

CHAPTER 3.0 OTHER CEQA CONSIDERATIONS

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

- a. Growth-inducing impacts of the proposed project (addressed below in Section 3.1);
- b. Significant irreversible environmental effects that would be involved in the proposed project should it be implemented (addressed below in Section 3.2); and
- c. Significant environmental effects that cannot be avoided if the proposed project is implemented (addressed below in Section 3.3).

3.1 Growth Inducing Impacts

As required by the CEQA Guidelines, an EIR must include a discussion of the ways in which the proposed project could directly or indirectly foster population growth or economic development, and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[d]). According to CEQA Guidelines Section 15126.2(d), “it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

A project can have direct and/or indirect growth inducement potential. Direct growth inducement can result from the construction of new housing that would result in new residents moving to an area. Indirect growth can be induced in a number of ways, including the stimulation of economic activity within the region that would result in the need for additional housing and services to support the new employment demand, or through the elimination of obstacles to growth, including both physical and regulatory obstacles. These topics are discussed in Sections 3.1.1 through 3.1.3 below.

Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Since the general plan of a community defines the location, type and intensity of growth, it is the primary means of regulating development and growth in that community. If approved, the proposed General Plan Update would be the applicable land use plan for the unincorporated area of San Diego County. It proposes areas for development of residential, commercial and industrial land uses, as well as roads and other infrastructure, to accommodate forecasted population growth.

The General Plan is responsible for accommodating its fair share of regional growth, as identified in the SANDAG Regional Comprehensive Plan (RCP), and discussed in Section 2.12, Population and Housing. While the General Plan Update would not result in unplanned growth, it would be considered growth inducing because it would accommodate an increase in population growth in the unincorporated County as compared to the existing condition. The General Plan Update proposes land use designations that would allow the construction of new housing, commercial uses and other employment areas, and new infrastructure that would allow growth to occur in areas previously constrained by lack of infrastructure, as described in greater detail below in Sections 3.1.1 through 3.1.3. Additionally, the CEQA Guidelines further explain

that the environmental effects of induced growth are considered indirect impacts of a proposed project and may be considered significant, adverse environmental impacts. Potential environmental impacts of growth are discussed below in Section 3.1.4.

3.1.1 Direct Population Growth

The General Plan Update serves as a comprehensive, long-term plan for the physical development of the unincorporated San Diego County. By definition, the General Plan Update would provide for and address future growth in the unincorporated County. The General Plan Update would directly influence the unincorporated County's population by providing land use designations to accommodate a population of 678,270 by 2030, which is 54 percent greater than the existing 2000 population, and a total of and additional 71,540 housing units compared to 2008 conditions. Therefore, the development of land uses and infrastructure that would be accommodated by the proposed General Plan Update would directly induce population growth. As described in Section 1.13.3, Growth Accommodated by the General Plan Update, the majority of future development, approximately 80 percent, under the General Plan Update would be concentrated in the northwestern and southwestern portion of the unincorporated County, west of the San Diego County Water Authority (SDCWA) boundary where existing infrastructure is available. Therefore, under the General Plan Update, the areas in the western unincorporated County would accommodate greater increases in housing units and population growth as compared to the eastern areas. Between 2008 and 2030, the following western communities would experience large increases in housing units as indicated: Alpine CPA (56 percent), Bonsall CPA (54 percent), Fallbrook CPA (35 percent), North County Metro Subregion (86 percent), Otay Subregion (44,851 percent), Rainbow CPA (90 percent), Ramona CPA (52 percent), and Valley Center CPA (108.5 percent). However, because the eastern portion of the unincorporated County is relatively undeveloped, the accommodated increase in development under the General Plan Update in this portion of the County would have the potential to result in a substantial increase in population growth relative to existing conditions. Housing units in the Desert Subregion, Mountain Empire Subregion, North Mountain Subregion, and Pala/Pauma Valley Subregion are anticipated to at least double between 2008 and 2030.

