

2.10 Land Use and Planning

This section evaluates existing conditions for land use and planning within San Diego County and the potential effects that implementation of the project may have upon adopted land uses, plans, policies. This section also contains a discussion of relevant land use policies. However, policy conflicts do not, in and of themselves, constitute a significant environmental impact. Potential conflicts would be environmental impacts only when they would result in physical impacts. Therefore, land use policies are discussed in this section for informational purposes only. All other associated physical impacts are discussed in Draft Supplement to the 2011 General Plan Update (GPU) Program Environmental Impact Report (2011 GPU PEIR) (Draft SEIR).

This section evaluates the potential for the project to result in the physical division of an established community, or to conflict with any applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. The potential for the project to result in a conflict with an adopted Habitat Conservation Plan (HCP) or Natural Communities Conservation Plan (NCCP) is discussed in Section 2.4, Biological Resources.

Comments received during the Notice of Preparation (NOP) scoping process included concerns regarding inclusion of general plan amendments (GPAs) in the Climate Action Plan (CAP), processing of GPAs prior to CAP completion or implementation of net zero requirements if processed before CAP completion, sustainable and equitable land use, need to implement growth boundaries, need for new housing near alternative transit corridors, and ability of the County to meet SB 375 targets. These concerns are addressed and summarized in this section. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this Draft SEIR.

2.10.1 Existing Conditions

The 2011 GPU PEIR included a discussion of existing conditions related to land uses in Section 2.9.1 of the Land Use chapter, which includes all lands within the unincorporated County. The land use conditions described in the 2011 GPU PEIR largely remain the same with exception of the approval of the GPAs listed in **Table 1-3**, Cumulative Projects List, of this Draft SEIR. Buildout of the approved GPAs will result in an additional approximately 3,231 dwelling units, 513,000 square feet of commercial uses, and 120,000 square feet of industrial uses compared to what was evaluated in the 2011 GPU PEIR. See Chapter 2.7 for additional analysis of GPAs. However, each of the approved GPAs were reviewed for consistency with the 2011 GPU and found to be consistent prior to being approved.

There are several GPAs, both County-initiated and proposed by project applicants, that are currently under review by the County. This includes GPA applications that were deemed complete prior to the project NOP date (October 20, 2016). See **Table 1-3**, Cumulative Projects List, in the Project Description of this Draft SEIR for the complete list of GPAs. As was done with the approved GPAs, each new GPA will undergo a comprehensive evaluation for 2011 GPU consistency, as well as for consistency with

other policies and regulations prior to being considered by the Board of Supervisors for approval. While these proposed GPAs are not considered in the baseline of emissions and environmental conditions for the project, they are considered in the Draft SEIR's evaluation of cumulative impacts as they are known, have active applications in process at the County, and are considered "probable future projects," as defined in CEQA Guidelines Section 15130 (b)(1)(A).

Additionally, while several of the County's Community and Subregional Plans have been amended and updated since adoption of the 2011 GPU, as described above, none of the plans have included changes to density or intensity. Therefore, the existing conditions related to Land Use described in the 2011 GPU PEIR on pages 2.9-1 through 2.9-21 are hereby incorporated by reference. As described on pages 2.9-27 through 2.9-29, there have been no newly constructed roadways or open space acquisitions that have resulted in the physical division of an established community. Similarly, as described on pages 2.9-29 through 2.9-36 of the GPU PEIR, no new plans have been adopted within the unincorporated County that conflict with existing land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact.

2.10.2 Regulatory Framework

Chapter 2.9 of the 2011 GPU PEIR, pages 2.9-22 through 2.9-27 describes the Regulatory Framework related to land use and is hereby incorporated by reference. A complete list of applicable federal, state, and local regulations that appeared in the 2011 GPU PEIR regarding land use follows. Those regulations that have been updated since adoption of the 2011 GPU are described in full. Those regulations that appear in a list format have not changed and continue to apply to the unincorporated County.

Federal

No federal land use regulations are applicable to the project.

State

- California Aeronautics Act
- California Planning and Zoning Law
- California Office of Planning and Research (OPR) General Plan Guidelines
- Local Agency Formation Commission (LAFCO)
- Natural Community Conservation Planning (NCCP) Act of 1991
- Senate Bill (SB) 375

California Office of Planning and Research General Plan Guidelines

The 2011 GPU PEIR states that the most recent version of the California Office of Planning and Research (OPR) General Plan Guidelines was prepared in 2003. This remains a valid statement; however, it should be noted that the OPR is currently in the process of preparing its 2017 update of the General Plan Guidelines. A public review draft was posted in October 2015.

Local

- San Diego Association of Governments (SANDAG) 2030 Regional Transportation Plan (RTP)
- SANDAG Congestion Management Program (CMP)
- SANDAG Regional Comprehensive Plan (RCP)
- County of San Diego Community and Subregional Plans; Specific Plans
- County of San Diego Forest Conservation Initiative (FCI)
- San Diego County Multiple Species Conservation Program (MSCP)
- County of San Diego County Trails Program (CTP)
- Airport Land Use Compatibility Plans (ALUCPs)
- County of San Diego Board of Supervisors Policies 1-63, 1-104, and J-33
- County of San Diego Zoning Ordinance (Zoning Ordinance)
- Sphere of Influence (SOI)
- San Diego County Regional Air Quality Strategy (RAQS)
- San Diego Basin Plan (Basin Plan)

SANDAG 2050 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS)

The 2011 GPU PEIR includes the 2030 RTP; however, the SANDAG Board of Directors adopted the 2050 Regional Transportation Plan (RTP) on October 28, 2011. This Plan supersedes the 2030 RTP. The Plan identifies projects to obligate projected revenues; allocating the largest proportion of the funds to transit projects, then the next largest portion for highway improvements, followed by local roads and streets.

Along with the 2050 RTP, the Board adopted the Sustainable Communities Strategy (SCS). The SCS details how the region will reduce greenhouse gas emissions to state-mandated levels over time. The inclusion of the SCS is required by Senate Bill 375, and the San Diego region is the first in California to produce a regional transportation plan with an SCS.

