

2.5 Cultural and Historical Resources

This section evaluates existing conditions for historic, archaeological, and paleontological resources, and human remains within the County, and the potential effects that implementation of the project may have on these resources.

The County did not receive any comments regarding historic, archeological, paleontological resources, or human remains during the Notice of Preparation (NOP) scoping process. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this Draft Supplement to the 2011 General Plan Update (GPU) Program Environmental Impact Report (2011 GPU PEIR) (Draft SEIR).

2.5.1 Existing Conditions

The 2011 GPU PEIR included a discussion of existing conditions related to cultural and paleontological resources in Section 2.5.1 (page 2.5-1) which includes all lands within the County. As described in full detail in Section 2.5.1 of the 2011 GPU PEIR, the County contained more than 27,000 recorded sites (19,400 archaeological recorded sites and approximately 8,000 other cultural resources sites) in 2011 with a continuously growing number of sites being discovered. The cultural and paleontological resources conditions described in the 2011 GPU PEIR are the same as the existing conditions evaluated for this Draft SEIR, except for the new issue of Tribal Cultural Resources (see Chapter 2.13, Tribal Cultural Resources, of this Draft SEIR). No other changes to the existing conditions have been identified that would alter the conclusions in the 2011 GPU PEIR. As described on pages 2.5-1 through 2.5-16 of the 2011 GPU PEIR, cultural and paleontological resources are found throughout the County. All references used from the 2011 GPU PEIR were reviewed to ensure they are still valid today, and are hereby incorporated by reference.

2.5.2 Regulatory Framework

The 2011 GPU PEIR described the Regulatory Framework related to cultural resources in Chapter 2.5 on pages 2.5-16 through 2.5-22, and is hereby incorporated by reference. Specific regulations discussed in the 2011 GPU PEIR and applicable to the project include the following:

Federal

- Executive Order 12072
- Historic Sites, Buildings, Objects, and Antiquities Act
- National Historic Landmarks Program
- National Historic Preservation Act
- National Register of Historic Places
- Native American Graves Protection and Repatriation Act
- Secretary of the Interior's Standards

State

- State Historical Landmarks Program
- State Points of Historical Interest Program
- California Register of Historic Places
- California Native American Graves Protection and Repatriation Act
- Public Resources Code Section 5079-5079.65
- Public Resources Code Section 5097-5097.6
- Public Resources Code Section 5097.9-5097.991
- Government Code Section 25373
- Government Code Section 27288.2
- Government Code Section 50280-50290
- Health and Safety Code Sections 18950-18961
- Health and Safety Code Sections 7050.5
- Penal Code Section 622
- Senate Bill 18- Traditional Tribal Cultural Places

Local

- County of San Diego Code of Regulatory Ordinances Section 87.101-87.804 Grading, Clearing, and Watercourses Ordinance
- County of San Diego Code of Regulatory Ordinances Section 86.601-86.608 Resource Protection Ordinance
- County of San Diego Zoning Ordinance
- County of San Diego Resource Conservation Areas
- San Diego County Local Register of Historical Resources
- San Diego County Historic Site Board

Adopted 2011 GPU Policies

The following policies applicable to cultural and paleontological resources that were adopted as part of the 2011 GPU and are applicable to the project include the following:

Policy COS-7.1: Archaeological Protection. Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.

Policy COS-7.2: Open Space Easements. Require development to avoid archaeological resources whenever possible. If complete avoidance is not possible, require development to fully mitigate impacts to archaeological resources.

Policy COS-7.3: Archaeological Collections. Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner.

Policy COS-7.4: Consultation with Affected Communities. Require consultation with affected communities, including local tribes to determine the appropriate treatment of cultural resources.

Policy COS-7.5: Treatment of Human Remains. Require human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the Most Likely Descendant (MLD) and under the requirements of Federal, State and County Regulations.

Policy COS-7.6: Cultural Resource Data Management. Coordinate with public agencies, tribes, and institutions in order to build and maintain a central database that includes a notation whether collections from each site are being curated, and if so, where, along with the nature and location of cultural resources throughout the County of San Diego.

Policy COS-8.1: Preservation and Adaptive Reuse. Encourage the preservation and/or adaptive reuse of historic sites, structures, and landscapes as a means of protecting important historic resources as part of the discretionary application process, and encourage the preservation of historic structures identified during the ministerial application process.

Policy COS-8.2: Education and Interpretation. Encourage and promote the development of educational and interpretive programs that focus on the rich multicultural heritage of the County of San Diego.

Policy COS-9.1: Preservation. Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes.

Policy COS-9.2: Impacts of Development. Require development to minimize impacts to unique geological features from human related destruction, damage, or loss.

Adopted 2011 GPU PEIR Mitigation Measures

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

Cul-1.1 Utilize the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant.

Cul-1.2 Provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources.

Cul-1.3 Initiate a new effort to identify and catalog historic and potentially historic resources within unincorporated San Diego County. This process will require public participation and evaluation by County staff and the Historic Site Board. The anticipated result of this effort is: 1) at minimum, landowners will be better informed of potential resources on their properties as well as the options available to them under the State/National Register or the Mills Act; and 2) in some cases, properties may be zoned with a special area designator for historic resources, thereby restricting demolition/removal and requiring a Site Plan permit for proposed construction which will be reviewed by the Historic Site Board.

Cul-1.4 Support the Historic Site Board in their efforts to provide oversight for historic resources.

Cul-1.5 Ensure landmarking and historical listing of County owned historic sites.

Cul-1.6 Implement, and update as necessary, the “County’s Guidelines for Determining Significance for Cultural Resources” to identify and minimize adverse impacts to historic and archaeological resources.

Cul-1.7 Identify potentially historic structures within the County and enter the information in the Department of Planning & Development Services property database. Identification will occur by compiling information from all available sources (e.g., County surveys, Historic Site Board, information received from Save Our Heritage Organization (SOHO) and community planning groups, information from other jurisdictions, etc.) and shall be updated at least every five years.

Cul-1.8 Revise the RPO to apply to the demolition or alteration of identified significant historic structures.

Cul-2.1: Develop management and restoration plans for identified and acquired properties with cultural resources.

Cul-2.2: Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information.

Cul-2.3: Support the dedication of easements that protect important cultural resources by using a variety of funding methods, such as grants or matching funds, or funds from private organizations.

Cul-2.4: Protect significant cultural resources through regional coordination and consultation with the NAHC and local tribal governments, including SB-18 review.

Cul-2.5: Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys.

Cul-2.6: Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the South Coast Information Center (SCIC) and consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review, while maintaining the confidentiality of sensitive cultural information.

Cul-3.1: Implement the Grading Ordinance and CEQA to avoid or minimize impacts to paleontological resources, require a paleontological monitor during grading when appropriate, and apply appropriate mitigation when impacts are significant.

Cul-3.2: Implement, and update as necessary, the County's Guidelines for Determining Significance for Paleontological Resources to identify and minimize adverse impacts to paleontological resources.

Cul-4.1: Include regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant.

2.5.3 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, 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 impacts 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, 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 would not result in any physical impacts.

2.5.4 Analysis of Project and Cumulative Impacts

The project and cumulative impact analysis study area for historic, archaeological, and paleontological resources, and human remains in the 2011 GPU PEIR was identified as the entire County. The project and cumulative study area for historic, archaeological, and paleontological resources, and human remains for the project is the same as the 2011 GPU PEIR.

