CHAPTER 4 OTHER CEQA SECTIONS

4.1 Growth Inducement

CEQA Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an EIR. A project can induce growth directly, indirectly, or both. Direct growth inducement would result if, for instance, a project involved construction of new housing. A project also can have indirect growth inducement potential if it would establish substantial new permanent employment opportunities (e.g., commercial, industrial or governmental enterprises) that would encourage development of new housing for employees, or if it would involve a substantial construction effort creating short-term employment opportunities. Similarly, under CEQA, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. Infrastructure projects could also indirectly stimulate growth by enhancing access to properties or increasing their desirability for development.

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open-space land to urban uses, and other effects.

4.1.1 Growth-Inducing Impacts

The General Plan generally shifts densities westward of the San Diego County Water Authority boundary and concentrates the highest densities around existing communities, in Village centers, to encourage a compact and efficient land use pattern. This type of land use pattern promotes efficiencies regarding the provision of infrastructure and community services and promotes the preservation of high-quality habitat in the most remote portions of the unincorporated county.

The 2011 GPU PEIR discussed the growth-inducing impacts of the General Plan in Chapter 3, “Growth Inducing Impacts” (pages 3-1 through 3-6). The detailed discussion provided in the 2011 GPU PEIR is incorporated into this draft SEIR by reference. As described therein, implementation of the General Plan reduces the potential for new housing units compared to the previous General Plan, but its implementation is still considered a growth accommodating action because it provides direction for the planning and management of population growth. It is also considered a growth-inducing action because it facilitates economic expansion and associated infrastructure improvements (i.e., water, sewer, and circulation systems) that could further remove existing obstacles to growth.

The General Plan, as amended, provides land use development patterns and growth policies that allow the planned and orderly expansion of development supported by adequate public services. A project that would induce unplanned growth could indirectly

cause additional adverse environmental and public services impacts not previously envisioned. To assess whether implementation of the CAP Update would result in growth-inducing effects beyond what is currently anticipated, this draft SEIR analyzes the degree to which the growth associated with implementation of the project would result in growth inducing impacts beyond what was anticipated for the General Plan, as amended.

4.1.1.1 Population Growth

The project is not by itself directly growth inducing because it does not increase densities or modify intensities of allowable land uses. The CAP Update, consistency modifications to the General Plan and 2011 GPU PEIR, updates to the GHG Threshold, and Guidelines for Determining Significance would implement the requirements of the General Plan and 2011 GPU PEIR to establish GHG emission reduction targets and create a plan that contains strategies and measures to achieve those targets. The project would not remove a constraint on a required public service or stimulate growth by enhancing access to properties that were previously inaccessible.

Approval and implementation of the project may result in improvements to alternative modes of transportation, including bicycle and pedestrian infrastructure, that would reduce GHG emissions by improving multimodal transportation options through increased connectivity, but would not increase wholesale access to any areas within the county in the way that constructing new roadways would. Actions that commit the County to work with partners to promote and support on-site renewable energy generation and storage are intended to increase renewable energy generation and use in the unincorporated area but would not be anticipated to substantially diminish an existing obstacle to growth. Similarly, the project would not result in the expansion of a wastewater treatment plant or eliminate any other constraint to development. To the extent that programs initiated by the CAP Update indirectly result in new or different housing (e.g., Action A-4.1.b, related to evaluating opportunities for farmworker housing), this development would be a modified expression of the growth anticipated and evaluated in the 2011 GPU PEIR.

As explained further in Chapter 1, “Project Description,” the CAP Update has been prepared consistent with the tiering and streamlining provisions of State CEQA Guidelines Section 15183.5, which allows for streamlining future project-specific GHG emissions analyses where projects considered by the County are within the buildout assumptions included in the CAP Update and can demonstrate consistency with the CAP Update measures and actions. The County has prepared a CAP Consistency Review Checklist that provides a process and evidence by which subsequent development projects would demonstrate consistency with the CAP Update. If subsequent projects are found to be consistent with the CAP Update (and within the growth projections assumed therein), then the environmental documents prepared for these projects can rely upon and incorporate by reference the cumulative GHG analysis for the CAP Update as presented in this draft SEIR. Evaluation of all other technical resource topics considered under CEQA would still be required.

The growth anticipated through the planning horizon for the CAP Update is within the scope of the development anticipated during preparation of the General Plan and

reflected in the 2011 GPU PEIR analyses. As described above, the County has established growth management policies, which would be supported by measures and actions in the CAP Update. The CAP Update's GHG emissions inventory and forecasts are based on predicted growth in existing demographic forecasts, including population, jobs, and household growth for the unincorporated county. The data were sourced from modeling conducted in the San Diego Association of Governments' 2021 Regional Transportation Plan. Therefore, to the extent that future projects streamline GHG analyses under the CAP, this would not result in indirect inducement of growth beyond the scope of the 2011 GPU PEIR.

The CAP Update establishes the measures necessary to address GHG emissions in a manner that achieves state and County goals. It is based on regional growth forecasts that are within the scope of the 2011 GPU PEIR and quantified forecasting that demonstrates the ability to meet established targets. The streamlining provision may reduce the need for subsequent development projects that are within the scope of projected growth to undertake project-specific analysis of GHG emissions and identify mitigation measures. However, establishing a program for addressing cumulative emissions from the community would not facilitate growth or indirectly remove obstacles to growth.

4.1.1.2 Economic Growth

Implementation of the project would likely result in some capital improvements and may result in incentivization of energy efficiency and renewable energy improvements, expansion of alternatively fueled vehicles, water conservation improvements, and expansion of waste collection services. These actions would result in a small number of new jobs, specifically related to construction and maintenance services, but are not expected to result in a substantial increase in the demand for additional housing or services. These jobs would likely be filled by the existing labor pool within the county, and are, therefore, not expected to be growth inducing.

4.1.1.3 Conclusion

The project would result in the adoption and implementation of strategies and measures that would need to be undertaken to reduce GHG emissions consistent with state legislative requirements. The project would not result in growth-inducing impacts associated with removing obstacles to growth, such as the extension of a roadway, or expansion of water and sewer services. Similarly, the project would not result in a substantial expansion of public services. The project does include a GPA to revise the General Plan and 2011 GPU PEIR to achieve consistency among the CAP Update and previous goals, policies, and mitigation measures; however, it would not result in an increase in density or change in land use. Therefore, the project would not result in direct growth inducement related to land use changes. Finally, although the project may result in a small increase in jobs related to the expansion of alternative transportation, energy, and solid waste infrastructure, it is not expected to be growth inducing because the locally available labor pool is anticipated to be able to fill any resultant positions.

4.2 Significant and Unavoidable Adverse Impacts

State CEQA Guidelines Section 15126.2(b) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed project is implemented. Because the analysis in this draft SEIR is intended to supplement the analysis in the 2011 GPU PEIR, the following describes the new or more severe significant and unavoidable impacts associated with the project compared to those disclosed in the 2011 GPU PEIR. Full descriptions of the new or more severe significant and unavoidable impacts of the proposed project are provided in Sections 2.1 through 2.15 of this SEIR, as applicable.

4.2.1.1 Impacts that Remain Significant and Unavoidable

Implementation of the CAP Update would result in significant and unavoidable impacts in the following issue areas; however, the magnitude of the impact would be consistent with the impacts disclosed in the 2011 GPU PEIR:

Aesthetics
- Visual Character or Quality (Project and Cumulative)
- Light and Glare (Project and Cumulative)

Agriculture and Forestry Resources
- Direct or Indirect Conversion of Agricultural Resources (Project and Cumulative)

Air Quality
- Air Quality Violations (Project and Cumulative)
- Non-Attainment Criteria Pollutants (Project and Cumulative)
- Sensitive Receptors (Project and Cumulative)

Biological Resources
- Special-Status Plant and Wildlife Species (Project and Cumulative)
- Riparian Habitat and Other Sensitive Natural Communities (Project and Cumulative)
- Wildlife Movement Corridors and Nursery Sites (Project and Cumulative)

Hazards and Hazardous Materials
- Wildland Fires (Project and Cumulative)

Hydrology and Water Quality
- Surface Water and Groundwater Quality (Project and Cumulative)
- Groundwater Supply and Recharge (Project and Cumulative)

Noise
- Excessive Noise Levels (Project and Cumulative)

Transportation
- Increase Hazards Due to a Design Features (Project and Cumulative)

4.2.1.2 New or More Severe Significant and Unavoidable Impacts

New or substantially more severe significant and unavoidable impacts are anticipated to result from implementation of the CAP Update in the following issue areas:

Aesthetics
- Scenic Vistas and Scenic Resources (Project and Cumulative)

Agriculture and Forestry Resources
- Conflict with Agricultural Zoning or Williamson Act Contract Lands (Project and Cumulative)
- Direct and Indirect Conversion or Loss of Forest Land (Project and Cumulative)

Cultural and Paleontological Resources
- Historical Resources (Project and Cumulative)
- Archaeological Resources (Project and Cumulative)
- Paleontological Resources (Project and Cumulative)
- Human Remains (Project and Cumulative)

Land Use and Planning
- Physically Divide an Established Community (Project and Cumulative)

Tribal Cultural Resources
- Tribal Cultural Resources (Project and Cumulative)

4.3 Significant Irreversible Environmental Changes

State CEQA Guidelines Section 15126.2(c) requires that an EIR evaluate the commitment of nonrenewable resources that would be considered irreversible by future generations. An example of this type of commitment may include the construction of a roadway that would provide access to previously inaccessible environmental lands. Irretrievable commitments of resources should be evaluated to ensure that such current consumption is justified. In addition, Section 15126.2(b) of the State CEQA Guidelines indicates that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. This draft SEIR considers the use of energy in Section 2.6, “Energy,” which should be referred to for a comprehensive evaluation of energy use related to the project.

As previously described, the project would identify strategies and measures that would need to be undertaken to reduce GHG emissions consistent with state legislative requirements and would not result in growth-inducing impacts. As described in Section 1.2, “Project Objectives,” in Chapter 1, “Project Description,” the primary focus of the project is to reduce community and County operations’ GHG emissions to meet the County’s GHG reduction targets identified in the CAP Update. The measures encourage improvements to alternative transportation infrastructure and the built environment, energy efficiency and water conservation, agricultural conservation, and enhanced waste processing. Some of the measures may indirectly result in the construction of some

improvements which would require the use of fuel and building materials during construction; however, the result of the improvements would be a long-term reduction in energy consumption and a reduction in the use of nonrenewable energy sources. Continued operation and maintenance of some of the facilities may require the use of additional fuel and water consumption; however, such use would be insignificant compared to the overall reduction in use of these resources that would result from CAP Update implementation. Therefore, no significant irreversible environmental changes would occur.

4.4 Cumulative Effects of In-process General Plan Amendments

This section addresses the Court of Appeal decision in the *Golden Door Properties, LLC, v. County of San Diego*, 50 *Cal. App. 5th 467* (Golden Door) with regard to the cumulative effects of in-process General Plan Amendments (in-process GPAs), which represent projects proposed in the unincorporated county that would require amendments to the General Plan that are in-process but have not yet been approved. The in-process GPAs are those projects that filed an application with Planning & Development Services, submitted materials for review, or have released documents for public review, but not approved by the County prior to this CAP Update SEIR Notice of Preparation (December 10, 2020). GPAs that were approved by the County Board of Supervisors prior to this CAP Update SEIR Notice of Preparation (December 10, 2020) are already included in the baseline projections for the CAP Update because they were approved prior to commencing analysis on the CAP Update SEIR.

This section includes an analysis of the potential cumulative effects of the implementation of in-process GPAs both in terms of 1) whether they would contribute to new or more significant cumulative impacts on other resources in combination with implementation of the proposed CAP Update and 2) how they affect the County's ability to meet its GHG reduction targets (see the analysis of GHG impacts below). Question 1 -- the cumulative impact of these in-process GPA projects -- is addressed separately in this Chapter below to address the County's revised approach in response to the Golden Door decision. (see Table 1-1 in Chapter 1, "Project Description,' for a summary of where in this draft SEIR each of the decision holdings are addressed.) Question 2 -- whether approval of in-process GPAs could affect the County's ability to meet its GHG reduction targets – is also addressed below.

As discussed in further detail below, the cumulative impact analyses contained in the resource sections in Chapter 2 of this SEIR utilize a projections-based approach to assessing whether the project would make a considerable contribution to a significant cumulative impact. In contrast, this analysis employs a list-based approach in response to the Court's holding that the cumulative impacts of proposed in-process GPAs should be specifically addressed. While an accurate accounting of the effects of the project in combination with the in-process GPAs is not fully achievable given that the location and other detail of future projects associated with the CAP Update is not currently known, this analysis attempts to provide a general accounting of the types of impacts that would combine to result in either a considerable contribution to an existing cumulative impact or a new significant cumulative impact.

Mitigation Measure M-GHG-1

One of the primary holdings in the Golden Door decision relates to whether a GHG mitigation measure in the 2018 SEIR, called M-GHG-1, was CEQA-compliant. Under M-GHG-1, certain GPA projects would have been allowed to mitigate their GHG emissions by purchasing carbon offsets originating outside the unincorporated County of San Diego if none were available within the unincorporated county. As part of the 2018 CAP SEIR, in-process GPAs that the County had not adopted by August 2017 were not included in the CAP's GHG projections; and, to the extent that in-process and future GPAs would increase GHG emissions above projected CAP levels, their impact would be significant (i.e., inconsistent with the CAP). In other words, in-process and future GPAs had the potential to impact the ability of the County to meet its targets. As discussed in further detail below, this draft SEIR no longer proposes M-GHG-1 or similar mitigation to mitigate for GHG impacts of in-process GPAs.

