



Permit Number: _____

COUNTY OF SAN DIEGO
LAND USE AND ENVIRONMENT GROUP
Department of Planning & Development Services

2024 Climate Action Plan Consistency Review Checklist

Introduction

The County of San Diego (County) 2024 Climate Action Plan (CAP) identifies strategies, measures, and actions to meet the County's targets to reduce greenhouse gas (GHG) emissions by 2030 and 2045, consistent with the State's 2022 Scoping Plan for Achieving Carbon Neutrality and legislative GHG reduction targets and demonstrates progress towards the State's 2045 net zero GHG emissions goal. The CAP's attainment of the County's GHG reduction targets is the result of (1) several initiatives to be directly implemented by the County and (2) incorporating GHG-reduction features into the construction and operation of development projects (including County-initiated and privately-initiated projects).

The CAP has been prepared in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15183.5, which allows for public agencies to analyze and mitigate GHG emissions as part of a larger "plan for the reduction of greenhouse gases." The CAP, CAP Consistency Review Checklist (Checklist), and the Supplemental Environmental Impact Report (SEIR) for the CAP collectively include the required elements of "a plan for the reduction of greenhouse gas emissions" set forth in CEQA Guidelines Section 15183.5(b). Therefore, the CAP is a CEQA-qualified climate action plan.

The purpose of the Checklist is two-fold:

1. Incorporate applicable CAP measures and actions into projects when they are not otherwise binding and enforceable, and
2. Provide a streamlined environmental review process for GHG emissions analysis for projects that require and are not exempt from environmental review pursuant to CEQA and determined to be consistent with the CAP.

Refer to the County's Guidelines for Determining Significance for Climate Change (Guidelines) for discussion of the process County staff will follow to evaluate GHG emissions impacts for projects subject to CEQA. The Guidelines identify the County's adopted "threshold of significance" for GHG emissions impacts and explain the role of the Checklist in the streamlined environmental review process.

Checklist Applicability

The Checklist applies to discretionary projects that are subject to and not exempt from CEQA (referred to herein as projects). The Checklist is therefore a critical implementation tool for incorporating CAP measures and actions that are not otherwise binding and enforceable into development projects (including new development applications and expansions or renovations of existing development).

Implementation of measures that do not apply to projects will occur through the implementation mechanisms identified in Chapter 5 of the CAP. Implementation of applicable CAP measures and actions by projects will help the County achieve incremental reductions towards the CAP targets, with additional reductions occurring through County initiatives and measures related to existing development that are implemented outside of the Checklist process.

Checklist Overview

The Checklist establishes a two-step process that project proponents shall follow to determine if projects are consistent with the CAP and whether they may have a significant cumulative impact under the County's adopted GHG thresholds of significance.

Step 1 of the Checklist assesses a project's consistency with the growth projections used in the CAP to estimate future GHG emissions from activities occurring in the unincorporated area and County facilities and operations. Because the CAP uses growth projections based on implementation of the adopted General Plan, the first step in determining a project's consistency with the CAP is to demonstrate its consistency with the regional categories and land use designations of the General Plan. All projects must demonstrate consistency with existing General Plan regional categories, land use designations, and the uses and development density and intensity allowed under the Zoning Ordinance.

If a project is consistent with the General Plan, then Step 2 of the Checklist should be completed. If a project is not consistent with the regional categories or land use designations of the General Plan, then it shall not use the CAP Consistency Checklist for CEQA streamlining.

Step 2 of the Checklist sets forth CAP measures and actions in the form of "consistency requirements" that project proponents are required to incorporate into their projects to demonstrate compliance with the CAP. Project proponents are required to demonstrate project consistency with the CAP consistency requirements or demonstrate why the requirements are not applicable to their project.

Projects that are consistent with the CAP, as determined using Steps 1 and 2 in this Checklist, may rely on the CAP for the cumulative impacts analysis of GHG emissions under CEQA. Projects that are not consistent with the CAP as determined by Steps 1 or 2 of the Checklist, shall not use the CAP Consistency Checklist for CEQA streamlining.

Checklist Completion and Review Procedures

General procedures for Checklist completion and review are described below, with more specific directions provided in Steps 1 and 2 of the Checklist.

