

Appendix H.3

Climate Action Plan Consistency Checklist



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: Starlight Solar

Property Address and APN: South of Interstate 8 (I-8) and Old Highway 80, east of Tierra Del Soul Rd

Applicant Name and Co.: Starlight Solar, LLC.

Contact Phone: 310-820-1200 Contact Email: cfahey@haagenco.com

Was a consultant retained to complete this checklist? ☒ Yes ☐ No
If Yes, complete the following:

Consultant Name: Stuart Muerth Contact Phone: (626) 240-0587

Company Name: SWCA Environmental Consultants Contact Email: stuart.muerth@swca.com

Project Information

- What is the size of the project site (acres [gross and net])? 588 acres
- 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]): 100 MW utility-scale PV solar, and 7,350-SF of solar facility buildings
 - ☐ Industrial (indicate total square footage [gross and net]): _____
 - ☐ Agricultural (indicate total acreage [gross and net]): _____
 - ☒ Other (describe): 224,000-SF BESS
- 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.

Starlight Solar LLC is requesting a Major Use Permit (MUP) from the County of San Diego (County) to develop, finance, construct, and operate an unoccupied renewable energy solar and battery storage project in southeastern San Diego County.

The County's General Plan designates the project site as Rural Lands 80 (RL-80) and the County Zoning Ordinance identifies the site as General Rural (S92). The County's General Regulation states that solar power plant projects are considered Major Impact Service and Utility in all zones and thus require the approval of an MUP. The project would use photovoltaic (PV) electric generation system technology to produce up to 100 megawatts (MW) of alternating current (AC) of solar energy at the utility scale. The project would also include an 868 megawatt-hour (MWh) (approximately 217 MW, 4-hour batteries) battery energy storage system (BESS).The project site encompasses a total of approximately 588 acres.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Consistent. The County's General Plan identifies that the project site is within the rural regional category, and designates the project site as RL-80. The County's Zoning Ordinance identifies the site as S92. The project would be considered a Major Impact Service and Utility and, under Section 1355 of the Zoning Ordinance, would be an allowable use with the approval of an MUP.

According to Section 1350 of the Zoning Ordinance, Major Impact Services and Utilities may be conditionally permitted in any zone if it is determined that public interest supersedes the usual limitations placed on land use and transcends the usual restraints of zoning for reasons of necessary location and community-wide interest. The MUP process considers the location, size, and operating characteristics of the proposed use and must find that the project would be compatible with adjacent uses with consideration given to the following: harmony in scale; availability of public facilities, services and utilities; effect on desirable neighborhood character; generation of traffic; and suitability of the site for type and intensity of use (Section 7358). The application for a MUP would be processed according to Section 7350 of the Zoning Ordinance, including making required findings pursuant to Section 7358. In accordance with Section 6954(b)(3), the project would be subject to requirements related to setback, height, visual, and security. The MUP would also be referred to the Boulevard Community Design Review Board for review and approval pursuant to Section 7355. Therefore, the project would be consistent with the County's Zoning Ordinance.

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)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Not Applicable. The project would not include cold storage or refrigerated warehouse facilities, and no loading docks would be needed.

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
<p>2. Install Electric Vehicle Charging Infrastructure</p> <p>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.</p> <p>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.</p> <p>Note: The County will amend the Code of Regulatory Ordinances by 2026, pursuant to CAP Action T-3.1.</p> <p><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></p>	T-3 (T-3.1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Not Applicable. No formal parking spaces would be provided by the project. The project would generally be autonomous during operations, but occasional maintenance workers would utilize on-site unmarked gravel areas for parking. During temporary construction and decommissioning activities, workers would also utilize the on-site unmarked gravel areas for parking. The County has not yet amended the Code of Regulatory Ordinances to require Tier 2 CalGreen electric vehicle parking. According to CALGreen Section A5.106.5.1, projects must designate 50 percent of the total number of parking spaces for of zero-emission, fuel-efficient, or carpool vehicles. Since the total number of parking spaces provided by the project is 0, the project would not be required to designate any zero-emission parking spaces.

<p>3. Increase Active Transportation</p> <p>If both of the following conditions are met, the project must incorporate sidewalk and bikeway improvements from the County's Active Transportation Plan.</p> <ol style="list-style-type: none"> 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. <p><i>Check "N/A" if the project does not meet both conditions.</i></p>	T-5 (T-5.1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.

Not Applicable. The project would not include any intersection or roadway segment improvements and is therefore not required to provide sidewalk and bikeway improvements.

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)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Not Applicable. The TDM ordinance has not been adopted by the County.

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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.

Consistent. All project equipment would be electrified. Electricity for operations associated with the project would be supplied by the San Diego Gas and Electric Company (SDG&E).

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
<p>6. Increase Renewable Energy</p> <p>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.</p> <p>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.</p> <p>Note: The County will amend the Code of Regulatory Ordinances by 2026, pursuant to CAP Action E-3.1.</p> <p><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></p>	E-3 (E-3.1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Consistent. The project would construct a 100 MW solar energy generation and storage facility, which would produce renewable solar energy over the project's lifetime. The project would also include 217.4 MW of AC energy storage in the proposed BESS. The power produced by the solar facility would interconnect into the existing SDG&E Boulevard substation via an underground generation-tie line.

Water and Wastewater

<p>7. Increase Water Efficiency</p> <p>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.</p> <p>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.</p> <p>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.</p>	W-2 (W-2.1, W-2.2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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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
<p>Note: The County will amend the Code of Regulatory Ordinances by 2026, pursuant to CAP Action W-2.1 and W-2.2.</p> <p>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.</p>				

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

Not Applicable. The project would not use any potable water. The project would primarily use water for dust control during construction and for panel cleaning during operations. The project would import non-potable groundwater from the Jacumba Community Services District, delivered by water trucks. None of the fixtures or systems listed in California Green Building Standards Code (CALGreen) Sections A5.303, A5.304, or A5.305 would be included in the project, and thus none of the water use reduction measures would apply to the project.

Agriculture and Conservation

<p>8. Increase Tree Preservation</p> <p>If the County's program to preserve native trees is in effect, the project must comply.</p> <p>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.</p>	A-2 (A-2.1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.

Not Applicable. The County has not yet developed a native tree preservation program. However, to mitigate impacts to biological resources including native trees, an off-site biological open space easement would be granted over a 448-acre area that includes sensitive vegetation communities, special-status plant species, and habitat for special-status species. This easement is for the protection of biological and prohibits all of the following on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space. The biological open space easement would be unfenced.

<p>9. Increase Tree Planting</p> <p>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.</p> <p>Check "N/A" if the project is not subject to the Landscaping Ordinance.</p>	A-2 (A-2.2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.

Not Applicable. The project does not propose single-family residential land uses.

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)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Not Applicable. The project is not a County-initiated project and would not involve County operations.

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) <i>Check "N/A" if not a County-initiated project.</i>	E-1 (E-1.1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.

Not Applicable. The project is not a County-initiated project and would not involve County operations.

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)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Provide substantial evidence supporting the project's consistency determination. Attach additional information as needed.				
Not Applicable. The project is not a County-initiated project and would not involve County operations.				