As described in Chapter 1, “Project Description,” of this SEIR, the CAP Update is being prepared to serve as mitigation to reduce GHG emissions resulting from anticipated buildout of the General Plan. To the extent a project is consistent with land use allowed under the General Plan, GHG emissions are addressed with CAP Update GHG reduction measures. Because the CAP Update is a requirement of the approved General Plan, it only addresses development consistent with the General Plan. The CAP's GHG projections, therefore, do not include in-process GPA projects for which the County has received applications, but that are in some stage of processing (e.g., staff is determining what its recommendation of approval will be and what conditions are required, and/or the decision maker is determining whether it will approve, modify, or deny the project). Thus, if a project's land use is consistent with the General Plan (as amended as of December 10, 2020), then its GHG emissions are already accounted for in the CAP's projections. When a project is within the scope of the General Plan, the proposed project will help the County achieve its share of GHG reduction targets by implementing CAP Update reduction measures through the CAP Consistency Review Checklist.

When a proposed project is outside the scope of the General Plan buildout, requiring a General Plan amendment, that project must use different means to demonstrate that the project does not obstruct the County’s ability to achieve its share of GHG reduction targets and have a significant impact on GHG emissions. In the 2018 CAP and SEIR, the GPAs had to demonstrate net zero GHG emissions, otherwise they would add GHG emissions beyond what would be allowable to meet GHG reduction targets. To address that problem, the 2018 SEIR allowed GPAs to use M-GHG-1 to mitigate GHG emissions by purchasing carbon offsets outside the unincorporated county.

This SEIR no longer relies on M-GHG-1, or anything equivalent, to mitigate the GHG impacts of GPAs. This SEIR contains no offsets or other mitigation measures facilitating GPAs. Rather, each in-process GPA would undergo its own project-level analysis of GHG impacts pursuant to CEQA and would develop its own threshold of significance and mitigation pathways for reducing that project’s impact on GHG emissions. These in-process GPAs and future GPA applications are inconsistent with the CAP Update if they are inconsistent with the density or intensity allowed in the General Plan. They cannot use the CAP Update to streamline their GHG analysis. Therefore, depending on the in-

process GPA, they could result in a potentially significant GHG impact and would be required to mitigate those impacts to the extent feasible.

Cumulative Impacts of In-Process GPAs

As stated above, M-GHG-1 of the 2018 CAP SEIR or equivalent will not be applied to in-process GPAs. As noted above, cumulative GHG impacts related to whether the County would be able to meet its reduction targets with approval of the in-process GPAs would be considered significant, and future project-specific analyses would be required to examine the ability of these GPA projects to successfully mitigate the direct impact of the GPA projects and their cumulative impacts. However, the Golden Door decision also discusses the potential for in-process GPAs to result in other types of cumulative impacts, and identifies the need for this SEIR to more completely assess the cumulative impacts of the in-process GPAs on other environmental resources besides GHG, given their potential to contribute to an existing cumulative impact or result in a new significant cumulative impact.

As described in the Introduction to Chapter 2, "Environmental Effects of the Project," of this SEIR, the State CEQA Guidelines identify two basic methods for establishing the cumulative environment in which the project is to be considered: (1) the use of a list of past, present, and probable future projects or (2) the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. Given the programmatic nature of the CAP Update, which is being prepared as mitigation for General Plan implementation, and the fact that this SEIR is a supplemental analysis to the 2011 GPU PEIR (a programmatic analysis of the effects of build-out of the General Plan), a projections approach is used in the resource sections of Chapter 2 of this SEIR to assess the cumulative impacts of the project. Such an approach is well suited to cumulative impacts that are the result of many individual contributors, that take place over a large impact area, or that are caused by incremental contributions over a long period of time.

While the projections-based approach has been retained in all resource sections of Chapter 2 of this SEIR to assess whether implementation of the project would either contribute considerably to or result in a new significant cumulative impact, the analysis below provides a list-based cumulative impact analysis to address the Court's focus on the need to consider the environmental impacts of the proposed project in combination with in-process GPA projects. These projects, listed below in Table 4-1, consist of in-process GPAs that have not been approved prior to December 10, 2020 (date of Notice of Preparation of this SEIR). Consistent with the Court's reasoning, in-process GPAs are the focus of this list-based analysis because they represent the potential for a change in the forecast conditions. The in-process GPAs considered in this analysis are shown on Figure 4-1 below.

The GPA projects listed in Table 4-1 and shown on Figure 4.1 are not included in SANDAG's 2021 Regional Transportation Plan/Sustainable Communities Strategy, which forms the basis of the analysis in Chapter 2. The listed GPA projects are considered

reasonably foreseeable for this SEIR because the detail available on the projects is sufficient to understand the changes in land use designations that are proposed (even though the GPA applications are in various stages of consideration and review, and recommendations by staff and approval by decision makers is unknown). As noted above, in-process GPAs are not considered in the CAP Update's GHG projections, and their direct and cumulative impacts are not covered in the 2011 GPU PEIR. Although a different method is utilized to consider the resource specific cumulative impacts of the project in combination with the in-process GPAs, the overall approach is to consider whether the project, in combination with other reasonably foreseeable projects in the unincorporated county, would contribute considerably to an existing cumulative impact or result in a new or more severe cumulative impact than identified in the 2011 GPU PEIR.

4.4.1 Aesthetics

4.4.1.1 2011 GPU PEIR Determination

Cumulative impact analysis for aesthetics related to the implementation of the General Plan is discussed in Section 2.1.4 of the 2011 GPU PEIR and is summarized in Section 2.1.3.6 of this SEIR. The 2011 GPU PEIR determined that the General Plan goals and policies and 2011 GPU PEIR mitigation measures, in combination with other applicable regulations would mitigate cumulative impacts to scenic vistas and scenic resources to a less-than-significant level. The potentially significant cumulative impacts related to visual character or quality and light or glare would remain significant after implementation of General Plan goals and policies and 2011 GPU PEIR mitigation measures. Therefore, implementation of the General Plan would result in significant and unavoidable cumulative impacts related to visual character or quality and light or glare.

4.4.1.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of the cumulative impact analysis for aesthetics is the immediate vicinity of view corridors, viewsheds, or scenic resources in the unincorporated county, including areas surrounding the two astronomical observatories. The unincorporated county contains many scenic vistas and resources, including coastlines, open space areas, historic structures, mountains, and watersheds. Future projects associated with the CAP Update could be located in rural or open areas of the unincorporated county, and therefore have the potential to result in greater visual contrast compared to existing conditions. The in-process GPAs could also occur in rural areas in the unincorporated county (e.g., Ivanhoe Ranch and Harmony Grove Village South) and could result in visual changes to the areas during construction and permanently introduce new structure that could result in impacts on scenic vistas and resources.

Scenic Vistas and Scenic Resources

Implementation of projects associated with the CAP Update could result in visual changes during construction of new facilities and as a result of the introduction of new facilities or modifications to existing facilities that could result in impacts on scenic vistas and resources and produce new sources of light or glare. Construction and operational

activities of in-process GPAs also would result in visual changes within the unincorporated county resulting from activities such as the removal of trees/vegetation, development of vertical structures (e.g., buildings and utility infrastructure), and installation of new lights or reflective materials in the unincorporated county. The incremental impacts of the CAP Update, in combination with the in-process GPAs, would cause or contribute to cumulative aesthetic conditions in the vicinity of existing view corridors, viewshed, scenic resources and areas surrounding the two astronomical observatory sites in the unincorporated county. The addition of incremental impacts from the CAP Update and in-process GPAs could result in a cumulative considerable contribution to significant cumulative impacts to scenic vistas and resources for which impacts cannot be mitigated to a less-than-significant level.

Compliance with relevant General Plan policies (Polices LU-6.6, LU-6.9, LU-10.2, LU-11.2, LU-12.4, COS-11.3, and COS-12.2) and applicable regulations related to scenic vistas and resources protection would reduce potential cumulative impacts associated with the CAP Update. Additionally, implementation of the adopted 2011 GPU PEIR Mitigation Measures Aes-1.2 and Aes-1.6 through Aes-1.9 and CAP Update Mitigation Measure Aes-1 (incorporating mitigation to reduce significant aesthetic impacts) would reduce the severity of the CAP Update's incremental contribution to cumulative impacts, but would not ensure that the CAP Update's contribution would be less than cumulatively considerable due to the uncertainty of the types, locations, and scale of future renewable energy projects that would be required to meet the GHG reduction goals of the CAP Update. Therefore, the CAP Update's contribution to these impacts would be cumulatively considerable. The cumulative impact would be significant. This is a new or more severe impact not disclosed in the 2011 GPU PEIR.

Visual Character or Quality

Cumulative projects in the unincorporated county also would contribute to a significant cumulative impact related to visual character or quality if, in combination, they would substantially degrade the existing visual character or quality of the site and its surroundings by introducing features that would detract from or contrast with existing visual character or quality. As analyzed in Section 2.1.3.4 of this SEIR, the CAP Update would further existing programs and provide new and modified infrastructure in new and established communities to reduce GHG emissions that could have an impact on visual character or quality within the unincorporated county through introduction of new uses that could alter the existing visual conditions. Implementation of adopted General Plan policies (Policies LU-6.6, LU-6.9, LU-10.2, LU-11.2, LU-12.4, COS-11.3, and COS-12.2), implementation of 2011 GPU PEIR mitigation measures (Mitigation Measures Aes-1.2, Aes-1.6 through Aes-1.9) and CAP Update Mitigation Measure Aes-1, and compliance with applicable design guidelines would reduce the impacts associated with the deterioration of visual character or quality to a less-than-significant level. However, impacts to visual character or quality resulting from implementation of large-scale renewable energy projects associated with CAP Update would remain significant after implementation of mitigation measures.

If approved, in-process GPAs would include development of residential housing, conversion of office land use to residential use, and construction of commercial uses in

new or existing communities that could degrade the existing character or quality or transform the surrounding community. Therefore, the CAP Update together with the in-process GPAs would have the potential to contribute to a significant cumulative impact related to visual character or quality. While implementation of the adopted 2011 GPU PEIR mitigation measures and CAP Update Mitigation Measure Aes-1 (incorporating mitigation to reduce significant aesthetic impacts) would reduce the severity of the CAP Update's incremental contribution to cumulative impacts, it would not ensure that the CAP Update's contribution would be less than cumulatively considerable due to the uncertainty of the types, locations, and scale of future renewable energy projects required to meet the GHG emissions reduction goals of the CAP Update. Therefore, the CAP Update's contribution to this impact would be cumulatively considerable but not more severe than disclosed in the 2011 GPU PEIR. The cumulative impact would be significant and would be consistent with the conclusion in the 2011 GPU PEIR. Implementation of the CAP Update in combination with the in-process GPAs would not result in a new or more severe significant cumulative impact not disclosed in the 2011 GPU PEIR.

Light and Glare

The incremental contribution of future projects associated with the CAP Update could result in a cumulative impact related to light or glare if one or more of the projects were to be located near other cumulative projects that are significant sources of light or glare. Discussion under Section 2.1.3.5 of this SEIR explains that at a program level it is not possible to determine that the light and glare impacts resulting from implementation of large-scale renewable energy projects would be mitigated to a less-than-significant level. Implementation of 2011 GPU PEIR adopted Mitigation Measures Aes-4.2 and Aes-4.6 through Aes-4.9, and CAP Update Mitigation Measures Aes-1 (incorporating mitigation to reduce significant aesthetic impacts), Aes-2 (preparing a Lighting Mitigation Plan), and Aes-3 (preparing a Shadow Flicker Study), would reduce the severity of the CAP Update's incremental contribution to cumulative impacts, but would not ensure that the CAP Update's contribution would be less than cumulatively considerable due to the uncertainty of the types, locations, and scale of future renewable energy projects required to meet the GHG emissions reduction goals of the CAP Update. In-process GPAs also could result in impacts to light and glare through installation of new lighting or reflective materials in new buildings in the unincorporated county. The identified in-process GPAs would be developed in accordance with applicable General Plan policies, area/community plans, and the mitigation measures and/or conditions of approval imposed as part of project-specific CEQA and permitting processes, therefore reducing the potential for them to result in significant impacts related to light and glare. However, given the extent of new development that these projects would introduce, there is an existing cumulative impact in the unincorporated county on light and glare, and it is likely that both the in-process GPAs and the CAP Update would make a considerable contribution to the cumulative impact. Accordingly, the cumulative impact related to light or glare would be significant and unavoidable. Implementation of the CAP Update would not result in a new significant cumulative impact not disclosed in the 2011 GPU PEIR.

4.4.1.3 Summary

Cumulative impacts related to visual character or quality and light or glare would be consistent with the 2011 GPU PEIR. Implementation of the CAP Update would result in a cumulatively considerable contribution to a significant cumulative impact related to scenic vistas and scenic resources. Therefore, implementation of the CAP Update, in combination with the in-process GPAs, **would result in a new or more severe impact** related to scenic vistas and scenic resources not disclosed in the 2011 GPU PEIR.