On November 28, 2011, a lawsuit was brought against the 2050 RTP PEIR claiming it did not adequately address reduction of greenhouse gas emissions. On December 3, 2012, the court found that the RTP EIR violated state law by failing to fully account for, and take steps to reduce greenhouse gas emissions. The ruling required SANDAG to conduct new

environmental review for the 2050 RTP to ensure it adequately addresses the risk of climate change, which could result in revisions to the Plan. In November 2014, the Court of Appeal also found that SANDAG’s program EIR for its RTP/SCS did not comply with CEQA because SANDAG omitted from the EIR an analysis of the Plan’s consistency with the state climate policy, reflected in Executive Order S-3-05, of continual greenhouse gas emission reductions. However, on July 13, 2017, the California Supreme Court ruled that SANDAG did not abuse its discretion by declining “to adopt the 2050 goal as a measure of significance in light of the fact that the Executive Order does not specify any plan or implementation measures to achieve its goal.”

In addition to concluding that an EIR need not use this executive order’s goal for determining significance, the Supreme Court described several principles relevant to CEQA review of GHG impacts, including: (1) EIRs should “reasonably evaluate” the “long-range GHG emission impacts for the year 2050;” (2) the 2050 target is “grounded in sound science” in that it is “based on the scientifically supported level of emissions reduction needed to avoid significant disruption of the climate;” and (3) in the case of the SANDAG plan, the increase in long-range GHG emissions by 2050, which would be substantially greater than 2010 levels, was appropriately determined to be significant and unavoidable.

County of San Diego Community Plan and Subregional Plan Updates

Each planning area has a community or subregional plan except for Pendleton/De Luz and County Islands, which are Community Plan Areas without organized planning or sponsor groups. Each community plan or subregional plan supplements the County General Plan by focusing on a specific planning area. The following plans have been revised or amended since adoption of the 2011 GPU to maintain consistency. These are amendments to planning documents, not projects considered a part of the cumulative project analysis in **Table 2.7-3**. A summary of each Plan Update follows.

Alpine Community Plan- Amended for consistency with the FCI, described below (GPA 12-004).

Central Mountain Subregional Plan- Amended for consistency with the FCI; Amended as part of a General Plan “cleanup” action to address inconsistencies; and Amended to establish new standalone Community Plans for Campo/Lake Morena and Pine Valley (GPA 14-001, GPA 12-004, GPA 16-002).

Crest/Dehesa/Harbisa Canyon/Granite Hills- Amended as part of a General Plan “cleanup” action to address inconsistencies (GPA 14-001).

Borrego Springs Community Plan- Amended to allow opportunities for small wind turbine development; Amended as part of a General Plan “cleanup” action to address inconsistencies (GPA 12-003, GPA 12-007).

Fallbrook Community Plan- Amended to accommodate Meadowood Master Planned Community; amended to accommodate Campus Park West Master Planned Community; amended as part of a General Plan “cleanup” action to address inconsistencies; amended

to accommodate Grand Tradition GPA (GPA 04-002, GPA 05-003, GPA 14-001, GPA 15-005).

Jamul/Dulzura Subregional Plan- Amended as part of a General Plan “cleanup” action to address inconsistencies (GPA 12-007, GPA 12-004).

Mountain Empire Subregional Plan- Amended to establish new standalone Community Plans for Campo/Lake Morena and Pine Valley (GPA 16-002).

North Mountain Subregional Plan- Amended as part of a General Plan “cleanup” action to address inconsistencies (GPA 12-007, GPA 12-004).

Pala/Pauma Subregional Plan- Amended as part of a General Plan “cleanup” action to address inconsistencies (GPA 14-001).

Rainbow Community Plan- Amended as part of a General Plan “cleanup” action to address inconsistencies (GPA 12-007).

San Dieguito Community Plan- Amended as part of a General Plan “cleanup” action to address inconsistencies (GPA 12-008, GPA 12-007).

Spring Valley Community Plan- Amended as part of a General Plan “cleanup” action to address inconsistencies (GPA 12-007).

Sweetwater Community Plan- Amended as part of a General Plan “cleanup” action to address inconsistencies (GPA 12-007).

Valley Center Community Plan- Amended as part of a General Plan “cleanup” action to address inconsistencies (GPA 14-001).

County of San Diego Forest Conservation Initiative

Since adoption of the 2011 GPU land use map, the Forest Conservation Initiative (FCI) GPA project was approved. The FCI was a voter-approved initiative requiring that approximately 71,300 acres of private lands within and adjacent to the Cleveland National Forest in San Diego County have a minimum lot size of 40 acres. The FCI was originally approved on November 2, 1993, and expired on December 31, 2010. The land use map revisions resulting with the update of the General Plan in 2011 excluded the FCI lands. Upon the expiration of the FCI, land in the affected areas reverted to the land use designations under the pre-FCI General Plan. As a result, the former FCI land use designations were not consistent with the 2011 GPU land use designations, nor the Guiding Principles and Policies adopted with the General Plan. In December 2016, the County BOS approved new land use designations that brought the FCI lands into consistency with the 2011 GPU.

Water Quality Control Plan for the San Diego Basin

The Water Quality Control Plan for the San Diego Basin (Basin Plan) was most recently amended in May 2016 and designates water quality objectives for constituents that could potentially cause an adverse effect or impact on the beneficial uses of water. The intent of the amended Basin Plan remains consistent with that described in Section 2.9.2.2, Local, of the 2011 GPU PEIR.

Adopted 2011 GPU Policies

The policies applicable to land use that were adopted as part of the 2011 GPU and are applicable to the project include the following:

Policy LU-2.1: Community Plans. Maintain updated Community Plans, as part of the General Plan, to guide development to reflect the character and vision for each individual unincorporated community, consistent with the General Plan.

Policy LU-9.3: Village and Community Core Guidelines and Regulations. Support the development and implementation of design guidelines, Village-specific regulations for roads, parking, and noise, and other planning and regulatory mechanisms that recognize the unique operations and character of Villages, Town Centers, and transportation nodes. Ensure that new development is compatible with the overall scale and character of established neighborhoods.

