

2.11 Land Use and Planning

This section describes existing land uses, plans, and policies and the potential effects that implementation of the CAP Update may have related to land use and planning. Specifically, this section evaluates the potential for the CAP Update to result in the physical division of an established community and to result in conflicts with any applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. Policy conflicts do not, in and of themselves, constitute a significant environmental impact; rather, potential conflicts with land use policies would be environmental impacts if these conflicts would result in physical impacts.

This section incorporates by reference the land use and planning setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the 2011 GPU PEIR. Because this analysis is subsequent to the adopted 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since certification of the 2011 GPU EIR.

This section focuses on conflicts with plans, policies, and regulations related to land use and planning. The potential for the CAP Update to conflict with an adopted Habitat Conservation Plan or Natural Communities Conservation Plan is discussed in Section 2.4, “Biological Resources.” The potential for the CAP Update to conflict with a water quality control plan or sustainable groundwater management plan is discussed in Section 2.10, “Hydrology and Water Quality.” Potential conflicts with applicable air quality plans are discussed in Section 2.3, “Air Quality,” renewable energy or energy efficiency plans are further discussed in Section 2.6, “Energy,” and plans adopted for the purpose of reducing GHG emissions are further discussed in Section 2.8, “Greenhouse Gas Emissions.” Additionally, potential conflicts with plans, policies, and regulations addressing the circulation system are further discussed in Section 2.13, “Transportation.”

Table 2.11-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. As indicated, implementation of the proposed project would not result in new or more severe significant impacts on land use and planning.

Table 2.11-1 Summary of Land Use and Planning–Related Impacts

Issue Number	Issue Topic	Determination from GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Physically Divide an Established Community	General Plan Only: Less than Significant with Mitigation	CAP Update Only: Yes	CAP Update Only: Yes
		General Plan Cumulative Contribution: Less than Significant with Mitigation	CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: Yes
2	Conflict with Land Use Plans, Policies, or Regulations	General Plan Only: Less than Significant	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less than Significant	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

Notes: CAP = Climate Action Plan; GPU = General Plan Update; PEIR = Program Environmental Impact Report; SEIR = Supplemental Environmental Impact Report.

Source: Compiled by Ascent Environmental in 2023.

Comments received during the Notice of Preparation (NOP) scoping process included recommendations for the County to evaluate how land use approvals and patterns affect GHG production, population growth, and environmental justice. In addition, comments requested that the County should focus residential and commercial development in urbanized transit corridors and prohibit these land uses in agricultural and rural areas. Commenters also requested that the County demonstrate the CAP’s consistency with the San Diego Association of Governments’ (SANDAG’s) Regional Transportation Plan/Sustainable Communities Strategy/Regional Comprehensive Plan (2021 Regional Plan) and the County General Plan. These concerns are addressed and summarized in this section and other relevant sections, including Section 2.2, “Agriculture and Forestry Resources,” Section 2.7, “Environmental Justice,” Section 2.8, “Greenhouse Gas Emissions,” and Section 2.13, “Transportation.” A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

2.11.1 Existing Conditions

Section 2.9, “Land Use” (pages 2.9-1 through 2.9-21), of the 2011 GPU PEIR provides a discussion of existing conditions related to land uses in the unincorporated county. Existing land use conditions in the unincorporated county remain largely the same as those described in the 2011 GPU PEIR, with exception of the approval of the General Plan Amendments described in Section 2.11.2, “Regulatory Framework.”

The unincorporated county encompasses approximately 3,570 square miles, of which over 90 percent is either open space or undeveloped. The County has jurisdiction over approximately 35 percent of land within unincorporated areas. The land use designations within the County’s jurisdiction are Residential, Commercial, Industrial, Public/Semi-Public, and Open Space. Development within the unincorporated county is predominately rural in character, with urbanized coastal and inland communities concentrated along the

westernmost boundaries of the unincorporated county. The remaining 65 percent of land, for which the County has no jurisdiction over land uses, is comprised of tribal lands and public agency lands, such as state parks, national forests, other public agency non-conservation lands, and military installations (County of San Diego 2014).

2.11.2 Regulatory Framework

Section 2.9 of the 2011 GPU PEIR (pages 2.9-22 through 2.9-27) describes the Regulatory Framework related to land use and is incorporated herein by reference. A complete list of applicable federal, state, and local regulations that appeared in the 2011 GPU PEIR regarding land use is provided below. Regulations that appear in a list format have not changed and continue to apply to the unincorporated county. Regulations that have been adopted or updated since adoption of the 2011 GPU PEIR are described in full.

2.11.2.1 Federal

No federal land use regulations are applicable to the project.

2.11.2.2 State

- California Planning and Zoning Law
- Senate Bill (SB) 375

2.11.2.3 Local

- County of San Diego Community and Subregional Plans; Specific Plans
- County of San Diego Board of Supervisors Policies I-63, I-104, and J-33
- County of San Diego Zoning Ordinance (Zoning Ordinance)

San Diego Association of Governments 2021 Regional Plan

As the metropolitan planning organization for the San Diego region, SANDAG is responsible for developing and implementing a long-range Regional Transportation Plan (RTP). The 2011 GPU PEIR includes a discussion of the 2030 RTP, which was adopted on March 28, 2003. Metropolitan planning organizations are responsible for preparing and adopting a new RTP every 4 years. The most current RTP for the San Diego region is the *2021 Regional Plan*, which was adopted on December 10, 2021, and supersedes the 2030 RTP (SANDAG 2021).

SANDAG's *2021 Regional Plan* provides a framework for coordinated land use and transportation planning strategies. It identifies projects, policies, and programs developed to achieve the following goals: (1) an efficient movement of people and goods; (2) access to affordable, reliable, and safe mobility options for everyone; and (3) healthier air and reduced GHG emissions regionwide. Examples of such projects include pedestrian, bicycle, and transit infrastructure improvements to facilitate multi-modal transportation and transportation demand management strategies to improve traffic flow and safety on roadways. The *2021 Regional Plan* is comprised of the following elements:

- RTP: An RTP serves as the long-term blueprint of the transportation system in a metropolitan region. SANDAG’s RTP identifies and analyzes transportation needs of the San Diego region and creates a framework for project priorities.
- Sustainable Communities Strategy (SCS): As a requirement of SB 375, the *2021 Regional Plan* includes an SCS, which consists of land use, housing, and transportation strategies that, if implemented, would allow the San Diego region to meet its regional targets for GHG emissions reductions from passenger vehicle use established by the California Air Resources Board.
- Regional Comprehensive Plan: The *2021 Regional Plan* also includes the elements of a regional comprehensive plan, as required by Public Utilities Code Section 132360 et seq., which integrates land uses, transportation systems, infrastructure needs, and public investment strategies, within a regional framework, in cooperation with member agencies and the public.

2020-2030 County Operations Strategic Sustainability Plan

The *2020-2030 County Operations Strategic Sustainability Plan* identifies high level sustainability initiatives and measures for internal operations and community-based actions. The plan includes initiatives and goals that focus on energy (reducing energy use and promoting clean energy production), water (reducing potable water consumption and promoting water reuse systems), waste (increasing diversion of solid waste and promoting recycling), and transportation (reducing fleet vehicle emissions and vehicle miles traveled, electrifying the fleet, and expanding electric vehicle charging infrastructure). The plan incorporates the goals and strategies from other County-developed plans, including the *2017 Zero Net Energy Portfolio Plan*, *2019 Renewable Energy Plan*, *2017 Strategic Plan to Reduce Waste*, and *2019 County Operations Waste Diversion Plan* (County of San Diego n.d.a).

County of San Diego Zero Carbon Portfolio Plan

The *Zero Carbon Portfolio Plan* (County of San Diego n.d.b) presents a strategy and specific measures that will result in a reduction in operational carbon emissions of 90 percent by 2030, relative to its 2008 baseline. Specific measures include purchasing increasingly renewable-sourced electricity, replacing fossil fuel-burning equipment with electric equipment in existing buildings, implementing energy efficiency measures at existing County-owned and occupied facilities, conducting ongoing monitoring of energy performance at existing County facilities, requiring all new construction capital projects to be all electric Zero Net Energy buildings, and installing PV systems on existing County properties. The plan is intended to support and build on existing state, County, and industry goals, including GHG emission reduction goals established by Assembly Bill (AB) 32 and Executive Orders B-30 and B-55 (see also Section 2.6, “Energy,” for additional information).