4.4.2 Agricultural Resources

4.4.2.1 2011 GPU PEIR Determination

The cumulative impact analysis for agricultural resources related to the implementation of the General Plan is contained in Section 2.2.4 of the 2011 GPU PEIR and is summarized in Section 2.2.3.6 of this SEIR. The 2011 GPU PEIR determined that cumulative development would contribute to significant cumulative impacts related to direct and indirect conversion of agricultural resources resulting from General Plan implementation. Compliance with existing regulations would ensure that no existing significant cumulative impact exists with respect to conflicts with agricultural zoning or Williamson Act contract lands.

4.4.2.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope for cumulative analysis of agricultural resources is the San Diego region. This scope is defined by the subtropical climate conditions of southern California that optimize the production of a variety of crops in the region.

Impacts would be cumulative in nature if the CAP Update in combination with the in-process GPAs would contribute to a regional loss of agricultural resources because of direct or indirect conversion; would contribute to a regionally significant impact resulting from conflicts with agricultural zoning and Williamson Act contracts; would contribute to a regionally significant impact resulting from conflicts with forest or timberland zoning; and would contribute to a regionally substantial impact resulting from direct or indirect conversion of loss of forest resources.

Direct or Indirect Conversion of Agricultural Resources, Conflict with Zoning, or Conflict with Williamson Act Contract Lands

Implementation of the CAP Update would include measures and actions to preserve existing agricultural land and improve land management practices that generally would not result in the conversion of agricultural lands to other uses. However, implementation of CAP Update Action E-3.3 would have the potential to result in large-scale renewable energy projects, which could result in the direct or indirect conversion of agricultural resources. Although 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, it cannot be guaranteed that

impacts related to direct or indirect conversion of agricultural resources would be reduced to a less-than-significant level.

The in-process GPAs also include projects that would increase housing development density in rural areas, some of which would result in conversion of agricultural lands to residential use. The in-process GPAs would be developed in accordance with the mitigation measures and/or conditions of approval imposed as part of project-specific CEQA and permitting processes, therefore reducing the potential for them to result in significant impacts related to agricultural uses. However, given the extent of new development that these projects would introduce, it is likely that they would make a considerable contribution to a cumulative impact. Therefore, implementation of the CAP Update, in combination with the in-process GPAs, would result in a considerable contribution to an existing cumulative effect related the conversion of agricultural resources, consistent with the conclusion in the 2011 GPU PEIR. This would not be a new or more severe impact not disclosed in the 2011 GPU PEIR. Similarly, development of large-scale renewable energy projects and in-process GPAs could result in conflicts with agricultural zoning or Williamson Act contracts. The CAP Update together with the in-process GPAs would result in a considerable contribution to an adverse cumulative condition related to conflicts with agricultural zoning or Williamson Act contracts. This would be a new significant impact not disclosed in the 2011 GPU PEIR.

Direct and Indirect Conversion or Loss of Forest Land or Conflict with Forest Zoning

San Diego County does not include lands zoned specifically for forest land, timberland, or timberland production. Nor does the County does have land use authority over development in national forests. Therefore, the CAP Update and in-process GPAs in the unincorporated county would not result in conflicts with zoning for forest land or timberland. The CAP Update and in-process GPAs would not contribute to a cumulative impact related to conflicts with forest or timberland zoning. This impact would be less than significant. This would not be a new or more severe impact than disclosed in the 2011 GPU PEIR. Although the County does not contain land designated as forest land, California Public Resources Code Section 12220(g) defines “forest land” as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Therefore, forest land occurs in many portions of the county. Implementation of the CAP Update Action E-3.3 would have the potential to result in large-scale renewable energy projects, which could result in the siting of new facilities or infrastructure in areas with existing forest land. The in-process GPAs could occur in rural or open areas of the unincorporated county, which could require installation of new utilities infrastructure in or immediately adjacent to existing forest land. Implementation of the in-process GPAs would have the potential to convert forestland to non-forest use. Therefore, large-scale renewable energy projects in combination with the in-process GPAs could result in the loss or conversion of forest land and would result in a considerable contribution to an existing cumulative effect related to

the conversion of loss of forest land. The impact would be significant and would be a new or more severe impact not identified in the 2011 GPU PEIR.

4.4.2.3 Summary

Cumulative impacts related to conversion of agricultural resources would be consistent with the 2011 GPU PEIR. Implementation of the CAP Update together with the in-process GPAs would result in a considerable contribution to cumulative impacts related to conflict with agricultural zoning or Williamson Act contracts and the loss or conversion of forest land. The cumulative impacts related to conflict with agricultural zoning or Williamson Act contracts and the loss or conversion of forest land would be significant and were not disclosed in the 2011 GPU PEIR. Therefore, implementation of the CAP Update, in combination with the in-process GPAs, **would result in new or more severe impacts** not disclosed in the 2011 GPU PEIR.

4.4.3 Air Quality

4.4.3.1 2011 GPU PEIR Determination

The cumulative impact analysis for air quality related to the implementation of the General Plan is contained in Section 2.3.4 of the 2011 GPU PEIR and is summarized in Section 2.2.3.8 of this SEIR. The 2011 GPU PEIR concludes that implementation of the General Plan would not contribute to significant cumulative impacts related to conflict with applicable air quality plans and objectionable odors. However, the General Plan's contribution to significant cumulative impacts related air quality violations, non-attainment criteria pollutants, and sensitive receptors, would be cumulatively considerable.

4.4.3.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of cumulative impact analysis for air quality is the entire unincorporated county and the surrounding vicinity.

Air Quality Plans
The CAP Update and the in-process GPAs would have the potential to result in a cumulative impact to air quality plans, if they would conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) and the California State Implementation Plan (SIP). Future projects associated with the CAP Update and the in-process GPAs would be required to comply with existing federal, state, and local regulation, including the RAQS and SIP, which would ensure that conflicts with applicable air quality plans would not occur. Therefore, the CAP Update, in combination with the in-process GPAs, would not result in a cumulative impact to air quality plans. This impact would be less than significant.

Air Quality Violations
The CAP Update and the in-process GPAs would have the potential to result in a significant cumulative air quality violation if they would violate any air quality standard or contribute to an existing or projected air quality violation. As analyzed in Section 2.3.3.4

of this SEIR, implementation of the CAP Update would result in significant and unavoidable impacts related to violations of federal and state air quality standards and emissions of nonattainment criteria pollutants for particulate matter (PM_{10} and $PM_{2.5}$), volatile organic compounds (VOCs), and nitrogen oxides (NO_x), primarily associated with construction activities and operational vehicle trips. Implementation of the in-process GPAs would include development projects that would involve construction activities and operational vehicle trips, which would result in emission of nonattainment criteria pollutants. Because the CAP Update does not propose changes to the land use types identified in the General Plan, emissions of nonattainment criteria pollutants are not expected to be greater than those accounted for in the 2011 GPU PEIR. However, the in-process GPAs include projects that would increase development density and conversion of office land use to residential use in the unincorporated county. Implementation of the in-process GPAs would likely result in greater emissions of nonattainment criteria pollutants than those disclosed in the 2011 GPU PEIR. The CAP Update, in combination with the in-process GPAs, would result in a considerable contribution to existing cumulative effects related to violation of air quality standards. The cumulative impacts would be significant and would be consistent with the conclusions in the 2011 GPU PEIR.

Non-Attainment Criteria Pollutants

The CAP Update and the in-process GPAs would have the potential to result in a significant cumulative impact associated with nonattainment criteria pollutants if they would result in a net increase of any criteria pollutants for which the San Diego Air Basin (SDAB) is in nonattainment. The SDAB is in nonattainment status for NO_X, VOCs, PM_{10}, and $PM_{2.5}$. As discussed previously, the CAP Update together with the in-process GPAs would be likely to result in greater emissions of nonattainment criteria pollutants than those disclosed in the 2011 GPU PEIR because the in-process GPAs include projects that proposed changes to the development density and land use types identified in the General Plan. The CAP Update, in combination with the in-process GPAs, would result in a considerable contribution to an existing cumulative impact related to nonattainment criteria pollutants. The cumulative impact would be significant, consistent with the conclusion in the 2011 GPU PEIR.

Sensitive Receptors

The CAP Update and the in-process GPAs would have the potential to result in a significant cumulative impact associated with sensitive receptors if they would expose sensitive receptors to a substantial concentration of toxic air contaminants (TACs) or hazardous air pollutants. The TACs and hazardous air pollutants (carbon monoxide [CO]) effects on sensitive receptors are discussed in Section 2.3.3.6 of this SEIR. Implementation of the CAP Update would not change the land use designations outlined in the 2011 GPU PEIR. Therefore, the CAP Update would not change the potential for sensitive receptors to be located near sources of substantial pollutant concentration. Although the in-process GPAs would be required to comply with emission thresholds for TACs and CO, some projects would involve land use changes and higher density residential development that could locate more sensitive receptors near pollutant concentration. Therefore, the CAP Update in combination with the in-process GPAs would result in a considerable contribution to an existing cumulative effect. The

cumulative impact would be significant and potentially more severe than disclosed in the 2011 GPU PEIR but would be consistent with the conclusion in the 2011 GPU PEIR.

Odors

The CAP Update and the in-process GPAs also would have the potential to result in a significant cumulative impact associated with objectionable odors if they would create objectionable odors or place sensitive receptors next to existing objectionable odors. Construction activities associated with the CAP Update and in-process GPAs would involve the use of equipment with diesel engines. Exhaust odors from diesel engines may be considered offensive to some individuals. However, minor odors from the use of heavy-duty diesel equipment would be intermittent and temporary and would dissipate rapidly from the source with an increase in distance. Given the temporary nature of construction activities and the dispersion properties of odors resulting from heavy-duty diesel equipment, construction activities are not anticipated to result in an odor-related impact. As discussed in Section 2.3.3.7 of this SEIR, future projects associated with the CAP Update would include development of solid waste facilities that would create objectionable odors during operation. However, solid waste facilities would be required to comply with San Diego County Air Pollution Control District's Rule 51 (Nuisance) and County Code Sections 63.401 and 63.402 to reduce odor impacts to nearby receptors to a less-than-significant level. The in-process GPAs involve mostly residential development and planning documents update, which are not typically associated with operational odors. Therefore, the CAP Update in combination with the in-process GPAs would not result in a substantial incremental effect that would result in cumulatively considerable contribution to a cumulative impact related to emissions of odors adversely affecting a substantial number of people. The cumulative impact would be less than significant and consistent with the conclusion in the 2011 GPU PEIR.

4.4.3.3 Summary

Cumulative impacts related to conflict with applicate air quality plans and objectionable odors would be less than significant and would be consistent with the 2011 GPU PEIR. The CAP Update, in combination with the identified in-process GPAs, would have considerable contribution to existing cumulative impacts related to violation of air quality standards, net increase of nonattainment criteria pollutant emissions, and expose sensitive receptors to TACs and CO. These cumulative impacts would be significant and would be consistent with the conclusions in the 2011 GPU PEIR. Implementation of the CAP Update, in combination with the in-process GPAs, **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

4.4.4 Biological Resources

4.4.4.1 2011 GPU PEIR Determination

The cumulative impact analysis for biological resources related to the implementation of the General Plan is contained in Section 2.4.4 of the 2011 GPU PEIR and is summarized in Section 2.4.3.9 of this SEIR. The 2011 GPU PEIR concludes that implementation of the General Plan would result in cumulatively considerable contribution to significant

cumulative impacts associated with special-status species and their habitats, riparian habitat and other sensitive communities, and wildlife movement corridors and nursery sites. Implementation of the General Plan would not contribute to significant cumulative impacts associated with federally protected wetlands, conflict with local policies and ordinances, and conflict with Habitat Conservation Plans and Natural Community Conservation Plans.

4.4.4.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of cumulative impact analysis for biological resources is the San Diego region, including the incorporated and unincorporated areas of San Diego County and surrounding counties.

Special-Status Plant and Wildlife Species

The CAP Update and the in-process GPAs would have the potential to result in cumulative impacts to special-status plant and wildlife species if they would result in direct or indirect loss of species or their habitats. Future projects associated with the CAP Update could result in development and potentially significant construction and operation impacts to special-status species and their habitats as discussed in Section 2.4.3.3 of this SEIR. Compliance with applicable General Plan policies (Policies COS-1.3, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-1.10, COS-1.11, COS-2.1, COS-2.2, LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, LU-10.2, and M-12.9) and 2011 GPU PEIR mitigation measures (Mitigation Measures Bio-1.1, Bio-1.2, Bio-1.3, Bio-1.4, Bio-1.5, and Bio-1.6), as well as compliance with existing federal, state, and local regulations related to special-status species protection, would reduce the potential impacts. However, because the location of future projects developed to implement the CAP Update is not known, the potential exists for such projects to make a considerable contribution to a significant cumulative impact. The in-process GPAs would include development planned within rural and open areas of the unincorporated county (e.g., Ivanhoe Ranch, Warner Springs Ranch Resort, and Peppertree Park), and development of these projects would likely result in impacts to special-status species and result in loss of habitat. The identified in-process GPAs would be subject to CEQA review; potential impacts would be identified, and mitigation measures would be developed to minimize impacts. However, given the extent of new development that these projects would introduce, it is likely that they would make a considerable contribution to a cumulative impact that the CAP Update would also contribute to. The cumulative impact would be significant and potentially more severe than disclosed in conclusions in the 2011 GPU PEIR. Nevertheless, the CAP Update's overall contribution to the cumulative impact would remain significant, consistent with the conclusion in the 2011 GPU PEIR.