Proposed GHG Reduction Measures

Table 1-1 of the Draft SEIR, provides a list of proposed GHG reduction measures and supporting efforts that would be implemented by the CAP. However, only those measures that are relevant to historic, archaeological, and paleontological resources, or would disturb human remains and could potentially result in a significant impact within the unincorporated County are described and evaluated below. None of the proposed measures or efforts 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 information about the measures is known. Consistent with the requirements of CEQA Guidelines 15168, this Draft SEIR provides a programmatic discussion of the potential general impacts of implementation of these measures, rather than project-level or site-specific physical impacts of such actions. This is consistent with the scope of analysis in the 2011 GPU PEIR.

Strategy T-2: Shift Towards Alternative Modes of Transportation

Measure T-2.1: Improve Roadway Segments as Multi-Modal. Improve roadway segments, intersections, and bikeways to implement multi-modal enhancements for pedestrian and cyclist comfort and safety along County-maintained public roads by improving 700 centerline miles of roadway segments, including 250 intersections and 210 lane miles of bikeway improvements by 2030 and an additional 500 centerline miles of roadway segments, including 250 intersections and 210 lane miles of bikeway improvements by 2050. This measure would implement roadway improvements to reduce Vehicle Miles Traveled (VMT) by calming traffic and improving the bicyclist and pedestrian infrastructure and would occur as part of resurfacing projects within existing paved areas. This could result in construction impacts.

Strategy T-3: Decarbonize On-Road and Off-Road Vehicle Fleet

Measure T-3.5: Install a total of 2,040 Level 2 electric vehicle charging stations (EVCS) through public-private partnerships at priority locations in the unincorporated county by 2030. This could result in construction impacts.

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

Measure T-4.1: Establish a Direct Investment Program. Close the 2030 GHG emissions target gap of ~~195,514~~ 175,460 MTCO_{2e} through direct investments in local projects that would offset carbon emissions within the unincorporated county by 2030. This measure would result in 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
- Urban Forest Management

Supporting Efforts for the Built Environment and Transportation Category

- Collaborate with incorporated cities, California Department of Transportation (Caltrans), and SANDAG to consider additional park-and-ride facilities.

- Collaborate with SANDAG to encourage installation of EV charging stations in new residential and non-residential developments.

Strategy E-1: Increase Building Energy Efficiency

Measure E-1.1: Improve Building Energy Efficiency in New Development. Achieve 10% greater building energy efficiency in all new non-residential development than is required by the current 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. Construction and operation of this technology could affect cultural, archaeological, and historic resources.

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 could include the construction of large-scale photovoltaic solar, photovoltaic concentrator technology, geothermal and/or wind turbines. This may result in physical changes resulting from construction, operation, and maintenance of infrastructure.

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 County. Physical changes could result from the addition of photovoltaic solar and small wind turbines in new development resulting in construction impacts.

Measure E-2.3: Install Solar Photovoltaics in Existing Homes. Increase installation of PV electrical systems in 52,273 existing residential homes by 2020 and 77,902 homes by 2030. This measure would result in an increase in photovoltaic solar on existing residential buildings throughout the unincorporated County. Physical changes from installing new solar systems on existing buildings could result related to changing visual context and construction impacts.

Measure E-2.4: Increase Use of On-site Renewable Electricity Generation for County Operations. Generate 10% of the County's operational electricity on-site 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 may result in construction, operation, and maintenance-related impacts and impacts related to a changing visual context.

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

Measure SW-1.1: Increase Solid Waste Diversion. Achieve 75% solid waste diversion in the unincorporated county 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 the Padre Dam Municipal Water District (MWD) to advance Advanced Water Purification (AWP) Program.

2.5.4.1 Issue 1: Historic Resources

This section describes potential project and cumulative impacts on historic resources with implementation of the project.

Guidelines for Determination of Significance

The project would result in a significant impact to historic resources if:

- The project causes a substantial adverse change in the significance of a historic resource as defined in Section 15064.5 of the CEQA Guidelines. This shall include the destruction, disturbance or any alteration of characteristics or elements of a resource that cause it to be significant in a manner not consistent with the Secretary of Interior Standards.

This Guideline is derived from CEQA Guidelines Sections 21083.2 and 15064.5, which recommend evaluating historic resources to determine whether a proposed action would result in an impact on significant historic resources. This Guideline is reflective of that utilized in the 2011 GPU PEIR.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated historic resources impacts from the adoption of the goals and policies of the 2011 GPU countywide, which is inclusive of the project area. In addition, the 2011 GPU PEIR evaluated buildout of the land use designations applied throughout the area. The 2011 GPU PEIR determined that buildout under the 2011 GPU would result in potentially significant direct (e.g., demolition, alteration, or relocation), indirect (e.g., human activity, increased access to and/or use of a historic resource), and cumulative

impacts on historic resources. The discussion of impacts can be found in Chapter 2.5 Cultural and Paleontological Resources, pages 2.5-22 through 2.5-27 and 2.5-34 to 2.5-35 of the 2011 GPU PEIR, and is hereby incorporated by reference. These impacts would be reduced to below a level of significance through the implementation of a combination of federal, state and local regulations; existing County regulatory processes; the adopted 2011 GPU goals and policies; and, specific mitigation measures/implementation programs identified in the 2011 GPU PEIR. Specific 2011 GPU policies and 2011 GPU PEIR mitigation measures related to the protection of historic resources are listed above under Section 2.5.2, Regulatory Framework.

CAP Impact Analysis

GHG Reduction Measures and Supporting Efforts

Implementation of the CAP could result in significant impacts related to historic resources from GHG reduction measures and supporting efforts that would include construction and operation of direct investment projects, bicycle, pedestrian, EVCS, and park-and-ride facilities, solid waste facilities, energy efficiency improvements and the introduction of small-scale solar photovoltaic and small wind turbines, or large-scale renewable energy systems which were not explicitly evaluated within the 2011 GPU PEIR. The 2012 Wind Energy Ordinance EIR (2012 Wind Energy EIR) evaluated impacts specifically related to the development of small and large-scale wind turbines and that analysis is summarized below and is hereby incorporated by reference (County of San Diego 2012). Additionally, the Padre Dam Municipal Water District's Comprehensive Facilities Master Plan PEIR (Padre Dam PEIR) evaluated impacts related to the development/expansion of water purification infrastructure and impacts from that document are summarized below and hereby incorporated by reference (Padre Dam MWD 2017).

Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to historic resources to the extent feasible in compliance with CEQA Guidelines Section 15126.4. While the types of projects that would result from implementation of the full scope of GHG reduction measures would not typically result in the substantial alteration of known historic resources, it is possible that implementation of some projects could result in development and construction of facilities that would result in direct and/or indirect impacts to historic resources. Types of impacts that could occur include retrofits to existing designated historic buildings, disturbance of the ground or setting, or demolition or construction of buildings and infrastructure that could affect the historic setting. Projects that include the alteration of historic buildings or structures would have a direct impact on historic resources. Projects that would introduce new visual elements, such as new small or large-scale renewable energy systems, have the potential to indirectly affect historic resources by changing the visual setting within which the historic resource is located.

Generally, improvements and projects that would result from implementation of the full scope of GHG reduction measures would undergo a discretionary review process in which the County would be able to utilize project conditions and mitigation to minimize

impacts related to historic resources, and may deny certain improvements if the object, building, structure, site, area or place is listed as a historic resource or zoned with the “H” Special Area Designator (Historic/Archaeological Landmark or District). Multi-modal improvements and park-and-ride projects, direct investment projects, solid waste facilities, and large-scale renewable energy projects would all be required to undergo the County’s discretionary review process during which relevant 2011 GPU policies and 2011 GPU PEIR mitigation measures located in Chapter 2.5, Cultural and Paleontological Resources, on pages 2.5-22 through 2.5-27 and 2.5-34 to 2.5-35 of the 2011 GPU PEIR would be implemented. In addition, federal, state, and local policies, ordinances, and applicable permitting procedures which protect historic resources would also be implemented.