County of San Diego Renewable Energy Plan

The County’s *Renewable Energy Plan* (County of San Diego 2019) outlines a series of measures to transition existing electricity consumption from fossil-fuel grid electricity to

clean, renewable power sources. This plan follows the guidance established by the County's *Zero Net Energy Portfolio Plan*, which sets a pathway for reducing the County's total energy footprint by improving energy efficiency and increasing the use of renewable energy. The *Renewable Energy Plan* documents the County's Renewable Energy Program, which consists of three components to increase renewable energy usage in County facilities: (1) enact Power Purchase Agreements for large-scale renewable power installations; (2) install County-owned PV systems at new Zero Net Energy facilities and at existing sites; and (3) purchase green power (100 percent community solar).

County of San Diego Strategic Plan to Reduce Waste

The County's *Strategic Plan to Reduce Waste* (County of San Diego 2017) was developed to (1) assess how the County is achieving its current diversion rate, (2) identify the programs, policies, and resources needed to achieve diversion targets, and (3) propose diversion opportunities and strategies for residents and businesses in the unincorporated areas of the county and for its internal operations to support efforts towards zero waste (90 percent diversion or greater). The plan presented a set of diversion programs and policies to achieve 75 percent diversion by 2020 and additional strategies targeting zero waste by 2040. The strategies in the plan focus on waste prevention, reuse, repair, recycling, and composting. The plan was developed to align with state legislation, regulations, and policies supporting diversion, which include AB 939 (diversion requirements for cities and counties), AB 341 (mandatory commercial recycling requirements), AB 1826 (organic materials recycling requirements), AB 876 (identify processing capacity for organic materials), SB 1383 (organic waste diversion requirements), and California Green Building Standards Code (CALGreen) (construction and demolition debris diversion requirements).

Airport Land Use Compatibility Plans

The 2011 GPU PEIR included a discussion of the Airport Land Use Compatibility Plans (ALUCPs) for the six airports located in the unincorporated county: Agua Caliente Airstrip, Borrego Valley Airport, Fallbrook Community Airpark, Jacumba Airport, Ocotillo Airstrip, and Ramona Airport. The overall goals of these ALUCPs are to protect public safety and welfare within safety zones, noise contours, and airspace protection and overflight boundaries. The ALUCPs for each of these airports were updated on April 7, 2022, superseding the previous ALUCPs that were adopted in 2006 and subsequently amended in 2011 (SDCRAA 2023). The intent of these ALUCPs remains consistent with that described in Section 2.9.2.2, "Local," of the 2011 GPU PEIR.

Local Coastal Program Land Use Plan

The Local Coastal Program Land Use Plan (LUP) is the primary document that governs land development in the County of San Diego's Coastal Zone. The LUP is designed to preserve the unique environment of the county's Coastal Zone and to encourage the protection and restoration of its resources, while encouraging public enjoyment of its recreational opportunities. The LUP guides both public and private activities that constitute "development" under the California Coastal Act of 1976. In general,

constructing a dwelling, commercial building, road, trail, or other improvements constitutes “development” that requires a permit, with specific exceptions. Furthermore, “development” includes changes in the use of land or water, even where construction is not involved (County of San Diego 2018).

County of San Diego Low Impact Development Handbook

The County’s Low Impact Development (LID) Handbook was approved in 2007 and most recently updated in 2014. The LID Handbook incorporates design guidelines, including site planning and integrated management practices, to manage stormwater drainage associated with new development in a manner consistent with the San Diego Regional Water Quality Control Board, Order No. R9-2007-0001 (Municipal Separate Storm Sewer System Permit) as well as the County’s Standard Urban Stormwater Mitigation Plan and Hydromodification Management Plan. The LID Handbook also requires that landscaping for new development conforms to the County’s *Landscape Water Conservation Design Manual* and the State of California’s Water Conservation Landscape Ordinance. See also Section 2.10, “Hydrology and Water Quality.”

2011 San Diego County General Plan

San Diego County General Plan Policies

The General Plan goals and policies related to land use and planning that are applicable to the CAP Update are identified in the following sections.

Land Use Element

The Land Use Element of the General Plan includes policies to guide future development in an efficient and sustainable manner that is compatible with the character of unincorporated communities and the protection of valuable and sensitive natural resources. The following policies from the Land Use Element are applicable to the CAP Update:

Policy LU-6.5: Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development (LID) techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County’s LID Handbook.

Policy LU-7.1: Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

Policy LU-12.4: Planning for Compatibility. Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character

and minimizes visual and environmental impacts: for Mobility Element roads identified in Table M-4, an LOS D or better may not be achieved.

Policy LU-16.3: New Waste Management Facilities. Encourage the establishment of additional recycling and resource recovery facilities in areas with Industrial land use designations or other appropriate areas based on the type of recycling.

Conservation and Open Space Element

The Conservation and Open Space Element of the General Plan includes goals and policies to guide future growth and development with respect to the conservation, management, and utilization of natural and cultural resources; the protection of open space; and the provision of park and recreation resources. The following policies from the Conservation and Open Space Element are applicable to the CAP Update:

Policy COS-4.1: Water Conservation. Require development to reduce the waste of potable water through use of efficient technologies and conservation efforts that minimize the County's dependence on imported water and conserve groundwater resources.

Policy COS-4.2: Drought-Efficient Landscaping. Require efficient irrigation systems and in new development encourage the use of native plant species and non-invasive drought tolerant/low water use plants in landscaping.

Policy COS-4.5: Recycled Water. Promote the use of recycled water and gray water systems where feasible.

Policy COS-5.5: Impacts of Development to Water Quality. Require development projects to avoid impacts to the water quality in local reservoirs, groundwater resources, and recharge areas, watersheds, and other local water sources.

Policy COS-6.2: Protection of Agricultural Operations. Protect existing agricultural operations from encroachment of incompatible land uses by doing the following:

- Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations.
- Encouraging new or expanded agricultural land uses to provide a buffer of non-intensive agriculture or other appropriate uses (e.g., landscape screening) between intensive uses and adjacent non-agricultural land uses.
- Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural use within the development.
- Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture.

- Supporting local and state right-to-farm regulations.
- Retain or facilitate large and contiguous agricultural operations by consolidation of development during the subdivision process.

Policy COS-6.4: Conservation Easements. Support the acquisition or voluntary dedication of agriculture conservation easements and programs that preserve agricultural lands.

Policy COS-14.3: Sustainable Development. Require design of residential subdivisions and nonresidential development through “green” and sustainable land development practices to conserve energy, water, open space, and natural resources.

Policy COS-14.7: Alternative Energy Sources for Development Projects. Encourage development projects that use energy recovery, photovoltaic, and wind energy.

Policy COS-14.13: Incentives for Sustainable and Low GHG Development. Provide incentives such as expedited project review and entitlement processing for developers that maximize use of sustainable and low GHG land development practices in exceedance of State and local standards.

Environmental Justice Element

The Environmental Justice Element of the San Diego County General Plan contains goals and policies to reduce unique or compounded health risks in disadvantaged communities, promote civic engagement in public decision making, and prioritize improvements and programs to address needs and benefits for disadvantaged communities. The following goal and policies from the Environmental Justice Element are applicable to the CAP Update:

Goal EJ-2: Protect Sensitive Land Use Compatibility. Support and expand land use development, transportation patterns, pollution mitigation, and other techniques to ensure compatibility that protects sensitive land uses (e.g. schools, housing, health facilities, childcare facilities, senior centers, parks, etc.) from increased pollution exposure in EJ Communities.

Policy EJ-2.3: Renewable Energy Facilities. Develop criteria to identify and evaluate potential environmental impacts of storage, operation, and maintenance of renewable energy facilities and products that affect EJ Communities.

Policy EJ-2.4: Designated Truck Routes. Consistent with the Mobility Element, minimize heavy truck traffic and designate routes away from residential neighborhoods and other sensitive areas in EJ Communities.

Policy 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.

Policy 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.

Policy 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.

Policy 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.

Policy EJ-5.2: Priority Siting and Improvements. Prioritize siting for new civic buildings, provision of County services, infrastructure improvements, and community amenities based on community-identified locations and feedback from EJ Communities (e.g. community centers, schools, parks, and open space, and emergency services, and improvements for transportation infrastructure, such as road maintenance, bike, and pedestrian facilities, including Americans with Disabilities Act (ADA) accessibility).