Riparian Habitat and Other Sensitive Natural Communities

The CAP Update and the in-process GPAs also would have the potential to result in cumulative impacts associated with riparian habitat or other natural communities through direct or indirect loss or degradation of habitats. As discussed in Section 2.4.3.4 of this SEIR, implementation of the CAP Update could result in new development and potentially significant construction and operational impacts to riparian habitat and other natural communities. Future projects associated with the CAP Update would be required to be

consistent with applicable General Plan policies and the 2011 GPU PEIR mitigation measures identified above, as well as comply with existing federal, state, and local regulations that protect sensitive and natural communities. However, because the location of future projects developed to implement the CAP Update is not known, the potential exists for such projects to make a considerable contribution to a significant cumulative impact. Similarly, the in-process GPAs would include new development in rural and undeveloped areas of the unincorporated county. Construction and operation of the in-process GPAs would have the potential to result in loss or degradation of riparian habitats or other natural communities. Although the in-process GPAs would be subject to CEQA review and would be required to incorporate mitigation measures to minimize or avoid potential impacts to the extent feasible, it is likely that they would make a considerable contribution to a cumulative impact given the extent of the projects (e.g., development of over 600 housing units in the Peppertree Park). Therefore, the cumulative impact would be significant and potentially more severe than disclosed in conclusions in the 2011 GPU PEIR. Nevertheless, the CAP Update's overall contribution to the cumulative impact would remain significant, consistent with the conclusion in the 2011 GPU PEIR.

State and Federally Protected Wetlands

Cumulative impacts associated with state and federally protected wetlands would occur if the CAP Update and the in-process GPAs could result in direct or indirect loss or degradation of wetlands. Implementation of the CAP Update and in-process GPAs would be required to comply with the adopted General Plan (Policies COS-3.1 and COS-3.2), 2011 GPU PEIR mitigation measures (Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, Bio-2.2, Bio-2.3, and Bio-2), and applicable state and federal regulations that protect wetlands. The General Plan policies, mitigation measures, and state and federal regulations would collectively require each individual project to avoid wetland areas or fully mitigate impacts to wetlands. The impact on wetlands would be less than significant. Therefore, the CAP Update in combination with the in-process GPAs would not result in a significant cumulative impact on state or federally protected wetlands. The cumulative impact would be less than significant and would be consistent with the conclusion in the 2011 GPU PEIR.

Wildlife Movement Corridors and Nursery Sites

Cumulative impacts associated with wildlife movement corridors and nursery sites would occur if implementation of the CAP Update and in-process GPAs would block an existing wildlife movement corridor or remove habitat used as a nursery site. Construction and operational activities associated with the CAP Update could result in direct and indirect disturbances to wildlife corridors and nurseries through ground disturbance, or conversion of habitat. Although implementation of applicable General Plan policies (Policies COS-1.1 through COS-1.5) and 2011 GPU PEIR mitigation measures (Bio-1.1, Bio-1.2, Bio-1.3, Bio-1.7, Bio-1.4, Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3) would reduce potential impacts on wildlife movement corridors and nursery sites, the impacts would remain significant because the exact location and nature of future projects associated with the CAP Update are unknown. Therefore, the CAP Update would make a considerable contribution to a cumulative impact. Implementation of the in-process GPAs would involve large development in rural and undeveloped areas of the unincorporated county. New development in rural and undeveloped areas would result in disturbances to wildlife

corridors and nurseries through ground disturbance, vegetation removal, and conversion of habitat. The in-process GPAs would be developed in accordance with applicable general plans, area/community plans, municipal codes, and the mitigation measures or conditions of approval imposed as part of project-specific CEQA and permitting processes, therefore reducing the potential for them to result in significant impacts associated with wildlife movement corridors and nursery sites. However, given the extent of new development that these projects would introduce, it is likely that they would make a considerable contribution to a cumulative impact. Therefore, implementation of the CAP Update in combination with the in-process GPAs would result in a considerable contribution to a significant cumulative impact. The cumulative impact would be significant, consistent with the conclusion in the 2011 GPU PEIR.

Local Policies and Ordinances

The CAP Update and in-process GPAs would be required to comply with applicable local policies and ordinances established to protect biological resources. All future projects associated with the CAP Update and the in-process GPAs would be required to follow County development requirements or other local jurisdiction requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to protection of biological resources. Additionally, project-level planning, environmental analysis, and compliance with existing local regulations and policies would identify potentially significant conflicts with local policies; minimize or avoid those impacts through the design, siting, and permitting process; and provide mitigation for any significant effects as a condition of project approval and permitting. Therefore, implementation of the CAP Update and in-process GPAs would not conflict with any local polices or ordinances. The CAP Update in combination with the in-process GPAs would not result in a significant cumulative impact related to conflicts with local policies or ordinances protecting biological resources. The cumulative impact would be less than significant.

Habitat Conservation Plans and Natural Community Conservation Plans

The CAP Update and the identified in-process GPAs would be required to comply with applicable Habitat Conservation Plans or Natural Community Conservation Plans, such as the San Diego Multiple Species Conservation Program and the Southern California Coastal Sage Scrub Natural Community Conservation Plan. The CAP Update and the in-process GPAs would not conflict with applicable Habitat Conservation Plans or Natural Community Conservation Plans. Therefore, the CAP Update in combination with the in-process GPAs would not result in a significant cumulative impact. The cumulative impact would be less than significant.

4.4.4.3 Summary

Implementation of the CAP Update in combination with the in-process GPAs would result in a considerable contribution to significant cumulative impacts on special-status species, riparian and other sensitive natural communities, and wildlife movement corridors and nursery sites. The cumulative impacts would be significant and would be consistent with the conclusions in the 2011 GPU PEIR. Therefore, implementation of the CAP Update, in combination with the in-process GPAs, **would not result in a new or more severe impact** than disclosed in the 2011 GPU PEIR.

4.4.5 Cultural and Paleontological Resources

4.4.5.1 2011 GPU PEIR Determination

The cumulative impact analysis for cultural and paleontological resources related to the implementation of the General Plan is contained in Section 2.5.4 of the 2011 GPU PEIR and is summarized in Section 2.5.3.7 of this SEIR. The 2011 GPU PEIR concludes that, the General Plan, in combination with cumulative projects, would have the potential to result in less than significant cumulative impacts associated with historical resources, archaeological resources, paleontological resources, and human remains with implementation of General Plan polices and 2011 GUP PEIR mitigation measures.

4.4.5.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of cumulative impact analysis for cultural resources is the southern California region, including both incorporated and unincorporated areas of San Diego County, surrounding counties, and Mexico. The geographic scope for the cumulative analysis of paleontological resources includes the Salton Trough, Peninsular Ranges, and Coastal Plain regions within southern California.

Historical Resources
The 2011 GPU PEIR stated that cumulative destruction of significant historical resources from construction and development planned within the San Diego region would be considered to be a cumulatively significant impact. The CAP Update and the in-process GPAs would have the potential to result in a considerable contribution to the existing cumulative impact if they would result in the loss of historical resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. As discussed in Section 2.5.3.3 of this SEIR, future projects associated with the CAP Update would have the potential to result in development of solar and wind projects on properties that are listed or zoned as historical resources. Therefore, the CAP Update's impacts related to historical resources would be potentially significant. The in-process GPAs would be subject to CEQA review. The potential impacts to historic resources would be identified, and mitigation measures would be developed to minimize impacts. However, given the extent of these projects, individual historical resources would still have the potential to be impacted or degraded from destruction or modification as a result of implementing the in-process GPAs. The CAP Update in combination with the in-process GPAs would result in a considerable contribution to a significant cumulative impact. The cumulative impact would be significant. This is a new or more severe impact not disclosed in the 2011 GPU PEIR.

Archeological Resources
A cumulative impact associated with archaeological resources would occur if the CAP Update and the in-process GPAs would result in the loss of archaeological resources through development activities that could cause a substantial adverse change in the significance of an archaeological resource. As discussed in Section 2.5.3.4 of this SEIR, future projects associated with the CAP Update would be required to implement applicable

General Plan policies and 2011 GPU PEIR Mitigation Measures Cul-1.1, Cul-1.6, Cul-2.1, Cul-2.2, Cul-2.3, Cul-2.5, and Cul-2.6, which would ensure that most measures and actions would have a less-than-significant impact to archaeological resources. However, implementation of the CAP Update would have the potential to result in installation of small-scale wind turbines without a discretionary permit, impacts related to archaeological resources would be potentially significant. Development of the in-process GPAs also would have the potential to result in adverse effects to previously unidentified archaeological resources. The identified in-process GPAs would be subject to CEQA review; potential impacts would be identified, and mitigation measures would be developed to minimize impacts. However, given the extent of ground disturbance that these projects would introduce, it is possible that archaeological resources would still have the potential to be damaged or destroyed. Therefore, the CAP Update, in combination with the in-process GPAs, would have the potential to result in a significant cumulative impact associated with archaeological resources. As discussed in Section 2.5.5.2, even with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures, and compliance with federal, state, and local regulations intended to protect archeological resources, impacts resulting from the CAP Update could remain significant and unavoidable. Therefore, the CAP Update, in combination with the in-process GPAs would result in a considerable contribution to a significant cumulative impact. This would be a new or more severe impact not disclosed in the 2011 GPU PEIR.

Paleontological Resources

The 2011 GPU PEIR stated that cumulative destruction of significant paleontological resources from construction and development planned within the San Diego region would be considered to be a cumulatively significant impact. Past projects involving development and construction have already impacted paleontological resources within the region. Future projects associated with the CAP Update could result in development of new or expanded solid waste, renewable energy, and transportation facilities in the unincorporated county, which would result in excavation and ground-disturbing activities that could damage or destroy paleontological resources. As discussed in Section 2.5.3.5 of this SEIR, future projects associated with the CAP Update would be required to implement applicable General Plan policies and 2011 GPU PEIR Mitigation Measures Cul-3.1 and Cul-3.2, which would reduce impact to paleontological resources. However, implementation of the CAP Update would have the potential to result in installation of small-scale wind turbines without a discretionary permit, it is not possible to ensure that impacts related to paleontological resources would be reduced to less-than-significant. Implementation of the in-process GPAs could result in similar construction activities that could damage or destroy paleontological resources during grading and excavation. The in-process GPAs would be regulated by state and local regulations, including CEQA and the County Grading Ordinance. However, given the extent of ground disturbance that these projects would introduce, it is possible that previously unidentified paleontological resources could be damaged or destroyed during grading or excavation activities. Therefore, the CAP Update, in combination with the in-process GPAs, would result in a considerable contribution to a significant cumulative impact. This would be a new or more severe impact not disclosed in the 2011 GPU PEIR.

Human Remains
The 2011 GPU PEIR stated that cumulative disturbance of human remains by construction and development within the San Diego region would be considered a cumulatively significant impact. Past projects involving development and construction have already impacted human remains within the region. Implementation of the CAP Update and in-process GPAs would result in new development that would have the potential to disturb human remains. As discussed in Section 2.5.3.6 of this SEIR, future projects associated with the CAP Update applicable General Plan policies and 2011 GPU PEIR Mitigation Measure Cul-4.1, which would ensure that most projects would have a less than significant impact to human remains. However, it is possible that implementation of the CAP Update, particularly construction of large-scale wind turbines, could result in a considerable contribution to an existing cumulative impact to human remains. Given the extent of ground disturbance that the in-process GPAs would introduce, it is reasonable to assume that previously unidentified human remains could be damaged or destroyed during grading or excavation activities, making a considerable contribution to a significant cumulative impact. Therefore, the CAP Update in combination with the in-process GPAs would result in a considerable contribution to a significant cumulative impact. This is a new or more severe impact not disclosed in the 2011 GPU PEIR.

4.4.5.3 Summary

Implementation of the CAP Update, in combination with the in-process GPAs, would result in a considerable contribution to significant cumulative impacts to cultural and paleontological resources. These cumulative impacts **would be new or more severe impacts** than disclosed in the 2011 GPU PEIR.

4.4.6 Energy

4.4.6.1 2011 GPU PEIR Determination

Cumulative impact analysis for energy related to the implementation of the General Plan is not discussed in the 2011 GPU PEIR.

4.4.6.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of cumulative impact analysis for energy is the San Diego Association of Governments (SANDAG) region, which encompasses the unincorporated areas and 18 incorporated cities that make up the entire County of San Diego.

Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources
A cumulative impact would occur if the CAP Update in combination with the in-process GPA projects would result in potential significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy and result in conflict with a state or local plan for renewable energy or energy efficiency. Implementation of the CAP Update would decrease the County's reliance on fossil fuels and would reduce energy consumption in the unincorporated area. The CAP Update includes measures and actions (e.g., Action E-3.3.) that would result in development of renewable energy projects, such

as wind and solar, which would increase electricity generation to offset increases in electricity demand. The CAP Update and the in-process GPAs would be required to comply with the most current building codes, including requirements for achieving appropriate energy efficiency standards (e.g., Title 24 standards or better) and comply with general plan policies related to energy efficiency. Therefore, the CAP Update, in combination with in-process GPAs, would not result in a significant cumulative impact associated with wasteful, inefficient, or unnecessary consumption of resources. This impact would be less than significant.