As described above, the General Plan Update has the potential to also induce direct population growth if it increased the number of residential developments within the County. The General Plan Update land use map identifies residential designations that would allow development of residential uses to accommodate future population growth in the unincorporated County. Between 2008 and 2030, the following western communities would experience large increases in housing units, as described above (see also discussion in Section 1.13.3, Growth Accommodated by General Pan Update): Alpine CPA, Bonsall CPA, Fallbrook CPA, North County Metro Subregion, Otay Subregion, Rainbow CPA, Ramona CPA, and Valley Center CPA. The following areas would experience limited increases in housing units under the General Plan Update because they are nearly built-out and have limited space available for new development: County Islands CPA, Lakeside CPA, San Dieguito CPA, Spring Valley CPA, Sweetwater CPA, and Valle de Oro CPA. The eastern communities of Central Mountain Subregion, Crest/Dehesa Subregion, and Julian CPA would accommodate relatively low increases of housing units because modest growth is proposed for these areas under the General Plan Update. The Desert Subregion, Jamul/Dulzura CPA, Mountain Empire Subregion, North Mountain Subregion, and Pala/Pauma Valley Subregion are eastern areas of the County that would experience relatively large increases in residential units compared to 2008 conditions. The acreage of residential land uses designated by the General Plan Update is

consistent with State requirements that a general plan provide appropriately designated land to accommodate future housing demand. The residential land use designations in the General Plan Update provide adequate housing capacity to meet the unincorporated County's Regional Housing Needs Allocation (RHNA) of 12,358 additional residential units. Therefore, the General Plan Update would result in future residential development that would result in population growth.

The General Plan Update is the land use framework for anticipated future population growth and housing demand. The General Plan Update land use plan would accommodate an increase of approximately 54 percent population growth between 2000 and 2030 as well as an increase in residential units. Therefore, the General Plan Update would result in the direct inducement of growth in the unincorporated County. The adverse environmental effects associated with this growth, such as those resulting from increased traffic and increased demands on services and utilities, have been analyzed in Chapter 2.0, Environmental Effects of the Proposed Project, of this EIR.

3.1.2 Employment Growth

In addition to direct growth, additional indirect growth could occur as new businesses are established or existing businesses expand, thus creating new sources of employment. Increased industrial, commercial, and residential development typically generates a secondary or indirect demand for other services, such as groceries, entertainment, and medical services that will stimulate economic activity. The development of new uses consistent with those proposed under the General Plan Update would result in this secondary demand for goods and services. In addition, economic growth would also result in additional population growth as new jobs are created and employees that fill those job positions create an increased demand for housing in the region. Both employment and population growth would be accommodated under the proposed General Plan Update through the proposed intensification of development in town centers in communities throughout the unincorporated County. Intensified town center development would be accommodated in the Alpine CPA, Central Mountain Subregion, Crest/Dehesa Subregion, Fallbrook CPA, Julian CPA, Rainbow CPA, San Dieguito CPA, and Valley Center CPA. In the North County Metro Subregion, the General Plan Update would accommodate new development in close proximity to the Buena Creek Sprinter Station. This area is currently developed with single family residences and low intensity commercial use, and implementation of the proposed General Plan Update would provide for intensified growth in this area in order to create a transit-oriented hub of higher intensity commercial and residential uses.

The General Plan Update would accommodate new commercial, industrial, and other development that would create new sources of employment and therefore result in growth inducement. In addition, employees to fill those job positions would create an increased demand for housing in the region. Additionally, proposed intensified development in the Rainbow CPA, North County Metro Subregion, San Dieguito CPA, and Valley Center CPA are located in close proximity to adjacent jurisdictions (Riverside County, City of San Marcos, Cities of Carlsbad and San Diego, and City of Escondido, respectively). The increase in employment opportunities in these unincorporated communities would potentially increase demand for housing in surrounding jurisdictions.