Policy 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.

Goal EJ-12: Healthy Design and Multi-Modal Development. Promote multi-modal land use design and development patterns that decrease vehicle miles traveled, and encourage increased physical activity, biking, and walking as a means to reduce health-related issues.

Policy EJ-12.2: Pedestrian Amenities Improvements. Support collaboration with private and agency partners to enhance pedestrian amenities, such as lighting, shade, benches, trash and recycling receptacles, bathrooms, hand sanitizing stations, water fountains, and prioritize investments in EJ Communities.

Policy EJ-12.3: Pedestrian and Bicycle Facilities. Prioritize the incorporation and installation of pedestrian and bicycle facilities in EJ Communities based on community-identified mobility needs and feedback. Consistent with the Mobility Element, require that new developments, redevelopment projects, and any new

and renovated transportation facilities built, managed, and/or operated by the County in EJ Communities include pedestrian and bicycle facilities. Support connections to programs providing pedestrian and bicycle safety training and resources.

Policy EJ-13.3: Urban Greening and Green Infrastructure. Encourage planting of native plants, and other urban greening and green infrastructure projects with supporting maintenance agreements within EJ Communities. Coordinate efforts of Climate Action Plan Urban Greening and DPW Green Streets Program with green spaces and recreational areas.

County of San Diego Community Plan and Subregional Plan Updates

Each planning area has a community or subregional plan except for Pendleton/De Luz and County Islands, which are Community Plan Areas without organized planning or sponsor groups. Each community plan or subregional plan supplements the County's General Plan by focusing on a specific planning area. The County has regularly revised and amended various community plans and subregional plans since adoption of the General Plan to maintain consistency.

2011 San Diego County GPU PEIR

The following mitigation measures from the 2011 GPU PEIR are applicable to the CAP Update:

Adopted Mitigation Measure Lan-1.1: Coordinate with adjacent cities and other agencies regarding planning efforts and resource protection. This includes working with SANDAG during updates to the RTP to ensure that regional roads are properly planned, sited, and designed. Additional on-going consultations include coordination with state, federal, and local agencies regarding the high speed rail, the Sunrise Powerlink, and tribal casinos.

Adopted Mitigation Measure Lan-1.2: Coordinate with land owners, other departments, and community groups to ensure that both public and private development projects and associated infrastructure minimize impacts to established communities. This involves community input and General Plan conformance reviews on County road projects to insure that County road planning and development is consistent with the General Plan. This also includes analysis of potential environmental impacts for public and private road projects and application of mitigation measures pursuant to CEQA. DPW policies and procedures shall be evaluated to ensure that such reviews are conducted and that issues regarding potential division of communities are identified and addressed. General Plan Amendments that propose changes to the circulation network shall be kept consistent with the General Plan Goals and Policies, and such proposals will also be reviewed by the communities. In addition, Board Policy I-63 and/or department procedures will be updated to meet this standard.

Adopted Mitigation Measure Lan-1.3: Maintain plans and standards for infrastructure and roads so that divisions of communities do not occur. This will include: 1) updates to County Road Standards to ensure that roads are designed and built in a safe manner consistent with the General Plan and community context; 2) adherence to Community Plans to guide infrastructure planning in the individual and unique communities of the County; 3) evaluation and, if necessary, revisions to the subdivision ordinance to ensure future project designs, and corresponding infrastructure designs, are consistent with the General Plan and with established community character; 4) preparation of local public road network plans to improve mobility, connectivity, and safety; and 5) preparation of community road standards that supplement the County road standards in order to recognize the unique constraints and character of different communities.

2.11.3 Analysis of Effects and Significance Determinations

2.11.3.1 Significance Criteria

Based on guidance provided in Appendix G of the State CEQA Guidelines, the proposed project would result in a significant impact on land use and planning if it would:

- physically divide an established community, or
- cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

2.11.3.2 Approach to Analysis

Impacts related to land use and planning were analyzed qualitatively based on a review of the CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented (i.e., the division of established communities and significant environmental effects resulting from conflicts with land use plans, policies, and regulations). Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant adopted General Plan policies and 2011 GPU PEIR mitigation measures have been applied to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update. These policies and mitigation measures are incorporated by reference.

Scope of SEIR Analysis

The impact analysis contained within this draft SEIR focuses on whether implementation of the CAP Update would result in new or more severe impacts than were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures

and actions) to demonstrate progress towards established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impact of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unincorporated county) and its role as a programmatic planning document designed to guide future decision-making related to the reduction of GHG emissions within the unincorporated county, the study area for land use and planning is the unincorporated area of the county within the County's jurisdiction (i.e., excluding tribal lands, state and federally owned lands, and military installations).

The analysis in this draft SEIR is programmatic. Implementation of all CAP Update measures and actions were considered during preparation of this draft SEIR, to the degree specific information about their implementation is known. This SEIR considers the types of impacts that could occur with implementation of future projects anticipated to result from implementation of the proposed GHG reduction measures and actions because these future projects have yet to be specifically defined. Future discretionary projects would be evaluated by the County to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If additional impacts would result, subsequent CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether impacts are reduced to a less-than-significant level.

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies and associated measures and actions proposed in the CAP Update (see Table 1-2) have been grouped into categories for the purpose of analysis, based on the sector they target (e.g., solid waste, water/wastewater). CAP Update actions and measures that would have the potential to affect land use and planning are summarized below. CAP Update actions and measures that would involve development of policies and programs that would not result in direct physical effects or those that would result in limited physical improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to land use and planning.

Solid Waste Measures and Actions. This category includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions relevant to land use and planning include those that would result in the development of new or expanded recycling and composting facilities (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

Water and Wastewater Measures and Actions. This category includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Key actions relevant to land use and planning include those that would result in the construction of new recycled water and stormwater capture and reuse infrastructure (Actions W-1.1, W-2.2, W-2.3, and W-2.4).

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. Key actions relevant to land use and planning include those that would result in the acquisition of conservation and agricultural lands (Actions A-1.1 and A-3.1) and the evaluation of opportunities for the construction of farmworker housing (Action A-4.1.b).

Energy Measures and Actions. This category includes strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Key actions relevant to land use and planning include those that would result in the construction of new small- and large-scale infrastructure to promote renewable energy use and electrification (Actions E-1.1, E-2.1, E-2.2, E-3.1 E-3.2a, E-3.2b, and E-3.3). Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the County’s vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions relevant to land use and planning include those that would result in the construction of new electric vehicle charging stations (Action T-3.1), hydrogen fueling infrastructure (Action T-3.1.a), and pedestrian and bicycle network improvements (Action T-5.1) and that would promote densification of land uses within Transit Priority Areas (Action T-6.2).

2.11.3.3 Issue 1: Physically Divide an Established Community

This section describes the potential impact related to the physical division of an established community from implementation of the CAP Update measures and actions.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, the project would have a potentially significant impact if it would:

- physically divide an established community.

For the purposes of this draft SEIR, established communities are defined as established town centers and communities described in Section 2.9.1.2 of the 2011 GPU PEIR. The County of San Diego has not published specific guidelines for determining significant impacts related to land use and planning under CEQA.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to the potential for physical division of established communities because of adoption of the goals and policies contained within

the plan, and buildout of the land use map. The 2011 GPU PEIR determined that buildout under the General Plan would result in potentially significant project impacts related to the physical division of an established community. The 2011 GPU PEIR determined that the impact could be reduced through a combination of the following:

- Implementing the following adopted General Plan policies that would ensure that future development and circulation improvements would be consistent with the character of established communities:
 - Policy LU-1.4: Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met:
 - Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding
 - Potential Village development would be accommodated by the General Plan road network
 - Public facilities and services can support the expansion without a reduction of services to other County residents
 - The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area
 - Policy LU-2.1: Community Plans. Maintain updated Community Plans, as part of the General Plan, to guide development to reflect the character and vision for each individual unincorporated community, consistent with the General Plan.
 - Policy LU-2.3: Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.
 - Policy LU-2.5: Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.
 - Policy LU-4.1: Regional Planning. Participate in regional planning to ensure that the unique communities, assets, and challenges of the unincorporated lands are appropriately addressed with the implementation of the planning principles and land use requirements of SB375.
 - Policy LU-4.2: Review of Impacts of Projects in Adjoining Jurisdictions. Review, comment, and coordinate when appropriate on plans, projects, and proposals of overlapping or neighboring agencies to ensure compatibility with the County's General Plan, and that adjacent communities are not adversely impacted.
 - Policy LU-4.3: Relationship of Plans in Adjoining Jurisdictions. Consider the plans and projects of overlapping or neighboring agencies in the planning of unincorporated lands, and invite comments and coordination when appropriate.

