

APPENDIX W

New/Updated General Plan Elements Consistency Evaluation

NEW/UPDATED GENERAL PLAN ELEMENTS CONSISTENCY EVALUATION

To: San Diego County Planning & Development Services
From: Dudek
Subject: New/Updated General Plan Elements Consistency Evaluation
Date: July 23, 2021

This Errata to the Final Environmental Impact Report (EIR) for the JVR Energy Park Project (“Project”) has been prepared to evaluate the Project’s consistency with the updated Housing and Safety Elements of the San Diego County General Plan (General Plan) as well as the new Environmental Justice Element of the General Plan. Dudek understands the updated Housing and Safety Elements and new Environmental Justice Element of the General Plan were adopted by the San Diego County Board of Supervisors (Board of Supervisors) on July 14, 2021.

The Project application was deemed complete prior to the Board of Supervisors’ adoption of the Environmental Justice, Housing, and Safety Elements described above, and these General Plan changes do not apply to the Project.

On July 9, 2021, the San Diego County Planning Commission recommended the 604-acre reduced footprint of the Project (referred to as the “Community Buffer Project”) for approval to the Board of Supervisors. The Project is expected to be go before the Board of Supervisors for approval in August 2021. This consistency memorandum has been prepared as information as part of the Project record to demonstrate that the even if they applied, the Project is consistent with these recent General Plan changes or the EIR provides sufficient information to address the changes.

1 Updated Housing Element

As discussed in the Board of Supervisors Land Use Agenda Item letter¹:

The Housing Element is a mandatory element of the General Plan that must be updated every eight years. The Housing Element includes policies and programs to increase housing opportunities for populations at all income segments and life stages. State Housing Law mandates that the Regional Housing Needs Assessment (RHNA) be incorporated as an integral component of the Housing Element periodic update. RHNA quantifies a jurisdiction’s capacity to meet existing and future housing needs. The County is required to demonstrate to the State that it has the capacity to accommodate its share of the RHNA for all income categories. The unincorporated area’s RHNA allocation for the 2021 - 2029 planning period is 6,700 new dwelling units spread across very-low, low, moderate, and above-moderate income categories.

¹ See Board Letter at <https://www.sandiegocounty.gov/content/sdc/cob/bosa/bos-calendar-meetings.html?date=07/14/2021&meetingtype=BOARD%20OF%20SUPERVISORS>

1.1 Regional Housing Needs Assessment

As required by the State Housing law, the County is required to identify sites with appropriate zoning and development standards and with services and facilities to accommodate the County’s RHNA for each income level. The County’s updated Housing Element includes maps and tables of the identified RHNA sites (see Appendix 6-G and 6-H of the updated Housing Element).²

A review of the RHNA sites was conducted to determine if the Project site is identified as a site that could support RHNA goals. The Project site is not located within an identified RHNA site; therefore, the Project is consistent with the RHNA aspect of the updated Housing Element.

1.2 New Goals and Policies

Dudek also conducted a review of new goals and policies contained within the updated Housing Element to evaluate the Project’s consistency². A list of new policies is included below; none are applicable to the Project. There were no new goals.

Project Consistency with New Housing Element Policies

New Policy	Project Consistency with New Policy
H-1.10 Amenities in Large-Scale Developments. Establish development standards and design guidelines for large developments to encourage amenities, such as tot lots, community facilities and the use of universal design features that accommodate both able-bodied and disabled individuals.	Not applicable. The Project would develop a solar facility that would generate and store solar energy. The Project does not include a residential component or require residential amenities.
H-3.9 Water and Sewer Priority. Pursuant to state law, work with water and sewer service providers to prioritize the provision of water and sewer services to affordable housing developments in the event that a rationing system is in place.	Not applicable. The Project would develop a solar facility that would generate and store solar energy. The Project does not include a residential component/affordable housing development.
H-6.7 Affirmatively Furthering Fair Housing. Ensure that the implementation of housing programs and delivery of housing services are conducted in a manner that promotes equal access to housing and opportunities.	Not applicable. The Project would develop a solar facility that would generate and store solar energy. The Project does not include a residential component.

