

2.8 Hazards and Hazardous Materials

This section evaluates the existing conditions related to hazardous materials, airports, wildland fire, vector hazards, and emergency response and evacuation plan conditions within the County, and the potential effects that implementation of the project may have.

The County received comments concerning wildfire risk 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).

2.8.1 Existing Conditions

The 2011 GPU PEIR included a discussion of existing conditions related to hazards and hazardous materials in Section 2.7, on pages 2.7-1 through 2.7-20 which includes all lands within the unincorporated County. No changes to the existing conditions have been identified that would alter the conclusions in the 2011 GPU PEIR. Therefore, the existing conditions in the 2011 GPU PEIR apply to the project and are hereby incorporated by reference.

2.8.2 Regulatory Framework

The 2011 GPU PEIR included a summary of the Regulatory Framework related to hazards and hazardous materials in Chapter 2.7, pages 2.7-20 through 2.7-28, and it is hereby incorporated by reference. Specific regulations discussed in the 2011 GPU PEIR and applicable to the project include the following:

Federal

- Center for Disease Control; National Center for Infectious Diseases; Division of VectorBorne Infectious Diseases
- Resource Conservation and Recovery Act (RCRA) of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Superfund Amendments and Reauthorization Act (SARA) of 1986
- Chemical Accident Prevention Provisions
- Emergency Planning Community Right-to-Know Act (EPCRA)
- Hazardous Materials Transportation Act
- EPA Region 9, Preliminary Remediation Goals (PRGs)
- International Fire Code (IFC)

- Federal Aviation Administration (FAA) Functions
- U.S. Department of Defense (DOD) Air Installations Compatible Use Zone (AICUZ) Program
- The Robert T. Stafford Disaster Relief and Emergency Assistance Act (P.L. 93-288), as amended, (42 U.S.C. Sections 5121-5206), and Related Authorities
- Federal Response Plan

State

- Government Code Section 65962.5 (a), Cortese List
- California Health & Safety Code (H&SC), Hazardous Materials Release Response Plans and Inventory
- Title 14 Division 1.5 of the California Code of Regulations
- Title 22 of the California Code of Regulations & Hazardous Waste Control Law, Chapter 6.5
- Title 23 of the California Code of Regulations (CCR), Underground Storage Tank (UST) Act
- Title 27 of the CCR, Solid Waste
- California Health and Safety Code §25270 etc., Aboveground Petroleum Storage Act
- California Human Health Screening Levels (CHHSLs)
- SB 1889, Accidental Release Prevention Law/California Accidental Release Prevention Program (CalARP)
- Emergency Response to Hazardous Materials Incidents
- California Fire Code (CFC)
- California Education Code (CEC)
- California State Aeronautics Act
- State Fire Regulations
- California Emergency Services Act
- California Natural Disaster Assistance Act (NDAA)

Local

- San Diego County, Site Assessment and Mitigation (SAM) Program
- San Diego County Board Policy I-132, Valley Center Mitigation Policy
- County of San Diego Code of Regulatory Ordinances Sections 68.401-68.406, Combustible Vegetation and Other Flammable Materials Ordinance
- County of San Diego Code of Regulatory Ordinances Sections 96.1.005 and 96.1.202, Removal of Fire Hazards
- County of San Diego Consolidated Fire Code
- County DPLU Fire Prevention in Project Design Standards

Adopted 2011 GPU Policies

The policies addressing hazards and hazardous materials that were adopted a part of the 2011 GPU and are applicable to the project include the following:

Policy LU-6.11: Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

Policy S-1.3: Risk Reduction Programs. Support efforts and programs that reduce the risk of natural and manmade hazards and that reduce the time for responding to these hazards.

Policy S-3.1: Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.

Policy S-3.2: Development in Hillsides and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.

Policy S-3.3: Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.

Policy S-3.4: Service Availability. Plan for development where fire and emergency services are available or planned.

Policy S-3.6: Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.

Policy S-4.1: Fuel Management Programs. Support programs and plans, such as Strategic Fire Plans, consistent with state law that require fuel management/modification within established defensible space boundaries and when strategic fuel modification is necessary outside of defensible space, balance fuel management needs to protect structures with the preservation of native vegetation and sensitive habitats.

Policy S-15.1: Land Use Compatibility. Require land uses surrounding airports to be compatible with the operation of each airport.

Policy S-15.2: Airport Operational Plans. Require operational plans for new public/private airports and heliports, as well as future operational changes to existing airports, to be compatible with existing and planned land uses that surround the airport facility.

Policy S-15.3: Hazardous Obstructions within Airport Approach and Departure. Restrict development of potentially hazardous obstructions or other hazards to flight located within airport approach and departure areas or known flight patterns and discourage uses that may impact airport operations or do not meet federal or state aviation standards.

Policy M-1.2: Interconnected Road Network. Provide an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies.

Policy M-3.3: Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes in conformance with state law and local regulations.

Policy M-7.1: Meeting Airport Needs. Operate and improve airport facilities to meet air transportation needs in a manner that adequately considers impacts to environmental resources and surrounding communities and to ensure consistency with Airport Land Use Compatibility Plans.

Adopted 2011 GPU PEIR Mitigation Measures

The mitigation measures addressing hazards and hazardous materials that were adopted as part of the 2011 GPU PEIR and are applicable to the project include the following:

Haz-1.1 requires the County to apply the Guidelines for Determining Significance, Airport Hazards, when reviewing new development projects to ensure compatibility with surrounding airports and land uses. It also requires application of appropriate mitigation, such as design/construction standards and aviation easements, when impacts are significant. This measure will prevent potential safety hazards associated with development located near public airports because specific design standards will be applied to ensure that the new development is compatible with the nearby uses.

Haz-1.2 is the participation in the development of ALUCPs and future revisions to the ALUCPs to ensure the compatibility of land uses and airport operations. By working

closely with the San Diego County Regional Airport Authority (SDCRAA), potential land use conflicts and safety hazards can be prevented.

Haz-1.3 requires that the Air Installation Compatible Use Zone (AICUZ) Program be considered when reviewing new development within the influence area. Such development projects must be consistent with the land use compatibility and safety policies within the AICUZ in order to minimize potential safety hazards.

Haz-1.4 entails close coordination between DPW and PDS staff when planning new airports or operational changes to existing airports when those changes would produce new or modified airport hazard zones. This will help to minimize land use compatibility issues and potential safety hazards.

Haz-1.5 requires close coordination with the San Diego County Regional Airport Authority (SDCRAA) and County Airports for issues related to airport planning and operations. This will further help to minimize land use compatibility issues and potential safety hazards.

Haz-2.1 is the implementation of the Zoning Ordinance, which requires Major Use Permits for private airports and heliports. The Major Use Permit findings and requirements will help to minimize potential land use compatibility conflicts and safety hazard issues for development near private airports. Projects that cannot be found to be compatible would be denied.

Haz-3.1 requires coordination between PDS and the Office of Emergency services to implement and periodically update the Hazard Mitigation Plan. This will ensure planning staff can identify standards that affect future development while OES staff will be able to detect and prevent impediments to emergency response and evacuation plans.