However, under the County’s Renewable Energy Zoning Ordinance Sections 6950 and 6952, homeowners would be allowed to install roof-mounted solar photovoltaic arrays and small wind turbines without discretionary review if they meet the zoning verification requirements of the applicable section. In the case of solar photovoltaic panels, they are generally flat, low lying elements that would not distract the viewer’s attention when placed on a roof line as they are limited to 5-feet maximum beyond the roof. When placed along an easement or within the subject property’s yard, the visual impact is not anticipated to distract from the historic setting.

As described on pages 2.5-12 to 2.5-13 of the 2012 Wind Energy EIR, if a parcel meets the criteria of the zoning ordinance, up to three small wind turbines could be installed on a parcel as an accessory use. If the property is eligible for historic listing or is located within an historic zoning district but is not registered as such, then installation of the wind turbines would not be subject to discretionary review and changes to the visual setting or ground disturbance could occur unmitigated. Therefore, impacts to historic resources could occur because it could result in the physical demolition, destruction, or alteration of the historic resource through ground disturbance, or it could alter the setting of the resource when the setting contributes to the resource’s significance through introducing new vertical elements. The 2012 Wind Energy EIR included Mitigation Measure M-CUL-1 which requires the County to provide incentives for property owners to participate in restoration, renovation, or reuse of historic resources, but found mitigation that would have required an extensive effort to identify all historic resources in the County to be legally infeasible and resource intensive. Therefore, this mitigation was rejected from further consideration.

In cases where improvements would be required to undergo the County’s discretionary review process, impacts would be minimized through implementation of adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures that would conserve, protect, and preserve historic resources consistent with federal and state requirements, as well as all applicable project-specific mitigation measures that would minimize impacts. However, because it is possible for some properties that are not listed or zoned as historic resources to install wind turbines or solar photovoltaic energy systems without a discretionary permit, impacts related to historic resources would be **potentially significant (Impact CULT-1)**.

Cumulative Impacts

Impacts would be cumulative in nature if the project in combination with cumulative development would contribute to the permanent loss of the County's historic resources (i.e., through the physical demolition, destruction, relocation, or alteration of these resources and/or immediate surroundings). 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 unincorporated 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 related 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.

The project would result in a variety of actions that could result in changes to historic resources and buildings, and because it is not possible to determine the amount, type, and locations of projects that would result from potentially significant measures, it is possible that some historic resources would be adversely affected by the project.

Further as described on page 2.5-20 of the 2012 Wind Energy EIR, even with federal, state, and local regulations in place, individual historic resources would still have the potential to be adversely affected or degraded from demolition, destruction, alteration, or structural relocation because of new private or public development or redevelopment allowable under cumulative projects. Therefore, the cumulative destruction of significant historic resources from construction and development planned within the region would be a cumulatively significant impact. Additionally, past projects involving development and construction have already adversely affected historic resources within the region. The 2012 Wind Energy EIR concluded that new small-scale wind projects would result in a considerable contribution to a significant cumulative regional impact. As described above, the project would have potentially significant historic resources impacts from small-scale wind and solar photovoltaic projects. Therefore, the project **would result in a considerable contribution** to a significant cumulative impact (**Impact CULT-2**).

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 4.4-13 through 4.4-14 of the Padre Dam PEIR, less-than-significant direct and indirect impacts were

identified for impacts to historic resources. Therefore, the potential loss of historic resources because of the Padre Dam AWP would **less than significant**.

Cumulative Impacts

The Padre Dam PEIR evaluated the cumulative historic resources impacts of the project on page 6-18. As described therein, the AWP project would result in less-than-significant impacts to historic resources and it **would not have a considerable contribution** to a significant cumulative impact.

Impact Summary

Implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures (listed above); compliance with existing federal, state, and local regulations related to historic resources would generally minimize or eliminate impacts related to historic resources because of implementation of the project. However, in some cases, it is possible that small-scale wind and solar renewable energy improvements could result in significant impacts to historic resources because of ground disturbance or changes to the historic building or setting. These projects may not be required to undergo a discretionary review process. Therefore, implementation of small-scale renewable wind and solar projects would result in **potentially significant** historic resources impacts and **would result in a considerable contribution** to a significant cumulative impact to historic resources. The County's participation in the AWP project would result in **less-than-significant** historic resources impacts, and **would not have a considerable contribution** to a significant cumulative impact.

2.5.4.2 Issue 2: Archaeological Resources

This section describes potential project and cumulative impacts on archaeological resources with implementation of the project.

Guidelines for Determination of Significance

The project would result in a significant impact to archaeological resources if:

- The project causes a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines. This shall include the destruction or disturbance of a significant archaeological site or any portion of a significant archaeological site that contains or has the potential to contain information important to history or prehistory.

This guideline is derived from CEQA Sections 21083.2 and 15064.5 of the CEQA Guidelines which recommend evaluating archaeological resources to determine whether a proposed action would have an impact on significant archaeological resources.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR determined that buildout under the 2011 GPU would result in potentially significant direct (e.g. alteration, or relocation), indirect (i.e., vandalism, looting, graffiti, and destruction because of increased access to and/or use of a resource because of additional human presence and activity), and cumulative impacts on known and unknown archaeological resources. The discussion of impacts can be found in Chapter 2.5, Cultural and Paleontological Resources, on pages 2.5-27 through 2.5-30 of the 2011 GPU PEIR and is hereby incorporated by reference. These impacts would be reduced to a less-than-significant level through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; the adopted 2011 GPU goals and policies; and, specific mitigation measures/implementation programs identified in the 2011 GPU PEIR and listed above under Section 2.5.2, Regulatory Framework.

CAP Impact Analysis

Implementation of the CAP has the potential to result in significant impacts to archaeological resources from implementation of GHG reduction measures and supporting efforts that would include construction of bicycle, pedestrian, EVCS, park-and-ride projects; direct investment projects; solid waste expansion projects; as well as small- and large-scale wind turbines, and large-scale photovoltaic solar and concentrated solar, and geothermal energy systems that were not explicitly evaluated within the 2011 GPU PEIR. The 2012 Wind Energy EIR evaluated impacts related to the development of small and large-scale wind turbines and impacts from that document are summarized below and hereby incorporated by reference (San Diego County 2012). Additionally, the Padre Dam Municipal Water District's Comprehensive Facilities Master Plan PEIR (Padre Dam PEIR) evaluated impacts related to the development/expansion of water purification infrastructure and impacts from that document are summarized below and hereby incorporated by reference (Padre Dam MWD 2017).

The following section describes the potentially significant impacts to archeological resources that could result from the implementation of the measures.

Bicycle, Pedestrian, EVCS, Park-and-Ride, Solid Waste Expansion

Implementation of GHG Reduction Measure T-2.1 and Supporting Efforts within the Built Environment and Transportation Category, and GHG Reduction Measure SW-1.1, could result in new or expanded park-and-ride facilities, new or expanded pedestrian and bicycle improvements, installation of EVCS, and new or expanded solid waste facilities. Specific locations for such improvements have not been identified. However, it is possible that the locations of such improvements could disturb archaeological resources because the location of all resources within the county is unknown.

Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to archaeological resources to the extent feasible in

compliance with CEQA Guidelines Section 15126.4. Implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures located in Chapter 2.5, Cultural and Paleontological Resources, on pages 2.5-27 through 2.5-30 listed above would reduce potential impacts to archeological resources. All future development projects that would be implemented by the measures listed above would be required to undergo discretionary review and comply with County development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to protection of archeological resources. With implementation of the applicable 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above; compliance with existing federal, state, and local regulations that protect archaeological resources; and completion of subsequent project-level planning and environmental review, potential direct impacts to archaeological resources because of bicycle, pedestrian, EVCS, park-and-ride, and compost facilities expansion projects would be **less than significant**.

Cumulative Impacts

Impacts would be cumulative in nature if in combination with effects of other projects, they would contribute to the local or regional loss of archaeological resources in the unincorporated county. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and Impact CULT-2 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts to archaeological resources resulting from the build-out associated with the General Plan would be reduced with implementation of the federal, state, and local regulations; County regulatory policies; and 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above. Implementation of GHG reduction measures and supporting efforts that could result in the construction of bicycle, pedestrian, EVCS, park-and-ride, and solid waste expansion would not result in any cumulative impacts because projects would be discretionary, and as such would be required to implement mitigation that would minimize impacts to archaeological resources. The 2011 GPU PEIR concluded that that cumulative impacts related to archaeological resources would be less than significant, and accordingly, the project **would not have a considerable contribution** such that a new significant cumulative impact would occur.

Local Direct Investment Program

Implementation of GHG Reduction Measure T-4.1 would result in direct investment projects to offset carbon emissions. As described in detail in Chapter 2.7 of this Draft SEIR, projects 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), periods, or use of fertilizers), 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. Protocols for these projects and others that could be considered are described in Chapter 2.7 with page numbers to review the protocols contained in Appendix B.

Most offset projects would involve some level of construction and physical disturbance of the land. This analysis assumes that implementation of offset projects under GHG Reduction Measure T-4.1 would result in construction activities that could include: the use of heavy equipment for earthmoving, materials processing, or compost spreading; vehicle trips during construction/equipment replacement/monitoring activities; possible changes in land form and views; and installation or upgrades of mechanical equipment or facilities. Construction activities associated with these measures could result in direct and indirect disturbances to archaeological resources.

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 its 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 implemented in accordance with CEQA Guidelines Section 15126.4. Therefore, the potential for disturbance of archaeological resources related to implementation of direct investment projects would be **less than significant**.

Cumulative Impacts

Impacts would be cumulative in nature if in combination with effects of other projects, they would contribute to the local or regional loss of archaeological resources in the unincorporated County. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and Impact CULT-2 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts to archaeological resources resulting from the build-out associated with the General Plan would be reduced to a less-than-significant level with implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above, and compliance with other applicable local, state, and federal regulations. Implementation of direct investment projects, as described above, would result in less-than-significant impacts to archaeological resources because they would be required to comply with applicable existing federal, state, and local regulations, and accordingly, the direct investment projects **would not have a considerable contribution** such that a new significant cumulative impact would occur.

Large-Scale Renewable Energy Systems and 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 could result in the development of large-scale renewable energy systems and/or small-scale renewable energy systems on existing residential and non-residential structures, including rooftop or ground-mounted photovoltaic solar arrays or small wind turbines, upgraded mechanical systems, and other similar improvements which could result in the construction of footings upon which renewable infrastructure would be mounted that could disturb archaeological resources. The potential for the construction of large-scale renewable energy infrastructure was not evaluated in the 2011 GPU PEIR but 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.

Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to archaeological resources to the extent feasible in compliance with CEQA Guidelines Section 15126.4. Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating the renewable energy source. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure which relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Solar array fields, geothermal infrastructure, and wind turbines typically encompass large areas and could result in impacts to archaeological resources because of construction activities, implementation of access roads and transmission lines, and conversion of large areas of land to renewable energy uses.

All large-scale renewable energy projects are subject to discretionary review by the County and would be required to obtain a Major Use Permit (MUP). As part of the County's discretionary review process all renewable energy projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to archaeological resources. As described on page 2.5-15 of the 2012 Wind Energy EIR, the MUP is subject to the County's Resource Protection Ordinance (RPO), which requires that archaeological resources be evaluated as part of the County's discretionary environmental review process and if archaeological resources are found to be significant pursuant to the RPO, they must be preserved. Therefore, because of the MUP discretionary review process and because all large-scale renewable energy projects are required to comply with RPO prior to approval, impacts related to large-scale renewable energy systems would be **less than significant**.

Small-scale renewable energy systems and other energy efficiency retrofits would occur in areas of existing development, and new development would install energy-efficient mechanical equipment at the time of construction. Implementation of new mechanical equipment or new renewable energy equipment would generally occur in developed areas of the County, and would be regulated by existing County codes and policies that

regulate the protection of archaeological resources. The placement of small-scale photovoltaic solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance Section 6954(a) that regulates the height and scale of these facilities. Rooftop and ground-mounted photovoltaic solar energy panels and roof-top wind turbines would not result in significant ground disturbance, although impacts to archaeological impacts could still occur.

However, small-scale ground-mounted wind turbines would have the potential to result in impacts to archaeological resources because they are allowed on a parcel as an accessory use without discretionary review. As described on page 2.5-14 and 2.5-15 of the 2012 Wind Energy EIR, small-scale wind turbines could result in ground disturbance through excavation and grading to create a secure foundation. The 2012 Wind Energy EIR considered mitigation to identify all archaeological resources in the County or to require an archaeological resources survey prior to installation of small wind turbines, but dismissed it as infeasible as it would be resource intensive, the County does not have the legal authority, and it would conflict with the County's goal to expand renewable energy. Therefore, the EIR concluded that impacts would remain significant. Accordingly, even with implementation of 2011 GPU policies, 2011 GPU PEIR mitigation measures, and local, state, and federal regulations, the potential exists for archaeological resource impacts related to small-scale wind turbines because of the lack of discretionary oversight for some facilities. Therefore, impacts related to archaeological resources would be **potentially significant (Impact CULT-3)**.

Cumulative Impacts

Cumulative impacts would occur if in combination with past, present, and reasonably foreseeable projects, a significant loss of archaeological resources would occur. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and Impact CULT-2 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts to archaeological resources resulting from the build-out associated with the General Plan would be reduced to a level below significance with implementation of the local, state, and federal regulations; County regulatory policies; and 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above. Additionally, the 2012 Wind Energy EIR concluded on page 2.5-21 that because of the MUP process that requires large-scale wind energy projects to comply with the RPO, and to mitigate to the extent feasible any impacts, cumulative archaeological impacts would be less than significant.

However, the 2012 Wind Energy EIR concluded on page 2.5-20 that the project has the potential to result in a significant impact associated with the loss of archaeological resources through development activities such as the installation of small-scale wind turbines that could occur without discretionary review, mitigation, or monitoring which could lead to a contribution to a regionally significant loss of archaeological resources.

Implementation of large-scale renewable energy systems and/or small-scale renewable energy systems on existing residential and non-residential structures, including rooftop or

ground-mounted photovoltaic solar arrays would result in less-than-significant impacts to archaeological resources and **would not have a considerable contribution** such that a new significant cumulative impact would occur. However, implementation of small-scale wind turbines without discretionary review could result in potentially significant impacts and **could result in a considerable contribution** such that a new significant cumulative impact to archaeological would occur (**Impact CULT-4**).