Policy LU-9.10: Internal Village Connectivity. Require that new development in Village areas are integrated with existing neighborhoods by providing connected and continuous street, pathway, and recreational open space networks, including pedestrian and bike paths.

Policy LU-11.2: Compatibility with Community Character. Require that commercial, office, and industrial development be located, scaled, and designed to be compatible with the unique character of the community.

Policy LU-12.4: Planning for Compatibility. Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts: for Mobility Element roads identified in Table M-4, an LOS D or better may not be achieved.

Policy H-2.1: Development that Respects Community Character. Require that development in existing residential neighborhoods be well-designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element.

Adopted 2011 GPU PEIR Mitigation Measures

The mitigation measures applicable to land use that were adopted as part of the 2011 GPU PEIR and are applicable to the project include the following:

Lan-1.1 requires coordination with adjacent cities and other agencies regarding planning efforts and resource protection. It specifically requires coordination with SANDAG during updates to the Regional Transportation Plan to ensure that regional roads are properly planned, sited, and designed. Consultation and coordination with this and other agencies will allow better planning of infrastructure and prevent significant impacts to communities from incompatible facilities.

Lan-1.2 requires coordination with land owners, other departments, and community groups to ensure that both public and private development projects and associated infrastructure minimize impacts to established communities. This involves community input and General Plan conformance reviews on County road projects to ensure that County road planning and development is consistent with the General Plan. This also includes analysis of potential environmental impacts for public and private road projects and application of mitigation measures pursuant to CEQA. Department of Public Works policies and procedures shall be evaluated to ensure that such reviews are conducted and that issues regarding potential division of communities are identified and addressed. General Plan Amendments that propose changes to the circulation network shall be kept consistent with the General Plan Goals and Policies, and such proposals will also be reviewed by the communities. In addition, Board Policy I-63, which contains provisions for General Plan Amendments, and/or department procedures will be updated to meet this standard.

Lan-1.3 requires the County to maintain plans and standards for infrastructure and roads so that divisions of communities do not occur. This will include: 1) updates to County Road Standards to ensure that roads are designed and built in a safe manner consistent with the General Plan and community context; 2) adherence to Community Plans to guide infrastructure planning in the individual and unique communities of the County; 3) evaluation and, if necessary, revisions to the subdivision ordinance to ensure future project designs, and corresponding infrastructure designs, are consistent with the General Plan and with established community character; 4) preparation of local public road network plans to improve mobility, connectivity, and safety; and 5) preparation of community road standards that supplement the County road standards to recognize the unique constraints and character of different communities. These efforts will minimize the potential impacts of future infrastructure on established communities.

2.10.3 Issues Not Discussed Further

As described in Chapter 1.0, Project Description, in response to litigation and considering legislative changes that have occurred since preparation of the 2012 Climate Action Plan (CAP), the County prepared a new CAP (subject of this Draft SEIR). The CAP and the targets and strategies identified therein necessitate changes to Goal COS-20 and Policy COS-20.1 of the County's General Plan (2011 GPU) and mitigation adopted in the 2011 GPU PEIR, Mitigation Measures CC-1.2, CC-1.7, and CC-1.8 to attain consistency with current legislative requirements. These changes require a 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)) as part of the administrative approval process. The Draft SEIR evaluates the GPA as part of the

actions associated with the CAP because the changes reflected in the GPA support and are consistent with implementation of the CAP and its GHG targets and GHG reduction measures. Therefore, the GPA is not addressed as a separate impact discussion below, but its impacts are included within the overall impact analysis of the CAP.

The Draft SEIR also evaluates the impacts associated with the implementation of proposed GHG Threshold, Guidelines for Determining Significance for Climate Change (Guidelines), and the Report Format and Content Requirements. The proposed GHG Threshold requires consistency with the CAP, and is the level below which a project would be determined to result in less-than-significant GHG impacts. To achieve consistency, a project will be required to implement the applicable GHG reduction measures outlined in the CAP. All measures have been evaluated throughout the Draft SEIR. Therefore, adoption of a GHG Threshold that establishes a requirement to be consistent with the CAP, the individual measures of which have been evaluated throughout this Draft SEIR, would not require a separate impact analysis because the impacts of establishing that threshold and what it would take to meet the threshold have been fully evaluated.

The Guidelines would provide direction to project applicants on how a project could achieve consistency with the CAP. The Guidelines are proposed to include a checklist that would require applicants to demonstrate how a project would be consistent with the CAP including through implementation of GHG reduction measures. The specific actions that would result from the Guidelines would be project-specific implementation of approved GHG reduction measures, the environmental impacts of which have been evaluated throughout this Draft SEIR. Therefore, evaluation of the Guidelines as a separate impact discussion is not provided below.

Finally, the Report Format and Content Requirements document would not result in any physical impact on the environment as it simply details the format for how reports should be written. As a result, this document is also not separately discussed below.

In summary, the GPA, GHG Threshold, and Guidelines, and Report Format and Content Requirements are not addressed as a separate impact discussion below. The GPA, GHG Threshold, and Guidelines are combined in the overall impact analysis of the CAP, while the Report Format and Content Requirement document provides technical direction to future project applicants and will not result in any physical impacts.

2.10.4 Analysis of Project and Cumulative Impacts

The scope of the project and cumulative impact analysis study area for land use in the 2011 GPU PEIR was identified as all unincorporated County lands. Implementation of the project would not re-designate or intensify development within any of the land use categories assigned by the 2011 GPU land use map. Therefore, this analysis uses the same scope identified in the 2011 GPU PEIR.

Proposed GHG Reduction Measures

Table 1-1 of this Draft SEIR, provides a list of all the proposed GHG reduction measures and supporting efforts that will be implemented by the CAP. However, only those measures that are relevant to land use and could potentially result in a significant impact within the County are described and evaluated below. None of the proposed measures indicate where specific improvements would be constructed, their size, or specific characteristics. As a program EIR, the Draft SEIR does not, and cannot, speculate on the individual environmental impacts of specific future projects/improvements. However, implementation of all GHG reduction measures and supporting efforts were considered during preparation of the Draft SEIR, to the degree specific information about implementation is known. Consistent with the requirements of CEQA Guidelines Section 15168, this Draft SEIR provides a programmatic discussion of general impacts of the implementation of these measures, and not project-level or site-specific physical impacts of such actions.