Haz-3.2 requires the County to implement the Guidelines for Determining Significance, Emergency Response Plans, to ensure that discretionary projects do not adversely impact emergency response or evacuation plans. It also requires the County to apply Public and Private Road Standards to projects. These steps will avoid potential conflicts with adopted emergency response and evacuation plans.

Haz-3.3 is the preparation of Fire Access Road network plans and incorporation into Community Plans or other documents as appropriate. It also requires the County to implement the Consolidated Fire Code and to require fire apparatus access roads and secondary access in development projects. These measures will ensure that projects are consistent with adopted emergency and evacuation plans.

Haz-4.1 requires the County to identify and minimize potential fire hazards for future development by using and maintaining a database that identifies fire prone areas, locating development away from Fire Hazard areas whenever practicable, and adhering to the County Guidelines for Determining Significance for Wildland Fires & Fire Protection and applying appropriate mitigation when impacts are significant. Implementation of these measures will typically prevent future placement of people and structures near wildland fire hazards.

Haz-4.2 requires the County to conduct effective and environmentally sensitive brush management measures such as: addressing habitat-specific fire controls within Resource Management Plans; implementation of the Weed Abatement Ordinance and enforcing proper techniques for maintaining defensible space around structures; coordination with the local fire authority having jurisdiction to ensure that district goals for fuel management and fire protection are being met; and recognizing the Memorandum of Understanding between the wildlife agencies and fire authorities that guides the abatement of flammable vegetation without violating environmental regulations for habitat protection. These actions will help minimize fire hazard losses while also avoiding significant impacts to environmental resources.

Haz-4.3 requires the County to enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. It also includes implementation of General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas. This effort can substantially reduce potential losses in the event of wildland fire.

Haz-4.4 requires the County to create a Conservation Subdivision Program that facilitates conservation-oriented, fire-safe, project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary. This program is included in the project and will result in subdivision designs with improved fire protection.

2.8.3 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 CAP, the County prepared a new CAP (subject of this Draft SEIR). The CAP and the targets and strategies identified therein necessitate changes to Goal COS-20 and Policy COS-20.1 of the County's General Plan (2011 GPU) and mitigation adopted in the 2011 GPU PEIR, Mitigation Measures CC-1.2, CC-1.7, and CC-1.8 to attain consistency with current legislative requirements. These changes require a General Plan Amendment to the County's General Plan and revision to the associated mitigation monitoring and reporting program (hereafter these two actions collectively refer to as (GPA)) as part of the administrative approval process. The Draft SEIR evaluates the GPA as part of the actions associated with the CAP because the changes reflected in the GPA support and are consistent with implementation of the CAP and its GHG targets and GHG reduction measures. Therefore, the GPA is not addressed as a separate impact discussion below, but its impacts are included within the overall impact analysis of the CAP.

The Draft SEIR also evaluates the impacts associated with the implementation of proposed GHG Threshold, Guidelines for Determining Significance for Climate Change (Guidelines), and the Report Format and Content Requirements. The proposed GHG Threshold requires consistency with the CAP, and is the level below which a project would be determined to result in less-than-significant GHG impacts. To achieve consistency, a project will be required to implement the applicable GHG reduction measures outlined in

the CAP. All measures have been evaluated throughout the Draft SEIR. Therefore, adoption of a GHG Threshold that establishes a requirement to be consistent with the CAP, the individual measures of which have been evaluated throughout this Draft SEIR, would not require a separate impact analysis because the impacts of establishing that threshold and what it would take to meet the threshold have been fully evaluated.

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

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

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

2.8.4 Analysis of Project and Cumulative Impacts

The project and cumulative impact analysis study area for hazards and hazardous materials in the 2011 GPU PEIR was identified as the entire unincorporated County. The CAP would apply to the unincorporated County, and utilizes the same project and cumulative study area for hazards and hazardous materials as the 2011 GPU PEIR, which is hereby incorporated by reference.

Proposed GHG Reduction Measures

Table 1-1 of this 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 hazards and hazardous materials and could potentially result in a significant impact within the County are described and evaluated below. None of the proposed measures or actions indicate where specific improvements would be constructed, their size, or specific characteristics. As a program EIR, the Draft SEIR does not, and cannot, speculate on the individual environmental impacts of specific future projects/improvements. However, implementation of all GHG reduction measures and supporting efforts were considered during preparation of the Draft SEIR, to the degree specific information about implementation is known. Consistent with the requirements of CEQA Guidelines Section 15168, this Draft SEIR provides a programmatic discussion of the potential general impacts of implementing 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 and is evaluated for consistency with policies related to circulation.

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

Measure T-3.5: Install Electric Vehicle Charging Stations. 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 the use of hazardous materials during construction activities.

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

Measure T-4.1: Establish a Local Direct Investment Program. Close the 2030 GHG emissions target gap of ~~195,514~~ 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 development.

Strategy E-1: Increase Building Energy Efficiency

Measure E-1.1: Improve Building Energy Efficiency in New Development. Achieve a 10% greater building energy efficiency in all new non-residential development than is required by the current state Energy Code (Title 24 Part 6) by 2020; require all new non-residential development to meet the state's Zero Net Energy (ZNE) standards by 2030. This measure would result in energy efficiency regulations that are 10% more efficient than current standards. This would result in GHG emissions reductions related to increased energy efficiency. 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.

Strategy E-2: Increase Renewable Energy Use

Measure E-2.1: Increase Renewable Electricity. Achieve 90% renewable electricity for the unincorporated county by 2030. Implementation This measure would result in the construction of distributed generation (small-scale renewables) on new and existing buildings, including solar photovoltaics, small wind-turbines, and energy storage solutions. This may also directly or indirectly require the construction of large-scale renewable energy generation systems to satisfy increased demand. This 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 unincorporated 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 photovoltaic (PV) electrical systems in 52,273 existing residential homes by 2020 and additional 77,902 homes by 2030. This measure would result in an increase in photovoltaic solar on existing residential buildings throughout the unincorporated County. 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 with renewables by 2020 and 20% by 2030. This measure would result in the development of County-owned renewable energy projects. This could result 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 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 and could result in vector-related issues.

Supporting Efforts for the Water and Wastewater Category

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

2.8.4.1 Issue 1: Transport, Use, Disposal, or Accidental Release of Hazardous Materials; Proximity to Schools; and Sites Containing Hazardous Materials

This section describes potential project and cumulative impacts related to hazardous materials including the transport, use, disposal, accidental release, proximity to schools, and contaminated sites with implementation of the project. The evaluation of hazardous materials-related topics has been consolidated into one discussion for the sake of brevity because the physical changes resulting from implementation of the GHG reduction measures and supporting efforts would be based upon construction activities and would result in the same discussion for each issue area.