Padre Dam Water and Wastewater Supporting Effort

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 4.4-16 through 4.4-19 of the Padre Dam PEIR, potentially significant direct and indirect impacts were identified for impacts to archaeological resources. However, all impacts were reduced to a level below significance with implementation of MWD's Native American Sacred Resources Policy and Mitigation Measure CUL-1 as described in the Padre Dam PEIR. Therefore, the potential loss of archaeological resources because of the Padre Dam AWP would **less than significant**.

Cumulative Impacts

The Padre Dam PEIR evaluated the cumulative historic resources impacts of the project on page 6-18. As described therein, the AWP project would result in less-than-significant impacts to archaeological resources with implementation of MWD's Native American Sacred Resources Policy and Mitigation Measure Cul-1 as described in the Padre Dam PEIR, and it **would not have a considerable contribution** to a significant cumulative impact.

Impact Summary

Implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures (listed above); local, state, and federal regulations; and the County's MUP discretionary review process would minimize or eliminate impacts related to archaeological resources because of implementation of traffic calming projects, bicycle and pedestrian improvements, EVCS, direct investment projects, solid waste facilities, small-scale solar photovoltaic systems, and large-scale renewable energy projects including solar photovoltaic, concentrator solar, geothermal, and wind turbines. Therefore, impacts to archaeological resources related to these measures and efforts would be **less than significant** and **would not have 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** archaeological resources impacts, and **would not have a considerable contribution** to a significant cumulative impact.

However, because it is possible to install small-scale wind turbines as an accessory use without discretionary review, significant impacts to archaeological resources could occur because of ground disturbance. Therefore, installation of small-scale wind turbines would

result in **potentially significant** archaeological impacts and **could result in a considerable contribution** such that a new significant cumulative impact would occur.

2.5.4.3 Issue 3: Paleontological Resources

This section describes potential project and cumulative impacts on paleontological resources because of implementation of the project.

Guidelines for Determination of Significance

The project would result in a significant impact to paleontological resources if:

- The project proposes activities directly or indirectly damaging to a unique paleontological resource or site. A significant impact to paleontological resources may occur as a result of the project, if project-related grading or excavation will disturb the substratum or parent material below the major soil horizons in any paleontologically sensitive area of the County.

This guideline is derived from CEQA Guidelines which requires the evaluation of paleontological resources to determine whether a proposed action would have a significant impact on paleontological resources.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts to paleontological resources from the adoption of the goals and policies of the plan, and the buildout of the land use map and determined that buildout under the 2011 GPU would result in potentially significant project and cumulative impacts on known and unknown paleontological resources in the unincorporated County.

The 2011 GPU PEIR determined activities resulting from implementation of the proposed 2011 GPU, especially construction-related and ground-disturbing activities, could damage or destroy fossils in the underlying rock units. Loss or alteration of paleontological resources may result in an irreversible loss of significant information that could be obtained from these non-renewable resources. The discussion of impacts can be found in Chapter 2.5, Cultural and Paleontological Resources, on pages 2.5-30 through 2.5-32 of the 2011 GPU PEIR, and is hereby incorporated by reference. These impacts would be reduced to below a level of significance through the implementation of a combination of local, state, and federal regulations; existing County regulatory processes; the adopted 2011 GPU goals and policies; and, specific mitigation measures identified in the 2011 GPU PEIR and listed above in Section 2.5.2, Regulatory Framework.

CAP Impact Analysis

Implementation of the CAP has the potential to result in significant impacts to paleontological resources from implementation of bicycle, pedestrian, EVCS, and park-

and-ride projects; direct investment projects; solid waste expansion projects; as well as small- and large-scale wind turbines, and large-scale photovoltaic solar and concentrated solar, and geothermal energy 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 that analysis is summarized below and is hereby incorporated by reference (County of San Diego 2012). Additionally, the Padre Dam Municipal Water District's Comprehensive Facilities Master Plan PEIR (Padre Dam PEIR) evaluated impacts related to the development/expansion of water purification infrastructure and impacts from that document are summarized below and hereby incorporated by reference (Padre Dam MWD 2017).

Impacts to paleontological resources generally occur because of the physical destruction of fossil remains by excavation or trenching activities that require cutting into the underlying geologic formations. Ground-disturbing activities in high or moderate sensitivity fossil-bearing geologic formations have the potential to damage or destroy paleontological resources that may be present below the ground surface. Such alterations of known or unknown paleontological resources may result in an irreversible loss of significant information that could be obtained from these non-renewable resources.

The following section describes the potentially significant impacts to paleontological resources that could result from the implementation of the project.

Bicycle, Pedestrian, EVCS, Park-and-Ride, Solid Waste Expansion

As described in detail in Section 2.5.4.1 above, implementation of new or expanded park-and-ride facilities, new or expanded pedestrian and bicycle improvements, new EVCS, and new or expanded solid waste facilities could result in impacts to paleontological resources. Specific locations for such improvements have not been identified. However, it is possible that the locations of such improvements could disturb some paleontological resources because the location all resources within the county is unknown. Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to paleontological resources to the extent feasible in compliance with CEQA Guidelines Section 15126.4.

Implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above would reduce potential impacts to paleontological resources because all projects would be required to undergo the County's discretionary review process which includes CEQA, and would be required to mitigate all resultant significant impacts. With implementation of the applicable 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above; compliance with existing local, state, and federal regulations that protect paleontological resources; and completion of subsequent project-level planning and environmental review, potential direct impacts to paleontological resources because of bicycle, pedestrian, EVCS, park-and-ride, and solid waste facilities expansion would be **less than significant**.

Cumulative Impacts

Impacts would be cumulative in nature if the project in combination with cumulative development would contribute to the permanent loss of the County's paleontological resources on a regional scale. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and Impact CULT-2 above applies for this cumulative discussion.

Cumulative projects that require significant excavation, such as regional energy and utility projects or the construction of new roadways, could result in adverse impacts to paleontological resources. All development proposals associated with implementation of the CAP would be required to undergo review by the County and would be required to comply with adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures; comply with existing federal, state, and local regulations that would protect paleontological resources. Cumulative paleontological resources impacts were determined to be less than significant in the 2011 GPU PEIR with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, and the project **would not result in a considerable contribution** such that a new significant cumulative impact would occur.

Local Direct Investment Program

Implementation of GHG Reduction Measure T-4.1 would result in direct investment projects to offset carbon emissions. As described in detail in Chapter 2.7 and Appendix B of this Draft SEIR, and Section 2.5.4.1 above, there are a variety of projects that could result from implementation of this measure.

Most offset projects would involve some level of construction and physical disturbance of the land. This analysis assumes that implementation of offset projects under GHG Reduction Measure T-4.1 would result in construction activities that could include: the use of heavy equipment for earthmoving, materials processing, or compost spreading; vehicle trips during construction/equipment replacement/monitoring activities; possible changes in land form and views; and installation or upgrades of mechanical equipment or facilities. Construction activities associated with these measures could result in direct and indirect disturbances to paleontological resources.

All projects would be required to comply with applicable existing local, state, and federal 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 its 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, the potential for disturbance of paleontological resources related to implementation of direct investment projects would be **less than significant**.