- Policy LU-4.4: Development Compatibility with Military Facilities. Ensure compatibility of new development with the current and planned mission and operations of U.S. government military installations.
- Policy LU-11.2: Compatibility with Community Character. Require that commercial, office, and industrial development be located, scaled, and designed to be compatible with the unique character of the community.
- Policy LU-12.4: Planning for Compatibility. Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts.
- Policy M-10.6: On-Street Parking. Minimize on-street vehicular parking outside Villages and Rural Villages where on-street parking is not needed, to reduce the width of paved shoulders and provide an opportunity for bicycle lanes to retain rural character in low-intensity areas. Where on-street parking occurs outside Villages and Rural Villages, require the design to be consistent with the rural character. [See applicable community plan for possible relevant policies.]
- Policy H-2.1: Development that Respects Community Character. Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element. [See applicable community plan for possible relevant policies.]
- Policy M-1.3: Treatment of High-Volume Roadways. To avoid bisecting communities or town centers, consider narrower rights-of-way, flexibility in design standards, and lower design speeds in areas planned for substantial development. Reduce noise, air, and visual impacts of new freeways, regional arterials, and Mobility Element roads, through landscaping, design, and/or careful location of facilities.
- Implementing the following mitigation measures identified in the 2011 GPU PEIR that would ensure that future infrastructure and development do not conflict with other local plans and regional planning efforts:
 - Adopted Mitigation Measure Lan-1.1: Coordinate with adjacent cities and other agencies regarding planning efforts and resource protection. This includes working with SANDAG during updates to the RTP to ensure that regional roads are properly planned, sited, and designed. Additional on-going consultations include coordination with state, federal, and local agencies regarding the high speed rail, the Sunrise Powerlink, and tribal casinos.
 - Adopted Mitigation Measure Lan-1.2: Coordinate with land owners, other departments, and community groups to ensure that both public and private

development projects and associated infrastructure minimize impacts to established communities. This involves community input and General Plan conformance reviews on County road projects to insure that County road planning and development is consistent with the General Plan. This also includes analysis of potential environmental impacts for public and private road projects and application of mitigation measures pursuant to CEQA. DPW policies and procedures shall be evaluated to ensure that such reviews are conducted and that issues regarding potential division of communities are identified and addressed. General Plan Amendments that propose changes to the circulation network shall be kept consistent with the General Plan Goals and Policies, and such proposals will also be reviewed by the communities. In addition, Board Policy I-63 and/or department procedures will be updated to meet this standard.

- Adopted Mitigation Measure Lan-1.3: Maintain plans and standards for infrastructure and roads so that divisions of communities do not occur. This will include: 1) updates to County Road Standards to ensure that roads are designed and built in a safe manner consistent with the General Plan and community context; 2) adherence to Community Plans to guide infrastructure planning in the individual and unique communities of the County; 3) evaluation and, if necessary, revisions to the subdivision ordinance to ensure future project designs, and corresponding infrastructure designs, are consistent with the General Plan and with established community character; 4) preparation of local public road network plans to improve mobility, connectivity, and safety; and 5) preparation of community road standards that supplement the County road standards in order to recognize the unique constraints and character of different communities.

The 2011 GPU PEIR determined that the impact related to the physical division of an established community would be reduced to a less-than-significant level through the implementation of adopted General Plan policies and the mitigation measures described above. The discussion of the impact related to the physical division of an established community can be found in Section 2.9, "Land Use" (pages 2.9-27 through 2.9-29), of the 2011 GPU PEIR, and is incorporated herein by reference.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures and actions to result in the physical division of an established community.

Solid Waste Measures and Actions

The CAP Update includes strategies, measures, and actions to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to land use and planning include those that would result in the

development of new or expanded recycling and composting facilities. For example, Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b include development of zero waste policies and improvements to waste management practices that may result in new or expanded composting and recycling facilities to increase waste diversion from landfills. Specific locations for new and expanded facilities have not been identified. Therefore, these improvements are analyzed at a programmatic level.

Projects with potential to physically divide an established community include those that would introduce new infrastructure that would bisect existing land uses or those that would change existing circulation patterns in a manner that would hinder access to established communities (e.g., freeway, railroad, airport, or large open space area). Specific locations for new and expanded solid waste facilities have not been identified, but it is assumed that the development of these facilities would occur in accordance with San Diego County Use Regulations and General Plan policies. Policy LU-16.3 encourages the establishment of new recycling and resource recovery facilities in areas with industrial land use designations or other appropriate areas based on the type of recycling. For example, the General Plan states that some agricultural areas may be appropriate for management or recycling of agricultural waste (i.e., composting). Because new and expanded solid waste facilities would be sited on land that is zoned for this type of land use, or allowable by condition, these facilities would not be sited in a manner that would physically divide established communities. In addition, these facilities would not be sited such that they would introduce land uses that are clearly incompatible with existing and planned surrounding land uses.

Based on the discussion above, implementation of solid waste measures and actions proposed in the CAP Update would result in a less-than-significant impact related to the physical division of established communities.

Water and Wastewater Measures and Actions

The CAP Update includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Actions W-1.1, W-2.2, W-2.3, and W-2.4 include development of policies that may result in the construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater. These actions are consistent with the policies in the adopted General Plan related to sustainable stormwater management (Policy LU-6.5), water conservation (Policy COS-4.1), drought-efficient landscaping (Policy COS-4.2), and recycled water (Policy COS-4.5), which were evaluated in the 2011 GPU PEIR.

The construction of new recycled water and stormwater capture and reuse infrastructure would not consist of new large-scale infrastructure (e.g., freeway, railroad, airport) or large

open space areas that would bisect existing land uses or those that would change existing circulation patterns in a manner that would hinder access to established communities. Rather, these actions would facilitate water efficiency and conservation for existing development and new development as it is approved. These infrastructure improvements, when considered separately from the future development that they may accompany, would not result in the conversion of any land uses or the introduction of new land uses that would be incompatible with existing and planned surrounding land uses. Accordingly, the physical division of established communities is not anticipated.

Based on the discussion above, implementation of water and wastewater measures and actions proposed in the CAP Update would result in a less-than-significant impact related to the physical division of established communities.

Agriculture and Conservation Measures and Actions

The CAP Update includes strategies to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. Actions A-1.1, A-1.2, A-1.2a, A-3.1, A-4.1, and A-4.1c would result in acquiring and managing conservation lands and improving land management practices on existing agricultural land to improve carbon sequestration. Some actions could result in the dedication of existing agricultural land in the unincorporated county for agricultural uses in perpetuity. Action A-4.1.b would result in the evaluation of opportunities for future construction of farmworker housing. New farmworker housing would be constructed as accessory uses to support existing agricultural operations.

The agriculture and conservation actions would not result in the development of new large-scale infrastructure (e.g., freeway, railroad, airport) or large open space areas that would bisect existing land uses or that would change existing circulation patterns in a manner that would hinder access to established communities. In addition, these actions would not introduce new land uses that would be incompatible with existing and planned surrounding land uses. Accordingly, the physical division of established communities is not anticipated.

Based on the discussion above, implementation of agriculture and conservation measures and actions would result in a less-than-significant impact related to the physical division of established communities.

Energy Measures and Actions

The CAP Update includes strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Actions E-1.1, E-2.1, E-2.2, E-3.1, E-3.2a, E-3.2b, and E-3.3 include development of policies and programs that may indirectly result in the construction of new small- and large-scale infrastructure to achieve the County's renewable energy use and electrification goals.

Small-Scale Energy Systems

Requirements for new development would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small-scale solar and energy storage systems and small-scale wind turbines (roof- or ground-mounted systems), as well as energy storage (Action E-3.2.b). With the exception of wind turbines, these types of improvements would be made to existing buildings or would be made in connection with new development as it is approved. Accordingly, these types of projects would not have potential to physically divide an established community.

