if no registry is in existence as identified in options (i), (ii), or (iii), above, then any other reputable registry or entity that issues carbon offsets consistent with Cal. Health & Saf. Code section 38562(d)(1)), to the satisfaction of the Director of PDS.</p> <p><u>Option 2 (Net Zero):</u> GPA project applicants shall reduce all project GHG emissions to zero to achieve no net increase over baseline conditions (carbon neutrality). Project emissions shall be reduced to zero through on-site design features and mitigation measures and off-site mitigation, including purchase of carbon offset credits by the applicant or its designee. Applicants shall demonstrate compliance with relevant CAP measures as identified in the "CAP Consistency Review Checklist" before considering additional feasible on-site design features and mitigation measures. Off-site mitigation, including purchase of carbon offset credits, would be allowed after all feasible on-site design features and mitigation measures have been incorporated.</p> <p>The County will consider, to the satisfaction of the Director of Planning & Development Services (PDS), the following geographic priorities for GHG reduction features, and GHG reduction projects and programs: 1) project</p>	

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
			<p>design features/on-site reduction measures; 2) off-site within the unincorporated areas of the County of San Diego; 3) off-site within the County of San Diego; 4) off-site within the State of California; 5) off-site within the United States; and 6) off-site internationally.</p> <p>Geographic priorities would focus first on local reduction features (including projects and programs that would reduce GHG emissions) to ensure that reduction efforts achieved locally would provide co-benefits. Depending on the direct investment project utilized, co-benefits may include reductions in criteria air pollutants, toxic air contaminants, energy demand, water consumption, health benefits, social benefits, and economic benefits. The GPA applicant or its designee shall first pursue offset projects and programs locally within unincorporated areas of the County of San Diego to the extent such direct investment projects and programs are available and are financially feasible, as reasonably determined by the Director of PDS.</p> <p>If carbon offset credits are provided as mitigation, the GPA applicant, or its designee, shall purchase and retire carbon offsets in a quantity sufficient to offset all GHG emissions from the project. This includes all GHG emissions from construction (including sequestration loss from vegetation removal) and operations.</p> <p>Prior to the County's issuance of the project's first grading permit (for construction GHG emissions) or first building permit (for operations GHG emissions) the GPA applicant, or its designee, shall provide evidence to the satisfaction of the Director of PDS that the project applicant or its designee has purchased and retired carbon offsets in a quantity sufficient to offset all construction and operations GHG emissions generated by the project. Operations emissions may be offset in phases, commensurate with the overall phasing of the project.</p> <p>Carbon offset credits must be purchased through any of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard, (ii) any registry approved by CARB to act as a registry under the state's cap-and-trade program, (iii) through the CAPCOA GHG Rx and the San Diego</p>	

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Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
			County Air Pollution Control District (APCD), or (iv) if no registry is in existence as identified in options (i), (ii), or (iii), above, then any other reputable registry or entity that issues carbon offsets consistent with Cal. Health & Saf. Code section 38562(d)(1)), to the satisfaction of the Director of PDS.	
<p><u>2. Conflict with a Plan, Policy, or Regulation Adopted for Reducing GHG Emissions</u></p> <p>Implementation of the CAP, along with GHG emissions described above, in combination with GHG emissions from reasonably foreseeable GPA projects, would result in a significant cumulative impact (GHG-3).</p>	Potentially Significant	Potentially Significant	See CAP Mitigation Measure M-GHG-1	Less than Significant
2.8 Hazards and Hazardous Material				
<p><u>1. Hazardous Substance Handling</u></p> <p>The proposed project would not result in significant impacts related to hazardous materials handling.</p>	Less than Significant	Less than Significant	No mitigation required.	Less than Significant
<p><u>2. Public and Private Airport Hazards</u></p> <p>The proposed project would not result in significant impacts related to public and private airport hazards.</p>	Less than Significant	Less than Significant	No mitigation required.	Less than Significant
<p><u>3. Emergency Response and Evacuation Plans</u></p> <p>The proposed project would not result in significant impacts related to emergency response and evacuation plans.</p>	Less than Significant	Less than Significant	No mitigation required.	Less than Significant
<p><u>4. Wildland Fires</u></p> <p>Implementation of GHG Reduction Measures E-1.1, E-2.1, E-2.2, E-2.3, and E-2.4 which would result in the development of new small-scale wind turbines could potentially result in direct and cumulative impacts related to wildland fires because of construction and operational components which include</p>	Potentially Significant	Potentially Significant	CAP Mitigation Measure M-HAZ-1: During the environmental review process for future discretionary permits for all renewable energy projects, the County Guidelines for Determining Significance for Wildland Fire & Fire Protection shall be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: installation of fire suppression systems; sufficient on-	Significant and Unavoidable

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
<p>mechanical equipment and electrical components adjacent to vegetation (HAZ-1, HAZ-2).</p> <p>Implementation of GHG Reduction Measures E-2.1 which would result in the development of new large-scale renewable energy systems could potentially result in direct and cumulative impacts related to wildland fires because of construction and operational components which include mechanical equipment and electrical components adjacent to vegetation (HAZ-3, HAZ-4).</p>			<p>site water storage; inclusion of fire management zones; and funded agreements with fire protection districts.</p>	
<p>2.9 Hydrology and Water Quality</p>				
<p><u>1. Water Quality Standards</u></p> <p>Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts to water quality standards because of construction activities and the uncertainty about the types of projects that would be undertaken (HYD-1, HYD-2).</p>	<p>Potentially Significant</p>	<p>Potentially Significant</p>	<p>No feasible mitigation identified.</p>	<p>Significant and Unavoidable</p>
<p><u>2. Groundwater Supplies</u></p> <p>Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to groundwater resources because of the potential need for additional groundwater resources (HYD-3, HYD-4).</p> <p>Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts to groundwater resources because of construction and operational activities and the uncertainty about the types of projects that would be undertaken (HYD-5, HYD-6).</p>	<p>Potentially Significant</p>	<p>Potentially Significant</p>	<p>No feasible mitigation identified.</p>	<p>Significant and Unavoidable</p>