1. The County's Department of Planning & Development Services (PDS) reviews development applications and makes determinations regarding project environmental review requirements under CEQA. Procedures for CEQA can be found on the County's [Process Guidance & Regulations/Statutes Homepage](#).
2. The project proponent shall complete the Checklist, and must provide substantial evidence to demonstrate project consistency with the CAP.
3. When completing Step 2 of the Checklist, the project proponent must provide substantial evidence demonstrating how each applicable CAP consistency requirement will be implemented by or incorporated into the project.

4. CAP consistency requirements determined to be applicable to the project in Step 2 of the Checklist shall be required as conditions of project approval.
5. Projects that cannot demonstrate consistency with the CAP using this Checklist are required to prepare a separate GHG analysis as part of the CEQA document prepared for the project and may be required to prepare an Environmental Impact Report (EIR). Refer to the County's Guidelines for Determining Significance for Climate Change (Guidelines) for a complete description of the County's procedural and content requirements for evaluating a project's GHG emissions under CEQA.

Checklist Updates

The Checklist may be administratively updated by the County from time to time to comply with amendments to State laws or court directives, or to remove measures that may become mandatory through future updates to State or local codes. Administrative revisions to the Checklist will be limited to changes that do not trigger a subsequent EIR or a supplement to the SEIR for the CAP pursuant to CEQA Guidelines Section 15162. Administrative revisions, as described above, will not require approval by the Board of Supervisors (Board). All other changes to the Checklist require Board approval.

Comprehensive updates to the Checklist will be coordinated with each CAP update and will require Board approval. Future updates to the CAP and Checklist shall comply with CEQA.

Application Information

Contact Information

Project No. and Name: PDS2019-LDGRMJ-30228, PDS2016-ENFGEN-000940,
PDS2022-ER-22-07-002 San Luis Rey Training Center Major
Grading Permit

Property Address and APN: 5772 Camino Del Rey, Bonsall Community Planning Area,
County of San Diego (APNs 127-460-13-00, 127-460-12-00)

Applicant Name and Co.: Beverly Gnau

Contact Phone: _____

Contact Email: _____

Was a consultant retained to complete this checklist? ☐ Yes ☒ No

If Yes, complete the following:

Consultant Name: _____

Contact

Phone: _____

Company Name: _____

Contact Email: _____

Project Information

1. What is the size of the project site (acres [gross and net])? 2.88
2. Identify all applicable proposed land uses (indicate square footage [gross and net]):
 - Residential (indicate # of single-family dwelling units): _____
 - Residential (indicate # of multi-family dwelling units): _____
 - Commercial (indicate total square footage [gross and net]): _____
 - Industrial (indicate total square footage [gross and net]): _____
 - Agricultural (indicate total acreage [gross and net]): 2.88
 - Other (describe): _____
3. Provide a description of the project. This description should match the project description used for the CEQA document. The description may be attached to the Checklist if there are space constraints.

The project includes a Major Grading Permit (PDS2019-LDGRMJ-30228) consisting of the even cut and fill of 10,400 cubic yards of soil balanced onsite on approximately 2.88 acres, to remedy a code violation case (PDS2016-ENFGEN-000940) for the San Luis Rey Training Center (project). The San Luis Rey Training Center is a thoroughbred racehorse training facility owned and operated by Los Angeles Turf Club, Incorporated. The San Luis Rey Training Center is located within the Bonsall Community Plan area of the unincorporated San Diego County and spans across twelve parcels totaling 204 acres governed by the "San Luis Rey Downs Private Development Plan (PDP)", adopted in November 1977. The code violation case is for the unpermitted clearing and grading of an access driveway and dirt roads, located on a portion southeast of the training center, partially inside and outside the existing PDP boundary, both owned by the Los Angeles Turf Club, Incorporated. The grading permit encompasses two areas of partially developed land. These violation areas are currently used for site access from Camino Del Rey, onsite roads, borrow site, staging equipment, and temporary structures, of which the

latter would be removed. The grading permit would stabilize the existing slopes and bring the project site into compliance with County regulations. Grading operations would take approximately 9 to 12 weeks.

Step 1: Demonstrate Consistency with the General Plan

The CAP uses growth projections based on implementation of the adopted General Plan to estimate future GHG emissions from activities occurring in the unincorporated area and County facilities and operations. Therefore, the first step in determining a project's consistency with the CAP is to demonstrate its consistency with the General Plan and Zoning Ordinance.