2 Updated Safety Element

As discussed in the Board of Supervisors Land Use Agenda Item letter:

The draft Safety Element includes new evacuation route data, analysis, and policies in response to the following state laws:

² See Attachment F at <https://www.sandiegocounty.gov/content/sdc/cob/bosa/bos-calendar-meetings.html?date=07/14/2021&meetingtype=BOARD%20OF%20SUPERVISORS>

- *Senate Bill 99 (2019): Requires that the Safety Element be updated concurrently with the Housing Element to include the identification of residential developments with limited emergency access; and*
- *Assembly Bill 747 (2019): Requires identifying evacuation routes and their capacity, safety, and viability under a range of emergency scenarios.*

The draft Safety Element also includes a new draft Vulnerability Assessment and Adaptation Report (Vulnerability Assessment) and climate change adaptation goals and policies in response to the following state law:

- *Senate Bill 379. Requires the County to address climate adaptation and resiliency strategies applicable to the unincorporated areas of the county. This bill also requires the Safety Element to include a set of goals, policies, and objectives based on a vulnerability assessment, identifying the risks that climate change poses and the geographic areas at risk from climate change impacts.*

The draft Safety Element includes six maps that graphically depict the hazards in the General Plan and various other planning documents. The hazard maps highlight areas of the unincorporated county affected by or vulnerable to a particular hazard. Community members and the County team utilize this information to implement policies found in other General Plan elements. An example of this is Policy S-9.7 that references areas at risk of flooding due to dam failure and prevents development that would interfere with emergency response and evacuation in these areas. Hazard maps include fire hazard severity zones; landslide susceptibility; floodplains; dam inundation areas; seismic hazards; and expansive clays, which are areas at risk of physical structure or infrastructure damage due to underlying clays shrinking and expanding with water absorption or extraction. The draft Safety Element updates the first four of these maps with newly available data and retains the other two as they currently exist.

2.1 Evacuation Routes/Updated Hazard Maps

Evacuation Routes

A review of Exhibit S-3 (Potential Evacuation Routes) in the updated Safety Element was conducted.³ The exhibit identifies major roads and State highways that serve as evacuation routes. As shown on the exhibit, in the vicinity of the Project site, Interstate 8 and Old Highway 80 are identified as evacuation routes.

As discussed in the EIR, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The Project would meet the emergency response objectives identified in the County General Plan and would not impair an adopted emergency evacuation plan in the Jacumba area. For the reasons stated above, impacts to an adopted emergency response plan or evacuation plan would be less than significant. Additionally, as discussed in the EIR, anticipated impacts to wildfire risk during Project operations (Impact WF-1)

³ See Attachment F at <https://www.sandiegocounty.gov/content/sdc/cob/bosa/bos-calendar-meetings.html?date=07/14/2021&meetingtype=BOARD%20OF%20SUPERVISORS>

would be potentially significant. With the implementation of M-WF-1 (Fire Protection Plan) and M-WF-3 (Fire Protection and Mitigation Agreement), potential impacts to operational wildfire risk would be less than significant.

Updated Hazard Maps

Dudek conducted a review of the following updated hazard maps: fire hazard severity zones; landslide susceptibility; floodplains; and dam inundation areas. (See footnote 3 above for the relevant maps.) The hazard data included within the Project’s draft Final Environmental Impact Report (EIR) used to assess potential environmental impacts of the Project is the same data included in the updated Safety Element figures with the exception of landslide susceptibility. The table below lists the corresponding maps.

Updated Safety Element Maps Comparison

Updated Safety Element Figure	Corresponding EIR Figure/Section	Notes
Figure S-1. Fire Hazard Severity Zones	Figure 2.12-2. Fire Hazard Severity Zones in Proposed Project Area	The updated Safety Element and EIR are consistent. The Project site is located within moderate, high, and very high fire hazard severity zones.
Figure S-3. Landslide Susceptibility	Section 2.5 (Geology, Soils, and Seismicity), page 2.5-18	The updated Safety Element and EIR are not consistent. <i>Updated Safety Element:</i> The Project site is located within and/or adjacent to areas with moderate landslide susceptibility. <i>EIR:</i> The Project site is not within a landslide susceptibility area as identified in the County’s Geologic Hazards Guidelines (County of San Diego 2007a).
Figure S-5. Floodplains	Section 2.7 (Hydrology and Water Quality), page 2.7-22	The updated Safety Element and EIR are consistent. The Flood hazard analysis has not been conducted by FEMA for the Project site and thus, a federally established flood risk has not been determined.
Figure S-6. Dam Inundation Areas	Section 2.7 (Hydrology and Water Quality), page 2.7-22	The updated Safety Element and EIR are consistent. The Project site is not downstream of a dam and thus would not be subject to inundation in the event of a dam failure.

Landslide Susceptibility. Although the updated Safety Element includes data that shows the Project may be within and/or adjacent to areas that have moderate landslide susceptibility, landslides have not been mapped on or adjacent to the site and evidence of landsliding was not observed during review of aerial photographs or during site reconnaissance. Rockfall hazards are possible in the more steeply sloping portions of the Project site, such as at Round Mountain. However, the proposed development would generally be limited to the relatively flat, low-lying areas of Jacumba Valley. In addition, the Project involves site grading for installation of the solar facility that would result in the creation of areas of cut and areas underlain by fill. To ensure that any proposed structures (including those proposed on the Project site) are adequately supported (whether on native soils, cut, or fill), a Soils Investigation Report would be required as part of the building permit process. Additionally, during trenching and excavation, the Project would be required to comply with OSHA standards to protect slopes and prevent cave-ins and other hazards related to soil stability.