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Hazards Materials and Existing Contamination, which is

reflective of the guidelines that were utilized in the 2011 GPU PEIR, the project would have a significant impact if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to the transport, use, and disposal of hazardous materials, accidental release of hazardous materials, use of hazardous materials in proximity to schools, and contaminated sites related to the adoption of the goals and policies contained within the plan and buildout of the land use map, and determined that buildout under the 2011 GPU would result in less-than-significant project and cumulative impacts in the unincorporated County.

The 2011 GPU PEIR determined that impacts would be reduced to less than significant because development would be required to comply with applicable federal, state, and local regulations related to the use, transportation, and storage of hazardous materials which would reduce these impacts to below a level of significance. The discussion of impacts can be found in Chapter 2.7 Hazards and Hazardous Materials, pages 2.7-28 through 2.7-39; and 2.7-50 through 2.7-52 of the 2011 GPU PEIR, and is hereby incorporated by reference. Specific policies and mitigation measures related to hazards and hazardous materials are listed above under Section 2.8.2, Regulatory Framework. No mitigation measures were required for these potential hazards.

CAP Impact Analysis

Implementation of the CAP has the potential to result in significant impacts related to hazardous materials-related issues from the construction of projects that would improve bicycle, pedestrian, and park-and-ride infrastructure, result in direct investment projects, result in the construction of small-scale wind turbines, large-scale photovoltaic solar, concentrated solar, large-scale wind turbines, geothermal renewable energy systems, and waste facilities that 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 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 that are associated with the Supporting Effort for the Water and Wastewater Category. The analysis from that document is summarized below and hereby incorporated by reference (Padre Dam MWD 2017).

The following section describes the potentially significant impacts related to hazardous materials that could result from the implementation of the CAP.

Bicycle, Pedestrian, EVCS, Park-and-Ride; Direct Investment Program; Small and Large-Scale Wind Turbines and Large-Scale Renewable Energy Systems; and Solid Waste Expansion Projects

Implementation of GHG Reduction Measures T-2.1, T-3.5, T-4.1, E-1.1, E-2.1, E-2.2, E-2.4, and SW-1.1 and Supporting Efforts could result in bicycle, pedestrian, EVCS, and park-and-ride improvements; energy efficiency retrofits on existing residential, new non-residential structures, and County facilities including rooftop or ground-mounted photovoltaic solar or small wind turbines; large-scale renewable energy systems; and new or expanded solid waste facilities. Specific locations for projects and retrofits have not been identified. As described on page 2.7-2 of the 2011 GPU PEIR, hazardous materials are widely utilized for many different applications, and may be stored by businesses, or utilized by certain commercial and industrial land uses. A significant impact would occur if the project included businesses, operations, or facilities that handle hazardous substances more than the threshold quantities listed in Chapter 6.95 of the H&SC, generate hazardous waste regulated under Chapter 6.5 of the H&SC, and/or store hazardous substances in underground storage tanks regulated under Chapter 6.7 of the H&SC, and would not be able to comply with applicable hazardous substance regulations. The project does not include GHG reduction measures that would result in businesses, operations, or facilities that handle hazardous substances more than listed threshold quantities.

Hazardous materials are controlled through numerous federal, state, and local regulations that require strict adherence to guidelines regarding the safe use, transportation, and disposal of hazardous materials as well as ensuring the reduction of the potential for humans or the environment to be affected by an accidental release of hazardous materials. Regulations that would be required of those transporting, using or disposing of hazardous materials include RCRA, CERCLA, the Hazardous Materials Transportation Act, IFC, Title 22, CCR Title 27, and the County Consolidated Fire Code. Similarly, with regard to the use or storage of hazardous materials near schools and the potential to site sensitive land uses upon a contaminated site, multiple local and state regulations require a discretionary process that results in the consultation of databases which store information related to contaminated sites, soils testing of potential project sites, project-level environmental assessments prior to grading, and compliance with many regulations which heavily restrict the use and storage of hazardous materials within one-quarter mile of a school.

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 hazards or hazardous materials to the extent feasible in compliance with CEQA Guidelines Section 15126.4. Specific locations for projects that would result from the implementation of the CAP have not been identified but projects would result in construction activities that could include the transport, use, or disposal of hazardous materials. All projects that could result from the measures listed above would be discretionary (with exception of small-wind turbines discussed below) and would be required to comply with federal, state, and local regulations that ensure the safe handling of hazardous materials.

The GHG reduction measures listed above that would result in small roadway infrastructure improvements or renewable energy systems could result in construction activities that may include the use and storage of commonly used hazardous materials such as gasoline, diesel fuel, lubricating oil, grease and other vehicle and equipment maintenance fluids should the facilities require grading/excavation. Implementation of GHG Reduction Measure T-4.1 would require the County to implement direct investment projects to offset carbon emissions. As described in detail in Chapter 2.7 and Appendix B of this Draft SEIR there are a variety of projects that could result from implementation of this measure and most offset projects would involve some level of construction, which may include heavy equipment for earthmoving, materials processing, or compost spreading; vehicle trips during construction/equipment replacement/monitoring activities; and installation or upgrades of mechanical equipment or facilities. Large-scale renewable energy systems and waste facilities would require construction activities including earthmoving, the use of construction equipment, and the use of worker vehicles, and may require the use of some hazardous materials to operate or maintain equipment but would be required to obtain a Major Use Permit (MUP) and undergo the County's discretionary review process prior to receiving a permit to develop or operate. Any use of hazardous materials during construction or operations would be evaluated and regulated through the discretionary process, including the preparation of Hazardous Materials Business Plans, as needed.

As explained in the 2011 GPU PEIR, implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures located in Chapter 2.7, Hazards and Hazardous Materials and listed above, in addition to all other applicable federal, state, and local regulations, would reduce potential impacts to hazardous materials. All storage, handling, transport, emission, and disposal of hazardous substances would be required to be in full compliance with federal, state, and local regulations.

Regarding the installation, operation, and maintenance of small wind turbines, as described on page 2.6-29 of the 2012 Wind Energy EIR, small wind turbines are permitted as accessory structures without a discretionary permit but would still require a building permit which would not be issued if the turbines would be located on a contaminated site under CA Government Code Section 65962.5. Additionally, turbines would not require the routine use and storage of hazardous materials, and would only utilize small amounts of lubricating oils and hydraulic fluids. Therefore, compliance with applicable federal, state, and local regulations that ensure the safe transport, use, storage, and siting related to

hazardous materials and completion of subsequent project-level planning and environmental review, ensures that potential direct and indirect impacts related to the transport, use, disposal, proximity to schools, and contaminated sites because of bicycle, pedestrian, EVCS, park-and-ride, direct investment projects, small-and large-scale wind turbines, and solid waste facilities expansion would be **less than significant**.

Cumulative Impacts

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

The 2011 GPU PEIR concluded that cumulative impacts related to hazardous materials resulting from the build-out associated with the General Plan would be reduced with implementation of the federal, state, and local regulations. Therefore, implementation of measures that could result in the construction of bicycle, pedestrian, EVCS, park-and-ride infrastructure, direct investment projects, small-scale wind turbines, large-scale photovoltaic solar, concentrated solar, wind turbines, geothermal renewable energy systems, and waste facilities would not result in any direct impacts. The 2011 GPU PEIR concluded that that cumulative impacts related to hazardous materials would be less than significant, therefore, the project **would not result in a substantial contribution** such that a new cumulative impact would occur.