All projects must demonstrate consistency with existing General Plan regional categories, land use designations, and zoning designations. If a project is consistent with the General Plan and Zoning Ordinance, then Step 2 of the Checklist should be completed. If a project is not consistent with the regional categories and land use designations of the General Plan and zoning designations, then it shall not use the CAP Consistency Checklist for CEQA streamlining.

Step 1: Demonstrate Consistency with the General Plan		
CAP Consistency Requirement	Yes	No
1. Is the proposed project consistent with the existing General Plan regional category and land use designations and the uses and development density and intensity allowed under the Zoning Ordinance?	☒	☐
Provide substantial evidence supporting the project's General Plan consistency determination. Attach additional information as needed.		

The site is subject to the General Plan Designation of Semi-Rural 2 (SR-2) and Zoning for the site of Limited Agriculture (A70), General Agriculture (A72). The Project involves grading only and would remain consistent with the land use designation and zoning.

If **"Yes,"** proceed to Step 2: Demonstrate Consistency with CAP Measures and Actions

If **"No,"** the project is not consistent with the CAP and shall not use the CAP Consistency Checklist for CEQA streamlining. Such projects are required to prepare preparation of a separate GHG analysis as part of the CEQA document prepared for the project and may be required to prepare an EIR. Refer to the County's Guidelines for Determining Significance for Climate Change (Guidelines) for a complete description of the County's procedural and content requirements for evaluating a project's GHG emissions under CEQA.

Step 2: Demonstrate Consistency with CAP Measures and Actions

The second step of the CAP consistency review is to demonstrate a project's consistency with applicable CAP measures and actions. Projects are required to demonstrate consistency with the CAP consistency requirements or demonstrate why the requirements are not applicable. For ease of reference, two sets of CAP consistency requirements are provided in this section: one set of requirements that applies to privately-initiated projects (Table 1), and a second set of requirements that applies to County-initiated projects (Table 2).

Table 1. CAP Consistency Requirements for Privately-Initiated Projects				
CAP Consistency Requirement (Privately-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
Built Environment and Transportation				
1. Electrify Loading Docks If the project includes cold storage or refrigerated warehouse facilities, it must comply with the County’s Code of Regulatory Ordinances as amended to require electric truck loading docks must be equipped with adequate infrastructure to deliver electricity to electric-powered truck refrigeration units (e-TRUs). Note: The County will amend the Code of Regulatory Ordinances by 2030, pursuant to CAP Action T-3.1. This requirement does not apply to projects unless the Code of Regulatory Ordinances has been amended and the amendments have gone into effect. <i>Check “N/A” if the project is not a privately-initiated project, is not subject to the Code of Regulatory Ordinances as amended, or if the amendments are not in effect.</i>	T-3 (T-3.1)	☐	☐	☒
Provide substantial evidence supporting the project’s consistency determination. Attach additional information as needed.				

The Project involves grading only, so no loading docks are proposed.

Table 1. CAP Consistency Requirements for Privately-Initiated Projects

CAP Consistency Requirement (Privately-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
2. Install Electric Vehicle Charging Infrastructure The project must comply with the County's Code of Regulatory Ordinances as amended to require (Tier 2) CALGreen or similar electric vehicle charging infrastructure installations and preferential parking for ZEVs for new multifamily residential and nonresidential construction. If the Code of Regulatory Ordinances has not yet been amended, the project shall achieve Tier 2 status as set forth in the 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen), Appendix A4 Residential Voluntary Measures, Division A4.6, Tier 1 and Tier 2, Section A4.601.5, Tier 2, and Appendix A5 Nonresidential Voluntary Measures, Division A5.6, Voluntary Tiers, Section A5.601.3 CALGreen Tier 2. Note: The County will amend the Code of Regulatory Ordinances by 2026, pursuant to CAP Action T-3.1. <i>Check "N/A" if the project is not a privately-initiated project or is not subject to CALGreen or the Code of Regulatory Ordinances as amended.</i>	T-3 (T-3.1)	☐	☐	☒
Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.				

The Project involves grading only, so no Electric Vehicle (EV) charging infrastructure would be required.