2.2 New Goals and Policies

As discussed in the Board of Supervisors Land Use Agenda Item letter:

The draft Safety Element includes 28 new policies and updates to 18 policies. Most of the new policies provide additional direction on topics already existing in the Safety Element, such as public safety, emergency response, and wildfires. The new policies identify new threats related to these topics or incorporate new techniques to mitigate hazards posed by these threats. There are also new policies related to climate change, based upon a new vulnerability assessment and adaptations analysis, which is discussed further below. The 18 existing policies were updated to modernize the language, concepts, and references.

Dudek conducted a review of new policies contained within the updated Safety Element to evaluate the Project’s consistency. (See footnote 3 above.) A list of new policies and the Project’s consistency with them is included below.

Project Consistency with New Safety Element Policies

New Policy	Project Consistency with New Policy
S-1.6 High Hazard Risk Relocation. Explore a program that identifies properties prone to high hazard risk that could be relocated through a buyout program or transfer of development rights. Use of this program could accompany the expiration of Tentative Tract Maps and Specific Plans located in high hazard risk areas.	Not applicable. The Project would develop a solar facility that would generate and store solar energy. The Project includes implementation of a Fire Protection Plan and Fire Protection and Mitigation Agreement.
S-1.7 Community Plan Updates. Ensure community plan updates consider the following guidance...	Not applicable. This measure is related to community plan updates.
S-1.8 County Updates. Update County Ordinances, Standards, and Design Guidelines to integrate the best practices and regulations that reduce hazard vulnerability and improve resilience throughout the county.	Not applicable. This measure is related to ordinance, standards, and design guidelines updates.
S-1.9 Adequate Services Provision. Plan existing and future development to meet current and future anticipated demands for infrastructure (e.g., water, sewer, roads), privately provided services (e.g., telecommunications, gas, electricity), and County provided services (e.g., police, fire).	Consistent. The Project was evaluated for impacts related to public services and utilities and service systems. Impacts were determined to be less than significant.
S-2.1 Future Fire Protection Plans. Future Fire Protection Plans shall evaluate evacuations in accordance with the evacuation standards adopted by the San Diego County Fire Protection District.	Consistent. The Project’s Fire Protection Plan includes information on evacuation procedures and routes.
S-2.2 Evacuation Impediments. Advise, and where appropriate, require all new developments to help eliminate impediments to evacuation within existing community plan areas, where limited ingress/egress conditions could impede evacuation events.	Consistent. The Project’s Fire Protection Plan includes information on evacuation procedures and routes.
S-2.3 Community Plan Evacuation. Identify community plan areas that have reduced or limited circulation access and develop an evacuation plan, and recommended improvements to ensure adequate evacuation capabilities.	Not applicable. This measure is related to community plan updates.

Project Consistency with New Safety Element Policies

New Policy	Project Consistency with New Policy
Community Evacuation Plans should be developed, evaluated, and revised periodically in concert with future updates to the County's EOP Annex Q.	
S-2.4 Prioritize CIP Roadways: Future CIP projects should prioritize development of roadways that serve as evacuation routes or require roadway improvements to existing roads to better function during an evacuation.	Not applicable. This measure is related to County CIP Projects.
S-2.5 Existing Development within Hazard Zones. Implement warning systems and evacuation plans for developed areas located within known hazard areas (i.e., flood, wildfire, earthquake, other hazards).	Consistent. The Project's Fire Protection Plan includes information on evacuation procedures and routes.
S-2.6 Effective Emergency Evacuation Programs. Develop, implement, and maintain an effective evacuation program for areas of risk in the event of a natural or human-caused disaster.	Consistent. The Project's Fire Protection Plan includes information on evacuation procedures and routes.
S-2.7 Evacuation Access. All development proposals are required to identify evacuation routes at the Community Plan level and identify and facilitate the establishment of new routes needed to ensure effective evacuation. Evacuation routes should be incorporated into existing Community Wildfire Protection Plans where available.	Consistent. The Project's Fire Protection Plan includes information on evacuation procedures and routes.
S-3.1 Emergency Management System Training. Conduct annual training sessions using adopted emergency management systems. Coordinate with relevant jurisdictions to execute a variety of exercises to test operational and emergency plans.	Not applicable. This measure is a County action.
S-3.2 Participation in Mutual Aid Systems. Maintain participation in local, regional, state, and national mutual aid systems to ensure that appropriate resources are available for response and recovery during and following a disaster.	Not applicable. This measure is a County action.
S-3.3 Updated Data and Information. Periodically update County datasets to include newer, more relevant information and mapping to support effective emergency response and hazard mitigation. Provide updated information to emergency responders to help ensure easier and faster response times.	Not applicable. This measure is a County action.
S-3.4 Coordination with Public Utilities. Public Safety Power Shutoff (PSPS) coordination between the County and SDGE should occur in order to limit the impacts on residents and businesses. SDGE and the County should continue to collaborate while monitoring weather conditions to ensure pertinent information is shared.	Not applicable. This measure is a County action.
S-4.8 Fire Threat Reduction. Reduce human-caused fires with a high visibility prevention program in all publicly accessible wildfire prone areas	Consistent. The Project includes implementation of a Fire Protection Plan and Fire Protection and Mitigation Agreement.
S-6.4 Regional Evacuation Coordination. Coordinate with State and Federal landowners regarding joint use and access	Not applicable. This measure is a County action.