State and Local Plans for Renewable Energy or Energy Efficiency
As analyzed in Section 2.6.3.4, future projects associated with the CAP Update would support the San Diego Association of Governments' *San Diego Forward: The Regional Plan's* (2021 Regional Plan's) goal of achieving GHG emissions reduction targets and would be required to comply with newer and more efficient technology to reduce GHG emission. Similarly, the in-process GPAs would be required to demonstrate consistency with the 2021 Regional Plan during the approval process and would be required to comply with newer or more energy efficiency standards. Therefore, future projects associated with the CAP Update and the in-process GPAs would not generate a cumulative conflict with state or local plans for renewable energy or energy efficiency. Implementation of the CAP Update, in combination with the in-process GPAs, would not result in a significant cumulative impact related to conflict with applicable plans for renewable energy or energy efficiency. This impact would be less than significant.

4.4.6.3 Summary

Implementation of the CAP Update, in combination with the in-process GPAs, would have less than significant cumulative energy impacts and **would not result in a new or more severe impact** than disclosed in the 2011 GPU PEIR.

4.4.7 Environmental Justice

4.4.7.1 2011 GPU PEIR Determination

Environmental justice (EJ) direct or cumulative impacts are not discussed in the 2011 GPU PEIR.

4.4.7.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of the cumulative impact analysis for EJ includes all the EJ communities within the cumulative study areas discussed in Sections 2.1 through 2.6 and Sections 2.8 through 2.15 of this SEIR.

Disproportionately High and Adverse Human Health or Environmental Impact on an EJ Community
Potential EJ impacts related to the implementation of the CAP Update are discussed in Section 2.7.3 of this SEIR. Implementation of the CAP Update would not cause a disproportionately high or adverse human health or environmental impact on an EJ

community. Implementation of the in-process GPAs could result in a significant impact to an EJ community if any of the in-process GPAs would cause a disproportionately high or adverse human health or environmental impact on an EJ community. However, all the identified in-process GPAs would be subject to discretionary review and would be evaluated for project-specific impacts under CEQA. Project-specific mitigation would reduce and minimize adverse human health or environmental impacts. Mitigation measures would be implemented to reduce the potential contribution of the project and to ensure that impacts are treated appropriately and with respect to all communities, including EJ communities, and the County initiatives and programs in place to address disproportionate environmental effects in EJ communities would be applied to enhance equitable outcomes throughout the unincorporated county. Therefore, impacts resulting from implementation of the in-process GPAs are generally not anticipated to be disproportionately higher on EJ communities. Therefore, the in-process GPAs and other cumulative projects in the county would not result in a significant cumulative impact to EJ. Therefore, the CAP Update would not result in a considerable contribution to a significant cumulative EJ impact. The cumulative impact would be less than significant.

4.4.7.3 Summary

The in-process GPAs in combination with other cumulative projects in the county would not result in a disproportionate impact on an EJ community. The CAP Update's contribution to the significant cumulative impact would not be cumulatively considerable. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

4.4.8 Greenhouse Gas Emissions

4.4.8.1 2011 GPU PEIR Determination

The cumulative impact analysis for climate change and GHG emissions related to the implementation of the General Plan is contained in Sections 2.17.3.1 and 2.17.3.2 of the 2011 GPU PEIR and is summarized in Section 2.8.3.5 of this SEIR. Climate change is the result of the combined, worldwide contributions of GHG to the atmosphere. Cumulative development has resulted in a cumulatively significant effect. However, implementation of the GHG-reducing policies and mitigation measures would ensure that the General Plan's contribution to cumulative impacts related to compliance with Assembly Bill (AB) 32 and global climate change to less than cumulatively considerable.

4.4.8.2 CAP Update Impact Analysis with In-Process GPAs

Because climate change is a global phenomenon which is cumulative by nature, as it is the result of combined worldwide contributions of GHG to the atmosphere over many years, the geographic scope of the cumulative impact analysis for GHG emissions is the globe. Implementation of the CAP Update would result in a considerable contribution to an existing cumulative impact related to GHG emissions if the CAP Update, in combination with the in-process GPAs, would generate GHG emissions that may have a significant impact on the environment or would result in conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

GHG Emissions That May Have a Significant Impact on the Environment

Implementation of the CAP Update would have the potential to result in construction of new or expanded solid waste facilities, renewable energy systems, and transportation facilities. As analyzed in Section 2.8.3.3 of this SEIR, construction activities associated with the CAP Update would result in GHG emissions; however, construction activities would be sporadic and inherently short-term and would facilitate the development of projects that would ultimately reduce GHG emissions. Operation of the projects associated with the CAP Update would reduce vehicle miles traveled (VMT), encourage electric vehicles and alternate transportation uses, incentivize alternative fuel use in equipment, and increase the use and generation of renewable energy in the unincorporated county. Therefore, any temporary construction GHG emissions would be offset by the overall net benefit of GHG emissions reduction resulting from operation of projects associated with the CAP Update. Implementation of the CAP Update would result in a beneficial impact related to GHG emissions.

If approved, the in-process GPA projects would include new developments that would result in GHG emissions during construction and operation. Construction of the in-process GPAs would result in temporary generation of GHG emissions related to off-road equipment use and on-road vehicle operations. Operation of the in-process GPAs would result in mobile-source GHG emissions associated with vehicle trips to and from the project sites (i.e., project-generated VMT), landscaping equipment, electricity consumption, water consumption, and the generation of wastewater and solid waste. The in-process GPAs would be subject to CEQA review. During the CEQA review process, potential impacts would be identified, and mitigation measures would be developed to minimize or avoid potential impacts to the extent feasible. Given the nature of the in-process GPAs (e.g., mixed use, residential development), it is likely that impacts would be reduced to a less-than-significant level through implementation of measures, such as utilizing alternative fueled equipment and vehicles, utilizing advanced engine controls equipment, and replacing natural gas infrastructure with electricity. Therefore, the CAP Update, in combination with the in-process GPAs, would not result in a cumulatively considerable contribution to an existing cumulative impact related to GHG emissions that may have a significant impact on the environment. The cumulative impact would be less than significant.

Conflict with an Applicable Plan, Policy, or Regulation for Reducing the Emission of GHGs

The Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) and the 2021 Regional Plan are adopted for the purpose of reducing GHG emissions and are applicable to the CAP Update and the in-process GPAs. As analyzed in Section 2.8.3.4 of this SEIR, the CAP Update measures and actions were developed to support the 2022 Scoping Plan's goal of achieving GHG reduction targets. The CAP Update measures and actions would also reduce VMT and transportation-related GHG emissions, which support the goals of the 2021 Regional Plan. Therefore, implementation of the CAP Update would not conflict with the goals of applicable GHG reduction plans. As discussed above, if approved, implementation of the in-process GPAs would result in generation of GHG emissions and would have the potential to conflict with the goals of the 2022 Scoping Plan and 2021 Regional Plan related to GHG emissions reduction. The in-process GPAs

would be subject to CEQA review. During the CEQA review process, the in-process GPAs' consistency with the 2022 Scoping Plan and 2021 Regional Plan would be evaluated, potential impacts would be identified, and mitigation measures would be developed to minimize or avoid potential impacts to the extent feasible.

To evaluate the potential effects of the in-process GPA projects on the County's ability to meet the targets established in the CAP Update, the County modeled the anticipated GHG emissions of the GPAs listed in Table 4-1 based on currently available information about the proposed projects (i.e., land uses, number and type of proposed housing units, location) supplemented by default modeling assumptions. The modeling does not account for any sustainability features that may be incorporated into the proposed GPA projects to reduce GHG emissions. Modeled emissions from the in-process GPA projects were then added to the County's forecast emissions with implementation of the CAP Update to determine if the known, in-process GPAs could affect the County's ability to achieve its GHG reduction targets. As shown in Table 4-2, GHG emissions would exceed the 2030 target if all of the in-process GPAs were implemented. However, the 2045 target would be achieved under a scenario that includes approval of the in-process GPAs in addition to forecast growth. Appendix B of this SEIR provides the California Emissions Estimator Model modelling results used to determine whether the County would meet its GHG reduction targets with the in-process GPAs.

The CAP Update would reduce forecast GHG emissions by 44.5 percent in 2030 and 89.8 percent in 2045, exceeding reduction targets aligned with the 2022 Scoping Plan, and would not result in a considerable contribution to the cumulative impact. As discussed above, implementation of the in-process GPAs would likely result in a less-than-significant GHG emissions impact that may have a significant effect on the environment with implementation of mitigation measures. However, implementation of the in-process GPAs would generate GHG emissions, which would limit the County's ability to meet the GHG emission reduction target in 2030 as shown in Table 4-2. Therefore, implementation of the in-process GPAs would result in a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The CAP Update, in combination with the in-process GPAs, would result in a considerable contribution to a cumulative impact related to conflict with an applicable plan policy, or regulation for reducing GHG emissions. The cumulative impact would be significant and would be a new or more severe impact not disclosed in the 2011 GPU PEIR.

4.4.8.3 Summary

Implementation of the CAP Update, in combination with the in-process GPAs, would not result in a substantial incremental effect that would result in new significant cumulative impacts related to GHG emissions. Implementation of the CAP Update, in combination with the in-process GPAs, would result in a considerable contribution to a significant cumulative impact related to a conflict with an applicable plan policy, or regulation for reducing GHG emissions. This **would be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

4.4.9 Hazards and Hazardous Materials

4.4.9.1 2011 GPU PEIR Determination

The cumulative impact analysis for hazards and hazardous materials related to the implementation of the General Plan is contained in Section 2.7.4 of the 2011 GPU PEIR and is summarized in Section 2.9.3.8 of this SEIR. The 2011 GPU PEIR concludes that implementation of the General Plan, in combination of cumulative projects, would not contribute to significant cumulative impacts related to hazardous materials and sites, airport hazards, impairment of emergency response and evacuation plans, and exposure of human to vector with compliance with applicable federal, state, and local regulations and adopted General Plan policies and implementation of 2011 GPU PEIR mitigation measures. However, implementation of the General Plan would result in new development in areas that are prone to wildland fires. Therefore, implementation of the General Plan would result in a potentially significant impact from the exposure of people or structures to a significant risk or loss, injury or death involving wildland fires. Implementation of the General Plan would result in cumulatively considerable contribution to an existing significant cumulative impact.

4.4.9.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of the cumulative impact analysis for hazards and hazardous materials is the unincorporated county and the immediately surrounding areas.

Hazardous Materials (including Transport, Storage, Use, Disposal; Reasonably Foreseeable Accidental Release; Emitting Hazardous Materials Near to Schools; Being Within a Listed Hazardous Materials Site Pursuant to Government Code Section 65962.5)

Implementation of the CAP Update would have the potential to result in construction of new or expanded solid waste facilities, renewable energy systems, and transportation facilities. As analyzed in Section 2.9.3.3 of this SEIR, new facilities would be required to comply with the applicable federal, state, and local regulations and adopted General Plan policies and would not result in a significant impact related to transport, use, disposal, or accidental release of hazardous materials; proximity to schools; and sites containing hazardous materials. The in-process GPAs would include new developments which would result in the use, storage, disposal or transportation of hazardous materials and would potentially increase hazards to the public or the environment. Similar to the CAP Update, the in-process GPAs would be required to comply with regulations applicable to the use, disposal, transportation, accidental spill of hazardous materials, including the Resource Conservation and Recovery Act, Comprehensive Environmental Response, Compensation, and Liability Act, the Hazardous Materials Transportation Act, International Fire Code, and California Code of Regulations Title 22 and Title 27. The in-process GPAs would also be subject to CEQA review, which would require analyses of proposed projects or existing land uses associated with an existing hazardous site and would require projects to reduce the risk related to emitting hazardous materials within one-quarter mile of schools. Compliance with existing regulations would ensure that the in-process GPAs would result in a less-than-significant impact related to transport, use,

disposal, or accidental release of hazardous materials; proximity to schools; and sites containing hazardous materials. Therefore, the CAP Update, in combination with the in-process GPAs, would not result in a substantial incremental effect that would result in a significant cumulative impact. The cumulative impact would be less than significant.

Public and Private Airports

A cumulative impact would also occur if the CAP Update in combination with the in-process GPAs would result in a regional increase in airport hazards to the public or the environment. As discussed in Section 2.9.3.4, compliance with existing federal, state, and local regulations and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures (Haz-1.1, Haz-1.3, and Haz-1.5) would ensure that implementation of the CAP Update would have a less than significant related to airport hazards. The identified in-process GPAs would be subject to safety regulations, such as airport land use plans, Federal Aviation Administration standards and the State Aeronautics Act, which would reduce the potential for safety hazards to a less-than-significant level. Therefore, the CAP Update, in combination with the in-process GPAs, would not result in a significant cumulative impact related to airport hazards. The cumulative impact would be less than significant.

Emergency Response and Evacuation Plans

A cumulative impact would occur if the CAP Update in combination with the in-process GPAs would result in a regional impairment of emergency response or evacuation plans. As discussed in Section 2.9.3.5, compliance with General Plan policies (e.g., S-1.2, M-1.2, M-3.3, and M-4.3) and implementation of 2011 GPU PEIR Mitigation Measures Haz-3.1, Haz-3.2, and Haz-3.3 would ensure that implementation of the CAP Update would not impede and conflict with adopted emergency response and evacuation plans and would reduce potential impacts to less than significant. Implementation of the in-process GPAs would have the potential to impair the existing emergency and evacuation plans if authorities are not properly notified or emergency routes are blocked during construction. However, the in-process GPAs would be required to comply with applicable emergency response and evacuation policies outlined in regulations such as the Federal Response Plan, the California Emergency Services Act, and local fire codes. Compliance with the existing regulations would ensure that the in-process GPAs would not result in a significant impact. Therefore, implementation of the CAP Update, in combination of the in-process GPAs, would not result in a substantial incremental effect that would result in a significant cumulative impact related to impediments and conflicts with adopted emergency response and evacuation plans. The cumulative impact would be less than significant.