Strategy T-1: Reduce Vehicle Miles Traveled

Measure T-1.1: Acquire Open Space Conservation Land. Acquire open space conservation lands consistent with current ~~and anticipated future~~ requirements of the County Multiple Species Conservation Program (MSCP) and future conservation efforts, including acquisition of 2,622 acres by 2020 and an additional 4,370 acres between 2021 and 2030. This measure would result in the acquisition ~~expansion of the program and~~ lands acquired for permanent dedication as open space. It is evaluated for the potential to physically divide communities.

Measure T-1.2: Acquire Agricultural Easements. Acquire agricultural easements the Purchase of Agriculture Conservation Easement (PACE) Program, including acquisition of 443 acres of agricultural easements by 2020 and an additional 4,430 acres between 2021 and 2030. This measure would result in existing agricultural land becoming dedicated for agricultural uses in perpetuity. It may result in physical changes related to the loss of future development potential. It is evaluated for the potential to physically divide communities.

Strategy T-4: Invest in Local Projects to Offset Carbon Emissions

Measure T-4.1: Establish a Local Direct Investment Program. Close the 2030 GHG emissions target gap of 195,514 MTCO₂e through direct investments in local projects that would offset carbon emissions within the unincorporated county by 2030. This measure would result in funding direct investments for local projects. The specific protocols that would be utilized are not known and evaluation of such actions would be speculative. However, this Draft SEIR conservatively assumes that some construction-related activities may occur with individual project implementation. Please see Chapter 2.7 and Appendix B of this SEIR for additional

information on direct investment projects and protocols. Protocols could include the following types of projects:

- Biomass Conversion,
- Boiler Efficiency Retrofits,
- Wetland Creation,
- Forest Restoration,
- Compost Additions to Rangeland,
- Organic Waste Digestion Capture,
- Manure Management,
- Building Weatherization Programs, and
- Urban Forest Management.

Strategy E-1: Increase Building Energy Efficiency

Measure E-1.1: Improve Building Energy Efficiency in New Development. Achieve a 10% greater building energy efficiency in all new non-residential development than is required by the 2016 State Energy Code (Title 24 Part 6) by 2020; require all new residential development to meet the State’s Zero Net Energy (ZNE) standards by 2020; and require all new non-residential development to meet the State’s ZNE standards by 2030. This measure would result in energy efficiency regulations that are 10% more efficient than current standards. Physical changes would be attributed to the installation, operation, and maintenance of small-scale solar systems and battery storage, or small-scale wind turbines with new residential construction which may include roof or ground-mounted systems. Evaluated for the potential to conflict with policies adopted for the purpose of avoiding or minimizing a physical environmental impact.

Strategy E-2: Increase Renewable Energy Use

Measure E-2.1: Increase Renewable Electricity. Achieve 90% renewable electricity for the unincorporated county by 2030. This measure would result in the construction of distributed generation (small-scale renewables) on new and existing buildings, including solar photovoltaics, small wind-turbines, and energy storage solutions. This may also directly or indirectly require the construction of large-scale renewable energy generation systems to satisfy increased demand. This may result in physical changes resulting from construction, operation, and maintenance of infrastructure. This measure was evaluated for the potential to physically divide existing communities.

Measure E-2.2: Increase Renewable Electricity in Non-Residential Development. Require installation of renewable energy systems (e.g., solar photovoltaics, wind) on new non-residential development. This measure would result in an increase in solar photovoltaic and small-scale wind turbines on new non-residential buildings throughout the unincorporated County. This measure was evaluated for the potential to conflict with policies adopted for the purpose of avoiding or minimizing a physical environmental impact.

Measure E-2.3: Install Solar Photovoltaics in Existing Homes. Increase installation of photovoltaic (PV) electrical systems in 52,273 existing residential homes by 2020 and additional 77,902 homes by 2030. This measure would result in an increase in photovoltaic solar on existing residential buildings throughout the unincorporated County. This measure was evaluated for the potential to conflict with policies adopted for the purpose of avoiding or minimizing a physical environmental impact.

Measure E-2.4: Increase Use of On-Site Renewable Electricity Generation for County Operations. Generate 10% of the County's operational electricity with renewables by 2020 and 20% by 2030. This measure would result in the development of County-owned renewable energy projects. This could result in new photovoltaic, small-scale wind turbines, and other renewables on County facilities. This measure was evaluated its potential to conflict with policies adopted for the purpose of avoiding or minimizing a physical environmental impact.

Strategy SW-1: Increase Solid Waste Diversion in the Unincorporated County

Measure SW-1.1: Increase Solid Waste Diversion. Achieve 75% solid waste diversion by 2030. This measure would result in new/expanded composting projects and facilities throughout the unincorporated County. This could result in a variety of physical impacts related to the construction and operation of such facilities dependent upon the scale of facilities.

Supporting Efforts for the Water and Wastewater Category

Work with Padre Dam Municipal Water District (MWD) to advance the East County Advanced Water Purification (AWP) Program.

2.10.4.1 Issue 1: Physically Divide an Established Community

This section describes potential project and cumulative impacts related to the physical division of an established community because of implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines, which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, the project would have a potentially significant impact if it would physically divide an established community. For the purposes of this Draft SEIR, established communities are defined as established town centers and communities described in Section 2.9.1.2 of the 2011 GPU PEIR and Community and Subregional Planning Areas under Section 2.10.1, Existing Conditions, of this Draft SEIR.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to the potential for physical division of established communities because of adoption of the goals and policies contained within the plan, and buildout of the land use map. It was determined that buildout under the 2011 GPU would result in potentially significant project and cumulative impacts related to the physical division of an established community. The 2011 GPU PEIR determined that the impacts related to the physical division of established communities would be reduced to below a level of significance through the implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures discussed above. The discussion of impacts can be found in the 2011 GPU EIR, Chapter 2.9, Land Use, on pages 2.9-27 through 2.9-29 and is hereby incorporated by reference.