Project Consistency with New Safety Element Policies

New Policy	Project Consistency with New Policy
agreements for roadways located on state and federal lands that can be used for evacuation purposes.	
S-8.6 Evacuation Prioritization. Identify roadways within the CIP that require seismic evaluation and retrofit that also function as evacuation routes to ensure these route improvements are prioritized.	Not applicable. This measure is a County action.
S-9.3 Evacuation Route Risk. Identify and propose mitigation actions for evacuation routes located in close proximity to active or potential landslide zones.	Not applicable. This measure is a County action.
S-10.1 Floodplain Data. Maintain and expand floodplain data and information throughout the County, to better understand current and future floodplain conditions and changes associated with development activities and mitigation projects.	Not applicable. This measure is a County action.
S-10.8 Evacuation Route Development. Identify secondary evacuation routes in community plan areas that are susceptible to flood-related impacts to ensure adequate evacuation access is available.	Not applicable. This measure is a County action.
S-12.1 Vulnerability Assessment and Adaptation Report. Implement the County’s Vulnerability Assessment and Adaptation Report and periodically update to ensure that implementation progress is monitored, and policies remain timely and effective.	Not applicable. This measure is a County action.
S-12.2 Community Plan Vulnerabilities. Integrate policies and recommendations from the Vulnerability Assessment and Adaptation Report into future community plan updates within the County.	Not applicable. This measure is a County action and applicable to community plan updates.
S-12.3 Changing Conditions. Ensure future planning and development projects integrate climate change projections into design solutions and engineering requirements.	Consistent. The Project, among other things, will elevate electrical components one foot above base flood elevations. County Department of Public Works will verify that all components located within the 100-year floodplain comply with the County Flood Damage Prevention Ordinance, County Hydrology Manual, and County Hydraulic Design. Further, the Project itself would develop a solar facility that would generate and store solar energy, thereby increasing the resilience of energy resources in the region and addressing the root causes of climate change.
S-12.4 Increased Resilience. Promote design solutions and best practices that ensure future developments and infrastructure can adapt to climate change effects.	Consistent. The Project , among other things, will elevate electrical components one foot above base flood elevations. County Department of Public Works will verify that all components located within the 100-year floodplain comply with the County Flood Damage Prevention Ordinance, County

Project Consistency with New Safety Element Policies

New Policy	Project Consistency with New Policy
	Hydrology Manual, and County Hydraulic Design. Further, the Project itself would develop a solar facility that would generate and store solar energy, thereby increasing the resilience of energy resources in the region and addressing the root causes of climate change.
S-12.5 Resilient Communities. Increase community resilience to climate change and protect vulnerable populations.	Consistent. The Project would develop a solar facility that would generate and store solar energy, thereby increasing the resilience of energy resources in the region.
S-12.6 Resilient Transportation Systems. Increase the resilience of transportation systems and protect critical transportation infrastructure from climate change.	Not applicable. The Project includes a temporary increase in trips during construction that would cease once construction is complete. Maintenance and operation of the Project would generate or attract fewer than 110 trips per day which would meet the County’s screening threshold for small projects that may be assumed to cause a less-than-significant impact for transportation.
S-12.7 Resilient Energy Resources. Increase the resilience of energy resources and protect critical energy infrastructure and systems from the increased risks associated with climate change.	Consistent. The Project would develop a solar facility that would generate and store solar energy, thereby increasing the resilience of energy resources in the region.
S-12.8 Resilient Water Resources. Protect water resources vulnerable to climate change and ensure a safe and reliable supply of water.	Consistent. The Project was evaluated for impacts related to hydrology and water quality. Impacts were determined to be less than significant with mitigation.
S-12.9 Resilient Natural Systems. Protect biodiversity and habitat vulnerable to climate change.	Consistent. The Project was evaluated for impacts to biological resources. Impacts were determined to be less than significant with mitigation. The Project will permanently conserve 435 acres of habitat.
S-12.10 Emergency Services. Ensure that emergency services have adequate capacity to address increased need due to climate change-related impacts.	Consistent. The Project was evaluated for impacts related to public services and utilities and service systems. Impacts were determined to be less than significant.
S-17.1 ALUCP Updates. Periodically review and coordinate with the San Diego Airport Land Use Commission on updates and modifications to ALUCPs conducted for airport facilities within San Diego County.	Not applicable. This measure is a County action.