Cumulative Impacts

Impacts would be cumulative in nature if in combination with effects of other projects, they would contribute to the local or regional loss of paleontological resources in the unincorporated County. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and Impact CULT-2 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 cumulative impacts to paleontological resources resulting from the build-out associated with the General Plan would be reduced with implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above, and compliance with other applicable local, state, and federal regulations. Future direct investment projects would be required to be evaluated under CEQA and to reduce and minimize impacts to the maximum feasible. Therefore, implementation of GHG Reduction Measure T-4.1 **would not result in a considerable contribution** such that a new significant cumulative paleontological resources impact would occur.

Large-Scale Renewable Energy Systems and Ground or Roof-Mounted Photovoltaic Solar, Small Wind Turbines, and other Building Retrofits

As described in detail in Section 2.5.4.1 above, implementation of GHG reduction measures could result in the development of large-scale renewable energy systems and/or small-scale renewable energy systems on existing residential and non-residential structures, including rooftop or ground-mounted photovoltaic solar arrays or small wind turbines, upgraded mechanical systems, and other similar improvements which could result in the construction of footings upon which renewable infrastructure would be mounted that could disturb paleontological resources. Specific locations for such improvements have not been identified. All large-scale renewable energy projects are subject to discretionary review and required to obtain a MUP. As part of the County's discretionary review process all renewable energy projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to paleontological resources. As described on page 2.5-19 of the 2012 Wind Energy EIR, the MUP is subject to the County's Grading Ordinance, which requires that paleontological monitors be present during grading and excavation activities at the discretion of the County, mandates the suspension of grading operations upon the discovery of fossils greater than 12 inches in any dimension and gives the appropriate County official the authority to determine the appropriate resource recovery operations which shall be carried out prior to the County official's authorization to resume normal grading operations. Therefore, because of the MUP discretionary review process and because all large-scale renewable energy projects are required to comply with the County's Grading Ordinance prior to approval, paleontological impacts related to development of large-scale renewable energy systems would be **less than significant**.

The placement of small-scale photovoltaic solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance Section 6954(a) that regulates the height and scale of these facilities. Rooftop mounted

photovoltaic solar energy panels and roof-top wind turbines would not result in ground disturbance and ground mounted photovoltaic solar panels do not require deep or wide concrete footings such that disturbance of soils at a depth where resources could be present would not occur. Therefore, these systems would result in less-than-significant impacts to paleontological resources.

However, ground-mounted wind turbines would have the potential to result in impacts to paleontological resources because of deep concrete footings and substantial grading at depth would be required. Additionally, as described on page 2.5-18 of the 2012 Wind Energy EIR, small-scale wind turbines may be located on a parcel as an accessory use that would not require a discretionary review. The 2012 Wind Energy EIR rejected mitigation that would have required identification of paleontological resources onsite prior to installation of wind turbines or to require a paleontological survey as it would conflict with the County's goal to expand renewable energy by creating onerous requirements. Therefore, the 2012 Wind EIR concluded that impacts would remain significant. Accordingly, even with implementation of 2011 GPU policies, 2011 GPU PEIR mitigation measures listed above, and federal, state, and local regulations that protect paleontological resources, the potential exists for impacts related to installation of small-scale wind turbines because of the lack of discretionary oversight and inability to mitigate impacts. Therefore, impacts to paleontological resources from implementation of small-scale wind turbines would be **potentially significant (Impact CULT-5)**.

Cumulative Impacts

Cumulative impacts would occur if in combination with past, present, and reasonably foreseeable projects, a significant loss of paleontological resources would occur. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and Impact CULT-2 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts to paleontological resources resulting from the build-out associated with the General Plan would be reduced with implementation of federal, state, and local regulations; County regulatory policies; and 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above. Additionally, the 2012 Wind Energy EIR concluded on page 2.5-23 that because of the MUP process that requires large-scale wind energy projects to comply with the County's Grading Ordinance, cumulative impacts would be less than significant related to paleontological resources. Because of the MUP discretionary review process and because all large-scale renewable energy projects are required to comply with the County's Grading Ordinance, paleontological impacts related to development of large-scale renewable energy systems would be less than significant and **would not have a considerable contribution** such that a new significant paleontological resources impact would occur.

However, the 2012 Wind Energy EIR concluded on page 2.5-23 that the project has the potential to result in a significant impact associated with the loss of paleontological resources through development activities without discretionary review, mitigation, and monitoring that could result from some small-scale wind turbines which could lead to a contribution to a regionally significant loss of paleontological resources. Therefore,

implementation of small-scale wind turbines without discretionary review **could result in a considerable contribution** such that a new significant cumulative impact to paleontological resources could occur (**Impact CULT-6**).

Padre Dam Water and Wastewater Supporting Effort

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 and that analysis is hereby incorporated by reference. As described on pages 4.4-20 through 4.4-22 of the Padre Dam PEIR, potentially significant direct and indirect impacts were identified for impacts to paleontological resources. However, all impacts were reduced to a level below significance with implementation of Mitigation Measure PAL-1 as described in the Padre Dam PEIR. Therefore, the potential loss of paleontological resources because of the Padre Dam AWP would **less than significant**.

Cumulative Impacts

The Padre Dam PEIR evaluated the cumulative paleontological resources impacts of the project on page 6-19. As described therein, the AWP project would result in less-than-significant impacts to paleontological resources with implementation of Mitigation Measure PAL-1 as described in the Padre Dam PEIR, and it **would not have a considerable contribution** to a significant cumulative impact.

Impact Summary

With implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures (listed above); federal, state, and local regulations; and the County's MUP discretionary review process, projects would be required to minimize or eliminate impacts related to paleontological resources because of implementation of traffic calming, bicycle and pedestrian improvements, EVCS, direct investment projects, solid waste facilities, small-scale solar photovoltaic systems, and large-scale renewable energy projects including solar photovoltaic, concentrator solar, geothermal, and wind turbines. Therefore, impacts to paleontological resources related to these measures and efforts would be **less than significant**. The County's participation in the AWP project would result in **less than significant** paleontological resources impacts, and **would not have a considerable contribution** to a significant cumulative impact.

However, because it is possible to install small-scale wind turbines as an accessory use without discretionary review, significant impacts to paleontological resources could occur because of ground disturbance. Therefore, project impacts to paleontological resources that would result from the installation of small-scale wind turbines would be **potentially significant** and **could result in a considerable contribution** such that a new significant cumulative impact to paleontological resources could occur.

2.5.4.4 Issue 4: Human Remains

This section describes potential project and cumulative impacts on human remains resulting from implementation of the project.

Guidelines for Determination of Significance

The project would result in a significant impact to human remains if:

- The project disturbs any human remains, including those interred outside of formal cemeteries.

This guideline was derived from CEQA Guidelines. This guideline is selected because human remains must be treated with dignity and respect and CEQA requires consultation with the “Most Likely Descendant” as identified by the Native American Heritage Commission for any project in which human remains have been identified.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR determined that buildout under the 2011 GPU could result in potentially significant project and cumulative impacts to human remains because of the potential for human burial sites (known or unknown) within the unincorporated County. The discussion of impacts can be found in Chapter 2.5, Cultural and Paleontological Resources, on pages 2.5-33 through 2.5-34 of the 2011 GPU PEIR, and is hereby incorporated by reference.

Human burials have occurred outside of dedicated cemeteries historically, and the disturbance of any human remains is considered a significant impact, regardless of archaeological significance or association. While some burials have been uncovered, the potential exists for unknown burials to be present, including Native American burials. As evident from human remains that were previously discovered throughout the unincorporated County, there is the potential for impacts to human remains to occur as the result of development allowable under the 2011 GPU. These impacts would be reduced to below a level of significance through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; the 2011 GPU goals and policies; and specific mitigation measures/ implementation programs identified in the 2011 GPU PEIR.