Generally, the majority of new development in the County, approximately 80 percent, is planned within the SDCWA boundary. This development pattern directs future growth to areas where

existing or planned infrastructure and services can support growth within or adjacent to existing communities. The majority of the proposed growth outside of the SDCWA would be more modest and reflect the development constraints of these areas, including lack of infrastructure. Growth in these areas would be focused around existing town centers and along major roadways such as I-8. The land use framework described in the Land Use Element of the General Plan Update establishes a model for development that defines communities by a village center surrounded by semi-rural or rural land. In communities inside the SDCWA boundary, higher density neighborhoods and a pedestrian-oriented commercial center would provide a focal point for commercial and civic life. Medium-density, single-family neighborhoods, as well as a broad range of commercial or industrial uses, would surround the commercial core. Semi-rural neighborhoods surrounded by greenbelts, agricultural uses, or other rural lands would be located outside the more urbanized portion of the community. This framework would avoid development of a new commercial or other economic center away from planned residential development, which would have the potential to result in unplanned residential growth. General Plan Update Policy LU-1.4 prohibits leapfrog development that is inconsistent with the land use plan and community plans. Leapfrog development consists of village densities located away from established villages or outside established water and sewer service boundaries that would require new infrastructure and would develop new housing that would directly or indirectly induce growth. Policy LU-3.3 requires new large developments to establish a complete neighborhood which would include a neighborhood commercial center within easy walking distance of surrounding residences when consistent with the area's Community Plan. Policy 11.1 encourages the location of commercial, office, and industrial development in village areas with high connectivity and accessibility from surrounding residential neighborhoods. Policies LU-11.2 and LU-11.7 require that commercial, office, and industrial development be located, scaled, and designed to be compatible with the unique character of the community and residential development. These policies require residential and commercial development to be provided consistent with, not independent of, each other. Additionally, the General Plan Update encourages communities to establish an urban limit line and/or village boundary when updating community plans to define a community-specific growth boundary. Therefore, although the General Plan Update would result in growth inducement due to increased employment opportunities, the General Plan Update land use framework, as well as policies identified in the Land Use Element, would guide development under the General Plan Update so that employment opportunities and associated housing demand would be developed consistent with each other.

3.1.3 Removing Obstacles to Growth

3.1.3.1 *Physical Obstacles to Growth*

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The General Plan Update would trigger growth if it would result in infrastructure with excess capacity, or, if it would remove an obstacle to growth in an area, such as providing infrastructure that was previously not available. Implementation of the proposed General Plan Update would allow for the development of land uses that would ultimately require the extension of roadways, sewer, water, and energy services throughout the unincorporated County. As described in Section 1.7.1.3, the Mobility Element identifies a road network consistent with buildout of the General Plan Update land use framework. The Mobility Element road network map includes County roads and State highways in the unincorporated County that form the

backbone of a regional network providing movement within and between communities. Under the proposed General Plan Update, approximately 835 additional lane miles of road are proposed to support buildout of the proposed land use map. In addition, some existing roadways would be upgraded to support population growth. Communities proposed for major road improvements include the Fallbrook CPA, Bonsall CPA, Valley Center CPA, North County Metro Subregion, San Dieguito CPA, Ramona CPA, Lakeside CPA, Crest/Dehesa Subregion, Valle de Oro CPA, Spring Valley CPA, Otay CPA, and Jamul/Dulzura Subregion. Additionally, new roadways or roadway extensions are proposed to connect growing communities, such as the Foothill Tollway in the northern area of the Pendleton/De Luz CPA. The extension of public services infrastructure, including roadways, water mains, and sewer lines, into areas of the unincorporated County that are not currently provided with these services would support new development. Upgrades in infrastructure in the unincorporated County have the potential to also remove an obstacle to growth in surrounding jurisdictions. For example, the proposed Foothill Tollway in the Pendleton/De Luz Subregion would extend into Orange County and has the potential to indirectly induce growth in Orange County if development was previously constrained by lack of accessibility.

Increased road access and infrastructure, such as water and sewer service, would occur under the General Plan Update; however, this type of development would be limited in the rural areas of the County to be consistent with the natural and human-made environment, as described in the other environmental topic sections in Chapter 2.0. As described above, major roadway improvements and new roadways are proposed primarily in areas west of the SDCWA boundary because growth would be concentrated in these areas. Water service and sewer service infrastructure also currently exist in this portion of the unincorporated County, making expansion and improvements to infrastructure feasible in these areas. By giving priority to development within areas identified for urban village residential densities, the General Plan Update would avoid inducement of growth in the rural areas of the unincorporated County. Environmental constraints such as rugged topography make provision of infrastructure difficult in rural areas. In addition, much of the area east of the SDCWA boundary would remain dependent on groundwater and septic systems, which limit future growth. Development accommodated by General Plan Update in the semi-rural and rural areas focuses development in and around existing unincorporated community town centers which allows the County to maximize existing infrastructure, provide for efficient service delivery, and strengthen town center areas while preserving the rural landscape. Improvements or expansion of infrastructure in any part of the unincorporated County would remove an existing obstacle to growth and induce population growth, although it would have a greater impact in rural eastern areas of the County.