3 New Environmental Justice Element

As discussed in the Board of Supervisors Land Use Agenda Item letter:

Pursuant to Senate Bill 1000 (Land use: general plans: safety and environmental justice), after January 1, 2018, all jurisdictions with State-identified “disadvantaged communities” are to incorporate environmental justice goals and policies into their General Plans upon revising two or more elements. The State uses the term “disadvantaged communities” to refer to communities disproportionately impacted by economic, health and environmental issues. The County will refer to these areas as Environmental Justice (EJ) Communities. EJ goals and policies will be incorporated into the General Plan by establishing a stand-alone EJ Element. The draft EJ Element contains goals and policies to reduce pollution in overburdened and underserved communities to ensure all people have the ability to live, work, and play in a safe and healthy environment.

3.1 Identified Environmental Justice Communities in San Diego County

The County’s Environmental Justice (EJ) Element identifies four (4) distinct EJ Communities: North El Cajon, North Lemon Grove, Spring Valley, and Sweetwater.⁴ The Project site is not located within an identified EJ Community.

Dudek conducted a review of new policies contained within the new EJ Element to evaluate the Project’s consistency. A list of the policies and the Project’s consistency with them is included below. Note that only the policies that are applicable County-wide are addressed in the consistency table below.

Project Consistency with New EJ Element Policies

New Policy	Project Consistency with New Policy
EJ-1.3 Explore Collaborative Partnerships (all unincorporated areas). Continue to identify current and potential partners and programs to implement EJ-related activities across the county and in countywide plans and initiatives	Not applicable. This measure is a County action.
EJ-2.5 Conflicting Land Use Buffers (all unincorporated areas). Consistent with the Land Use Element, avoid land use conflicts by ensuring sensitive land uses are adequately buffered from heavy industrial uses and other facilities that may pose a threat to human health. See Land Use Element.	Consistent. The Project was evaluated for impacts related to air quality and greenhouse gas emissions. Air quality impacts were determined to be less than significant with mitigation (mitigation entails minimizing diesel particulate matter emissions during construction and preparing and implementing a Fugitive Dust Control Plan during construction). Greenhouse gas emissions impacts were determined to be less than significant. Further, the Project is not considered to be a heavy industrial use.

⁴ See Attachment H at <https://www.sandiegocounty.gov/content/sdc/cob/bosa/bos-calendar-meetings.html?date=07/14/2021&meetingtype=BOARD%20OF%20SUPERVISORS>

Project Consistency with New EJ Element Policies

New Policy	Project Consistency with New Policy
<p>EJ-2.6 Pollution Reduction Incentives (all unincorporated areas). Encourage existing stationary sources of emissions to use feasible measures to minimize emissions that could have potential impacts on air quality. Incentivize non-conforming uses to relocate to appropriate industrial zones if currently impacting sensitive land uses.</p>	<p>Consistent. The Project was evaluated for impacts related to air quality and greenhouse gas emissions. Air quality impacts were determined to be less than significant with mitigation (mitigation entails minimizing diesel particulate matter emissions during construction and preparing and implementing a Fugitive Dust Control Plan during construction. Greenhouse gas emissions impacts were determined to be less than significant. Further, renewable solar energy produced by the Project will facilitate reduced reliance on fossil fuel-based energy generation.</p>
<p>EJ-2.7 New Sensitive Land Uses (all unincorporated areas). Consistent with the Land Use Element, avoid locating new homes, schools, childcare and eldercare facilities, parks and recreation, and health care facilities within 500 feet of freeways, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy, which does not include homes, schools, childcare and eldercare facilities, parks and recreation, or health care facilities.</p>
<p>EJ-2.8 Existing Sensitive Land Uses (all unincorporated areas). Consistent with the Land Use Element, promote policies, programs, and incentives (such as buffers, monitoring requirements, permit inspection, etc.) to minimize health, noise, and environmental impacts on existing homes, schools, childcare, and eldercare facilities, parks, and recreation, and healthcare facilities located within 500 feet of freeways, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.</p>	<p>Consistent. The Project was evaluated for impacts related to existing homes, public services and parks and recreation. Impacts were determined to be less than significant.</p>
<p>EJ-3.2 Smoke-Free Environments (all unincorporated areas). Reduce current gaps in protections for smoke-free public spaces, including entryways, sidewalks, special events, worksites, and services areas. Monitor and reduce air quality and environmental impacts of secondhand and thirdhand smoke to protect County residents from negative health impacts.</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would be privately owned and operated, and not open to the public.</p>
<p>EJ-3.3 Air Quality Compliance (all unincorporated areas). Review and update County regulations and/or requirements, based on improved technology, and new rules and regulations. Identify trends and patterns of non-compliance and make this information available to EJ communities if not already available.</p>	<p>Not applicable. This measure is a County action.</p>
<p>EJ-3.4 Industrial Business Operations and Practices (all unincorporated areas). Collaborate with the industrial business community to improve outdoor air quality through enhanced operations and other pollution reduction practices, including permit inspection incentives and collaboration to obtain grants, where possible.</p>	<p>Not applicable. This measure is a County action.</p>