Wildland Fires

The 2011 GPU PEIR determined that there is an existing significant cumulative impact associated with wildland fires in the San Diego region because the frequent and intensive wildland fires in the areas have exposed people and structures to a potentially significant loss of life and property and many areas in the region are considered High and Very High Fire Hazard Severity Zones (FHSZs). Implementation of the CAP Update would result in future projects that could expose people or structures to significant risks of loss, injury, or death involving wildland fires. The impact would be reduced through implementing

adopted General Plan policies (Policies LU-6.11, LU-10.2, S-4.1 through 4.4, S-4.6, S-4.7, S-5.1, and COS-18.3) and 2011 GPU PEIR mitigation measures (Mitigation Measures Haz-4.1 through Haz-4.4 and Pub-1.5 through Pub-1.7) but would not be reduced to a less-than-significant level. Implementation of the in-process GPAs would likely result in residential development, which would likely place people and structures within danger of wildland fires due to the widespread risk across the region. Although regulations exist to reduce hazards associated with wildland fires, they would not reduce the risk to a less-than-significant level. Therefore, the CAP Update in combination of the in-process GPAs would result in a considerable contribution to a significant impact related to wildland fires. The cumulative impact would be significant and unavoidable but not substantially more severe than disclosed in the 2011 GPU PEIR and would be consistent with the conclusion in the 2011 GPU PEIR.

Vectors

A cumulative impact related to vectors would occur if the CAP Update in combination with the in-process GPAs would increase vector breeding sources in the unincorporated county and surrounding areas or placing a substantial number of people near an existing off-site vector breeding source. The CAP Update includes development of new or expanded composting/anaerobic digestion facilities and new stormwater and greywater capture systems that could create new vector breeding sources. However, as discussed in Section 2.9.3.7, the impact would be reduced to less than significant through compliance with existing federal, state, and local regulations and processes related to vector control. Implementation of the in-process GPAs would include residential development that would have the potential to place a substantial number of people near an existing vector breeding source and could significantly increase the potential exposure of people to vectors. However, the in-process GPAs would be required to comply with Centers for Disease Control and Prevention Division of Vector-Borne Infectious Diseases and California Health and Safety Code requirements regarding vector transmission. Compliance with existing regulations would ensure that implementation of the in-process GPAs would not have significant impacts related to vectors. Therefore, the CAP Update, in combination with the in-process GPAs, would not result in a substantial incremental effect that would result in a significant cumulative impact related to exposing humans to vectors. The cumulative impact would be less than significant.

4.4.9.3 Summary

Implementation of the CAP Update, in combination with the in-process GPAs, would not result in substantial incremental effect that would result in new significant cumulative impacts related to transport, use, disposal, or accidental release of hazardous materials; proximity to schools; sites containing hazardous materials; impediments and conflicts with adopted emergency response and evacuation plans; and exposing humans to vectors. These cumulative impacts would be less than significant. Implementation of the CAP Update, in combination with the in-process GPAs, would result in a considerable contribution to an existing significant cumulative impact related to wildland fires. The cumulative impact would be significant and unavoidable and would be consistent with the conclusion in the 2011 GPU PEIR. Therefore, implementation of the CAP Update, in

combination with the in-process GPAs, **would not result in a new or more severe impact** than disclosed in the 2011 GPU PEIR.

4.4.10 Hydrology and Water Quality

4.4.10.1 2011 GPU PEIR Determination

The cumulative impact analysis for hydrology and water quality related to the implementation of the General Plan is contained in Section 2.8.4 of the 2011 GPU PEIR and is summarized in Section 2.10.3.6 of this SEIR. The 2011 GPU PEIR concludes that buildout of the General Plan would result in significant and unavoidable cumulative impacts related to surface water and groundwater quality and groundwater supplies. The cumulative impacts on surface hydrology and drainage from implementation of the General Plan would be less than significant with compliance with applicable, federal, state, and local regulations and implementation of General Plan polices and 2011 GPU PEIR mitigation measures.

4.4.10.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of cumulative impact analysis for hydrology and water quality encompasses the drainage basins, watersheds, water bodies or groundwater basins, depending on the location of the potential impact and its tributary area.

Surface Water and Groundwater Quality
The 2011 GPU PEIR determined that cumulative development would result in a potentially significant cumulative impact on water quality. Implementation of the CAP Update includes components (e.g., construction of new or expanded solid waste facilities, potential future new farmworker housing, and renewable energy projects) that could degrade surface water and groundwater quality. As discussed in Section 2.10.3.3 of this SEIR, compliance with existing federal, state, and local regulations and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures (Mitigation Measures Hyd-1.1 through Hyd-1.5) would reduce potential impacts. However, because the exact location and nature of projects is not known, the potential for projects implemented under the CAP Update to contribute to a cumulatively significant impact would remain. Implementation of the in-process GPAs would result in new residential development, gas station, and commercial development that could also result in pollutants entering downstream receiving waters that have the potential to degrade surface water and groundwater quality. The in-process GPAs also would be required to comply with water quality standards, including Clean Water Act, Porter-Cologne Water Quality Control Act, National Pollutant Discharge Elimination System, applicable basin plans, and location regulations. Given the extent of ground-disturbing activities the new development would introduce, it is likely that they would make a considerable contribution to a significant cumulative impact. Therefore, the CAP Update, in combination with the in-process GPAs, would result in a considerable contribution to a significant cumulative impact. The cumulative impact would be significant, consistent with the conclusion in the 2011 GPU PEIR.

Groundwater Supply and Recharge

The 2011 GPU PEIR concluded that development throughout the planning horizon of the General Plan would result in a significant cumulative impact to groundwater supplies even with implementation of the General Plan policies and 2011 GPU PEIR mitigation measures. Implementation of the CAP Update measures would include construction of new or expanded solid waste facilities, potential future new farmworker housing, and large-scale renewable energy projects that could decrease groundwater supplies and interfere with groundwater recharge. As discussed in Section 2.10.3.4 of this SEIR, compliance with existing federal, state, and local regulations and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures (Mitigation Measures Hyd-1.1 through Hyd-1.5 and Hyd-2.1 through Hyd-2.5) would reduce potential impacts. However, because the exact location and nature of projects is not known, the potential for projects implemented under the CAP Update to contribute to a cumulatively significant impact would remain. Implementation of the in-process GPAs would include new large residential development in rural and undeveloped areas of the unincorporated county that could decrease groundwater supplies and interfere with groundwater recharge. Although the in-process GPAs are subject to existing regulations related to groundwater protection and CEQA review, which would require projects to mitigate impacts to groundwater supplies and recharge, these projects collectively would make a considerable contribution to a significant cumulative impact related to groundwater supplies and recharge due to the magnitude of the new development (e.g., Preserve at Riverbend includes 1,330 units). Therefore, the CAP Update, in combination with the in-process GPAs, would result in a considerable contribution to a significant cumulative impact. The cumulative impact would be significant, consistent with the conclusions in the 2011 GPU PEIR.

Surface Hydrology and Drainage

A cumulative impact related to surface hydrology and drainage would occur if the CAP Update, in combination with the in-process GPAs, would contribute to altered surface hydrology and drainage within drainage basins, watershed, water bodies or groundwater basins. Implementation of the CAP Update would include construction of new or expanded solid waste facilities, potential future new farmworker housing, and renewable energy projects could result in potential impacts on surface hydrology and drainage. However, as discussed in Section 2.10.3.5 of this SEIR, compliance with federal, state, and local regulations and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Hyd-1.2 through Hyd-1.3, Hyd-2.5, Hyd-3.1, Hyd-3.2, Hyd-3.3, Hyd-4.1 through Hyd-4.3, Hyd-6.1, and Hyd-8.2) would reduce potential impacts to less than significant. Implementation of the in-process GPAs would include new large residential development in rural and undeveloped areas of the unincorporated county that could alter surface hydrology and drainage systems. However, the in-process GPAs would be required to comply with the same applicable with federal, state, and local regulations and implementation of adopted General Plan policies related to protection of surface hydrology and drainage and would be subject to CEQA review. During the CEQA review process, potential impacts would be identified, and mitigation measures would be developed to reduce impacts to a less-than-significant level. Therefore, the CAP Update, in combination with the in-process GPAs, would not result in a substantial incremental effect that would result in a significant cumulative impact. The cumulative impact would be less than significant.

4.4.10.3 Summary

Implementation of the CAP Update, in combination with the in-process GPAs, would result in considerable contribution to the existing cumulative effects to surface and groundwater quality and groundwater supplies. These cumulative impacts would be significant and unavoidable and would be consistent with the conclusions in the 2011 GPU PEIR. The CAP Update, in combination with the in-process GPAs, would not result in substantial incremental effect related to surface hydrology and drainage. The impacts would be less than significant and would not result in a substantial incremental effect such that a new significant cumulative impact would occur. Therefore, implementation of the CAP Update, in combination with the in-process GPAs, **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

4.4.11 Land Use and Planning

4.4.11.1 2011 GPU PEIR Determination

The cumulative impact analysis for land use and planning related to the implementation of the General Plan is contained in Section 2.9.4 of the 2011 GPU PEIR and is summarized in Section 2.11.3.5 of this SEIR. The 2011 GPU PEIR concludes that cumulative development would result in a less-than-significant cumulative impact related to the physical division of a community with implementation of mitigation measures and would result in a less-than-significant cumulative impact related to conflicts with land use plans, policies, or regulations.

4.4.11.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of the cumulative impact analysis for land use is the San Diego region, including jurisdictions and special districts within and adjacent to the unincorporated county.

Physically Divide an Established Community

In the San Diego region, new large-scale development and transportation network improvements in undeveloped areas have resulted in, and will continue to result in, the division of established communities. Therefore, there is an existing significant cumulative impact with respect to the division of established communities from cumulative development in the region. The in-process GPAs would not include development of roadways, airports, railroad tracks, open space areas, or other features that would individually have the potential to physically divide an established community. In addition, the in-process GPAs would be required to conform to applicable land use plans, policies, and regulations in order to be approved. The in-process GPAs would not result in a considerable contribution to a significant cumulative impact. As analyzed in Section 2.11.3.3 of this SEIR, implementation of the CAP Update would not introduce new infrastructure or large open space areas that would bisect existing land uses except the potential development of large-scale renewable energy projects. Large-renewable energy projects could result in new linear infrastructure (e.g., roadways) that have the potential to physically divide an established community. 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 and would be a new or more severe impact not disclosed in the 2011 GPU PEIR.

Conflict with Land Use Plans, Policies, or Regulations
A cumulative impact associated with conflicts with land use plans, polices, and regulations developed for the protection of the environment would occur if the CAP Update, in combination with the in-process GPAs, would conflict with existing land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. As discussed in Section 2.11.3.4, implementation of CAP Update would be required to comply with land use plans, polices, or regulations developed for the protection of the environment. Similarly, while in-process GPAs may not be consistent with current General Plan land use and zoning designations, these projects would be required to comply with the applicable regulations. However, it is possible that a GPA could request changes to a policy developed for the purposes of environmental protection. Therefore, implementation of the CAP Update, in combination with the in-process GPAs, would result in a substantial incremental effect that would result in a significant cumulative impact related to conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The cumulative impact would be significant and would be a new or more severe impact not disclosed in the 2011 GPU PEIR.

4.4.11.3 Summary

Implementation of the CAP Update in combination with the in-process GPAs would result in a considerable contribution to an existing significant cumulative impact related to the physical division of established communities and would result in a significant cumulative impact related to conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The cumulative impacts would be significant and **would be new or more severe** than disclosed in the 2011 GPU PEIR.

4.4.12 Noise

4.4.12.1 2011 GPU PEIR Determination

The cumulative impact analysis for noise related to the implementation of the General Plan is contained in Section 2.11.4 of the 2011 GPU PEIR and is summarized in Section 2.12.3.6 of this SEIR. The 2011 GPU PEIR concludes that with implementation of mitigation from the 2011 GPU PEIR and compliance with the adopted General Plan policies, the buildout of the General Plan would result in less-than-significant cumulative impacts related to excessive construction noise levels, excessive groundborne vibration, and excessive noise exposure from airports and significant and unavoidable cumulative impacts related to permanent increase in ambient noise levels.

4.4.12.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of cumulative impact analysis for noise is limited to areas surrounding noise-generating sources, such as roadways, agricultural or industrial uses because noise impacts are localized in nature.

Excessive Noise Levels

As analyzed in Section 2.12.3.3 of this SEIR, implementation of the CAP Update would have the potential to result in development of new or expanded facilities, renewable energy infrastructure, and transportation facilities in the unincorporated county. With implementation of adopted General Plan policies (Polices LU-2.8, N-3.1, N-4.9, N-6.4, S-15.1, S-15.2, and S-15.4) and applicable 2011 GPU PEIR mitigation measures (Mitigation Measures Noi-1.1, Noi-1.3, Noi-2.1, Noi-2.4, Noi-5.1, and Noi-5.3), implementation of the CAP Update would result in less than significant impacts related to noise resulting from construction of new development. However, operational sources of low-frequency noise associated with CAP Update Action E-3.3 would be potentially significant because it is possible for a noise waiver to be granted to large wind turbines subject to specific conditions. Implementation of the in-process GPAs would include new development in rural and open areas in the unincorporated county. Construction activities associated with the in-process GPAs would be required to comply with noise standards contained in the County Municipal Code and California Code of Regulations to ensure impacts would be less than significant. However, new development in rural and open areas would permanently increase ambient noise levels in areas that are typically quiet. If the wind turbine projects associated with the CAP Update are located in the vicinity of any of the in-process GPAs, the noise associated with operation of large wind turbines could combine with low-frequency noise sources from the in-process GPAs to result in cumulative increases above ambient for low-frequency noise level. This could result in excessive noise levels over the existing environment. Therefore, the CAP Update, in combination with the in-process GPAs, would result in a considerable contribution to an existing cumulative effect related to permanent increase in ambient noise levels. The cumulative impact would be significant but not more severe than disclosed in the 2011 GPU PEIR and would be consistent with the conclusion in the 2011 GPU PEIR.