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 4.8-8 through 4.8-11 of the Padre Dam PEIR, potentially significant direct and indirect impacts were identified for hazardous materials. However, all impacts were reduced to a level below significance with implementation of Mitigation Measures HAZ-1 and HAZ-2 as described in the Padre Dam

PEIR. Therefore, the potential impacts related to hazardous materials because of the Padre Dam AWP would be **less than significant**.

Cumulative Impacts

The Padre Dam PEIR evaluated the cumulative hazardous materials impacts of the project on page 6-23. As described therein, the AWP project would result in less-than-significant impacts to hazardous materials with implementation of Mitigation Measures HAZ-1 and HAZ-2, and it **would not have a considerable contribution** such that a new significant cumulative impact would occur.

Impact Summary

With implementation of applicable 2011 GPU policies and 2011 GPU PEIR mitigation measures (listed above), and compliance with existing federal, state, and local regulations related to hazardous materials, projects would be required to reduce project and cumulative impacts associated with the transport, use, and disposal of hazardous materials, accidental release of hazardous materials, use of hazardous materials in proximity to schools, and contaminated sites because of the construction of bicycle, pedestrian, EVCS, park-and-ride infrastructure, direct investment projects, small-and large-scale wind turbines, large-scale photovoltaic solar, concentrated solar, geothermal renewable energy systems, and waste facilities. Therefore, impacts related to implementation of the CAP would be **less than significant** and **would not result in a considerable contribution** such that a new significant cumulative impact would occur. The County's participation in the AWP project would result in **less than significant project** hazardous materials impacts, and **would not result in a considerable contribution** to a new significant cumulative hazardous materials impact.

2.8.4.2 Issue 2: Public and Private Airports

This section describes potential project and cumulative impacts related to public and private airports with implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Airport Hazards, the project would result in a significant impact if it would:

- Locate development within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and would result in a safety hazard for people residing or working in the project area; or
- Locate development within the vicinity of a private airstrip and would result in a safety hazard for people residing or working in the project area.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to public and private airports with the adoption of the goals and policies contained within the 2011 GPU and buildout of the land use map, and determined that buildout under the 2011 GPU would result in less-than-significant project and cumulative impacts in the unincorporated County.

The 2011 GPU PEIR determined that impacts would be less than significant because federal and state regulations exist that prevent hazards to the public and environment near airports, and because the 2011 GPU included Goals LU-4, S-15, and LU-4.7, multiple policies, and the 2011 GPU PEIR mitigation measures listed above in Section 2.8.2 Regulatory Framework. Enforcement of existing regulations and implementation of 2011 GPU goals and policies and 2011 GPU PEIR mitigation measures would reduce hazards related to development near public and private airports to below a level of significance. The discussion of impacts can be found in Chapter 2.7, Hazards and Hazardous Materials, pages 2.7-39 through 2.7-44; 2.7-52 through 2.7-53 of the 2011 GPU PEIR, and is hereby incorporated by reference.

CAP Impact Analysis

Implementation of the CAP has the potential to result in significant impacts related to public and private airports from the construction of small-and large-scale small wind turbines, geothermal renewable energy systems, and transmission lines from all large-scale renewable energy projects that were not explicitly evaluated within the 2011 GPU PEIR. Small transportation infrastructure improvements, direct investment projects, and waste facilities would not have the potential to cause airport impacts and are not evaluated further in this issue. 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 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 (2017 Padre Dam PEIR) evaluated impacts related to the development/expansion of water purification infrastructure and impacts that are associated with the Supporting Effort for the Water and Wastewater Category. The analysis from that document is summarized below and hereby incorporated by reference (Padre Dam MWD 2017).

Small-Scale Wind Turbines

Construction of wind turbines could result in significant impacts if the turbines were sited in such a way to produce visual or electronic impairment to navigation. The main compatibility concerns for the protection of airport airspace are related to airspace obstructions (building height, antennas, etc.) and hazards to flight (wildlife attractants, distracting lighting or glare, etc.). This would occur if the structures were located too close to an airport runway, were too tall, or produced glare or lighting that could cause a distraction to pilots. Specific locations for small-and large-scale renewable energy

projects have not been chosen, however, it is possible that turbines would be constructed within an Airport Influence area (area around an airport for which an Airport Land Use Compatibility Plan exists), within 2 miles of a public airport, within the safety zone for an airport, or within a private airstrip and could potentially result, in a safety risk.

However, as described on pages 2.6-37 through 2.6-39 of the 2012 Wind Energy EIR, small wind turbines that are permitted by the County's Wind Energy Ordinance shall not exceed 80 feet in height and would not be allowed to contain exterior lighting. As described in The County's Guidelines for Determining Significance: Airport Hazards, small wind turbines are not expected to affect navigable airspace. Additionally, small wind turbines are required to:

- Comply with the California Land Use Planning Handbook's Safety Compatibility Criteria for Safety Compatibility Zones.
- Be determined to be compatible with the applicable ALUCP and Compatibility Policies for the Airport by the San Diego County Regional Airport Authority.
- If a wind energy facility is located within the FAA Height Notification Surface due to its proximity to an airport, notice will be filed with the FAA. The applicant would complete the FAA Form 7460-1, Notice of Proposed Construction or Alteration, and submit the form to the FAA for review. The FAA would review the project and identify if the project is an airspace obstruction or hazard. If not, the project would comply with the FAA Regulations Part 77, Objects Affecting Navigable Airspace.

Therefore, small wind turbines would be required to comply with federal, state, and local regulations that would prevent hazards to the public and environment near public and private airports and would result in **less-than-significant** impacts.

Cumulative Impacts

Impacts would be cumulative in nature if in combination with effects of other projects, they would contribute to a regional increase in airport hazards to the public or the environment. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.8.4.1 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts related to airports resulting from the build-out associated with the General Plan would be reduced with implementation of the federal, state, and local regulations, and 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above. Also, as previously concluded, development of small wind turbines would not result in significant direct impacts. The 2011 GPU PEIR concluded that that cumulative impacts related to hazardous materials would be less than significant, therefore, implementation of new small-scale wind turbines **would not result in a considerable contribution** such that a new significant cumulative impact would occur.

Large-Scale Wind Turbines, Geothermal Energy Systems, and Transmission Lines

As described in detail in Section 2.1, Aesthetics and Visual Resources, of this Draft SEIR, implementation of GHG Reduction Measure E-2.1 could result in the construction of new large-scale renewable energy systems including wind turbines and geothermal energy systems, or transmission lines associated with large-scale renewable energy projects. Large-scale renewable energy infrastructure would generally be constructed in primarily 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.