CAP Impact Analysis

Implementation of the CAP has the potential to result in significant impacts related to the physical division of an existing community from implementation of GHG reduction measures and supporting efforts that would expand the MSCP and PACE programs, and result in the development of large-scale renewable energy projects including solar photovoltaic, solar concentrator, large-scale wind turbines, and geothermal systems that were not explicitly evaluated within the 2011 GPU PEIR. The 2012 Wind Energy EIR evaluated impacts specifically related to the development of small and large-scale wind turbines and is summarized below and hereby incorporated by reference where appropriate (San Diego County 2012). Additionally, the Padre Dam Municipal Water District's Comprehensive Facilities Master Plan PEIR (2017 Padre Dam PEIR) evaluated impacts related to the development/expansion of water purification infrastructure and impacts that are associated with the Supporting Effort for the Water and Wastewater Category. The analysis from that document is summarized below and hereby incorporated by reference (Padre Dam MWD 2017).

Expanded PACE and MCSP Programs

GHG Reduction Measures T-1.1 and T-1.2 would ~~expand~~ result in the acquisition of the existing MSCP and PACE programs to acquire additional lands for biological and agricultural preservation which could result in a significant impact if it were to result in a physical division of an established community. However, the lands that would be acquired for preservation under one of the MSCP subarea plans have been previously designated by the County for preservation, and would not be located within existing communities. GHG Reduction Measure T-1.2 would expand the acquisition of lands under the PACE program and could result in the conversion of a relatively small amount of land to permanent agricultural easements, however, this land use type typically occurs in rural and undeveloped portions of the County and would not be expected to occur within established communities. Further, these types of land use conversions are typically not of the size to result in the physical division of an established community. Additionally, the GHG reduction measures would not redesignate adopted 2011 GPU land uses, and

would not change existing land use patterns. The 2011 GPU policies and 2011 GPU PEIR mitigation measures that are listed above would further limit the potential for project impacts related to the physical division of existing communities. Overall, impacts related to division of an established community would be **less than significant**.

Cumulative Impacts

Project impacts would be cumulative in nature if in combination with effects of other projects, they would result in facilities or infrastructure that resulted in the physical division of a community. CEQA Guidelines Section 15130 describes two methods for establishing the cumulative environment in which the project is to be considered: the use of a list of past, present, and probable future projects; or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. This analysis uses a combination of the list and planning document approach, as described in Chapter 1, Project Description. Physical improvements resulting from implementation of the CAP have the potential to combine with the physical impacts of other past, present, or probable future projects in the County and could result in a cumulative impact based upon proximity and construction schedule. **Table 1-3** in the Project Description contains a list of past, present, and probable future projects that when combined with the project, could result in a cumulatively considerable effect. Cumulative impacts could also result when the physical improvements resulting from implementation of the CAP interact with development associated with build-out of the County's General Plan and potentially increase those impacts resulting in a cumulatively considerable effect.

Implementation of the GHG reduction measures listed above could result in ~~expanded~~ acquisition of land for preservation under the MSCP and PACE programs. As described above, the 2011 GPU PEIR determined that with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR, cumulative impacts related to physical division of a community would be less-than-significant. Further, no significant division of an established community impacts would occur with implementation of the above measures. Therefore, implementation of project **would not have a considerable contribution** such that a new significant cumulative impact related to the division of an established community would occur.

Large Scale Renewable Energy Infrastructure

GHG Reduction Measure E-2.1 would result in the development of large-scale renewable energy infrastructure including solar photovoltaic, concentrator solar, large-scale wind, and geothermal energy systems. As described in Section 2.1.4.1, Scenic Vistas or Scenic Resources, of this Draft SEIR, large-scale renewable energy systems require the construction of multiple components, to support energy production including substations, transmission systems, maintenance buildings, internal and external access roads, etc. As described on page 2.7-12 of the 2012 Wind Energy EIR, road improvements would be constructed according to the County's Zoning Ordinance Sections 6750–6799, San Diego County Public Road Standards, and San Diego County Private Road Standards. Additionally, projects would be subject to discretionary review and required to obtain a Major Use Permit (MUP). As part of the County's discretionary review process, projects

would be evaluated under CEQA and would be required to implement measures to minimize land use impacts, including the possibility of physical division of a community. However, because there is ultimately no guarantee on a project-specific level that mitigation measures would reduce impacts to a level below significant, the project may result in significant impacts because of road improvements for large wind turbines and solar facilities that could physically divide an established community. The 2012 Wind Energy EIR considered mitigation that would have prohibited design features, such as roadways, however, this mitigation was determined to be infeasible because it would have conflicted with the County's goal to expand renewable energy resources. The same infeasibility applies to large-scale solar and geothermal energy projects. Further, the County could also make findings that the land use impacts of a specific project would not outweigh the renewable energy benefits of such projects. Therefore, implementation of large-scale renewable energy projects would have a **potentially significant** impact to physical division of a community (**Impact LU-1**).

Cumulative Impacts

Impacts would be cumulative in nature if the project combined with other cumulative development projects would result in facilities or infrastructure that resulted in the physical division of a community. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.10.4.1 above applies for this cumulative discussion.

As described above, the 2011 GPU PEIR determined that with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR, cumulative impacts related to physical division of a community would be less-than-significant. However, as described on page 2.7-17 of the 2012 Wind Energy EIR, while it is likely that resultant large-scale renewable energy projects would be located throughout the County outside of established communities, there is no guarantee that project-level mitigation would reduce impacts to below a level of significance, and the construction of new or widened access roadways would have the potential to physically divide a community (County of San Diego 2012). Similar types of land use impacts and conflicts could occur with implementation of large scale solar projects. Therefore, even with implementation of adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures that would minimize the likelihood of a physical division of community, cumulative land use impacts would remain potentially significant and the project **would result in a considerable contribution** such that a new significant cumulative impact related to the division of an established community could occur (**Impact LU-2**).