Project Consistency with New EJ Element Policies

New Policy	Project Consistency with New Policy
<p>EJ-3.5 Design Review Considerations (all unincorporated areas). Explore the feasibility to include in the design review process, the use of measures to reduce indoor air quality impacts (i.e., air filtration systems sufficient to mitigate the effects of wildfire smoke, kitchen range top exhaust fans, and low-VOC paint and carpet for new developments).</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy and does not entail any residential development.</p>
<p>EJ-3.6 Community Engagement for Monitoring (all unincorporated areas). Support and promote ongoing community engagement for participating in air quality monitoring programs and incentives.</p>	<p>Not applicable. This measure is a County action.</p>
<p>EJ-3.7 Carbon Sequestration Efforts (all unincorporated areas). Consistent with the Land Use Element and Climate Action Plan, support and promote carbon sequestration and carbon farming efforts for agricultural lands in unincorporated areas to mitigate air, water, and soil pollution exposure and help build climate resilience. See Land Use Element Policy LU-6.1 and Climate Action Plan Strategy A-6.</p>	<p>Consistent. The Project would develop a solar facility that would generate and store solar energy, which will offset greenhouse gas emissions. The site can be returned to agricultural use after the Project is decommissioned to support and promote carbon sequestration and carbon farming efforts.</p>
<p>EJ-5.6 Opportunity Sites Engagement (all unincorporated areas). Engage community residents in the siting of potential future development of land for public facilities.</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy and is not a public facility.</p>
<p>EJ-5.7 Accessible Routes (all unincorporated areas). Work with local transit and flexible transit providers (e.g., CalTrans and microtransit options) to establish and maintain routes and service frequency that provide residents with access to schools, parks, healthcare facilities, shopping centers, employment, and other public facilities across the County.</p>	<p>Not applicable. This measure is a County action.</p>
<p>EJ-5.8 New Development and Aging Infrastructure (all unincorporated areas). Consider the impacts of new developments on aging infrastructure and require infrastructure rehabilitation and improvements as a condition of approval, where feasible.</p>	<p>Consistent. The Project was evaluated for impacts related to public services and utilities and service systems. Impacts were determined to be less than significant.</p>
<p>EJ-5.9 Weatherization for Public Buildings (all unincorporated areas). Examine public buildings and facilities in unincorporated areas, including EJ Communities, to eliminate current gaps in weatherization efforts to ensure the safety and resiliency of these facilities for a variety of climate scenarios including extreme heat, flooding, and wildfire smoke.</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy and is not a public facility.</p>
<p>EJ-5.10 Reduce Crime and Community Violence (all unincorporated areas). Address safety concerns by reviewing and summarizing research on policies and programs known to improve safety, reduce crime, and community violence without relying on policing. Convene a diverse group of stakeholders, including residents, across the fields of criminology, social and behavioral sciences, public health, epidemiology, law, and public policy to meet and produce an accessible synthesis of research evidence and recommendations for local EJ Communities. See Safety Element Policies S-16.2 and S-16.3.</p>	<p>Not applicable. This measure is a County action.</p>