Large wind turbines may range in height from 300 to 500 feet at the topmost blade tip and would be required to display aviation lighting per Federal Aviation Administration requirements if they are taller than 200 feet. Similarly, geothermal energy systems would vary in size and scale but would contain several stacks to release steam. It is unlikely that these stacks would reach 200 feet upon which aviation lighting would be required, but specific details are not known. Therefore, it is possible that wind turbines and geothermal energy systems could result in a safety risk if of sufficient height and located in the proximity of public or private airports.

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 airport hazard impacts to the extent feasible in compliance with CEQA Guidelines Section 15126.4. Additionally, as described on pages 2.6-38 through 2.6-39 of the 2012 Wind Energy EIR, all large-scale wind turbine projects would be required to obtain a MUP. Similarly, geothermal energy facilities would also be required to obtain a MUP per the County's Zoning Ordinance. Therefore, each facility type would be required to undergo discretionary review which would provide the opportunity to evaluate if any land use conflicts related to airports existed. If significant impacts were identified, projects would be required to mitigate to remedy any safety hazards. Additionally, implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above would further reduce the potential for hazards related to the development of large-scale wind and geothermal renewable energy systems. Therefore, impacts related to conflicts with an airport land use plan, facilities located within 2 miles of a public airport or public use airport, or facilities located within the vicinity of a private airstrip that would result in a safety hazard for people residing or working in the project area because of development of large-scale wind turbine, geothermal energy systems, or transmission lines associated with all large-scale renewable energy 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 a regional increase in airport hazards to the public or the environment.

The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.8.4.1 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts related to airports resulting from the build-out associated with the General Plan would be reduced with implementation of the federal, state, and local regulations, and 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above. Also, as previously concluded, development of small and large-scale wind turbines and geothermal energy systems would not result in significant direct impacts. The 2011 GPU PEIR concluded that that cumulative impacts related to hazardous materials would be less than significant, therefore, implementation of new large-scale wind turbines and geothermal facilities, and transmission lines associated with all large-scale renewable energy projects **would not result in a considerable contribution** such that a new significant cumulative impact would occur.

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 4.8-11 through 4.8-12 of the Padre Dam PEIR, less-than-significant direct and indirect impacts were identified for airport hazards. Therefore, the potential impacts related to airport hazards because of the Padre Dam AWP would be **less than significant**.

Cumulative Impacts

The Padre Dam PEIR evaluated the cumulative airport hazard impacts of the project on page 6-23. As described therein, the AWP project would result in less-than-significant impacts related to airport hazards and it **would not result in a considerable contribution** such that a new significant cumulative impact would occur.

Impact Summary

Compliance with existing federal, state, and local regulations related to airports and implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures (listed above) would ensure that project and cumulative impacts associated with potential hazards associated with an airport land use plan, within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip because of small-and large-scale wind turbines and geothermal renewable energy systems, and transmission lines associated with all renewable energy projects would be **less than significant** and **would not result in a considerable contribution** such that a new significant cumulative impact would occur. The County's participation in the AWP project would result in **less than significant** impacts related to airport hazards, and **would not result in a considerable contribution** such that a new significant cumulative impact would occur.

2.8.4.3 Issue 3: Emergency Response and Evacuation Plans

This section describes potential project and cumulative impacts related to emergency response and evacuation plans with implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Emergency Response Plans, the project would result in a significant impact if it would:

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Further, a significant impact could occur because of development that proposes large concentrations of people or special needs individuals, such as stadiums or hospitals, in an area with increased hazards, such as a dam inundation area, that could cause adverse effects related to the implementation of the Multi-Jurisdictional Hazard Mitigation Plan or a Dam Evacuation Plan. Failure to provide reasonable access for emergency equipment and evacuation of civilians could also result in the major loss of life, property, and natural resources and would be considered a significant impact.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to emergency response and evacuation plans with the adoption of the goals and policies contained within the plan and buildout of the land use map, and determined that buildout under the 2011 GPU would result in less-than-significant project and cumulative impacts in the unincorporated County.

The 2011 GPU PEIR determined that impacts would be less than significant because the County reviews development proposals for consistency with existing emergency response and evacuation plans, and because the County would implement 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above in Section 2.8.2, Regulatory Framework, which would further reduce the risk of impairment of emergency response and evacuation plans. Enforcement of existing regulations and implementation of 2011 GPU goals and policies, and 2011 GPU PEIR mitigation measures would reduce hazards related to emergency response and evacuation to below a level of significance. The discussion of impacts can be found in Chapter 2.7 Hazards and Hazardous Materials, pages 2.7-39 through 2.7-43 through 2.7-25; and 2.7-52 through 2.7-53 of the 2011 GPU PEIR, and is hereby incorporated by reference.

CAP Impact Analysis

Implementation of GHG Reduction Measure E-2.1 would result in the development of large-scale renewable energy projects which have the potential to result in significant impacts related to emergency response and evacuation plans. A significant impact could

occur because of development that constructs tall structures that could physically interfere with the implementation of an emergency response if the height of the structure or tower interferes with the ability of emergency air support services to carry out missions. Small-scale wind turbines would not result in obstructions to the implementation of emergency response and evacuation plans because of their limited height and are not further evaluated in this issue.

Large-Scale Wind Turbines and Geothermal Energy Systems

As described in detail in Chapter 2.1, ~~Aesthetics and Visual Resources~~, of this Draft SEIR, the development of large-scale renewable energy systems would result in large projects that occur over many acres, and include large and tall components, including tall wind turbines, or tall steam stacks, as well as new roads transmission lines, and fencing. While specific locations for these projects have not been selected, projects would primarily be in areas of the County that are suited to the type of energy that the infrastructure is intended to produce, and would generally be located away from population centers or areas with great evacuation need.

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 the facilitation of emergency response and evacuation plans to the extent feasible in compliance with CEQA Guidelines Section 15126.4. Additionally, all large-scale renewable energy projects would be required to undergo the County's discretionary review process to obtain a MUP. In the case of large-scale wind turbines, as described on page 2.6-40 of the 2012 Wind Energy EIR, tall structures (300- to 500-feet tall) could potentially affect the ability of emergency air support services to carry out missions associated with an emergency response and may also result in obstructions on roads that are used as emergency access or evacuation. Similarly, this Draft SEIR assumes that geothermal energy projects could also include tall stacks as part of the infrastructure that could result in similar emergency response impacts. However, in both cases, all utility-scale renewable energy systems would require a MUP, and the County would be required to review all proposals for consistency with existing emergency response and evacuation plans. If any significant impacts were identified, all feasible mitigation would be implemented. Additionally, projects would be required to comply with adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above, which would further reduce the potential for impacts. Therefore, impacts related to the implementation of emergency response and evacuation plans because of development of large-scale renewable energy projects would be **less than significant**.

Cumulative Impacts

Impacts would be cumulative in nature if in combination with effects of other projects, large-scale renewable energy projects would contribute to a regional impairment of emergency response or evacuation plans. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.8.4.1 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts related to emergency response and evacuation plans resulting from the build-out associated with the 2011 GPU would be reduced with implementation of the local discretionary process and 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above. Also, as previously concluded, development of large-scale renewable energy systems would not result in significant direct impacts. The 2011 GPU PEIR concluded that that cumulative impacts related to emergency response and evacuation plans would be less than significant, therefore, the project **would not result in a considerable contribution** such that a new significant cumulative impact related to emergency response and evacuation plans 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.