The existing infrastructure in the unincorporated County is not adequate to support the growth accommodated under the General Plan Update and therefore presents an obstacle to growth. The General Plan Update includes goals and policies that would ensure that road improvements and extensions included in the proposed Mobility Element Roadway, and development of new public services and infrastructure, are provided consistent with development accommodated by the General Plan Update land use framework. Policy H-1.3 encourages the development of housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available. Policy LU-9.4 prioritizes infrastructure improvements and the provision of public facilities for villages and community cores, consistent with the intensity of development allowed by the proposed land use map. This policy avoids providing more infrastructure than is necessary to accommodate planned growth. Policy LU-12.1 requires the provision of infrastructure, facilities, and services concurrent with new development. Providing infrastructure concurrent with development instead of prior to

development allows for the appropriate amount of infrastructure to be provided. Policy LU-14.4 prohibits the extension of sewer facilities outside of village boundaries which would have the potential to induce unplanned growth and be inconsistent with the General Plan Update. Although the General Plan Update provides a framework for infrastructure that would minimize unplanned growth, new and expanded infrastructure would support planned growth proposed by the General Plan Update. Therefore, the proposed project would remove an existing obstacle to growth in order to accommodate new development that would induce population growth in the region.

3.1.3.2 Regulatory Obstacles to Growth

The elimination or change in regulatory processes, including existing plans, policies and ordinances, would potentially result in the removal of restrictions to growth, which would allow for new or increased population growth to occur. The General Plan Update includes the revision and/or deletion of some existing County plans, policies and regulations in an effort to streamline development and permitting processes so that the densities accommodated by the General Plan Update can be achieved. The effect of these regulatory changes would result in the removal of obstacles to growth. A discussion of the planning and regulatory components that would be revised to be consistent with the General Plan Update is provided in Section 1.8, Other Project Components. These components include community plan updates, specific plan changes, agricultural preserve modifications and deletions, and a number of ordinance revisions including the RPO, Groundwater Ordinance, Subdivision Ordinance, and Zoning Ordinance. Changes to these plans, policies and regulations would have the potential to remove an obstacle to growth in the unincorporated County. For example, as discussed in Section 1.8.5, the RPO would be amended to allow some additional flexibility in project design while still protecting significant natural resources. Another example, as discussed in Section 1.8.4, would be the removal of a building moratorium associated with GPA 92-01 in certain areas of the Central Mountain Subregion. Both of these examples would have the effect of removing an obstacle to growth. While removal of these regulatory obstacles may induce growth in some areas compared to growth that would be allowed under existing regulatory processes, new growth would be consistent with the General Plan Update and would not be unplanned growth.

3.1.4 Environmental Impacts of Population Growth

As described above, the proposed General Plan Update would be considered growth-inducing because it would accommodate new residential development that would result in direct inducement of population growth, and an increase employment opportunities and removal of obstacles to growth that would indirectly induce population growth in the region. Therefore, the proposed project would have the potential to result in adverse physical environmental effects due to population growth. The General Plan Update proposes land use designations that would accommodate future population growth; therefore, the effects of population growth within the unincorporated County are the direct and cumulative impacts of the proposed project, and are addressed in Sections 2.1 through 2.17 of this EIR. Environmental impacts of the proposed project were evaluated and significant impacts were identified and mitigated to the extent feasible. Any direct and cumulative impacts that would not be mitigated to below a level of significance are identified below in Section 3.3, Significant and Unavoidable Impacts.