Project Consistency with New EJ Element Policies

New Policy	Project Consistency with New Policy
<p>EJ-6.5 Low-Income Homeowners (all unincorporated areas). Provide assistance and program referrals for low-income homeowners to maintain and improve residential properties through rehabilitation and energy efficiency and weatherization assistance programs. See Housing Element Policies H-3.7, H-3.8, and H-6.6.</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would not include residential uses.</p>
<p>EJ-6.6 Rehabilitation Assistance and Code Compliance (all unincorporated areas). Focus efforts for rehabilitation assistance and code compliance in communities with a high concentration of older and substandard residential structures.</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would not include residential uses.</p>
<p>EJ-6.7 Property Maintenance and Neighborhood Quality (all unincorporated areas). Promote policies and programs to increase awareness among property owners and residents about property maintenance, upkeep, weatherization, neighborhood quality, and the link between maintenance and neighborhood safety.</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would not include residential uses.</p>
<p>EJ-6.8 Crime Reduction Improvements including Street Lighting (all unincorporated areas). Support increase of proven best practices in urban planning for crime reduction such as street lighting improvements, Element Policies S-14.1, S-15.1, S-16.2, S-16.3.</p>	<p>Consistent. The Project will be designed and constructed in accordance with all County lighting requirements.</p>
<p>EJ-7.3 Renter and Owner Resources (all unincorporated areas). Promote affordable options, accessible resources, and supportive services for tenants and homeowners, including connections to landlord-tenant mediation services.</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would not include residential uses.</p>
<p>EJ-7.4 Developer and Community Outreach (all unincorporated areas). Support and promote guidelines and best practices for affordable housing developers to conduct meaningful engagement to identify community needs, develop partnerships, and gather support for affordable housing projects through public outreach.</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would not include residential uses.</p>
<p>EJ-8.1 Transportation System Linkages (all unincorporated areas). Ensure transportation systems serve local neighborhoods by linking residents to healthy food sources, such as grocery stores and farmers’ markets. Provide supportive services to residents such as subsidized transit passes.</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would not include residential uses.</p>
<p>EJ-8.2 Multimodal Access to Food (all unincorporated areas). Expand multimodal access to fresh food by encouraging grocery stores, healthy corner stores, and outdoor markets at transit centers and reducing transportation barriers to accessing existing healthy food assets (e.g., provide transportation support to grocery stores).</p>	<p>Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would not include commercial uses.</p>
<p>EJ-8.3 Local Agriculture and Food Production (all unincorporated areas). Support and incentivize local agriculture and food production by reducing permitting barriers to sustainable growing practices in EJ Communities</p>	<p>Not applicable. There are no permitting barriers for local agriculture and food production associated with the site, which can</p>

Project Consistency with New EJ Element Policies

New Policy	Project Consistency with New Policy
and unincorporated areas. Explore feasibility of allocating suitable vacant or underutilized public and privately-owned land for edible landscaping and community gardens. Where appropriate, work with the local Water Authority to determine incentives for food production.	be returned to agricultural use after the Project is decommissioned.
EJ-8.4 Food Waste Reduction (all unincorporated areas). Support and expand policies and programs to help reduce and mitigate the economic and environmental impacts of food waste. Amend the existing Organics Ordinance to allow food to be taken from large food waste producers and private residences for composting to be used in food production.	Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would not include residential uses.
EJ-9.4 New Development and Redevelopment Incentives (all unincorporated areas). Promote incentives for new development and redevelopment projects to include a healthy food supply, such as a community garden or food forest, or be located within a half-mile of a healthy food supply, where applicable and appropriate.	Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would not include residential uses.
EJ-9.5 Development of Food Access Programs Through Civic Engagement (all unincorporated areas). Continue civic engagement to explore the development of additional programs that promote food access and security across the and collaborate with existing partners in the community to leverage resources and work that is already being done in the county.	Not applicable. This measure is a County action.
EJ-9.6 County Emergency Food Response and Distribution (all unincorporated areas). Design emergency response services to prioritize access to healthy foods through partnerships with food banks, pantries, and other mutual aid networks.	Not applicable. This measure is a County action.
EJ-10.3 Healthy Food Supplies (all unincorporated areas). Continue to support the Live Well San Diego Food System Initiative and incorporate healthy food options into County-purchased and contracted food procurement. Promote healthy and locally grown food options at County-owned facilities, agency offices, parks and recreation centers, and sponsored events where food is made available to County residents.	Not applicable. This measure is a County action.
EJ-10.4 School Initiatives (all unincorporated areas). Work with school districts to develop school-based programs that integrate educational components about locally grown fresh produce and nutrition.	Not applicable. This measure is a County action.
EJ-10.5 Health and Nutrition Education and Awareness (all unincorporated areas). Support and expand countywide efforts to offer focused educational awareness campaigns to promote healthy eating habits and food choices and Countywide opportunities to increase access to health and nutrition resources.	Not applicable. This measure is a County action.
EJ-10.6 Development of Health and Nutrition Programs Through Civic Engagement (all unincorporated areas). Continue civic engagement to develop additional programs	Not applicable. This measure is a County action.