Because the variety of projects that may be approved and ultimately undertaken by the County under the Local Direct Investment Program is not known, it is too speculative to determine the types of impacts that could occur and whether regulations or mitigation measures would be available to minimize potential environmental impacts. However, all projects would be required to comply with applicable existing federal, state, and local regulations. Specifically, projects would be evaluated for their consistency with 2011 GPU policies, 2011 GPU PEIR mitigation measures, County Grading Ordinance regulations, County Resources Protection Ordinance regulations, etc. Future discretionary projects may also be required to undergo additional CEQA analysis to evaluate their project-specific impacts. If a determination is made that potentially significant impacts related to inconsistencies with emergency response or evacuation plans would result from implementation of direct investment projects, then all feasible mitigation would be required to be implemented in accordance with CEQA Guidelines Section 15126.4. Therefore, the impacts related to conflicts with emergency response or evacuation plans would be **less than significant**.

Cumulative Impacts

Impacts would be cumulative in nature if in combination with effects of other projects, large-scale renewable energy projects would contribute to a regional impairment of emergency response or evacuation plans. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.8.4.1 above applies for this cumulative discussion.

Implementation of GHG Reduction Measure T-4.1, would result in direct investment projects as described above. The 2011 GPU PEIR concluded that cumulative impacts related to emergency response and evacuation plans resulting from the build-out associated with the General Plan would be reduced to less than significant with implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above, and compliance with applicable state and federal regulations. Future discretionary projects would be required to be evaluated under CEQA and to reduce and minimize impacts to the maximum extent feasible, as well as comply with existing federal, state, and local regulations that would ensure that conflicts with emergency response and evacuation plans would not occur. Therefore, implementation of GHG Reduction Measure T-4.1 **would not have a considerable contribution** such that a new significant cumulative impact would occur.

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 the Padre Dam PEIR and that analysis is hereby incorporated by reference. As described on pages 4.8-12 through 4.8-13 of the Padre Dam PEIR, potentially significant direct and indirect impacts were identified for emergency response and evacuation plans. However, all impacts were reduced to a level below significance with implementation of mitigation measure TRA-1 and preparation of a Construction Traffic Control Plan as described in the Padre Dam PEIR. Therefore, the potential impacts related to emergency response and evacuation plans because of the Padre Dam AWP would be **less than significant**.

Cumulative Impacts

The Padre Dam PEIR evaluated the cumulative emergency response and evacuation impacts of the project on page 6-23. As described therein, the AWP project would result in potentially significant impacts related to emergency response and evacuation plans that would be mitigated with implementation of mitigation measures TRA-1, and it **would not have a considerable contribution** such that a new significant cumulative impact would occur.

Impact Summary

Compliance with existing local regulations related to implementation of emergency response and evacuation plans and implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures (listed above) would ensure that project and cumulative

impacts associated with potential hazards associated with the implementation of emergency response and evacuation plans because of large-scale renewable energy systems and direct investment projects would be **less than significant** and **would not result in a considerable contribution** such that a new significant cumulative impact would occur. The County's participation in the AWP project would result in **less than significant** impacts related to emergency response and evacuation plans, and **would not have a considerable contribution** such that a new significant cumulative impact would occur.

2.8.4.4 Issue 4: Wildland Fires

This section describes potential project and cumulative impacts related to wildland fires with implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Wildland Fire and Fire Protection, the project would result in a significant impact if it would:

- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to wildland fires with the adoption of the goals and policies contained within the 2011 GPU and buildout of the land use map, and determined that buildout under the 2011 GPU would result in significant and unavoidable project and cumulative impacts in the unincorporated County.

The 2011 GPU PEIR determined that impacts would be significant and unavoidable because the federal, state, and local regulations which require the evaluation of fire hazards in projects under the discretionary review process and implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above in Section 2.8.2 Regulatory Framework would not ensure that fire hazards are mitigated to a level below significance because of the extreme nature of fire conditions within the unincorporated County. The discussion of impacts can be found in Chapter 2.7 Hazards and Hazardous Materials, pages 2.7-45 through 2.7-48; and 2.7-53 of the GPU PEIR, and is hereby incorporated by reference.

CAP Impact Analysis

Implementation of GHG Reduction Measures E-1.1, E-2.1, E-2.2, E-2.3, and E-2.4 listed above, would result in the development of new small-scale wind turbines and large-scale renewable energy projects and has the potential to result in significant direct and indirect

impacts related to wildland fire that 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 large-scale wind turbines and is summarized below and hereby incorporated by reference (San Diego County 2012).

Small-Scale Renewable Energy Systems

As described on page 2.7-46 in the 2011 GPU PEIR, a majority of the unincorporated County is identified as having High or Very High fire hazard severity, and economic and environmental barriers exist that may prevent adequate response to wildland fire events. Further, projects would have a significant impact if they would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Implementation of the measures would result in new small-scale photovoltaic and small-scale wind turbines that could include ground-mounted infrastructure. As described on pages 2.6-41 through 2.6-42 of the 2012 Wind Energy EIR, installation of new renewable energy equipment could occur in developed areas of the County, which would be located near irrigated lands and/or fire service providers. In these cases, installation of such infrastructure would not be anticipated to expose people or structures to a significant risk of loss, injury, or death involving hazardous wildland fires.

It is also possible that new small-scale renewable energy systems could be in less urbanized settings, which could result in placement of the structures adjacent to wildland vegetation that may have the potential to support wildfire. Construction activities that may result in ignition sources would include vegetation clearing and piling, grading, site preparation, soil disturbances, concrete pouring and preparation, pole and turbine placement and construction and refueling. These construction activities may include presence of vehicles, heavy equipment, heat-generating equipment and activities, and sparks from various sources as well as use of fuels, and combustible materials during construction and infrastructure installation. Additionally, the projects would result in the generation and transmission of electric current which would be potentially susceptible to equipment failure. Maintenance activities, though infrequent would result in additional presence of humans and equipment.

Future discretionary wind and solar 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 wildfire to the extent feasible in compliance with CEQA Guidelines Section 15126.4. Additionally, federal, state, and local regulations exist to minimize or prevent wildfire, and implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above would aid in the efforts to prevent wildfire in the County in general by managing vegetation, preparing for the threat of wildfire based upon weather conditions, and staffing fire service providers appropriately. However, in accordance with the County's Zoning Ordinance, small-scale solar photovoltaic systems (under 500 square feet) and up to three small wind turbines are permitted without a discretionary permit if specific zoning criteria are met in accordance with the ordinance.

Therefore, impacts related to small-scale renewable energy systems would be **potentially significant** because there is no way to ensure that all impacts related to wildfire would be reduced to a level below significance because of the lack of discretionary oversight (**Impact HAZ-1**).