Local Direct Investments Program

Implementation of GHG Reduction Measure T-4.1 would require the County to implement or fund direct investment projects to offset carbon emissions. As described in detail in Chapter 2.7 and Appendix B of this Draft SEIR, projects that could result from implementation of this measure could include but are not limited to: biomass conversion to energy or soil application (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 (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 (i.e., increasing soil carbon sequestration and improving quality of soils), organic waste digestion (i.e., diverting organic waste and/or wastewater to a biogas control system), livestock management (i.e., installing biogas control systems for manure management on dairy cattle and swine farms), urban forest and urban tree planting projects (i.e., tree planting, maintenance, and/or improved management activities to increase carbon storage through trees), and winterization (i.e., energy efficiency upgrades to buildings). This list is not intended to be exhaustive, but represents some of the types of projects that could be considered in the future.

Most direct investment projects would involve some level of construction and physical disturbance of the land and depending on their size and location could result in the division of an established community. Because the variety of projects that may be approved and ultimately undertaken by the County under the Local Direct Investment Program is not known, it is too speculative to determine the types of impacts that could occur and whether regulations or mitigation measures would be available to minimize potential environmental impacts. However, all projects would be required to comply with applicable existing federal, state, and local regulations. Specifically, projects would be evaluated for their consistency with 2011 GPU policies, 2011 GPU PEIR mitigation measures, County Grading Ordinance regulations, County Resources Protection Ordinance regulations, etc. Future discretionary projects may also be required to undergo additional CEQA analysis to evaluate their project-specific impacts. If a determination is made that potentially significant impacts would result from implementation of direct investment projects, then all feasible mitigation would be required to be implemented in accordance with CEQA Guidelines Section 15126.4.

While all feasible mitigation would be applied at the project level as part of the County's discretionary review process, construction of projects associated with GHG Reduction Measure T-4.1 could still result in impacts related to the division of an established community. At the programmatic level, it is not possible to determine with certainty that these impacts would be reduced to a level below significance. Therefore, this would be a **potentially significant impact (Impact LU-3)**.

Cumulative Impacts

Impacts would be cumulative in nature if the project, in combination with cumulative development, would contribute to the division of an established community. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.10.4.1 above applies for this cumulative discussion.

Implementation of GHG Reduction Measure T-4.1, would result in direct investment projects as described above and in Chapter 2.7. As described above, the 2011 GPU PEIR determined that with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR, cumulative impacts related to physical division of a community would be less-than-

significant. Further, discretionary projects would be required to be evaluated under CEQA and to reduce and minimize impacts to the maximum extent feasible, as well as comply with existing federal, state, and local regulations that minimize land use conflicts. However, because the exact location and nature of direct investment projects is not known, the potential for projects implemented under a Local Direct Investment Program to contribute to a cumulatively significant impact would remain. Therefore, implementation of GHG Reduction Measure T-4.1 **could result in a considerable contribution** such that a new significant cumulative impact related to the division of an established community could occur (**Impact LU-4**).

Padre Dam Water and Wastewater Supporting Measure

As described in Chapter 1, Project Description, the CAP includes a Water and Wastewater Supporting Effort, that would support participation in the Padre Dam AWP project. The Padre Dam MWD prepared the Padre Dam PEIR for that project and that analysis is hereby incorporated by reference. As described on pages 4.10-7 through 4.10-8 of the Padre Dam PEIR, less-than-significant land use impacts were identified. Therefore, the impacts related to the division of an established community because of the Padre Dam AWP would **less-than significant**.

Cumulative Impacts

The Padre Dam PEIR evaluated the cumulative land use impacts of the project on page 6-26. As described therein, the AWP project would result in less-than-significant impacts land use impacts and it **would not have a considerable contribution** such that a new significant cumulative impact would occur.

Impact Summary

Implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above would ensure that project and cumulative impacts associated with the physical division of a community because of implementation of GHG reduction measures that would expand land acquisition under the MSCP and PACE programs would be **less-than-significant** and **would not result in a considerable contribution** such that a new significant cumulative impact would occur. The County's participation in the AWP project would result in **less-than-significant** land use impacts, and **would not have a considerable contribution** such that a new significant cumulative land use impact would occur.

However, project impacts related to implementation of GHG Reduction Measure E-2.1 and the Direct Investment Program would remain **potentially significant** even with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures. Further, these reduction measures **would result in a considerable contribution** such that a new potentially significant cumulative impact related to physical division of a community would occur.

2.10.4.2 Issue 2: Conflict with Land Use Plans, Policies, or Regulations

This section describes potential project and cumulative impacts related to the potential for conflict with land use plans, policies, or regulations because of implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines, the project would have a significant impact if it would conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to possible conflicts with land use plans, policies, or regulations adopted to avoid or mitigate environmental impacts on pages 2.9-29 through 2.9-36. The 2011 GPU was determined to be consistent with applicable land use plans, policies, and regulations, including the RCP, RTP, CMP, Basin Plan, ALUCPs, RAQS, CTP, SOI, community plans, Zoning Ordinance, and specific plans. Therefore, no impact would occur. There were no policies in the 2011 GPU or mitigation measures included in the 2011 GPU PEIR related to this topic.

CAP Impact Analysis

Implementation of the CAP has the potential to result in significant impacts related to conflicts with applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. The CAP is a comprehensive plan that identifies strategies, measures, and actions for addressing state legislation. The CAP has been prepared to be consistent with the 2011 GPU, and other relevant plans, policies, and regulations. However, implementation of GHG reduction measures and supporting efforts listed above that would result in the installation of small-scale renewable energy systems including solar photovoltaic and wind; development of large-scale renewable energy systems including solar photovoltaic, concentrator solar, wind turbines, and geothermal; direct investment projects; and increased diversion of waste which could result in new or expanded organic waste facilities have the potential to result in significant impacts and were not explicitly evaluated in the 2011 GPU PEIR. The 2012 Wind Energy EIR evaluated impacts related to the development of small and large-scale wind turbines and this analysis is summarized below and is hereby incorporated by reference (San Diego County 2012). Additionally, the Padre Dam PEIR evaluated impacts related to the development/expansion of water purification infrastructure and impacts that are associated with the Supporting Effort for the Water and Wastewater Category. The analysis from that document is summarized below and hereby incorporated by reference (Padre Dam MWD 2017).