Specific locations for new small-scale wind turbines have not been identified; however, these facilities would be developed in accordance with the County's Wind Energy Ordinance. As described on page 2.7-11 of the 2012 Wind Energy EIR, small-scale wind turbines would be located in concert with existing residential, commercial, industrial, and agricultural uses. Future small-scale wind turbines could potentially require the development or improvement of access roads. However, small-scale wind turbines are allowed as accessory uses and any new or improved access roads would be contained within properties and would be accessed via private roads that would not bisect communities or town centers. Therefore, small-scale wind turbines would not significantly disrupt or divide an established community or create land uses that are clearly incompatible with existing and planned surrounding land uses (County of San Diego 2012). Accordingly, the physical division of an established community from development of small-scale energy infrastructure is not anticipated.

Large-Scale Renewable Energy Systems

Implementation of policies and programs to increase renewable energy in the unincorporated county has the potential to indirectly result in the development of large-scale renewable energy systems to satisfy increased demand. These systems would include solar energy generation technologies such as PV and concentrator solar, and large-scale wind turbine systems. Because the demand generated by such programs and the types of renewable energy systems that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level.

Large-scale renewable energy system projects may require the construction of multiple components to support energy production, including substations, transmission systems, maintenance buildings, and internal and external access roads. These projects would vary in size and could be as large as several thousand acres. It is anticipated that these facilities would be constructed in primarily undeveloped locations that are suitable for generating renewable energy. Specific locations that may be chosen for these large-scale utility projects are unknown. It is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. However, linear infrastructure, such as roadways, would have potential to divide established communities

if this infrastructure was sited in a manner that would disrupt existing access and circulation patterns.

Each large-scale renewable energy project would be required to obtain applicable permits (e.g., Administrative Permit or Major Use Permit). During the permit process, individual projects would be reviewed to ensure that the physical character (i.e., scale, bulk, coverage, and density) of each project is in harmony with the County's zoning regulations and compatible with adjacent properties. In addition, the physical characteristics of the site would be reviewed to determine if the site is suitable for the type and intensity of the proposed use or development. Large-scale wind turbine systems are further governed by the County's Wind Energy Ordinance, which sets forth requirements related to location, size, design, and operating characteristics of proposed facilities. Roadway improvements would be constructed according to the County's Zoning Ordinance Sections 6750–6799, San Diego County Public Road Standards, and San Diego County Private Road Standards.

Each large-scale renewable energy project also would be required to undergo evaluation for project-specific impacts under CEQA at the time of application. As applicable, individual projects would be required to demonstrate consistency with General Plan goals and policies (e.g., Goal EJ-2 and Policies LU-12.4, EJ-2.3, EJ-2.5, EJ-2.7, EJ-5.2) and implement 2011 GPU PEIR mitigation measures (Lan-1.1 through Lan-1.3), listed above in the "2011 San Diego County General Plan" and "2011 San Diego County GPU PEIR" sections, respectively, which are intended to reduce the potential for roadways to physically divide established communities. In addition, project-specific mitigation would be identified, where applicable, to minimize or eliminate impacts related to the direct or indirect conversion of agricultural resources to the extent feasible.

Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects impact related to division of established communities could be significant.

Built Environment and Transportation Measures and Actions

The CAP Update includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Actions T-3.1, T-3.1.b, T-5.1, and T-6.2 would include the development of plans and programs that may result in the construction of pedestrian, bicycle, and transit network improvements and zero-emission vehicle infrastructure. Because of the nature of such improvements (i.e., limited size and within existing transportation corridors), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. These improvements are anticipated to improve multi-modal connections between and within communities. The CAP Update does not propose any large-scale transportation infrastructure (e.g., freeway, railroad, airport) that would bisect existing land uses or that would change existing circulation patterns in a manner that would hinder access to

established communities. Accordingly, the physical division of established communities is not anticipated.

Based on the discussion above, implementation of built environment and transportation measures and actions proposed in the CAP Update would result in a less-than-significant impact related to the physical division of established communities.

Summary

Based on the discussion above, solid waste, water and wastewater, agriculture and conservation, small-scale renewable energy, and built environment and transportation measures and actions that would be implemented under the CAP Update are not anticipated to result in the physical division of established communities. However, large-scale renewable energy projects could introduce linear infrastructure (e.g., roadways) with potential to physically divide established communities. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts related to the physical division of established communities would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of these projects. Therefore, large-scale renewable energy facilities would have a **potentially significant** impact related to the physical division of established communities (**Impact LU-1**). Implementation of the CAP Update **would result in a new significant impact** not disclosed in the 2011 GPU PEIR.

2.11.3.4 Issue 2: Conflict with Land Use Plans, Policies, or Regulations

This section describes the potential impact related to conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact that would result from implementation of the CAP Update measures and actions.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, the project would have a potentially significant impact if it would:

- result in conflicts with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact.

The County of San Diego has not published specific guidelines for determining significant impacts related to land use and planning under CEQA.

Merely being in conflict with an existing plan, policy, or regulation would not necessarily be considered a significant impact under CEQA; rather, the conflict must result in a substantial adverse effect in the environment. Further, a project need not conform perfectly to every policy to be consistent with a planning document, such as a general

plan. In the case of a general plan, the project must be “compatible with the objectives, policies, general land uses, and programs specified in” the general plan. (*Sequoiah Hills, supra, 23 Cal.App.4th at pp. 717-718.*)

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to the potential for possible conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. The 2011 GPU PEIR determined that buildout under the General Plan would not result in potentially significant project impacts related to possible conflicts with land use plans, policies, or regulations adopted to avoid or mitigate environmental impacts. The 2011 GPU PEIR determined that conflicts with land use plans, policies, or regulations would be avoided through implementation of the following policies:

- Policy LU-4.1: Regional Planning. Participate in regional planning to ensure that the unique communities, assets, and challenges of the unincorporated lands are appropriately addressed with the implementation of the planning principles and land use requirements, including the provisions of SB375.
- Policy LU-4.7: Airport Land Use Compatibility Plans (ALUCP). Coordinate with the Airport Land Use Commission (ALUC) and support review of Airport Land Use Compatibility Plans (ALUCP) for development within Airport Influence Areas.
- Policy LU-6.5: Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County’s LID Handbook.
- Policy LU-14.1: Wastewater Facility Plans. Coordinate with wastewater agencies and districts during the preparation or update of wastewater facility master plans and/or capital improvement plans to provide adequate capacity and assure consistency with the County’s land use plans.
- Policy S-15.1: Sheriff Facility Locations. Locate Sheriff facilities to best serve existing and planned development and the corresponding demand for services.
- Policy M-12.1: County Trails System. Implement a County Trails Program by developing the designated trail and pathway alignments and implementing goals and policies identified in the Community Trails Master Plan.

The 2011 GPU PEIR determined that the impact related to conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact would be less than significant through the implementation of adopted General Plan policies discussed above. No mitigation measures were identified or required. The discussion of the impact related to conflicts with land use plans, policies, or regulations can be found in Section 2.9, “Land Use” (pages 2.9-29 through 2.9-36), of the 2011 GPU PEIR, and is incorporated herein by reference.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures and actions to result in conflicts with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact.

As noted above under “2011 San Diego County General Plan” in Section 2.11.2.3, “Local,” the Environmental Justice Element of the General Plan contains goals and policies to reduce unique or compounded health risks in disadvantaged communities, promote civic engagement in public decision making, and prioritize improvements and programs to address needs and benefits for disadvantaged communities. General Plan policies that are relevant to the CAP Update include policies to protect environmental justice communities from increased pollution exposure (EJ-2.3 through EJ-2.7, EJ-3.7) and ensure that environmental justice communities receive equitable public facilities and infrastructure (EJ-5.2, EJ-12.2, EJ-12.3, and EJ-13.3). The CAP Update does not propose any measures or actions that would impair the County’s ability to carry out the goals and policies in the Environmental Justice Element. Rather, the CAP Update includes an equity framework intended to serve as guidance for the implementation of inclusive climate actions outlined in the CAP Update. Specifically, the equity framework identifies best practices in implementing and assessing fair and inclusive climate actions, programs, and outcomes and prioritizing communities with the greatest need. The CAP Update considers socioeconomic groups and local communities that are vulnerable to climate change. Relevant measures and actions proposed under the CAP Update that would benefit underserved communities are described in the sections below. Therefore, the CAP Update would not conflict with applicable General Plan policies adopted for the purpose of avoiding or mitigating an environmental impact on environmental justice communities. See also Section 2.7, “Environmental Justice,” which summarizes existing conditions related to environmental justice concerns, identifies existing regulatory requirements, and includes an analysis demonstrating that CAP implementation would not result in adverse environmental impacts that might be disproportionately borne by minority and low-income communities within San Diego County.