3.2 Significant Irreversible Environmental Changes

CEQA Sections 21100(b) (2) and 21100.1(a) require that EIRs prepared for the adoption of a plan, policy, or ordinance of a public agency must include a discussion of significant irreversible environmental changes of project implementation. Section 15126.2(c) of the CEQA Guidelines describes significant irreversible environmental changes that would be caused by a proposed project as:

Uses of nonrenewable resources during the initial and continued phases of a project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

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

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

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

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

In addition, development of the proposed project would result in increased demand on public services and utilities (see Section 2.13, Public Services, and Section 2.16, Utilities and Service Systems). This increased demand would require expansion of infrastructure that would result in irreversible conversion of land similar to other development types and would also result in the permanent commitment of resources such as water and energy by making these resources available to more consumers. The proposed project would also result in significant unavoidable effects related to air emissions, including emissions of greenhouse gases (see Section 2.3, Air Quality, and Section 2.17, Climate Change). Long-term impacts would also result from an increase in vehicular traffic, and associated noise emissions (see Section 2.15, Traffic, and Section 2.11, Noise). Additional development that would occur under the proposed project could result in the loss of significant historical resources (see Section 2.5, Cultural Resources) or important farmland (see Section 2.2, Agriculture Resources) as land containing these resources is converted to other land uses. Additionally, besides increasing consumption of mineral resources for development, new development has the potential to make mineral resource deposits unavailable for future extraction by placing structures on top of resources or by developing land uses that would be incompatible with extraction operations in the vicinity of known mineral deposits (see Section 2.10, Mineral Resources).

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the proposed project. As described in Section 2.7, Hazards and Hazardous Materials, implementation of the General Plan Update would allow for the development of land uses, such as industrial buildings, that commonly store, use, and dispose of hazardous materials. Additionally, industries and businesses using hazardous materials may expand or increase to accommodate the projected population growth under implementation of the General Plan Update. Compliance with applicable federal, State and local hazardous materials regulations such as the Chemical Accident Prevention Provision, Emergency Planning and Community Right-to-Know Act, the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the California Health and Safety Code, California Code of Regulations Title 23, the Aboveground Petroleum Storage Act, California Accidental Release Prevention Program, the California Emergency Services Act, and the County Consolidated Fire Code would ensure that the proposed project would not result in irreversible environmental damage related to the accidental release of hazardous materials.

3.3 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects. Specifically, Section 15126.2(b) states:

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

Significant, unavoidable adverse impacts were identified for several environmental issues in Chapter 2.0. These impacts and their implications are described in greater detail in their respective section in Chapter 2.0. Despite these unavoidable effects, a comprehensive update to the County’s General Plan is still being proposed because the existing General Plan is based on outdated information and is, therefore, not considered to be a sound basis for current land

use decisions. Additional reasons for supporting a comprehensive update to the County's General Plan, including project objectives, are provided in Chapter 1.0, Project Description. The following is a summary of the significant and unavoidable impacts that would result from the proposed project:

- **Aesthetics**

- **Issue 3 – Visual Character or Quality:** Implementation of the General Plan Update would accommodate intensified development, especially in town centers, which has the potential to result in the degradation of, or substantial change in, the existing visual character or quality of communities throughout the unincorporated County. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to visual character and quality, but not to below a level of significance.
- **Issue 4 – Light or Glare:** The proposed General Plan Update would have the potential to result in increased light within the County that would adversely affect day or nighttime views. The proposed General Plan Update policies and mitigation measures would reduce direct impacts associated with increased light, but not to below a level of significance.
- **Cumulative Impact – Visual Character or Quality:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with visual character and quality. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to visual character and quality, but not to below a level of significance.
- **Cumulative Impact – Light or Glare:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with increased light. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to nighttime lighting, but not to below a level of significance.

- **Agricultural Resources**

- **Issue 1 – Conversion of Farmland:** Implementation of the proposed General Plan Update would result in the direct conversion of 4,782 acres of agricultural resources to non-agricultural land uses. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to conversion of farmland, but not to below a level of significance.
- **Issue 3 – Indirect Conversion of Farmland:** Implementation of the General Plan Update would redirect high density growth into areas containing agricultural resources and potentially cause some indirect conversion of agricultural resources to non-agricultural use because of incompatibility between development accommodated by the General Plan Update and existing agricultural activity. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to indirect conversion of farmland, but not to below a level of significance.
- **Cumulative Impact – Conversion of Farmland:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region

associated with the conversion of farmland to non-agricultural use. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to conversion of farmland, but not to below a level of significance.