CAP Impact Analysis

Implementation of the CAP could result in significant impacts from implementation of bicycle, pedestrian, EVCS, park-and-ride, direct investment projects, solid waste expansion, as well as small- and large-scale wind turbines, and large-scale photovoltaic solar and concentrated solar, and geothermal energy 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 that

analysis is summarized below and is hereby incorporated by reference (County of San Diego 2012). Additionally, the Padre Dam Municipal Water District's Comprehensive Facilities Master Plan PEIR (Padre Dam PEIR) evaluated impacts related to the development/expansion of water purification infrastructure and impacts from that document are summarized below and hereby incorporated by reference (Padre Dam MWD 2017).

Impacts to human remains generally occur because of ground-disturbing activities, including grading, excavation, and utilities installation during construction. The potential for disturbance may be reduced through surveying a site to determine the likelihood that human remains are present, review of archaeological records to determine if human remains are known to occur in the area, and then designing future development to avoid areas where burials may be present. However, if surface evidence and archaeological records do not exist for a site, construction activities associated with the future development, including grading and excavation, would have the potential to disturb human remains. Any disturbance would be a significant impact.

The following section describes the potentially significant impacts to human remains that could result from the implementation of the measures.

Bicycle, Pedestrian, EVCS, Park-and-Ride, Solid Waste Expansion

As described in detail in Section 2.5.4.1 above, the project could result in new or expanded park-and-ride facilities, new or expanded pedestrian and bicycle improvements, EVCS, and new or expanded solid waste facilities. Specific locations for such improvements have not been identified. However, it is possible that the locations of such improvements could disturb some human remains because the location of all human remains that were buried outside of formal cemeteries is unknown. Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to human remains to the extent feasible in compliance with CEQA Guidelines Section 15126.4.

Implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above would reduce potential impacts related to the disturbance of human remains because all projects would be required to undergo the County's discretionary review process which includes CEQA, and would be required to mitigate resultant significant impacts. With implementation of the applicable 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above; compliance with existing federal, state, and local regulations that protect human remains; and completion of subsequent project-level planning and environmental review, potential direct impacts to disturbance of human remains because of implementation of measures that could result in the construction of bicycle, pedestrian, EVCS, park-and-ride, and solid waste expansion facilities would be **less than significant**.

Cumulative Impacts

Impacts would be cumulative in nature if the project in combination with cumulative development would contribute to a regionally significant disturbance to unknown human remains. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and Impact CULT-2 above applies for this cumulative discussion.

Implementation of the CAP would result in construction of bicycle, pedestrian, park-and-ride, and solid waste facilities expansion which would be required to undergo review by the County and would be required to comply with adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above that would require appropriate treatment of human remains, if discovered. Cumulative disturbance to human remains impacts were determined to be less than significant in the 2011 GPU PEIR, and the project **would not result in a considerable contribution** such that a new significant cumulative impact would occur.

Local Direct Investment Projects

Implementation of GHG Reduction Measure T-4.1 would result in direct investment projects to offset carbon emissions. As described in detail in Chapter 2.7 of this Draft SEIR, and Impact CULT-5 above, there are a variety of projects that could result from implementation of this measure.

Most offset projects would involve some level of construction and physical disturbance of the land. This analysis assumes that implementation of offset projects under GHG Reduction Measure T-4.1 would result in construction activities that could include: the use of heavy equipment for earthmoving, materials processing, or compost spreading; vehicle trips during construction/equipment replacement/monitoring activities; possible changes in land form and views; and installation or upgrades of mechanical equipment or facilities. Construction activities associated with these measures could result in direct and indirect disturbances to human remains.

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 its 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, the potential for disturbance of human remains related to implementation of direct investment projects would be **less than significant**.

Cumulative Impacts

Impacts would be cumulative in nature if the project in combination with cumulative development would contribute to a regionally significant disturbance to unknown human

remains. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and Impact CULT-2 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 cumulative impacts to human remains resulting from the build-out associated with the General Plan would be reduced with implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above, and compliance with other applicable local, state, and federal regulations. Future direct investment projects would be required to be evaluated under CEQA and to reduce and minimize impacts to the maximum feasible. Therefore, implementation of GHG Reduction Measure T-4.1 **would not result in a considerable contribution** such that a new significant cumulative impact would occur.

Large-Scale Renewable Energy Systems and Ground or Roof-Mounted Photovoltaic Solar, Small Wind Turbines, and other Building Retrofits

As described in detail in Section 2.5.4.1 above, implementation of large-scale renewable energy systems and/or small-scale renewable energy systems on existing residential and non-residential structures, including rooftop or ground-mounted photovoltaic solar arrays or small wind turbines, upgraded mechanical systems, and other similar improvements, could result in the construction of footings that could disturb human remains. Specific locations for such improvements have not been identified.

All large-scale renewable energy projects are subject to discretionary review and required to obtain a MUP. As part of the County's discretionary review process all renewable energy projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to human remains. As described on page 2.5-22 of the 2012 Wind Energy EIR, the MUP is subject to the County's RPO, which would require that conditions placed upon the project would require that human remains be protected and undisturbed if discovered as part of the County's discretionary environmental review process. Therefore, because of the MUP discretionary review process and because all large-scale renewable energy projects are required to comply with RPO prior to approval, impacts related to measures that would result in the development of large-scale renewable energy systems would be **less than significant**.

The placement of small-scale photovoltaic solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance Section 6954(a) that regulates the height and scale of these facilities. Rooftop photovoltaic solar energy panels and roof-top wind turbines would not result in ground disturbance and ground mounted photovoltaic solar panels do not require deep or wide concrete footings which minimizes the amount of ground disturbance. As such, these energy systems could result in impacts to human remains.

Ground-mounted wind turbines would have the potential to result in impacts to human remains because of the need to secure the turbines with deep concrete footings and the resultant ground disturbance and grading at depth that may be required. Additionally, as

described on page 2.5-22 of the 2012 Wind Energy EIR, small-scale wind turbines may be located on a parcel as an accessory use that would not require a discretionary review.

The 2012 Wind Energy EIR rejected mitigation that would have required identification of human remains onsite prior to installation of wind turbines as it would conflict with the County's goal to expand renewable energy by creating onerous requirements. Therefore, the EIR concluded that impacts would remain significant. Accordingly, even with implementation of 2011 GPU policies, 2011 GPU PEIR mitigation measures listed above, and federal, state, and local regulations, the potential exists for direct impacts related to the disturbance of unknown human remains because of installation of small-scale wind turbines that lack discretionary oversight. Therefore, impacts related to the disturbance of human remains would be **potentially significant (Impact CULT-7)**.

Cumulative Impacts

Impacts would be cumulative in nature if the project in combination with cumulative development would contribute to a regionally significant disturbance to human remains. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and Impact CULT-2 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts to human remains resulting from the build-out associated with the General Plan would be reduced with implementation of the federal, state, and local regulations; County regulatory policies; and 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above. Additionally, the 2012 Wind Energy EIR concluded on page 2.5-33 through 2.5-34 that because of the MUP process that requires large-scale wind energy projects to comply with the County's Grading Ordinance, cumulative impacts would be less than significant related to human remains. All large-scale renewable energy development proposals would be required to undergo discretionary review by the County and would be required to comply with adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above that would preserve human remains if discovered. Cumulative disturbance to human remains impacts were determined to be less than significant in the 2011 GPU PEIR, and the project **would not result in a considerable contribution** such that a new significant cumulative impact related to human remains would occur.