As noted in Section 2.11.2.3, above, SANDAG’s *2021 Regional Plan* represents the RTP for the County. It provides a framework for coordinated land use and transportation planning strategies by identifying projects, policies, and programs developed to achieve the goals of efficiently moving people and goods; providing access to affordable, reliable, and safe mobility options for everyone; and providing healthier air and reduced GHG emissions regionwide. Examples of such projects include pedestrian, bicycle, and transit infrastructure improvements to facilitate multi-modal transportation and transportation demand management strategies to improve traffic flow and safety on roadways. The measures and actions proposed under the CAP Update and described below are intended to further statewide and regional goals, including those of the Regional Plan, by promoting policies and actions that reduce GHG emissions through improved solid waste and water/wastewater use and management, increasing the availability of renewable sources of energy, promoting sustainable agricultural practices, and promoting transportation and built environment improvements that encourage the development of multi-modal transportation options and vehicular emissions reductions.

These measures and actions also are compatible with the goals and initiatives laid out in the County's *2020-2030 County Operations Strategic Sustainability Plan*, which includes initiatives and goals that focus on energy (reducing energy use and promoting clean energy production), water (reducing potable water consumption and promoting water reuse systems), waste (increasing diversion of solid waste and promoting recycling), and transportation (reducing fleet vehicle emissions and vehicle miles traveled, electrifying the fleet, and expanding electric vehicle charging infrastructure); the County's *Zero Carbon Portfolio Plan*, which presents measures to support and build on existing state, County, and industry goals, including GHG emission reduction goals established by AB 32 and Executive Orders B-30 and B-55; and the County's *Renewable Energy Plan*, which outlines a series of measures to transition existing electricity consumption from fossil-fuel grid electricity to clean, renewable power sources.

Solid Waste Measures and Actions

This category includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions relevant to land use and planning include those that would result in the development of new or expanded recycling and composting facilities (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

Specific locations for new and expanded sustainable solid waste facilities have not been identified, but the development of these facilities would be required to comply with General Plan policies and zoning regulations. In accordance with General Plan Policies LU-16.3 and COS-6.2, new recycling and resource recovery facilities would be sited in areas with industrial land use designations or other appropriate areas based on the type of recycling, subject to a use permit. For example, the General Plan states that some agricultural areas may be appropriate for management or recycling of agricultural waste (i.e., composting facilities). Therefore, the siting of sustainable solid waste facilities would not conflict with the County's General Plan or zoning regulations.

Future discretionary actions would be evaluated for project-specific impacts related to land use and planning under CEQA at the time of application. Because recycling and composting facilities would be sited in accordance with the County's General Plan and zoning regulations, the construction and operation of such facilities are not anticipated to result in physical environmental effects related to incompatible land uses. Such facilities would not be sited in proximity to sensitive land uses, such as residences, schools and day care centers, parks and recreational facilities, and medical facilities. Therefore, sensitive populations would not be exposed to excessive odors and pests, noise, emissions of air pollutants and toxic air contaminants (e.g., volatile organic compounds), vehicle traffic, or hazardous materials associated with the construction and operation of recycling and composting facilities. For further analysis related to the physical effects of construction and operation of recycling and composting facilities, see also Section 2.3, "Air Quality," Section 2.7, "Environmental Justice," Section 2.9, "Hazards and Hazardous Materials," Section 2.12, "Noise," and Section 2.13, "Transportation."

Future discretionary actions would also be required to undergo site-specific review under CEQA for consistency with other land use plans, policies, and regulations at the time of application. For example, new or expanded sustainable solid waste facilities proposed within the county's Coastal Zone would be required to demonstrate consistency with the Local Coastal Program LUP and would be subject to review and approval by the County, which has assumed permitting authority for the California Coastal Commission within the unincorporated coastal area. In addition, new or expanded sustainable solid waste facilities proposed within the safety zone, noise contour, or airspace protection and overflight boundary of any airport would be required to demonstrate consistency with the applicable airport's land use compatibility plan (in accordance with General Plan Policy LU-4.7) and would be subject to review and approval by the San Diego County Regional Airport Authority. If potential for impacts would result, additional CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether there would be conflicts with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact.

Furthermore, the construction of new recycling and composting facilities and implementation of other waste reduction programs proposed in the CAP Update would help the County achieve its zero waste and diversion goals outlined in the 2020-2030 County Operations Strategic Sustainability Plan, which connect all the County's separate sustainability planning efforts, including the Strategic Plan to Reduce Waste Implementation, and the CAP Update would ensure that the County's operations and community-based actions are aligned with state legislation promoting solid waste diversion (i.e., AB 939, AB 341, AB 1826, AB 876, SB 1383, and CALGreen).

Based on the above discussion, the solid waste measures and actions would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. The impact would be less than significant.

Water and Wastewater Measures and Actions

This category includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Key actions relevant to land use and planning include those that would result in the construction of new recycled water and stormwater capture and reuse infrastructure (Actions W-1.1, W-2.2, W-2.3, and W-2.4).

Specific locations for new recycled water and stormwater capture and reuse infrastructure have not been identified; however, this infrastructure would facilitate water efficiency and conservation for existing development and new development as it is approved. These infrastructure improvements, when considered separately from the future development that they may accompany, would not change existing land uses or introduce new land uses in a manner that would conflict with the County's General Plan or zoning regulations. Implementation of water and wastewater actions under the CAP Update would ensure consistency with various County plans, including the County's *Landscape Water Conservation Design Manual*, *Low Impact Development Handbook*, *Standard Urban Stormwater Mitigation Plan*, and *Hydromodification Management Plan*, which govern

water conservation and stormwater management for new development (see also Section 2.10, “Hydrology and Water Quality”). Implementation of new recycled water and stormwater capture and reuse infrastructure would also be consistent with General Plan Policies COS-4.1, COS-4.2, and COS-4.5, which were adopted for the purpose of reducing potable water consumption and increasing the use of recycled water systems in new development. In addition, implementation of these actions would help the County achieve similar goals outlined in the *2020-2030 County Operations Strategic Sustainability Plan*. Therefore, the water and wastewater measures and actions would not conflict with applicable land use plans, policies, and regulations.

Based on the above discussion, the water and wastewater measures and actions would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. Because the 2011 GPU PEIR concluded that the impact related to conflicts with land use plans, policies, and regulations would be less than significant, implementation of the water and wastewater measures and actions under the CAP Update would not result in a new or substantial increase in the magnitude of this impact.

Agriculture and Conservation Measures and Actions

This category includes strategies to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. Key actions relevant to land use and planning include those that would result in the acquisition of conservation and agricultural lands (Actions A-1.1 and A-3.1). Dedicating existing agricultural land in the unincorporated county for agricultural uses in perpetuity could be inconsistent with the land uses envisioned in the General Plan land use diagram. These actions would, however, be consistent with Guiding Principle 8 in the County’s General Plan to “preserve agriculture as an integral component of the region’s economy, character, and open space network.” In addition, these actions would be consistent with General Plan Policies LU-7.1, COS-6.2, and COS-6.4, which were adopted for the purpose of protecting agricultural operations and preserving agricultural lands. Action A-4.1.b would result in the evaluation of opportunities for future construction of farmworker housing. However, new farmworker housing would be constructed as accessory uses to support existing agricultural operations and would be reviewed for consistency with the County’s Zoning Code as part of the permitting process. Therefore, although agriculture and conservation measures and actions could result in changes to land use and zoning designations throughout the unincorporated county, implementation of these actions would not conflict with the guiding principles and policies identified in the General Plan.