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that promote health and nutrition resources and support community organizations already engaged in these efforts.	
EJ-11.4 Youth-Based Programs and Resources (all unincorporated areas). Work with school districts, afterschool programs, and youth organizations to promote educational resources and affordable, low or no-cost programs that encourage children and teens to increase physical activity.	Not applicable. This measure is a County action.
EJ-11.5 Community Engagement (all unincorporated areas). Partner with community-based organizations to seek community involvement and feedback to create appropriate and relevant programming and to support improvements to natural and built environment placemaking to promote physical activity and recreation.	Not applicable. This measure is a County action.
EJ-12.5 Mixed-Use Development (all unincorporated areas). Consistent with the Land Use Element, develop Programs to incentivize mixed-use development and an appropriate balance of land uses, such as schools, parks, job centers, retail, and grocery, so that essential goods and services are within walking and biking distance of residential areas. See Land Use Element Policies LU-5.1 and 11.3.	Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would not include residential or commercial uses.
EJ-12.6 Community Engagement (all unincorporated areas). Partner with CBOs and with residents to support improvements to natural and built environments to promote land use design that increases physical activity, biking, and walking.	Not applicable. This measure is a County action.
EJ-12.7 ADA Accessibility (all unincorporated areas). Prioritize compliance with American Disability Act (ADA) standards and accessibility for all pedestrian, transit, and bicycle improvements, through ongoing engagement and incorporation of feedback from disability community stakeholder groups.	Not applicable. This measure is a County action.
EJ-12.8 Transportation Action Plans (all unincorporated areas). Support policies and programs through the “Safe Routes to Schools” and “Vision Zero” framework to reduce traffic fatalities and severe injuries, while increasing safe, healthy, equitable mobility for all.	Consistent. The Project was evaluated for impacts related to transportation hazards. Impacts were determined to be less than significant with mitigation (mitigation entails preparation of a traffic control plan, construction notification plan, and notification to property owners and provide alternative access during construction).
EJ-13.5 Safety Concerns (all unincorporated areas). Continue addressing safety concerns that may create barriers to physical activity by assessing adequate lighting and street visibility in new and existing parks and recreation facilities. Research international best practices in urban planning to identify best design elements to ensure public safety and crime reduction.	Not applicable. The Project would develop a solar facility that would generate and store solar energy, which would not include park or recreation facilities.
EJ-13.6 Vacant and Underutilized Land (all unincorporated areas). Identify vacant and underutilized land and existing	Not applicable. The Project would develop a solar facility that would generate and storage

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green spaces in the unincorporated County that can be revitalized into neighborhood parks or community gardens to provide more space for outdoor physical and recreational activity for all ages.	solar energy thereby increasing the resilience of energy resources in the region which is also a benefit to the community. The Project site could be considered for revitalization as a neighborhood park or community garden if it remains vacant and underutilized after the Project is decommissioned.
EJ-14.4 Maximize Accessibility (all unincorporated areas). Ensure that meetings and other public engagement events are held at accessible locations and times with considerations for childcare, food options, ADA accommodations, technology access, and language interpretation to support greater attendance.	Not applicable. This measure is a County action.
EJ-14.5 Multi-Platform Engagement (all unincorporated areas). Require the use of multiple platforms for virtual, phone, or in-person engagement to support greater participation and attendance. Where possible and preferred by the community, collaborate with community partners to utilize existing meetings and venues in EJ Communities.	Not applicable. This measure is a County action.
EJ-16.2 Universal Outreach Methods (all unincorporated areas). Establish guidelines for diverse methods of outreach that promote civic engagement especially to households that are linguistically isolated and do not have internet access, as well as youth, seniors, persons with disabilities, and refugees. Ensure that methods of communication are utilized that maximize outreach and consider methods needed for harder-to-reach communities, such as the use of ethnic-based newspapers, phone, text, and email listservs, and in-person social networks.	Not applicable. This measure is a County action.
EJ-16.3 Data Mapping and Visualization (all unincorporated areas). Ensure data mapping, and visualization tools are easily accessible and comprehensible to the general public.	Not applicable. This measure is a County action.
EJ-17.3 Existing Processes and Practices (all unincorporated areas). Examine existing countywide processes and practices for ways to embed environmental justice goals, policies, and actions throughout future updates to General Plan Elements, Climate Action Plans, and other County-initiated planning efforts.	Not applicable. This measure is a County action.
EJ-18.2 Census Tract Data (all unincorporated areas). Coordinate with public agencies to collect and report data at the census tract level to better align with statewide data reporting across the County	Not applicable. This measure is a County action.

4 Summary

The Project is consistent with the updated Housing and Safety Elements and new Environmental Justice Element of the General Plan.