- **Cumulative Impact – Indirect Conversion of Farmland:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with the indirect conversion of farmland to non-agricultural use. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to indirect conversion of farmland, but not to below a level of significance.

- **Air Quality**

- **Issue 2 – Air Quality Violations:** The proposed General Plan Update would have the potential to result in a significant violation of an air quality standard because emissions of criteria pollutants associated with new residential, commercial, and industrial development consistent with the General Plan Update would exceed the screening-level thresholds for air pollutants. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to air quality violations, but not to below a level of significance.
- **Issue 3 – Non-Attainment Criteria Pollutants:** The proposed General Plan Update would have the potential to result in a direct cumulatively considerable net increase in pollutants for which the SDAB is listed as non-attainment. The SDAB is considered a nonattainment area for ozone and respirable particulate matter. The proposed General Plan Update policies and mitigation measures would reduce direct impacts related to non-attainment criteria pollutants, but not to below a level of significance.
- **Issue 4 – Sensitive Receptors:** The proposed General Plan Update would have the potential to result in exposure of sensitive receptors to diesel particulate matter. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to sensitive receptors, but not to below a level of significance.
- **Cumulative Impact – Air Quality Violations:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with the violation of air quality standards. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts related to air quality violations, but not to below a level of significance.
- **Cumulative Impact – Non-Attainment Criteria Pollutants:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with non-attainment of criteria pollutants (specifically O_3 , PM_{10} and $PM_{2.5}$). The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts related to non-attainment criteria pollutants, but not to below a level of significance.
- **Cumulative Impact – Sensitive Receptors:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with air quality (diesel emissions) impacts to sensitive receptors. The

proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to sensitive receptors, but not to below a level of significance.

- **Biological Resources**

- **Issue 1 – Special Status Plant and Wildlife Species:** The General Plan Update would have the potential to result in significant impacts to special status species and their habitats. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to special status species, but not to below a level of significance.
- **Issue 2 – Riparian Habitat and Other Sensitive Natural Communities:** The General Plan Update would have the potential to result in significant impacts to riparian habitat and other sensitive natural communities. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to riparian and other sensitive habitats, but not to below a level of significance.
- **Issue 3 – Wildlife Movement Corridors and Nursery Sites:** The General Plan Update would have the potential to result in significant impacts to wildlife movement corridors and nursery sites. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to wildlife corridors and nursery sites, but not to below a level of significance.
- **Cumulative Impact – Special Status Plant and Wildlife Species:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact associated with special status species until a comprehensive NCCP is in place for the long-term protection of special status plant and wildlife in North County and East County. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to special status species, but not to below a level of significance.
- **Cumulative Impact – Riparian Habitat and Other Sensitive Natural Communities:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact associated with riparian habitat and other sensitive natural communities until a comprehensive NCCP is in place for the long-term protection of riparian and other sensitive habitats in North County and East County. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to riparian habitat and other sensitive natural communities, but not to below a level of significance.
- **Cumulative Impact – Wildlife Movement Corridors and Nursery Sites:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact associated with wildlife movement corridors and nursery sites until a comprehensive NCCP is in place for the long-term protection of wildlife corridors and nursery sites in North County and East County. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to wildlife movement corridors and nursery sites, but not to below a level of significance.

- **Hazards and Hazardous Materials**

- **Issue 8 – Wildland Fires:** Implementation of the proposed General Plan Update would result in land uses that allow residential, commercial and industrial development in areas that are prone to wildland fires. This is due to the fact that the majority of the unincorporated County is located in very high or extreme fire threat hazard areas. Implementation of the General Plan Update would result in a potentially significant impact from the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands. The proposed General Plan Update policies and mitigation measures would reduce direct impacts related to wildland fires, but not to below a level of significance.
- **Cumulative Impact – Wildland Fires:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with loss of life and property associated with wildland fires. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to wildland fires, but not to below a level of significance.