Cumulative Impacts

Impacts would be cumulative in nature if in combination with effects of other projects, they would contribute to a regional increase in risk for wildfire. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.8.4.1 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts related to wildfire resulting from the build-out associated with the General Plan would be significant and unavoidable, even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above. Additionally, even with implementation of the 2011 GPU policies, 2011 GPU PEIR mitigation, and the 2012 Wind Energy EIR mitigation measure M-HAZ-1 (detailed below in Section 2.8.5.4), small-scale wind turbines could result in significant wildfire impacts because there is no way to ensure that all impacts related to wildfire would be reduced to a level below significance because of the lack of discretionary oversight. Therefore, the project **could result in a considerable contribution** to a significant cumulative impact (**Impact HAZ-2**).

Large-Scale Renewable Energy Systems

Large-scale renewable energy infrastructure would generally be constructed in primarily undeveloped locations that are suited 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 due to 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; this could include areas with agricultural resources. Large-scale renewable solar systems can range in size from 2 to several thousand acres and the size of large-scale wind turbine farms can range from 30 acres to several hundred or thousand acres.

Future discretionary large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize potential impacts related to wildfire to the extent feasible in compliance with CEQA Guidelines Section 15126.4. 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 large-scale energy projects would be evaluated under CEQA and would be required to implement measures to minimize impacts related to wildfire.

However, as described on pages 2.6-42 through 2.6-43 of the 2012 Wind Energy EIR, large wind turbines can be a source of wildfire ignitions because of the electrical

components which may fail mechanically or electrically. Most wind turbines are equipped with lightning arrestors and automatic fire detection systems, however, this does not eliminate the risk for fire. The 2012 Wind Energy EIR Mitigation Measure M-HAZ-1 was adopted which requires new large-scale wind projects to adopt project-specific mitigation measures such as installing fire suppression systems, on-site water storage, delineating fire management zones, etc. Additional mitigation that would have prohibited the construction of wind turbines in high and very high fire hazard zones was determined infeasible because it would conflict with the County's goal to increase the development of renewable energy. In the case of large-scale solar systems, lithium ion batteries (though typically enclosed to reduce fire risk) pose a risk for overheating and potential ignition of nearby vegetation. Construction and decommissioning activities for large-scale renewable energy systems may also be a source of ignition because of increased activity and equipment onsite during grading, clearing, site preparation, and refueling activities.

Even though the risk of wildfire can be managed through the discretionary review process, and the application of federal, state, and local regulations, because large-scale renewable energy projects could be located near wildland areas, it may not be possible to ensure that project-specific mitigation measures would reduce impacts to a level below significance. Therefore, wildfire impacts related to large-scale renewable energy facilities would be **potentially significant (Impact HAZ-3)**.

Cumulative Impacts

Impacts would be cumulative in nature if in combination with effects of other projects, they would contribute to a regional increase in risk for wildfire. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.8.4.1 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts related to wildfire resulting from the build-out associated with the General Plan would be significant and unavoidable, even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above. Additionally, even with implementation of the 2011 GPU policies, 2011 GPU PEIR mitigation, and the 2012 Wind Energy EIR mitigation measure M-HAZ-1, GHG Reduction Measure E-2.1 would place mechanical and electrical components at the wildland interface. Therefore, the project **could result in a considerable contribution** to a significant cumulative impact **(Impact HAZ-4)**.

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 2.8.4.3 above, there are a variety of projects that could result from implementation of this measure.

Because the variety of projects that may be approved and ultimately undertaken by the County under the Local Direct Investment Program is not known, it is too speculative to determine the types of impacts that could occur and whether regulations or mitigation

measures would be available to minimize potential environmental impacts. However, none of the projects would inherently result in an increased risk for wildfire because the limited mechanical components that would be required. Further, all projects would be required to comply with applicable existing federal, state, and local regulations through the discretionary review process. Specifically, projects would be evaluated for their consistency with 2011 GPU policies, 2011 GPU PEIR mitigation measures, County Grading Ordinance regulations, County Resources Protection Ordinance regulations, etc. Future discretionary projects may also be required to undergo additional CEQA analysis to evaluate their project-specific impacts. If a determination is made that potentially significant impacts related to wildland fires would result from implementation of direct investment projects, then all feasible mitigation would be required to be implemented in accordance with CEQA Guidelines Section 15126.4. Therefore, the impacts related to wildland fires would be **less than significant**.

Cumulative Impacts

Impacts would be cumulative in nature if in combination with effects of other projects, if they would contribute to a regional increase in risk for wildfire. The methodology for determining the cumulative environment described in Chapter 1, Project Description, and summarized above in Section 2.8.4.1 above applies for this cumulative discussion.

Implementation of GHG Reduction Measure T-4.1, would result in direct investment projects as described above and in Chapter 2.7. The 2011 GPU PEIR concluded that cumulative impacts related to wildfire resulting from the build-out associated with the General Plan would be significant and unavoidable even with implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures listed above because the 2011 GPU would result in new development adjacent to wildland interface areas. Direct investment projects generally would not introduce habitable, mechanical, or industrial structures to wildland areas. In most cases, these projects would create or restore degraded natural areas. Additionally, future discretionary projects would be required to be evaluated under CEQA and to reduce and minimize impacts to the maximum extent feasible, as well as comply with existing federal, state, and local regulations that would ensure that the potential for wildland fires would be minimized or avoided. Therefore, implementation of GHG Reduction Measure T-4.1 **would not result in a considerable contribution** to a significant cumulative impact.

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 4.8-14 through 4.8-15 of the Padre Dam PEIR, potentially significant direct and indirect impacts were identified for wildland fires. However, all impacts were reduced to a level below significance with implementation of Mitigation Measure HAZ-3 as described in the Padre Dam PEIR. Therefore, the potential impacts related to wildland fires because of the Padre Dam AWP would be **less than significant**.

Cumulative Impacts

The Padre Dam PEIR evaluated the cumulative wildfire impacts of the project on page 6-23. As described therein, the AWP project would result in potentially significant impacts related to wildland fires that would be mitigated with implementation of Mitigation Measure HAZ-3, and it **would not result in a considerable contribution** to a significant cumulative impact.

Impact Summary

With implementation of the 2011 GPU policies, 2011 GPU PEIR mitigation measures (listed above), compliance with federal, state, and local regulations, and implementation of the 2012 Wind Energy EIR Mitigation Measure M-HAZ-1, impacts related to wildfire would be reduced, but not to a level below significance. Significant direct and cumulative impacts related to wildfire could result from measures that would result in small-and-large-scale renewable energy systems because of the introduction of mechanical and electric components, as well as construction activities to areas of the County that are susceptible to wildfire. Therefore, project impacts related to wildfire which would result from the development of small-and large-scale renewable energy systems would be **potentially significant** and this measure **would result in a considerable contribution** to a significant and unavoidable cumulative impact on wildfire. The County's participation in the AWP project would result in **less than significant impacts** related to wildfire, and **would not result in a considerable contribution** to a significant cumulative wildfire impact.

2.8.4.5 Issue 5: Vectors

This section describes potential project and cumulative impacts related to vectors with implementation of the project.