The following section describes the potentially significant impacts related to conflicts with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact that could result from the measures.

Ground or Roof-Mounted Photovoltaic Solar, Small Wind Turbines, and other Building Retrofits

Implementation of GHG Reduction Measures E-1.1, E-2.1, E-2.2, E-2.3, and E-2.4 would result in energy efficiency retrofits on existing residential and non-residential structures, including rooftop or ground-mounted photovoltaic solar arrays or small wind turbines, and modern mechanical systems, and other similar improvements.

Installation of small-scale solar photovoltaic energy systems, generally result in minimal environmental impacts and are exempt from analysis under CEQA if they are less than 500 square feet, pursuant to SB 226. Similarly, per the County's Wind Energy Ordinance and as described on pages 2.7-13 to 2.7-15 of the 2012 Wind Energy EIR, new small-scale wind turbines are permitted on or adjacent to existing buildings without discretionary review if the Zoning Ordinance criteria are met. Ultimately, the 2012 Wind Energy EIR concluded that development of small-scale wind turbines is consistent with the County's goal to increase the availability and consumption of renewable energy without adversely affecting hillside and ridgeline aesthetics, and, therefore, these facilities would not result in conflicts with plans, policies and regulations and this impact would be less than significant (San Diego County 2012).

All other renewable energy projects (except small wind turbines and solar project under 500 square feet as described above) resulting from implementation of the CAP would be required to undergo the County's discretionary review process and comply with existing federal, state, and local regulations would require that projects avoid or minimize impacts, such as the County's Resources Protection Ordinance which prohibits "development...or any other use damaging to...historic site(s)" and other policies and ordinances that protect sensitive visual resources. Further, all new development that would be required to receive a discretionary permit would be evaluated for consistency with the County's 2011 GPU policies and 2011 GPU PEIR mitigation measures prior to project approval. Upon approval, the County would be required to make a finding of consistency with the 2011 GPU policies and 2011 GPU. Therefore, overall impacts because of the addition of energy retrofits related to conflicts with plans, policies, and programs would be **less than significant**.

Cumulative Impacts

Impacts would be cumulative in nature if the project, in combination with cumulative development, would result in a considerable contribution such that a new conflict with a policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact would occur. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.10.4.1 above applies for this cumulative discussion.

As described above, the 2011 GPU PEIR concluded that no significant cumulative policy conflict impacts would occur. Development associated with implementation of the CAP that would result in new small-scale renewable energy systems would be permitted to install wind turbines and solar photovoltaic as an accessory use if the parcel meets the criteria of the Zoning Ordinance. This would be consistent with the County's policies and goals regarding the desired expansion of renewable energy in the County. Therefore, small-scale renewable energy systems **would not have a considerable contribution** such that a new significant cumulative impact related to conflicts with land use policies or regulations would occur.

Large-Scale Renewable Energy Infrastructure

Implementation of GHG Reduction Measure E-2.1 could result in the construction of new large-scale renewable energy systems, including large-scale photovoltaic solar, concentrated solar power geothermal systems, and/or wind turbines. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this Draft SEIR evaluates the potential for impacts at the program level. Specific locations for projects have not been identified. While the potential for the construction of large-scale renewable energy infrastructure was not evaluated in the 2011 GPU PEIR, potential wind energy impacts were evaluated in the 2012 Wind Energy EIR and a summary of that analysis is provided below and is hereby incorporated by reference.

In general, larger-scale renewable energy facilities would likely be located outside developed areas of the community planning areas because of the need for large acreage that is unencumbered by buildings and shadow. Ownership of the facilities may be either public or private, and may be provided by a utility company.

As described on pages 2.7-16 and 2.7-17 of the 2012 Wind Energy EIR, large-scale wind energy projects would be subject to a discretionary review, would need to implement mitigation measures as needed, and would be required to meet the goals and policies of applicable land use plans prior to receiving a MUP. Therefore, no significant impacts would occur. Further, all other large-scale renewable energy projects (e.g., solar, geothermal) would be subject to discretionary review and required to obtain a MUP. As part of the County's discretionary review process, all projects would be evaluated under CEQA and would be required to implement measures to minimize land use impacts. Because large-scale renewable energy projects would not be approved unless they meet the goals and policies of applicable land use plans, implementation of the project would result in **less-than-significant** land use policy conflict impacts.

Cumulative Impacts

Impacts would be cumulative in nature if the project, in combination with cumulative development, would result in a considerable contribution such that a new conflict with a policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact would occur. The methodology for determining the cumulative environment

described in Chapter 1, Project Description, and summarized above in Section 2.10.4.1 above applies for this cumulative discussion.

As described above, the 2011 GPU PEIR concluded that no significant cumulative policy conflict impacts would occur. Development associated with implementation of the GHG reduction measures that would result in large-scale renewable energy systems would be subject to discretionary review and required to obtain a MUP. As part of the County's discretionary review process, all projects would be evaluated under CEQA and would be required to implement measures to minimize land use impacts. Therefore, large-scale renewable energy systems **would not have a considerable contribution** such that a new significant cumulative impact related to conflicts with land use policies or regulations would occur.

Diversion of Solid Waste

Implementation of GHG Reduction Measure SW-1.1 would increase diversion of solid waste. This measure could result in construction of new, and expansion of existing composting facilities throughout the County. All new or expanded solid waste projects would be subject to discretionary review and, as part of the County's discretionary review process, all projects would be evaluated under CEQA and would be required to implement measures to minimize land use impacts, as necessary. Because solid waste projects would not be approved unless they meet the goals and policies of applicable land use plans, implementation of new or expanded solid waste facilities would result in **less-than-significant** impacts.

Cumulative Impacts

Impacts would be cumulative in nature if the project, in combination with cumulative development, would result in a considerable contribution such that a new conflict with a policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact would occur. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.10.4.1 above applies for this cumulative discussion.