- **Hydrology and Water Quality**

- **Issue 1 – Water Quality Standards and Requirements:** The development of future land uses as designated in the proposed General Plan Update would contribute pollutants such as sediments, hydrocarbons and paints in quantities that would otherwise significantly degrade surface water quality. It is also anticipated that non-point source pollutants, caused from the development of future land uses as designated in the proposed General Plan Update, would otherwise degrade surface water quality. Additionally, the General Plan Update would result in potentially significant impacts to water quality from proposing land uses in groundwater dependent areas that are currently experiencing groundwater contamination. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to hydrology and water quality, but not to below a level of significance.
- **Issue 2 – Groundwater Supplies and Recharge:** There are multiple areas in the unincorporated County that are currently experiencing groundwater supply and recharge impacts. Implementation of the General Plan Update would allow land uses and development to occur in these areas, thereby worsening an already unsustainable groundwater supply. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to groundwater supplies and recharge, but not to below a level of significance.
- **Cumulative Impact - Water Quality Standards and Requirements:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with water quality standards and requirements. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to water quality standards and requirements, but not to below a level of significance.
- **Cumulative Impact – Groundwater Supplies and Recharge:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative

impact in the region associated with groundwater supplies and recharge. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to groundwater supplies and recharge, but not to below a level of significance.

- **Mineral Resources**

- **Issue 1 – Mineral Resource Availability:** The General Plan Update proposes land uses in areas designated MRZ-2, MRZ-3, or those areas underlain by Quaternary alluvium that would be incompatible with these resources and would result in the loss of availability of known or suspected mineral resources that would be of value to the region and the residents of the State. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to mineral resource availability, but not to below a level of significance.
- **Issue 2 – Mineral Resource Recovery Sites:** The General Plan Update proposes potentially incompatible land uses that would have the potential to encroach on areas where mines are active or where future resource recovery sites would have otherwise been permitted. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to mineral resource recovery sites, but not to below a level of significance.
- **Cumulative Impact – Mineral Resource Availability:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with mineral resource availability. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to mineral resource availability, but not to below a level of significance.
- **Cumulative Impact – Mineral Resource Recovery Sites:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with mineral resource recovery sites. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to mineral resource recovery sites, but not to below a level of significance.

- **Noise**

- **Issue 3 – Permanent Increase in Ambient Noise Levels:** Traffic on new roadways or roadway improvements, as well as operation of new industrial facilities, agricultural operations, and other noise-generating uses under the General Plan Update would permanently increase ambient noise and would result in a potentially significant impact. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to permanent increase in ambient noise levels, but not to below a level of significance.
- **Cumulative Impact – Permanent Increase in Ambient Noise Levels:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with permanent increases in ambient noise levels. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts associated with permanent increases in ambient noise, but not to below a level of significance.

- **Public Services**
 - **Issue 3 – School Services:** The proposed General Plan Update is projected to increase housing and population within the unincorporated County, which would result in an increase in school enrollment. To maintain acceptable service ratios, the construction of new or expanded school facilities would be required. The construction of these facilities would have the potential to result in significant environmental impacts. However, the construction of school facilities is not under the jurisdiction of the County. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to school services, but not to below a level of significance.
 - **Cumulative Impact – School Services:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with environmental effects from the construction of school facilities. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts associated with school services, but not to below a level of significance.
- **Transportation and Traffic**
 - **Issue 1 – Unincorporated County Traffic and Level of Service Standards:** Implementation of the proposed General Plan Update would result in a total of 158 deficient roadway segments throughout the unincorporated County. The 158 deficient roadway segments would result in a total of approximately 270 deficient lane miles since roadway segments often consist of multiple lanes. Therefore, with implementation of the proposed General Plan Update, a total of approximately 270 lane miles would exceed the LOS standard established by the County. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to unincorporated County traffic and LOS standards, but not to below a level of significance.
 - **Issue 2 – Adjacent Jurisdictions Traffic and Level of Service Standards:** When compared to existing conditions, implementation of the proposed General Plan Update is expected to result in 34 roadway segments in adjacent cities that would exceed the LOS standard established by the respective city. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to adjacent jurisdictions traffic and LOS standards, but not to below a level of significance.
 - **Issue 3 – Rural Road Safety:** Implementation of the proposed General Plan would result in the adoption of a Mobility Element network that includes existing roadways with horizontal and vertical curves that are sharper than existing standards. This would be considered a potential transportation hazard. Additionally, the proposed General Plan Update may pose an increased risk to pedestrians and bicyclists by increasing and/or redistributing traffic patterns. Implementation of the proposed General Plan Update would also have the potential to result in hazards from at-grade rail crossings. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to rural road safety, but not to below a level of significance.
 - **Cumulative Impact – Unincorporated County Traffic and Level of Service Standards:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with traffic and

LOS in the County. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to impacts to unincorporated County traffic and LOS standards, but not to below a level of significance.