The CAP Update also includes actions that promote equity and align with the policies in the Environmental Justice Element of the General Plan. Action A-2.1 would implement an Equity Driven Tree Planting Program that prioritizes underserved communities. The program would expand tree canopy cover throughout the county and would include a public education component on the benefits of drought-tolerant tree plantings. This action would be consistent with General Plan Policy EJ-3.7, which was adopted to promote carbon sequestration efforts that ensure equitable air quality throughout the unincorporated county, and General Plan Policy EJ-13.3, which was adopted to

encourage urban greening within environmental justice communities. Action A-4.1.a would result in a food sourcing policy that prioritizes and contracts with equitable food suppliers in County operations.

Based on the above discussion, the agriculture and conservation measures and actions would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. The impact would be less than significant.

Energy Measures and Actions

This category includes strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Key actions relevant to land use and planning include those that would result in the construction of new small- and large-scale infrastructure to promote renewable energy use and electrification (Actions E-1.1, E-2.1, E-2.2, E-3.1, E-3.2, E-3.2a, E-3.2b, and E-3.3).

Small-Scale Energy Systems

The construction and operation of small-scale renewable energy systems have potential to result in physical effects, such as increases in noise levels and changes to existing views. Specific locations for new small-scale renewable energy systems have not been identified; however, the installation and operation of solar energy systems and wind turbines are required to comply with the standards and procedures outlined in the Renewable Energy Regulations contained in Sections 6950–6959 of the County’s Zoning Ordinance. These regulations are intended to minimize physical effects related to incompatible land uses. Specifically, the Renewable Energy Regulations identify height and setback requirements for onsite PV solar energy systems that are permitted as accessory uses to agricultural, civic, commercial, industrial, and residential land uses. The Renewable Energy Regulations also specify requirements for the location, size, design, and operating characteristics of offsite PV solar energy systems to ensure compatibility with adjacent land uses. With regard to small-scale wind turbines, the Renewable Energy Regulations specify design criteria; sound level limits; height limits; and setback requirements from roads, property lines, transmission towers and lines, and protected biological resources. Therefore, the energy measures and actions would not conflict with County ordinances governing the development of small-scale renewable energy systems.

The construction of small-scale renewable energy systems would be consistent with General Plan Policies COS-14.3, COS-14.7, and COS-14.13, which were adopted for the purpose of reducing emissions of criteria pollutants and GHGs from new development through minimized energy demands. These actions would help the County achieve similar goals outlined in other County plans for reducing non-renewable energy consumption, which include the *2020-2030 County Operations Strategic Sustainability Plan*, *Zero Carbon Portfolio Plan*, and *Renewable Energy Plan*. Therefore, the energy measures and

actions would not conflict with County plans and policies reflecting the County's desire to expand renewable energy sources. See also Section 2.6, "Energy."

Further, the energy measures and actions would align with the goals and policies in the Environmental Justice Element of the General Plan that promote equity for environmental justice communities. Action E-2.2.a would assist renters with implementing energy efficiency improvements. Action E-3.2.a would incentivize the development of renewable energy systems (e.g., solar) on low-income homes. This action would be consistent with General Plan Policy EJ-6.5, which was adopted to assist low-income homeowners through energy efficiency programs.

Based on the above discussion, the energy measures and actions would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. The impact would be less than significant.

Large-Scale Renewable Energy Systems

Implementation of policies and programs to increase renewable energy in the unincorporated county have potential to indirectly result in the development of large-scale renewable energy systems to satisfy increased demand. These systems would include solar energy generation technology such as solar PV and concentrator solar, and large-scale wind turbine systems. Because the demand generated by such programs and the types of renewable energy systems that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level and assumes use of typical solar and wind generation technologies.

Large-scale renewable energy system projects may require the construction of multiple components to support energy production, including substations, transmission systems, maintenance buildings, and internal and external access roads. These projects would vary in size and could be as large as several thousand acres. It is anticipated that these facilities would be constructed in primarily undeveloped locations that are suitable for generating renewable energy. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees.

Each large-scale renewable energy project would be required to obtain applicable permits (e.g., Administrative Permit or Major Use Permit). During the permit process, individual projects would be reviewed to ensure that the physical character (i.e., scale, bulk, coverage, and density) of each project is in harmony with the County's zoning regulations and compatible with adjacent properties. In addition, the physical characteristics of the site would be reviewed to determine if the site is suitable for the type and intensity of the proposed use or development. Large-scale wind turbine systems are further governed by the County's Wind Energy Ordinance, which sets forth requirements related to location, size, design, and operating characteristics of proposed facilities. Roadway improvements would be constructed according to the County's Zoning Ordinance Sections

6750–6799, San Diego County Public Road Standards, and San Diego County Private Road Standards.

Each large-scale renewable energy project also would be required to undergo evaluation for project-specific impacts under CEQA at the time of application. As applicable, individual projects would be required to demonstrate consistency with General Plan policies (e.g., Policies LU-4.7, LU-6.5, S-15.1, M-12.1, LU-4.1, LU-14.1) that would avoid conflicts with land use plans, policies, or regulations. In addition, project-specific mitigation would be identified, where applicable, to minimize or eliminate impacts related to the direct or indirect conversion of agricultural resources to the extent feasible.

Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible. Large-scale renewable energy projects would not be approved unless they meet the goals and policies of applicable land use plans. The impact would be less than significant.

Built Environment and Transportation Measures and Actions

This category includes strategies to decarbonize the County’s vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions relevant to land use and planning include those that would result in the construction of pedestrian, bicycle, and transit network improvements and zero-emission vehicle infrastructure (Actions T-3.1, T-3.1.b, and T-5.1) and that would promote increased density of land uses within Transit Priority Areas (e.g., Action T-6.2).

The construction of new electric vehicle charging stations and hydrogen fueling infrastructure would support the County’s plans for reducing non-renewable energy consumption, which include the *2020-2030 County Operations Strategic Sustainability Plan*, *Zero Carbon Portfolio Plan*, and *Renewable Energy Plan*. Pedestrian and bicycle network improvements would be consistent with Guiding Principle 6 in the County’s General Plan to “provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.” In addition, bicycle and pedestrian network improvements would be consistent with the intent of the County’s *Active Transportation Plan*, which supports the County’s efforts to promote active transportation options through pedestrian and bicycle improvements in the unincorporated county. Therefore, the built environment and transportation measures and actions would not conflict with County plans and policies related to energy consumption and the transportation network.

As discussed in Section 1.7, “Project Consistency with Applicable Plans,” SANDAG’s *2021 Regional Plan* provides a basis for allocating federal and state funds used for specific items such as land use incentives and transportation improvements. The County has considered the *2021 Regional Plan* goals and implemented them to the extent feasible during the preparation of the CAP Update. Accordingly, the pedestrian and bicycle network improvements that would be implemented under the CAP Update reflect

the types of projects identified in the *2021 Regional Plan*. These improvements would support goals in the *2021 Regional Plan* to improve the efficiency and equity of the transportation network and reduce air pollutant and GHG emissions.

As discussed in the “Buildout Assumptions” section of this SEIR relies on SANDAG’s *2021 Regional Plan* population projections, which represent a scaled down and more current and realistic estimate of the development potential in the unincorporated county than what was considered in the 2011 GPU PEIR. More specifically, the *2021 Regional Plan EIR* Alternative 2 growth assumption (DS39 scenario) was used as the basis for the buildout assumptions assumed in the CAP Update because it mostly closely resembled observed patterns of growth. Accordingly, the population and number of residential units are anticipated to be less than what was originally assumed in the 2011 GPU PEIR. Although SANDAG anticipates a different distribution of land uses than assumed in the 2011 GPU PEIR, the CAP Update would be consistent with the *2021 Regional Plan*’s overarching vision of sustainable growth and development in the region. For example, implementation of Action T-6.2 under the CAP Update would promote densification of land uses within Transit Priority Areas. The densification of land uses near transit is similarly reflected in the *2021 Regional Plan*, which includes actions to partner with jurisdictions on planning efforts that support sustainable communities in Mobility Hub areas and Transit Priority Areas, encourage planning and capital projects that allow for higher-density and mixed-use development within Mobility Hub areas and transit priority areas, and incentivize housing in transit-rich areas. Therefore, the CAP Update would not conflict with the *2021 Regional Plan*. See also Section 2.13, “Transportation.”

Based on the above discussion, the built environment and transportation measures and actions would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. The impact would be less than significant.