Excessive Groundborne Vibration

A cumulative impact would occur if the CAP Update or any of the in-process GPAs would exceed the Federal Transit Administration (FTA) and Federal Railroad Administration guidelines for groundborne vibration and noise. As discussed in Section 2.12.3.4 of this SEIR, implementation of 2011 GPU PEIR Mitigation Measures Noi-2.1 and Noi-2.4 and compliance with adopted General Plan Policy N-3.1 and existing regulations would ensure that vibrational noise associated with the CAP Update would be less than significant. Implementation of the in-process GPAs would have the potential to result in vibration impacts during construction through the use of heavy-duty equipment or pile driving. However, the in-process GPAs would be subject to FTA and Federal Railroad Administration guidelines for groundborne vibration and noise and CEQA review. During the CEQA review process, potential impacts would be identified, and mitigation measures would be developed to reduce impacts to a less-than-significant level. Therefore, implementation of the CAP Update, in combination with the in-process GPAs, would not

result in a substantial incremental effect that would result in a significant cumulative impact related to excessive groundborne vibration. The cumulative impact would be less than significant.

Excessive Noise from a Public or Private Airport

A cumulative impact related to excessive noise from a public or private airport would occur if the CAP Update in combination with the in-process GPAs would result in the exposure of noise sensitive land uses to excessive noise from a public or private airport. As discussed in Section 2.12.3.5 of this SEIR, excessive noise from a public or a private airport associated with implementation of the CAP Update would be less than significant with implementation of 2011 GPU PEIR Mitigation Measure Noi-5.1 and compliance with adopted General Plan Policies N-4.9, S-15.1, S-15.2, and S-15.4. Construction and operation of the in-process GPAs would have the potential to expose noise sensitive land uses (e.g., residential use) to excessive noise from an airport if a project is located near an airport. Most of the in-process GPAs are located more than 2 miles from an airport except the two Peppertree Park projects that are located within 2,000 feet of Fallbrook Airpark. However, the operation of the Fallbrook Airpark would not result in significant adverse noise impact off the airport property because the 2025 65 Community Noise Equivalent Level noise contour is expected to be fully within airport property (County of San Diego Department of Public Works 2006). Therefore, the noise impacts of the aviation operation of the Fallbrook Airpark would not result in significant noise impact with respect to surrounding land uses. In addition, all in-process GPAs would be required to comply with applicable airport land use plans, which minimize the public's exposure to excessive noise within areas around airports. Therefore, implementation of the identified in-process GPAs would not result in a significant impact related to excessive noise from a public or private airport. Implementation of the CAP Update, in combination with the in-process GPAs, would not result in a substantial incremental effect that would result in a significant cumulative impact related to excessive noise from a public or private airport. The cumulative impact would be less than significant.

4.4.12.3 Summary

Implementation of the CAP Update would not result in significant impacts related to excessive groundborne vibration or excessive noise from a public or private airport. The CAP Update together with the in-process GPAs would not result in a substantial incremental effect such that new significant cumulative impacts would occur. The CAP Update together with the in-process GPAs would result in a considerable contribution to an existing cumulative impact related to permanent increases in ambient noise levels. This cumulative impact would be significant and consistent with the conclusion in the 2011 GPU PEIR. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

4.4.13 Transportation

4.4.13.1 2011 GPU PEIR Determination

A cumulative impact analysis for transportation related to the implementation of the General Plan is contained in Section 2.15.4 of the 2011 GPU PEIR and is summarized in Section 2.13.3.7 of this SEIR. The 2011 GPU PEIR concludes that implementation of the General Plan would result in cumulatively considerable contributions to a significant cumulative impact to deficient roadway segments, to a significant cumulative impact to adjacent cities' traffic and level of service levels, and to a significant cumulative impact to road safety. The General Plan's contribution to cumulative impacts related to emergency access, parking capacity, and alternative transportation would be less than cumulatively considerable with implementation of mitigation measures and General Plan policies. Section 15064.3 of the State CEQA Guidelines was adopted in December 2018 and provides that VMT is the "most appropriate measure of transportation impacts" and mandated analysis of VMT impacts effective July 1, 2020. Given that this change to the CEQA Guidelines occurred after certification of the 2011 GPU PEIR, the PEIR did not evaluate impacts to VMT.

4.4.13.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of the cumulative impact analysis for transportation is the SANDAG region, which encompasses the unincorporated areas and 18 incorporated cities that make up the entire County of San Diego.

Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System

A cumulative impact would occur if the CAP Update together with the in-process GPAs would conflict with plans, ordinances, or policies establishing measures of effectiveness for the performance of the circulation system. As analyzed in Section 2.13.3.3 of this SEIR, implementation of the CAP Update would not involve off-site improvements which would substantially alter or damage the existing roadway network. CAP Update built environment and transportation measures and actions would enhance alternative transportation facilities; and would therefore, be beneficial to alternative transportation including bicyclists, pedestrians, and transit riders. Although traffic operations could be degraded during construction, all construction activities would be required to follow local protocols to ensure safety and minimize traffic disturbance during construction activities including the development of a traffic control plan for any work on a County-maintained roadway or in the County right-of-way. Therefore, implementation of the CAP Update would not result in a significant impact on the operation of the circulation system. If approved, in-process GPAs would result in new development in the unincorporated county. Construction and operation of the in-process GPAs would have the potential to contribute to degraded traffic operations from the generation of vehicle trips. The in-process GPAs would be subject to CEQA review and would be required to incorporate mitigation measures to minimize or avoid potential impacts to the extent feasible. Given the nature of the in-process GPAs (e.g., residential and mixed-use development), it is likely that impacts would be reduced to a less-than-significant level through implementation of traffic

control plans and construction notification. Therefore, the CAP Update together with the in-process GPAs would not result in a substantial incremental effect that would result in a new significant cumulative impact to plans, ordinances, or policies addressing the circulation system. The cumulative impact would be less than significant.

Exceed VMT Threshold

A cumulative impact would occur if the CAP Update together with the in-process GPAs would result in VMT that is not at least 15 percent below the SANDAG regional average or otherwise not exempt from detailed analysis. As discussed in Section 2.13.4 of this SEIR, growth assumed to occur under the adopted General Plan is projected to result in VMT that exceeds the regional average. To evaluate the potential for the in-process GPA projects to increase VMT relative to the VMT included in the GHG emissions forecasts for the CAP Update, the transportation model used in forecasting development and VMT in the CAP Update (SANDAG's DS 39 model) was modified to reflect the residential buildout of the in-process GPA projects. Because only limited information on non-residential uses associated with the in-process GPAs was available, and the residential component is the major component of most of the projects, the VMT modeling for the in-process GPAs reflects the highest VMT outcomes since it does not capture the typical reductions associated with mixed-use developments and neighborhood serving retail and focuses only on growth in housing units. Denser development would likely catalyze growth in employment and mixed-use development and would result in greater VMT reductions than shown. In 2035, regional VMT per resident is forecast to be 19.7. In the unincorporated county, modeled VMT per resident would be 27.4 under the adopted General Plan and 27.5 with approval and construction of the in-process GPA projects (assuming any of the in-process GPAs are approved). Similarly, in 2050 regional VMT per resident is forecast to be 19.9. In the unincorporated county, modeled VMT per resident would be 27.7 under the adopted General Plan and 27.8 with approval and construction of the in-process GPA projects. Given the information currently available about the in-process GPAs, the GPAs are assumed to contribute to an existing cumulative impact related to VMT. The CAP Update would reduce forecast VMT, as described in Section 2.13, "Transportation," and would not result in a cumulatively considerable contribution to the impact. Given that VMT impacts were not identified in the 2011 GPU PEIR, and the in-process GPAs could contribute to a significant cumulative VMT impact, implementation of the CAP Update, in combination with the in-process GPAs, would result in a new or more severe impact. Appendix B of this SEIR includes a memorandum prepared by Fehr & Peers that explains the methodology and modeling results for the calculation of VMT associated with the in-process GPAs.

Substantially Increase Hazards Due to a Design Feature

The 2011 GPU PEIR concludes that cumulative development would result in significant cumulative impacts related to transportation hazards. A cumulatively considerable contribution to an existing significant cumulative impact would occur if the CAP Update, in combination with the in-process GPAs, would result in substantially increased hazards due to a design feature. As analyzed in Section 2.13.3.5 of this SEIR, implementation of

the CAP Update would result in development of new or expanded solid waste facilities, renewable energy systems, and transportation infrastructure. During construction, projects associated with the CAP Update would result in degraded traffic operations due to increased traffic trips. However, the construction-related impacts would be localized and temporary. In addition, implementation of the Geneal Plan policies and 2011 GPU PEIR mitigation measures would reduce the impacts to a less-than-significant level. Once constructed, these projects would not exacerbate inadequate road widths, or construct new roadways with sharp curves or inadequate sight distances. All projects would be required to meet County design standards and would be subject to review by County staff to ensure all applicable regulations are met. Therefore, implementation of CAP Update would not result in increased design hazards across the County's roadway network. If approved, the in-process GPAs would result in new development. Construction of new development would have the potential to result in road hazards due to a design feature or physical configuration of existing or proposed roads that can adversely affect the safe transport of vehicles along a roadway. The in-process GPAs would be subject to CEQA review and would be required to incorporate mitigation measures to minimize or avoid potential impacts to the extent feasible. Given the nature of the in-process GPAs (e.g., mixed-use and residential development), it is likely that impacts would be reduced to a less-than-significant level through implementation of traffic control plans during construction. All in-process GPAs would be designed per County of San Diego Public Road Standards and Design Standards to meet applicable standards of safety, design, and sight distance. Once operational, the in-process GPAs would not substantially increase hazards and impacts would be less than significant. Therefore, the CAP Update, in combination with the in-process GPAs, would not result in a cumulatively considerable contribution to a significant cumulative impact related to transportation hazards.

Result in Inadequate Emergency Access

A cumulative impact would occur if the CAP Update together with the in-process GPAs would result in inadequate emergency access. As analyzed in Section 2.13.3.6 of this SEIR, projects associated with the CAP Update would be required to meet state and local regulations related to emergency access and design. Additionally, all projects would be subject to review by applicable emergency service agencies to ensure emergency access is maintained during construction and operations. With implementation of the relevant General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local regulations that regulate transportation; and completion of subsequent project-level planning and environmental review, impacts related to emergency access would be less than significant. Similar to the CAP Update, implementation of the in-process GPAs would be required to meet federal, state, and local regulations related to emergency access and design. The relevant General Plan policies and 2011 GPU PEIR mitigation measures identified in Section 2.13.3.6 of this SEIR would also be applicable to the in-process GPAs, which would reduce impacts related to emergency access to a less-than-significant level. Therefore, the CAP Update together with the in-process GPAs would not result in a substantial incremental effect that would result in a new significant cumulative impact related to emergency access**.** The cumulative impact would be less than significant.

4.4.13.3 Summary

Implementation of the CAP Update together with the in-process GPAs would not result in a substantial incremental effect that would result in new significant cumulative impacts related to conflict with plans, ordinances, or policies establishing measures of effectiveness for the performance of the circulation system, emergency access, or transportation hazards. These cumulative impacts would be less than significant. Given the nature of the proposed project, which would contribute to a reduction in regional VMT, implementation of the CAP Update would not result in a considerable contribution to an existing significant cumulative impact related to VMT. However, because VMT impacts were not identified in the 2011 GPU PEIR, and the in-process GPAs could contribute to a significant cumulative VMT impact, implementation of the CAP Update, in combination with the in-process GPAs, **would result in a new or more severe impact** than disclosed in the 2011 GPU PEIR.

4.4.14 Tribal Cultural Resources

4.4.14.1 2011 GPU PEIR Determination

A cumulative impact analysis for TCRs related to the implementation of the General Plan is not included in the 2011 GPU PEIR because TCRs were not identified as an environmental resource topic until 2015.

4.4.14.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of the cumulative impact analysis for TCRs would be the county because TCRs could have the potential to occur throughout the county outside trial lands.

Tribal Cultural Resources
The CAP Update in combination with the in-process GPAs could result in new developments that could result in adverse impacts to known and unknown TCRs. As discussed in Section 2.14.3.3 of this SEIR, compliance with CEQA Sections 21080.3.1 and 21084.3 would require tribal consultation and provide an opportunity to avoid or minimize the disturbance of TCRs; however, because the location, size, and magnitude of the future projects associated with the CAP Update are unknown, it may be infeasible to fully mitigate the impact to a less-than-significant level. Implementation of the in-process GPAs would involve construction of new buildings and infrastructure, the placement of structures, and the excavation of earthen materials. Although all in-process GPAs would be required to consult with affiliated tribes to identify TCRs, it is possible that unknown TCRs may be present and could be adversely affected by construction activities associated with the in-process GPAs. Therefore, implementation of the in-process GPAs could result in a potential significant impact to TCRs. The CAP Update in combination with the in-process GPAs would result in a significant cumulative impact to TCRs. Implementation of the CAP Update Mitigation Measure TCR-1 would require development to avoid tribal cultural resources when feasible. However, because the exact location and nature of projects is not known, the potential for projects associated with the CAP Update to contribute to a cumulatively significant impact would remain. Therefore, the CAP

Update, in combination with the in-process GPAs, would result in a cumulative considerable contribution to a significant impact. The cumulative impact would remain significant after mitigation. Implementation of the CAP Update would result in a new impact not disclosed in the 2011 GPU PEIR.