- **Cumulative Impact – Adjacent Jurisdictions Traffic and Level of Service Standards:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with traffic and LOS in adjacent cities. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to adjacent jurisdictions traffic and LOS standards, but not to below a level of significance.
- **Cumulative Impact – Rural Road Safety:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with rural road safety. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to rural road safety, but not to below a level of significance.
- **Utilities and Service Systems**
 - **Issue 4 – Adequate Water Supplies:** Implementation of the proposed General Plan Update would increase the number of housing units and populations served within the service areas of SDCWA-member water districts and groundwater dependent water districts. Although multiple planning documents exist to ensure a reliable water supply is available for future growth within the County, issues such as cutbacks in imported water and unprecedented drought years were unaccounted for in these documents. Additionally, some groundwater basins throughout the County would be impacted upon build out of the proposed General Plan Update. This would result in some groundwater dependent water districts having a potentially inadequate water supply. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to water supplies, but not to below a level of significant.
 - **Issue 6 – Sufficient Landfill Capacity:** If additional landfills are not constructed and existing landfills are not expanded, it is estimated that the County will run out of physical landfill capacity by 2016. Therefore, the development of future land uses as designated in the proposed General Plan Update would have the potential to be served by landfills with insufficient capacity to accommodate future solid waste disposal needs. The proposed General Plan Update policies and mitigation measures would reduce direct impacts to landfill capacity, but not to below a level of significance.
 - **Cumulative Impact – Adequate Water Supplies:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with adequate water supplies. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to water supplies, but not to below a level of significance.
 - **Cumulative Impact – Sufficient Landfill Capacity:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with sufficient landfill capacity. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts to landfill capacity, but not to below a level of significance.

- **Global Climate Change**

- **Issue 1 – Compliance with AB 32:** By the year 2020, GHG emissions are projected to increase to 7.1 MMT CO₂e (from 5.3 MMT CO₂e in 1990) under a BAU scenario, which for the purposes of this analysis is the development of the General Plan Update without incorporation of any GHG-reducing policies or mitigation measures., GHG emissions Countywide are projected to increase to 7.15 MMT CO₂e. This amount represents an increase of 24 percent over 2006 levels, and a 36 percent increase from estimated 1990 levels. The proposed General Plan Update policies and mitigation measures would reduce direct impacts related to compliance with AB 32. However, as detailed in the State's Scoping Plan, in order to achieve AB 32 levels, action will be required at all levels of government. While the State's commitment to AB 32 provides some assurances that such efforts will come to complete fruition at all levels, they are beyond the authority of the County. Without them, the County will not be able to independently achieve the AB 32 targets. Impacts would remain significant and unavoidable.
- **Issue 2 – Effects of Global Climate Change on the General Plan Update:** Climate change impacts that would be most relevant to the unincorporated County, and the proposed General Plan Update, include effects on water supply, wildfires, energy needs, and impacts to public health. The proposed General Plan policies and mitigation measures, in addition to compliance with applicable regulations such as the CAA, Lieberman-Warner Climate Security Act, CARB standards, Title 24 standards, Executive Order S-3-05, AB 32, Executive Order S-01-07, SB 97, SB 1368, SB 1078, APCD standards and existing County programs and policies, would mitigate the potential direct impacts of global climate change. However, addressing the adverse effects of climate change requires action at all levels of government. Because the County must depend on action taken by these other entities, impacts would remain significant and unavoidable.
- **Cumulative Impact – Compliance with AB 32:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with compliance with AB 32. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts related to compliance with AB 32, but not to below a level of significance.
- **Cumulative Impact – Effects of Global Climate Change on the General Plan Update:** The General Plan Update would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with effects of global climate change. The proposed General Plan Update policies and mitigation measures would reduce cumulative impacts related to the effects of global climate change, but not to below a level of significance.