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
<u>3. Alter Existing Drainage Patterns</u> Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts to drainage patterns because of construction and operational activities and the uncertainty about the types of projects that would be undertaken (HYD-7, HYD-8).	Potentially Significant	Potentially Significant	No feasible mitigation available.	Significant and Unavoidable
<u>4. Flood Hazards</u> The proposed project would not result in significant impacts related to flood hazards.	Less than Significant	Less than Significant	No mitigation required.	Less than Significant
2.10 Land Use and Planning				
<u>1. Physically Divide Established Community</u> Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to physical division of communities because of the potential need for road improvements (LU-1, LU-2). Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts to physical division of communities because of the uncertainty about the types of projects that would be undertaken and locations of projects (LU-3, LU-4).	Potentially Significant	Potentially Significant	No feasible mitigation identified.	Significant and Unavoidable
<u>2. Conflict with Plans, Policies, and Regulations</u> The proposed project would not result in significant impacts related to plans, policies, and regulations.	Less than Significant	Less than Significant	No mitigation required.	Less than Significant

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
2.11 Noise				
<p>1. Excessive Noise Levels Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to excessive noise levels because of possible low-frequency noise associated with large wind turbines (NOI-1, NOI-2).</p> <p>Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts to excessive noise levels because of construction activities and the uncertainty about the types of projects that would be undertaken and locations of projects (NOI-3, NOI-4).</p>	Potentially Significant	Potentially Significant	No feasible mitigation identified.	Significant and Unavoidable
<p>2. Excessive Groundborne Vibration The proposed project would not result in significant impacts related to excessive groundborne vibration.</p>	Less than Significant	Less than Significant	No mitigation required.	Less than Significant
<p>3. Permanent Increase in Ambient Noise Levels Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to permanent increase in ambient noise levels because of possible low-frequency noise associated with large wind turbines (NOI-5, NOI-6).</p> <p>Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts to permanent increase in ambient noise levels because of construction activities and the uncertainty about the types of projects that would be undertaken and locations of projects (NOI-7, NOI-8).</p>	Potentially Significant	Potentially Significant	No feasible mitigation identified.	Significant and Unavoidable

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
<p><u>4. Temporary or Periodic Increase in Ambient Noise Levels</u> Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to periodic increase in ambient noise levels because of possible low-frequency noise associated with large wind turbines (NOI-9, NOI-10).</p> <p>Implementation of GHG Reduction Measure T-4.1 which would result in the development of local carbon offset projects would potentially result in direct and cumulative impacts to periodic increase in ambient noise levels because of construction activities and the uncertainty about the types of projects that would be undertaken and locations of projects (NOI-11, NOI-12).</p>	Potentially Significant	Potentially Significant	No feasible mitigation identified.	Significant and Unavoidable
2.12 Transportation and Traffic				
<p><u>1. LOS and Conflicts with Plans, Policies, or Ordinances</u> Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to LOS and conflicts with circulation management because of temporary construction activities (TRA-1, TRA-2).</p>	Potentially Significant	Potentially Significant	CAP Mitigation Measure M-TRAF-1: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Transportation and Traffic shall be applied. When traffic impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: traffic signal improvements; physical road improvements; street re-striping and parking prohibitions; fair share contributions toward identified, funded and scheduled projects; and transportation demand management programs.	Significant and Unavoidable
<p><u>2. Emergency Access</u> The proposed project would not result in significant impacts related to emergency access.</p>	Less than Significant	Less than Significant	No mitigation required.	Less than Significant

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation
<p><u>3. Substantially Increase Design Hazards</u> The proposed project would not result in significant impacts related to design hazards.</p>	Less than Significant	Less than Significant	No mitigation required.	Less than Significant
2.13 Tribal Cultural Resources				
<p><u>1. Tribal Cultural Resources</u> Implementation of GHG Reduction Measures T-2.1, T-4.1, E-2.1, SW-1.1 and Supporting Efforts which would result in the development of bicycle, pedestrian, park-and-ride facilities, local carbon offset projects, large-scale renewable energy systems, and waste facilities would potentially result in direct and cumulative impacts related to tribal cultural resources because at a programmatic level it is not possible to ensure that significant impacts can be fully mitigated due to speculation regarding location, size, and magnitude of future projects (TCR-1, TCR-2).</p>	Potentially Significant	Potentially Significant	<p>CAP Mitigation Measure M-TCR-1 Facilitate the identification of tribal cultural resources through field studies, collaboration with agencies, tribes, and institutions, such as the South Coastal Information Center, while maintaining the confidentiality of sensitive cultural information.</p> <p>CAP Mitigation Measure M-TCR-2 Require development to avoid tribal cultural resources, if feasible. If complete avoidance is not possible, require development to mitigate impacts to tribal cultural resources pursuant to Assembly Bill 52.</p> <p>CAP Mitigation Measure M-TCR-3 Support the dedication of easements that protect tribal cultural resources.</p> <p>CAP Mitigation Measure M-TCR-4 Protect significant tribal cultural resources through regional coordination and consultation with the Native American Heritage Commission and local tribal governments, including Senate Bill 18 and Assembly Bill 52 consultation.</p>	Significant and Unavoidable