Table 1. CAP Consistency Requirements for Privately-Initiated Projects				
CAP Consistency Requirement (Privately-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
3. Increase Active Transportation If both of the following conditions are met, the project must incorporate sidewalk and bikeway improvements from the County's Active Transportation Plan. 1. Intersection or roadway segment improvements are proposed and/or required as part of the project, AND 2. The County's Active Transportation Plan identifies sidewalks or on-road bikeway facilities at intersection(s) or on roadway segment(s) that would be improved as part of the project.	T-5 (T-5.1)	☐	☐	☒
<i>Check "N/A" if the project does not meet both conditions</i> Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.				

The Project involves grading only, so no infrastructure or roadway improvements would be required.

Table 1. CAP Consistency Requirements for Privately-Initiated Projects				
CAP Consistency Requirement (Privately-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
4. Reduce Single-Occupancy Vehicle Trips When the County has adopted the Transportation Demand Management (TDM) ordinance and it has gone into effect, the project must comply with the ordinance. Note: The County will adopt the TDM ordinance by 2028, pursuant to CAP Action T-6.2. This requirement does not apply to projects unless the TDM Ordinance has been adopted and has gone into effect. <i>Check "N/A" if the project is not a privately-initiated project, is not subject to the Code of Regulatory Ordinances as amended, or if the amendments are not in effect.</i>	T-6 (T-6.2)	☐	☐	☒
Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.				

The County has not yet adopted a TDM Ordinance.

Table 1. CAP Consistency Requirements for Privately-Initiated Projects				
CAP Consistency Requirement (Privately-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
Energy				
5. Electrify Buildings and Appliances The project must comply with the County's Code of Regulatory Ordinances as amended to incorporate all-electric appliances and equipment in new residential, commercial, and industrial construction or incorporate (Tier 2) CALGreen or similar energy efficiency requirements for existing development projects. If the Code of Regulatory Ordinances has not yet been amended, the project shall achieve Tier 2 status as set forth in the 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen), Appendix A4 Residential Voluntary Measures, Division A4.6, Tier 1 and Tier 2, Section A4.601.5, Tier 2, and Appendix A5 Nonresidential Voluntary Measures, Division A5.6, Voluntary Tiers, Section A5.601.3 CALGreen Tier 2. Note: The County will amend the Code of Regulatory Ordinances by 2026 to establish requirements for existing development projects, pursuant to CAP Actions E-2.1 and E-2.2. <i>Check "N/A" if the project is not a privately-initiated project or is not subject to CALGreen or the Code of Regulatory Ordinances as amended.</i>	E-2 (E-2.1, E-2.2)	☐	☐	☒
Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.				

The Project involves grading only, so no building electrification or energy efficient appliances would be required.

Table 1. CAP Consistency Requirements for Privately-Initiated Projects

CAP Consistency Requirement (Privately-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
6. Increase Renewable Energy The project must comply with the County's Code of Regulatory Ordinances as amended to incorporate (Tier 2) CALGreen or similar renewable energy requirements for new residential and nonresidential construction. If the Code of Regulatory Ordinances has not yet been amended, the project shall achieve Tier 2 status as set forth in the 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen), Appendix A4 Residential Voluntary Measures, Division A4.6, Tier 1 and Tier 2, Section A4.601.5, Tier 2, and Appendix A5 Nonresidential Voluntary Measures, Division A5.6, Voluntary Tiers, Section A5.601.3 CALGreen Tier 2. Note: The County will amend the Code of Regulatory Ordinances by 2026, pursuant to CAP Action E-3.1. <i>Check "N/A" if the project is not a privately-initiated project or is not subject to CALGreen or the Code of Regulatory Ordinances as amended.</i>	E-3 (E-3.1)	☐	☐	☒

Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.

The Project involves grading only, so no renewable energy would be required.