Guidelines for Determination of Significance

Based on the County of San Diego Guidelines for Determining Significance, Vectors, which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, the project would have a significant impact if it would substantially increase human exposure to vectors capable of spreading disease by:

- Proposing a vector breeding source including, but not limited to, sources of standing water for more than 72 hours (e.g., ponds, stormwater management facilities, constructed wetlands); or
- Proposing a vector breeding source including, but not limited to, composting or manure management facilities, confined animal facilities, or animal boarding/breeding/training operations.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to vectors with the adoption of the goals and policies contained within the plan and buildout of the land use map, and determined that buildout under the 2011 GPU would result in less-than-significant project and cumulative impacts in the unincorporated County.

The 2011 GPU PEIR determined that impacts would be less than significant because the County reviews development proposals for consistency with federal, state, and local regulations, and because the County would implement 2011 GPU policies listed above in Section 2.8.2, Regulatory Framework. Enforcement of existing regulations and implementation of 2011 GPU policies would reduce hazards related to vectors to below a level of significance. The discussion of impacts can be found in Chapter 2.7 Hazards and Hazardous Materials, pages 2.7-48 through 2.7-49 and 2.7-54 of the 2011 GPU PEIR, and is hereby incorporated by reference.

CAP Impact Analysis

Solid Waste Expansion and Local Direct Investment Program

Implementation of the GHG Reduction Measure SW-1.1 and T-4.1 listed above could result in new or expanded compost facilities and compost spreading over grazing lands, reforestation, and coastal wetland creation, as well as other direct investments which were not explicitly evaluated within the 2011 GPU PEIR which could result in significant impacts related to new vector breeding sources. If the new vector breeding source is located near a substantial human population, a potentially adverse environmental effect could occur.

New or expanded compost facilities would be required to meet the County's waste diversion goals. Facilities would undergo a discretionary review process which would require environmental evaluation of the site, and future operations. Significant impacts that are identified during the discretionary review process would be required to be mitigated. Federal, state, and local regulations implement programs that aid in the prevention of new vector breeding sources, as well as provide vector control as needed. Additionally, the County's Department of Environmental Health reviews project development plans for adequate vector control when projects have the potential to create new vector breeding sources. Therefore, the discretionary review process would alleviate the potential for the creation of new vector breeding sources associated with new or expanded solid waste facilities, compost spreading operations, reforestation, and wetlands creation and this impact would be **less than significant**.

Cumulative Impacts

Impacts would be cumulative in nature if in combination with effects of other projects, if they would contribute to a regional increase in vectors or vector breeding sources such that the public is affected. The methodology for determining the cumulative environment

described in Chapter 1, Project Description, and summarized above in Section 2.8.4.1 above applies for this cumulative discussion.

The 2011 GPU PEIR concluded that cumulative impacts related to vectors resulting from the build-out associated with the General Plan would be reduced with implementation of the federal, state, and local regulations. Also, as previously concluded, development of new or expanded solid waste facilities, compost spreading operations, reforestation, and wetlands creation would not result in significant direct impacts. The 2011 GPU PEIR concluded that that cumulative impacts related to vectors would be less than significant, therefore, the project **would not result in a considerable contribution** such that a new cumulative impact would occur.

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; however, evaluation of vector impacts was not included. The AWP project is an infrastructure improvement project that would not result in any facilities or activities that could be a source of vector hazards. The County believes the analysis provided in the Padre Dam PEIR is adequate for purposes of CEQA.

Impact Summary

Compliance with existing federal, state, and local regulations related to vector control and implementation of applicable 2011 GPU policies would ensure that project and cumulative impacts associated with vectors from the implementation of the CAP that would result in new or expanded compost facilities, compost spreading operations, reforestation, and wetlands creation would be **less than significant and would not result in a considerable contribution** such that a new significant cumulative impact would occur.

2.8.5 Mitigation

2.8.5.1 Issue 1: Transport, Use, Disposal, or Accidental Release of Hazardous Materials; Proximity to Schools; and Sites Containing Hazardous Materials

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

2.8.5.2 Issue 2: Public and Private Airports

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

2.8.5.3 Issue 3: Emergency Response and Evacuation Plans

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

2.8.5.4 Issue 4: Wildland Fires

The 2012 Wind Energy EIR included the following mitigation measures to minimize the potentially significant impacts related to large wind turbine projects:

Mitigation Measure M-HAZ-1: During the environmental review process for future discretionary permits for wind turbines, the County Guidelines for Determining Significance for Wildland Fire & Fire Protection shall be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: installation of fire suppression systems; sufficient on-site water storage; inclusion of fire management zones; and funded agreements with fire protection districts.

As described in Section 2.8.4.1, additional wind turbine mitigation was considered but rejected as infeasible through the Wind Energy EIR. Mitigation Measure M-HAZ-1 shall be incorporated into the Mitigation Monitoring and Reporting Program for the CAP and shall be applied to all large-scale renewable energy projects including but not limited to solar photovoltaic, solar concentrator, wind turbine, and utility-scale geothermal systems during the discretionary review process which would occur as a condition of receiving a MUP. As described above, future large-scale renewable energy 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 wildfire to the extent feasible in compliance with CEQA Guidelines Section 15126.4. However, because of the uncertainty of the types, locations, and scale of future renewable energy projects, it is not possible to guarantee that all impacts to wildfire would be reduced to a level below significance. Mitigation Measure M-HAZ-1 from the Wind Energy Ordinance EIR has been revised to include all large-scale renewable energy projects as follows:

CAP Mitigation Measure M-HAZ-1: During the environmental review process for future discretionary permits for all renewable energy projects, the County Guidelines for Determining Significance for Wildland Fire & Fire Protection shall be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: installation of fire suppression systems; sufficient on-site water storage; inclusion of fire management zones; and funded agreements with fire protection districts.

Additional mitigation was contemplated as part of this Draft SEIR that would implement a development cap upon large-scale renewable energy projects. This mitigation was rejected as infeasible because it may reduce the effectiveness of GHG Reduction

Measure E-2.1 and achievement of the County's 2030 GHG emissions reduction target. It is unknown how many and what 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 2.8.4.4 Wildland Fires, even with implementation of the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures that minimize wildland fire risk, and Mitigation Measure HAZ-1 from the 2012 Wind Energy EIR and as revised for this Draft SEIR, significant project and cumulative impacts could occur from implementation of GHG reduction measures that would result in small-and large-scale renewable energy systems because of the introduction of electrical and mechanical components and construction activities to areas that are susceptible to wildfire. Individual small-scale renewable energy systems are permitted without a discretionary permit, so wildfire risk associated with these systems remains significant and unavoidable.

No other feasible project-related mitigation beyond existing federal, state, and local permitting requirements, compliance with the County's adopted 2011 GPU policies or mitigation measures, and compliance with the CAP mitigation measure above is available and could be applied to the individual renewable energy projects. Therefore, **significant and unavoidable project cumulative impacts** related to wildfire would remain under CAP.

2.8.5.5 Issue 5: Vectors

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

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