As described above, the 2011 GPU PEIR concluded that no significant cumulative policy conflict impacts would occur. Development associated with implementation of the CAP that could result in expanded solid waste facilities would be subject to discretionary review and required to obtain a MUP. As part of the County's discretionary review process, all projects would be evaluated under CEQA and would be required to implement measures to minimize land use impacts. Therefore, solid waste facilities **would not have a considerable contribution** such that a new significant cumulative impact related to conflicts with land use policies or regulations would occur.

Local Direct Investments Program

Implementation of GHG Reduction Measure T-4.1 would require the County to implement or fund direct investment projects to offset carbon emissions. A detailed description of

these projects is provided in Chapter 2.7 and Appendix B of this Draft SEIR and Section 2.10.4.1 above.

Most direct investment projects would involve some level of construction and physical disturbance of the land and depending on their size and location could result in the division of an established community. Because the variety of projects that may be approved and ultimately undertaken by the County under the Local Direct Investment Program is not known, it is too speculative to determine the types of impacts that could occur and whether regulations or mitigation measures would be available to minimize potential environmental impacts. However, all projects would be required to comply with applicable existing federal, state, and local regulations. Specifically, projects would be evaluated for their consistency with 2011 GPU policies, 2011 GPU PEIR mitigation measures, County Grading Ordinance regulations, County Resources Protection Ordinance regulations, etc. Future discretionary projects may also be required to undergo additional CEQA analysis to evaluate their project-specific impacts. If a determination is made that potentially significant impacts would result from implementation of offset projects, then all feasible mitigation would be required to be implemented in accordance with CEQA Guidelines Section 15126.4. Therefore, this would be a **less-than-significant** impact.

Cumulative Impacts

Impacts would be cumulative in nature if the project, in combination with cumulative development, would result in a considerable contribution such that a new conflict with a policy, or regulation adopted to avoiding or mitigating an environmental impact would occur. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.10.4.1 above applies for this cumulative discussion.

Implementation of GHG Reduction Measure T-4.1, would result in direct investment projects as described above. The 2011 GPU PEIR concluded that no significant cumulative policy conflict impacts would occur. Development associated with implementation of the GHG reduction measures that would result in direct investment projects would be required to be evaluated under CEQA and to reduce and minimize impacts, as well as comply with existing federal, state, and local regulations that minimize land use conflicts. Therefore, direct investment projects **would not have a considerable contribution** such that a new significant cumulative impact related to conflicts with land use policies or regulations would occur.

Padre Dam Water and Wastewater Supporting Measure

As described in Chapter 1, Project Description, the CAP includes a Water and Wastewater Supporting Effort, that would support participation in the Padre Dam AWP project. The Padre Dam MWD prepared the Padre Dam PEIR for that project and that analysis is hereby incorporated by reference. As described on pages 4.10-5 through 4.10-7 of the Padre Dam PEIR, potentially significant direct and indirect land use impacts were identified. However, all impacts were reduced to a level below significance with implementation of Mitigation Measures Aes-3, Bio 1A through Bio-1L, Bio-2A, Bio-2B,

Bio-3A through Bio-3C, Noi-1 through Noi-5, and Tra-1. Therefore, the impacts related to land use policy conflicts because of the Padre Dam AWP would **less-than significant**.

Cumulative Impacts

The Padre Dam PEIR evaluated the cumulative land use impacts of the project on page 6-26. As described therein, the AWP project would result in less-than-significant impacts land use impacts with implementation of Mitigation Measures Aes-3, Bio 1A through Bio-1L, Bio-2A, Bio-2B, Bio-3A through Bio-3C, Noi-1 through Noi-5, and Tra-1 and it **would not have a considerable contribution** such that a new significant cumulative impact would occur.

Impact Summary

Implementation of the project would result in **less-than-significant** impacts related to the potential conflict with a plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental impact. Therefore, the project **would not have a considerable contribution** such that significant cumulative impact would occur.

2.10.5 Mitigation

2.10.5.1 Issue 1: Physically Divide an Established Community

As described in Section 2.10.4.1, 2012 Wind Energy EIR mitigation was considered but rejected as infeasible that would have prohibited design features that would create a physical division within an established community because it was uncertain whether project benefits of large-scale renewable wind projects could in some cases outweigh the land use impacts related to the division. This mitigation is still considered infeasible because it could conflict with the County's goals to expand renewable energy.

Additional mitigation was contemplated as part of this Draft SEIR that would implement a development cap upon large-scale renewable energy projects. This mitigation was rejected as infeasible because it may reduce the effectiveness of GHG Reduction Measure E-2.1 and achievement of the County's 2030 GHG emissions reduction target. It is unknown how many numbers and types of renewable large-scale renewable energy facilities would be required to meet the GHG reduction goals of the CAP because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available.

Therefore, as described above in Section 2.10.4.1, even with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures that prevent the physical division of a community, additional significant project and cumulative impacts that could occur from implementation of GHG Reduction Measure E-2.1 because of the scale and nature of the projects. Individual renewable energy projects that would result in impacts related to the physical division of a community would be required to comply with all federal, state, and local regulations and any applicable mitigation.

No other feasible project-related mitigation beyond existing local, state, and federal permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to the individual projects under the CAP. Where projects would comply with existing regulations and would receive applicable permits from regulatory agencies, it would reduce its project-specific impacts to a less-than-significant level and would reduce its contribution to cumulative impacts such that it would not be considerable. However, overall **significant and unavoidable project and cumulative impacts** to physical division of a community would remain.

Project level impacts and mitigation measures were identified within the Padre Dam PEIR as described above in Section 2.10.4.1. The County is not currently relying upon GHG reduction from this Water and Wastewater Supporting Effort. However, should the County choose to implement this measure, the County shall provide fair share participation in the mitigation identified in the Padre Dam PEIR as required by CEQA Guidelines Section 15096(g)(1). No additional mitigation is required.

2.10.5.2 Issue 2: Conflict with Land Use Plans, Policies, or Regulations

Project level impacts and contributions to cumulative impacts were determined to be less than significant; therefore, no mitigation measures in addition to those identified in the 2011 GPU EIR were discussed or required.