However, as described on page 2.5-34 of the 2012 Wind Energy EIR, up to three small wind turbines are permitted as an accessory use to a residential structure without a discretionary permit and would not be required to implement mitigation. Therefore, it is possible that small-scale wind turbines **could result in a considerable contribution** such that a new significant cumulative impact related to human remains could occur **(Impact CULT-8)**.

Padre Dam Water and Wastewater Supporting Effort

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 and that analysis is hereby

incorporated by reference. As described on page 4.4-19 of the Padre Dam PEIR, less-than-significant direct and indirect impacts were identified for impacts to human remains. Therefore, the potential loss of human remains because of the Padre Dam AWP would be **less than significant**.

Cumulative Impacts

The Padre Dam PEIR evaluated the cumulative human remains impacts of the project on page 6-18. As described therein, the AWP project would result in less-than-significant impacts to human remains as described in the Padre Dam PEIR, and it **would not have a considerable contribution** to a significant cumulative impact.

Impact Summary

Implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures; federal, state, and local regulations; and the County's MUP discretionary review process would minimize or eliminate impacts related to disturbance of human remains because of implementation of traffic calming, bicycle and pedestrian improvements, EVCS, solid waste facilities, small-scale solar photovoltaic systems, and large-scale renewable energy projects including solar photovoltaic, concentrator solar, geothermal, and wind turbines. Therefore, impacts to human remains related to these measures and efforts would be **less than significant** and **would not result in a considerable contribution** such that a new significant cumulative impact to human remains would occur. The County's participation in the AWP project would result in **less-than-significant** human remains impacts, and **would not have a considerable contribution** to a significant cumulative impact.

However, because it is possible to install small-scale wind turbines as an accessory use without discretionary review, significant impacts to human remains could occur because of ground disturbance and the lack of mitigation requirements. Therefore, installation of small-scale wind turbines would be **potentially significant** and **could result in a considerable contribution** such that a new significant cumulative impact to human remains would occur.

2.5.5 Mitigation

2.5.5.1 Issue 1: Impacts to Historic Resources

The 2012 Wind Energy EIR included the following mitigation measure to minimize the potentially significant impacts related to small-scale wind turbines:

Mitigation Measure M-CUL-1: The County shall provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources. This will be done by reaching out to property owners with identified historic resources to participate.

As described in Section 2.5.4.1, additional wind turbine mitigation was considered but rejected as infeasible through the Wind Energy EIR. Mitigation Measure M-CUL-1 shall be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) for the CAP and shall be applied to all small-scale wind and solar projects. However, because small-scale renewable energy projects are allowed as an accessory use without a discretionary permit, it is not possible to guarantee that all impacts to historic resources would be reduced to a level below significance. Mitigation Measures M-CUL-1 from the 2012 Wind Energy Ordinance EIR has been revised to include all renewable energy projects as follows:

CAP Mitigation Measure M-CUL-1: For all small-scale wind turbine projects, the County shall provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources. This will be done by reaching out to property owners with identified historic resources to participate.

Additional mitigation was contemplated as part of this Draft SEIR that would implement a development cap upon small scale renewable energy projects. This mitigation was rejected as infeasible because it may preclude the feasibility of GHG Reduction Measures E-1.1, E-2.1, E-2.2, E-2.3, and E-2.4 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 2.5.4.1, Historic Resources, even with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures that prevent significant impacts to historic resources, CAP Mitigation Measure M-CUL-1, and compliance with federal, state, and local regulations intended to protect historic resources, impacts could remain significant and unavoidable. No other feasible project-related mitigation is available and could be applied to small-scale wind and solar energy projects because of the lack of discretionary review and ability to mitigate as a condition of a permit. The project's impacts related to historic resources from GHG reduction measures that would result in the installation of small wind turbines or solar photovoltaic facilities would remain **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact to historic resources would occur.

Project level impacts and mitigation measures were identified within the Padre Dam PEIR as described above in Section 2.5.4.1. 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.

2.5.5.2 Issue 2: Impacts to Archaeological Resources

As described during the impacts analysis, because small-scale renewable energy projects are allowed as an accessory use without a discretionary permit, it is not possible to guarantee that all impacts to archaeological resources would be reduced to a level below significance. Additional mitigation was contemplated as part of this Draft SEIR that would implement a development cap upon small-scale renewable energy projects. This mitigation was rejected as infeasible because it may preclude the feasibility of GHG Reduction Measures E-1.1, E-2.1, E-2.2, E-2.3, and E-2.4 and achievement of the County's 2030 GHG emissions reduction target. It is unknown how many numbers and types of renewable small-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 2.5.4.2, Archaeological Resources, even with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures, and compliance with federal, state, and local regulations intended to protect archeological resources that prevent significant impacts to archaeological resources, impacts could remain significant and unavoidable. No other feasible project-related mitigation is available and could be applied to small-scale renewable energy projects because of the lack of discretionary review and ability to mitigate as a condition of a permit. The project's impacts related to archaeological resources related to the installation of small wind turbines would remain **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact to archaeological resources would occur.

Project level impacts and mitigation measures were identified within the Padre Dam PEIR as described above in Section 2.5.4.2. 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.

2.5.5.3 Issue 3: Impacts to Paleontological Resources

As described during the impacts analysis, because small-scale renewable energy projects are allowed as an accessory use without a discretionary permit, it is not possible to guarantee that all impacts to paleontological resources would be reduced to a level below significance. Additional mitigation was contemplated as part of this Draft SEIR that would implement a development cap upon small scale renewable energy projects. This mitigation was rejected as infeasible because it may preclude the feasibility of GHG Reduction Measures E-1.1, E-2.1, E-2.2, E-2.3, and E-2.4 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 2.5.4.3, Paleontological Resources, even with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures and compliance with federal, state, and local regulations intended to protect paleontological resources, impacts could remain significant and unavoidable. No other feasible project-related mitigation is available and could be applied to small-scale renewable energy projects because of the lack of discretionary review and ability to mitigate as a condition of a permit. The project's impacts related to paleontological resources from GHG reduction measures that would result in the installation of small wind turbines would remain **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact to paleontological resources would occur.

Project level impacts and mitigation measures were identified within the Padre Dam PEIR as described above in Section 2.5.4.3. 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.

2.5.5.4 Issue 4: Impacts to Human Remains

As described during the impacts analysis, because small-scale renewable energy projects are allowed as an accessory use without a discretionary permit, it is not possible to guarantee that all impacts to human remains would be reduced to a level below significance. Additional mitigation was contemplated as part of this Draft SEIR that would implement a development cap upon small scale renewable energy projects. This mitigation was rejected as infeasible because it may preclude the feasibility of GHG Reduction Measures E-1.1, E-2.1, E-2.2, E-2.3, and E-2.4 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 2.5.4.4, Human Remains, even with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures and compliance with federal, state, and local regulations intended to protect human remains, impacts could remain significant and unavoidable. No other feasible project-related mitigation is available and could be applied to small-scale renewable energy projects because of the lack of discretionary review and ability to mitigate as a condition of a permit. The project's impacts related to disturbance of human remains from GHG reduction measures that would result in the installation of small wind turbines would remain **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact to human remains would occur.

Project level impacts and mitigation measures were identified within the Padre Dam PEIR as described above in Section 2.5.4.4. 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.

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