4.4.14.3 Summary

Implementation of the CAP Update, in combination with the in-process GPAs, would result in a significant cumulative impact to TCRs, The CAP Update's contribution to the significant cumulative impact would be cumulatively considerable. The cumulative impact would be significant and **would be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

4.4.15 Wildfire

4.4.15.1 2011 GPU PEIR Determination

Cumulative impact analysis for wildfire related to the implementation of the General Plan is not discussed in the 2011 GPU PEIR because wildfire impact thresholds were added to the Appendix G of the State CEQA guidelines in 2018 after the certification of the 2011 GPU PEIR.

4.4.15.2 CAP Update Impact Analysis with In-Process GPAs

The geographic scope of the cumulative impact analysis for wildfire is the SANDAG region. Cumulative impacts related to implementation of an emergency response plan or emergency evacuation plan are discussed in "Hazards and Hazardous Materials" above.

Exacerbate Wildfire Risks
As discussed in Section 2.15.1, "Existing Conditions," the unincorporated county contains lands that are classified as Very High FHSZs. Because of the amount of Very High FHSZs in the unincorporated county, it is reasonable to assume that there are existing significant cumulative impacts related to the exacerbation of wildfire risks, related to exacerbation of wildfire risk from installation and maintenance of infrastructure, and related to exposing people or structures to post-fire risks.

As analyzed in Section 2.15.3.4 of this SEIR, future projects associated with the CAP Update would result in less than significant impacts related to exacerbation of wildfire risk with implementation of adopted General Plan policies and applicable 2011 GPU PEIR mitigation measures, and other applicable regulations listed in Section 2.15.2, "Regulatory Framework," of this SEIR.

Implementation of the in-process GPAs would result in housing development in rural and open areas with high fire risk, which could exacerbate wildfire risk. Similar to the CAP Update, all in-process GPAs would be required to comply with the adopted General Plan policies and regulations listed in Section 2.15.2, "Regulatory Framework," of this SEIR to protect project occupants from wildfire hazards. Such compliance would ensure that

proper fire safety measures would be employed during project construction; that sufficient ingress, egress, and wildfire suppression equipment would be present on-site; and that building materials and design, landscape design, and vegetation management would be sufficient to reduce the risk of wildfire to project occupants. However, given the prevalence of Very High FHSZs in the unincorporated county, it is reasonable to assume that there are existing significant cumulative impacts related to the exacerbation of wildfire risks, related to exacerbation of wildfire risk from installation and maintenance of infrastructure, and related to exposing people or structures to post-fire risks, and that given the level of new development proposed under the in-process GPAs, these projects would contribute to cumulative impact. Therefore, the CAP Update in combination with the in-process GPAs would result in a considerable contribution to a significant cumulative impact. The cumulative impact would be less than significant.

Install Infrastructure That Exacerbates Fire Risk

Implementation of the CAP Update and in-process GPAs could result in installation of infrastructure, such as power lines, power poles, battery storage systems, and/or substation. Installation of this infrastructure could result in placement of structures adjacent to wildland vegetation. Construction activities associated with installation of infrastructure may result in ignition sources, including heat sources or sparks from power tools, heated exhausts from worker vehicles, and improper electrical connections. During operation of the CAP Update and in-process GPAs, the primary wildfire ignition risks could include, but are not limited to, electrical shorts, employee and maintenance vehicles, collapse of supporting structures (e.g., power lines and power poles) causing electrical shorts and fire, and overgrown fuel under and around structures. As discussed in Section 2.15.3.4 of this SEIR, implementation of the adopted General Plan policies and 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7 would ensure that the CAP Update would result in less than significant impacts related to installation of infrastructure that exacerbates fire risk. Installation of infrastructure associated with the in-process GPAs would be required to be designed and constructed in accordance with current fire and building codes. Defensible space and fuel management required by the California Public Utilities Commission and California Department of Forestry and Fire Protection for utilities infrastructure development (as summarized in Section 2.15.2.2 of this SEIR) would also be provided. In-process GPAs would be subject to discretionary review and would be evaluated for project-specific impacts under CEQA. Project-specific mitigation would reduce and minimize impacts related to the exacerbation of fire risk to the extent feasible. Therefore, the CAP Update, in combination with the in-process GPAs, would not result in a considerable contribution to a significant cumulative impact. The cumulative impact would be less than significant.

Expose People or Structures to Post-Fire Risks

Implementation of the CAP Update could result in future development, such as expansion of facilities, identification of opportunities for potential future farmworker housing, and development of small-scale and large-scale renewable energy projects. These potential developments could expose people or structures to significant risks. However, as discussed in Section 2.15.3.5 of this SEIR, post-wildfire risks to new development associated with the CAP Update would be reduced to a less-than significant level through compliance with existing regulations related to wildfire protection, the adopted General Plan

policies, and the 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.5 through Pub-1.7. Implementation of the in-process GPAs would result in housing and commercial development in areas subject to high fire risks, which could also expose people and/or structures to significant post-wildfire risk. It is foreseeable that the in-process GPAs proposed in the unincorporated county would also be required to comply with the same existing regulations related to wildfire protection, the adopted General Plan policies, and the 2011 GPU PEIR mitigation measures summarized in Section 2.15.3.5 of this SEIR, resulting in the mitigation of impacts related to post-wildfire risk. Further, given the fact that impacts resulting from the proposed CAP Update and in-process GPAs would not result in a significant impact related to exposing people or structures to post-wildfire risks, the CAP Update in combination with the in-process GPAs would not result in a considerable contribution to a significant cumulative impact. The cumulative impact would be less than significant.

4.4.15.3 Summary

The CAP Update together with the in-process GPAs would not result in a considerable contribution to existing cumulative impacts related to installation of infrastructure that exacerbates fires and exposing people or structures to post-wildfire risks. However, the CAP Update, in combination with the in-process GPAs would result in a considerable contribution to an existing cumulative impact related to exacerbation of wildfire risk. This cumulative impact would be significant; and because wildfire was not analyzed as a stand-alone topic in the 2011 GPU PEIR, given the addition of this topic to the CEQA Appendix G Checklist in 2018, implementation of the CAP Update together with the in-process GPAs **would result in a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Table 4-1 In-Process Projects that include General Plan Amendments

Project Name	Community Plan Area	Board District	APN(s)	Project Details
Ivanhoe Ranch	Valle de Oro	2	518-030-41, -43, -44, -45	Residential DUs: 120
Warner Springs Ranch Resort SPA	North Mountain	5	137-092-31, -33	Residential DUs: 45
Peppertree Park SPA (Units 9 + 10)	Fallbrook	5	104-350-19	Residential DUs: 685
Peppertree Park SPA (Units 7 + 8)	Fallbrook	5	106-042-01	TBD
Passerelle - Campus Park	Fallbrook	5	108-120-61	Conversion of 157,000 SF of Office Professional to 138 Detached Condo Units in the Campus Park Specific Plan.
Abdali Gas Station	Bonsall	5	126-260-21	GPA/Rezone/Site Plan of excess Caltrans ROW for the construction of a Gas Station
Labrador Lane	Lakeside	2	396-101-01, -02, 396-080-92	104 mobile home units
Rancho Librado	San Dieguito	3	268-180-01, -39, -50, -51	56 units (54 age restricted condos and 2 guest quarters)
Castle Creek	Valley Center	5	POR 172-250-04, POR 172-040-67	63 age restricted condos
Preserve at Riverbend	Pala/Pauma	5	110-072-03, -04, 110-150-24, -26, -43, -44, -45, -46, 110-361-16, 110-362-08, -09, 128-020-02, -06, -49, -50, 128-470-05-01, 128-470-05-02, 128-470-08, -09, -15, -16, -18, -19, -20	Residential DUs: 1,330 Commercial SF: TBD
Harmony Grove Village South	San Dieguito	5	235-011-06, 238-021-08, -09, -10	Residential DUs: 453 Commercial SF: 5,000
Valley Center Community Plan Update	Valley Center	5	NA	TBD
Twin Oaks Community Plan Update	North County Metro	5	NA	TBD

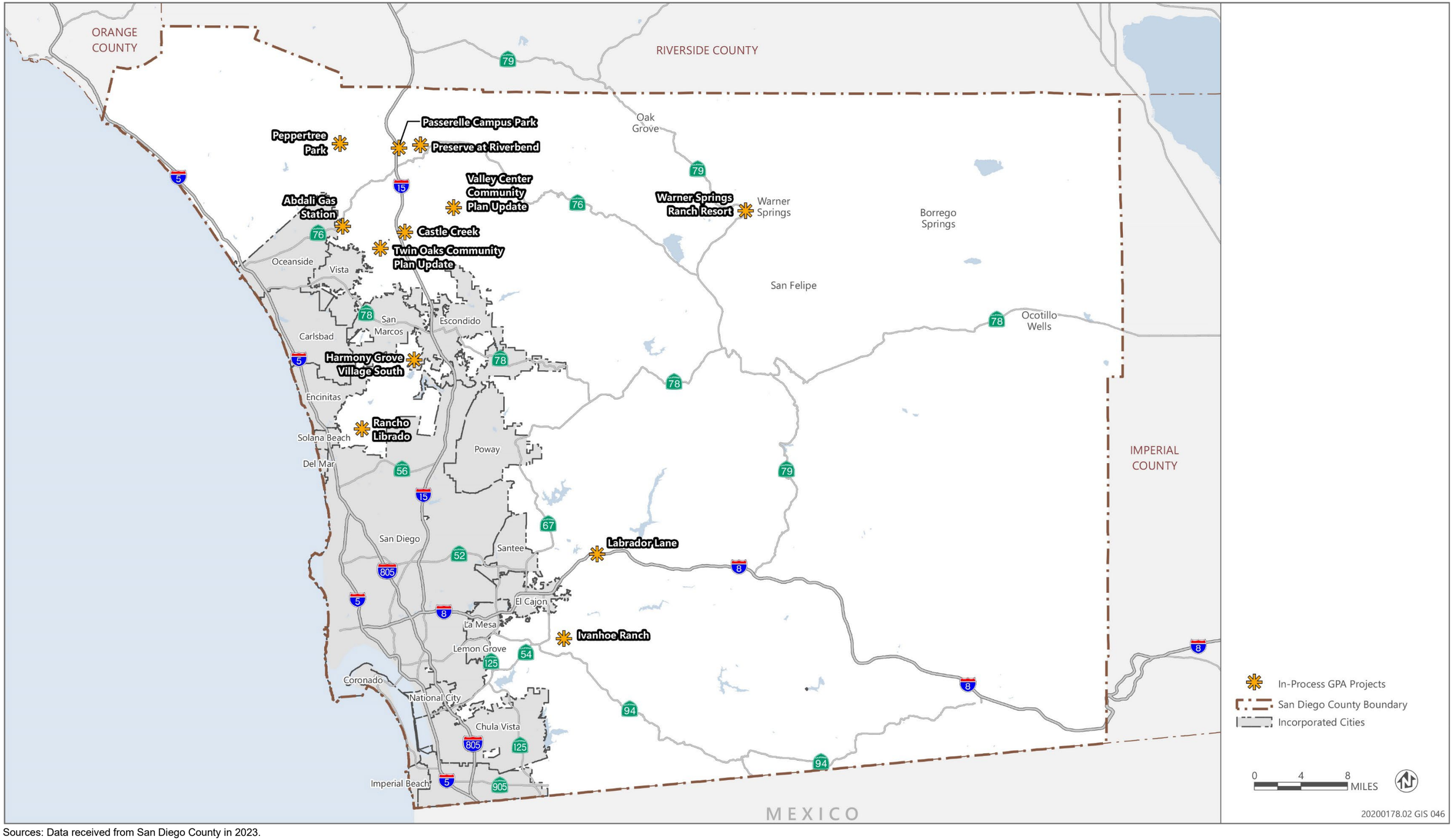
Source: data compiled by San Diego County in 2023.

Table 4-2 Summary of Projected GHG Emissions from In-Process General Plan Amendments

Total Annual Emissions ($MTCO_2e$)	2030	2045
Forecast GHG Emissions with CAP Update	1,656,086	305,813
Total projected GHG Emissions from In-Process GPAs	37,310	36,285
Total Projected GHG Emissions (forecast emissions and in-process GPAs)	**1,693,396**	**342,098**
CAP Targets	1,683,156	434,185
Reductions Needed to meet Targets	10,240	(92,087)

Notes: Emissions modeled in CalEEMod using default assumptions for the in-process GPA projects identified in Table 4-1 with VMT modeled by Fehr and Peers in 2023 to include all in-process GPA projects. Refer to Appendix B for detailed model outputs. Negative values indicate surplus reductions.

$MTCO_2e$ – metric tons of carbon dioxide equivalent



Sources: Data received from San Diego County in 2023.

Figure 4-1 Location of In-Process GPA Projects