Summary

The 2011 GPU PEIR concluded that the impact related to conflicts with land use plans, policies, and regulations would be less than significant. Similarly, the solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions proposed in the CAP Update would be generally consistent with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. Therefore, the impact would remain **less than significant** with implementation of the CAP Update. Implementation of the measures and actions in the CAP Update **would not result in new or more severe impacts**.

2.11.3.5 Cumulative Impact Analysis

The cumulative impact analysis study area for land use and planning in the 2011 GPU PEIR was identified as the San Diego region, including jurisdictions and special districts within and adjacent to the unincorporated county (see page 2.9-36 of the 2011 GPU PEIR). The cumulative environmental setting has been updated from the 2011 GPU PEIR

and is based on the development forecasts in SANDAG's *2021 Regional Plan* (SANDAG 2021). Therefore, the cumulative impact analysis study area for land use and planning is the SANDAG region, which encompasses the unincorporated areas and 18 incorporated cities that make up the entire County of San Diego. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Physically Divide an Established Community

The 2011 GPU PEIR determined that cumulative development would result in a less-than-significant cumulative impact related to the physical division of a community with the implementation of mitigation measures. Growth within the San Diego region has contributed to an ongoing trend of increased density and land use development. Growth and development patterns within the region are generally consistent with applicable land use plans; however, certain projects such as new large-scale development and transportation network improvements in previously unserved areas have resulted in, and will continue to result in, the division of established communities. Accordingly, there is an existing significant cumulative impact with respect to the division of established communities from past, present, and reasonably foreseeable future development in the cumulative impact analysis study area.

As described in Section 2.11.3.3, "Issue 1: Physically Divide an Established Community," most CAP Update measures and actions would not introduce new infrastructure (e.g., freeway, railroad, airport) or large open space areas that would bisect existing land uses or change existing circulation patterns in a manner that would hinder access to established communities. In addition, the CAP Update measures and actions would not result in the development of land uses that would directly or indirectly induce growth or change development patterns in the San Diego region; rather, these measures and actions are intended to accommodate projected growth in the region while ensuring the sustainability of the region's resources. However, large-scale renewable energy projects could result in new linear infrastructure (e.g., roadways) with potential to physically divide established communities. Therefore, implementation of the CAP Update would result in a considerable contribution to an existing cumulative effect related to the division of an established community. The cumulative impact would be **significant (Impact-C-LU-1)**. Implementation of the CAP Update **would result in a new significant impact** not disclosed in the 2011 GPU PEIR.

Issue 2: Conflict with Land Use Plans, Policies, or Regulations

The 2011 GPU PEIR determined that cumulative development would result in a less-than-significant cumulative impact related to conflicts with land use plans, policies, or regulations. Cumulative projects within unincorporated San Diego County are required to demonstrate that they would not result in conflicts with applicable land use plans, policies, and regulations in order to be approved. Where projects are inconsistent with applicable plans, such as the General Plan, analysis of associated impacts would be required on a project-by-project basis both through CEQA compliance and local processes such as design review. Therefore, there is a less-than-significant cumulative impact with respect

to conflicts with land use plans, policies, or regulations from past, present, and reasonably foreseeable future development in the cumulative impact analysis study area.

As described in Section 2.11.3.4, “Issue 2: Conflict with Land Use Plans, Policies, or Regulations,” CAP Update measures and actions would not result in conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Rather, the County has considered the guiding principles and goals related to reducing GHG emissions in the various regional and countywide planning documents and has implemented them to the extent feasible during the preparation of the CAP Update. Similar to the conclusions of the 2011 GPU PEIR, implementation of the project would not result in a substantial incremental effect that would result in a new significant cumulative impact related to conflicts with land use plans, policies, or regulations. The cumulative impact would be **less than significant**. Implementation of the CAP Update **would not result in a new significant impact** not disclosed in the 2011 GPU PEIR.

2.11.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would result in a potentially significant impact and a new significant cumulative impact related to the physical division of established communities, as summarized below.

Impact LU-1: Physically Divide an Established Community. Large-scale renewable energy projects could introduce linear infrastructure (e.g., roadways) with potential to physically divide established communities. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts related to the physical division of established communities would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of these projects.

Impact-C-LU-1: Result in a Cumulatively Considerable Contribution to Physical Division of Established Communities. Large-scale renewable energy projects could result in new linear infrastructure (e.g., roadways) with potential to physically divide established communities. Therefore, implementation of the CAP Update would result in a considerable contribution to an existing cumulative effect related to the division of an established community.

2.11.5 Mitigation Measures

2.11.5.1 Issue 1: Physically Divide an Established Community

The following mitigation measures were adopted as part of the 2011 GPU PEIR and are applicable to the CAP Update:

Adopted Mitigation Measure Lan-1.1: Coordinate with adjacent cities and other agencies regarding planning efforts and resource protection. This includes working

with SANDAG during updates to the RTP to ensure that regional roads are properly planned, sited, and designed. Additional on-going consultations include coordination with state, federal, and local agencies regarding the high speed rail, the Sunrise Powerlink, and tribal casinos.

Adopted Mitigation Measure Lan-1.2: Coordinate with land owners, other departments, and community groups to ensure that both public and private development projects and associated infrastructure minimize impacts to established communities. This involves community input and General Plan conformance reviews on County road projects to insure that County road planning and development is consistent with the General Plan. This also includes analysis of potential environmental impacts for public and private road projects and application of mitigation measures pursuant to CEQA. DPW policies and procedures shall be evaluated to ensure that such reviews are conducted and that issues regarding potential division of communities are identified and addressed. General Plan Amendments that propose changes to the circulation network shall be kept consistent with the General Plan Goals and Policies, and such proposals will also be reviewed by the communities. In addition, Board Policy I-63 and/or department procedures will be updated to meet this standard.

Adopted Mitigation Measure Lan-1.3: Maintain plans and standards for infrastructure and roads so that divisions of communities do not occur. This will include: 1) updates to County Road Standards to ensure that roads are designed and built in a safe manner consistent with the General Plan and community context; 2) adherence to Community Plans to guide infrastructure planning in the individual and unique communities of the County; 3) evaluation and, if necessary, revisions to the subdivision ordinance to ensure future project designs, and corresponding infrastructure designs, are consistent with the General Plan and with established community character; 4) preparation of local public road network plans to improve mobility, connectivity, and safety; and 5) preparation of community road standards that supplement the County road standards in order to recognize the unique constraints and character of different communities.

The 2013 Wind Energy Ordinance EIR considered mitigation that would require future large wind turbine projects to avoid using project designs or project features (such as access roads) that would potentially divide an established community. However, this measure was determined to be infeasible because future large wind projects may be able to make findings that land use impacts do not outweigh the benefits of such projects.

Additional mitigation was contemplated as part of this draft SEIR that would implement a development cap on large-scale renewable energy projects. However, this potential mitigation measure was rejected as infeasible because it may interfere with implementation of CAP Update Action E-3.3 (to provide 100 percent renewable energy from San Diego Community Power by 2030) and diminish the potential for the County to achieve the 2030 GHG emissions reduction target established by the CAP Update. This mitigation would also be infeasible because it would conflict with the County's goal for expanding renewable energy resources. It is unknown how many individual projects and

the specific types of large-scale renewable energy systems that would be required to meet the GHG reduction goals of the CAP Update because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available.

2.11.5.2 Issue 2: Conflict with Land Use Plans, Policies, or Regulations

The General Plan and CAP Update would not result in the potential for substantial conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. No mitigation measures were identified in the 2011 GPU PEIR and no new mitigation measures are required.

2.11.6 Significance Conclusions

2.11.6.1 Issue 1: Physically Divide an Established Community

With implementation of the CAP Update, large-scale renewable energy projects have potential to result in the physical division of established communities. Even with compliance with existing land use regulations and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation is available that could be applied to large-scale renewable energy projects. Therefore, the project's impact related to the physical division of established communities would be **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact related to the conversion of agricultural resources could occur. This **would be a new or more severe impact** not disclosed in the 2011 GPU PEIR.

2.11.6.2 Issue 2: Conflict with Land Use Plans, Policies, or Regulations

As described above in Sections 2.11.3.4 and 2.11.3.5, measures and actions that would be implemented under the CAP Update would result in a **less-than-significant impact** related to conflicts with land use plans, policies, and regulations and **would not result in a new significant cumulative impact** related to conflicts with land use plans, policies, and regulations. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.