Table 1. CAP Consistency Requirements for Privately-Initiated Projects

CAP Consistency Requirement (Privately-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
Water and Wastewater				
7. Increase Water Efficiency The project must comply with the County's Code of Regulatory Ordinances as amended to require (Tier 2) CALGreen or similar water efficiency requirements and reduced outdoor water use for landscaping requirements. Residential projects: If the Code of Regulatory Ordinances has not yet been amended, residential projects must comply with the requirements of the 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen), Appendix A4 Voluntary Residential Measures by complying with at least three elective measures from Section A4.303, Section A4.304, and Section A4.305 Tier 2 Water Efficiency and Conservation Requirements. Nonresidential projects: If the Code of Regulatory Ordinances has not yet been amended, nonresidential projects must comply with the requirements of the 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen), Appendix A5 Voluntary Nonresidential Measures, Section A5.303.2.3.2 Tier 2 Water Efficiency and Conservation Requirements and three elective measures from Section A5.303, Section A5.304, and Section A5.305 Tier 2 Water Efficiency and Conservation Requirements. Note: The County will amend the Code of Regulatory Ordinances by 2026, pursuant to CAP Action W-2.1 and W-2.2. <i>Check "N/A" if the project is not a privately-initiated project, is not subject to CALGreen or the Code of Regulatory Ordinances as amended.</i>	W-2 (W-2.1, W-2.2)	☐	☐	☒
Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.				

The Project involves grading only and no building construction or operation would occur, so no water efficiency measures would be required.

Table 1. CAP Consistency Requirements for Privately-Initiated Projects				
CAP Consistency Requirement (Privately-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
Agriculture and Conservation				
8. Increase Tree Preservation				
If the County's program to preserve native trees is in effect, the project must comply.	A-2 (A-2.1)	☐	☐	☒
Check "N/A" if the project is not a privately-initiated project, is not subject to the native tree preservation program, or if the program is not in effect.				
Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.				

The program to preserve native trees is not in effect.

Table 1. CAP Consistency Requirements for Privately-Initiated Projects				
CAP Consistency Requirement (Privately-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
9. Increase Tree Planting Single family residential: The project must comply with the tree planting requirements of the County's Landscaping Ordinance. Each new single family residential project shall include two trees per dwelling unit. <i>Check "N/A" if the project is not subject to the Landscaping Ordinance</i>	A-2 (A-2.2)	☐	☐	☒
Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.				

The Project involves grading only and no residential uses are proposed, so no building tree planting would be required.

Table 2. CAP Consistency Requirements for County-Initiated Projects

CAP Consistency Requirement (County-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
Built Environment and Transportation				
1. Use Electric-Powered or Zero Emission Construction Vehicles and Equipment The project must use electric-powered or other zero emissions vehicles and equipment during construction activities. This requirement applies to medium- and heavy-duty vehicles and equipment (defined as equal to or greater than 50 horsepower). <i>Check "N/A" if the project is not a County-initiated project.</i> <i>Check "N/A" if the project does not require the use of medium- or heavy-duty construction vehicles or equipment.</i> <i>Check "N/A" if electric-powered or zero emission vehicles and equipment are not commercially available for the project's medium- and heavy-duty vehicle and equipment needs during construction. To support this "N/A" response, demonstrate that a minimum of three fleet owners/operators/fuel providers in San Diego County or adjacent counties were contacted and responded that electric-powered or other zero emission equipment and/or fuel options are not commercially available for the project's vehicle and equipment needs during construction.</i>	T-1 (T-1.1)	☐	☐	☒

Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.

The Project is not a County-initiated project.

Table 2. CAP Consistency Requirements for County-Initiated Projects

CAP Consistency Requirement (County-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
Energy				
2. Increase Energy Efficiency and Renewable Energy Use The project must comply with the County Facilities Zero Carbon Portfolio Plan by complying with the following: 1. Use electric appliances and equipment. Appliances and equipment powered by non-electric sources are not permitted. 2. Achieve Zero Net Energy (i.e., produce enough renewable energy to meet its own annual energy consumption requirements)	E-1 (E-1.1)	☐	☐	☒
Check "N/A" if not a County-initiated project.				

Check "N/A" if not a County-initiated project.

Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.

The Project is not a County-initiated project.

Table 2. CAP Consistency Requirements for County-Initiated Projects				
CAP Consistency Requirement (County-Initiated Project)	Supporting CAP Measure (Action)	Project Consistency Determination		
		Consistent	Not Consistent	N/A
Water and Wastewater				
3. Increase Water Efficiency The project must incorporate applicable measures identified in the County's Water Efficiency Plan. <i>Check "N/A" if the project is privately initiated.</i>	W-1 (W-1.1)	☐	☐	☒
Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.				

The Project is not a County-initiated project.