Draft Supplement to the 2011 General Plan Update Program Environmental Impact Report for the Climate Action Plan Update

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October 2023

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ACRONYMS AND ABBREVIATIONS

2011 GPU PEIR	2011 General Plan Update Final Program Environmental Impact Report
2011 GPU	County's General Plan, 2011 General Plan Update
AB 32	California Global Warming Solutions Act of 2006
AB	State Assembly Bill
ACMs	asbestos-containing materials
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plans
ATP	Active Transportation Plan
BAU	business-as-usual
BMO	Biological Mitigation Ordinance
Board	County's Board of Supervisors
BOS	Board of Supervisors, referring to San Diego County
C&D	Construction & Demolition
Cal/OSHA	California Division of Occupational Safety and Health
CalCAN	California Climate and Agriculture Network
CAP	Climate Action Plan
CARB	California Air Resource Board's
Carl Moyer Program	Carl Moyer Memorial Air Quality Standards Attainment Program
CBC	California Building Code
CCE	Community Choice Energy
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CH_4	methane
Checklist	CAP Consistency Review Checklist
CIP	Capital Improvement Program
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNG	compressed natural gas
CO	Carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County operations	community and County local government operations
County	County of San Diego
CREP	Comprehensive Renewable Energy Plan
CRIS-Climate Registry	Climate Registry Information System
CRPR	California Rare Plant Ranks
CWA	San Diego County Water Authority

dBA	A-weighted decibels
DEH	Department of Environmental Health
Draft SEIR	Supplemental Environmental Impact Report
EFMP	Enhanced Fleet Modernization Program
EIR	Environmental Impact Report
ESA	Endangered Species Act
EV	electric vehicle
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
GHG	greenhouse gas
GPA	General Plan Amendment
GPU	General Plan Update
Guidelines	Guidelines for Determining Significance for Climate Change
GWP	global warming potential
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
LBP	lead-based paint
L_{eq}	Equivalent Energy Level
L_{max}	maximum sound level
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendant
MM	Mitigation Measures
MMRP	Mitigation Monitoring and Reporting Program
MSCP	Multi-Species Conservation Plan
$MTCO_2e$	metric tons of carbon dioxide equivalent
MTS	San Diego Metropolitan Transit System
N_2O	nitrogen dioxide
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plans
NCTD	North County Transit District
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
Outreach Plan	Public Outreach and Engagement Plan
PACE	Purchase of Agriculture Conservation Easement

PDR	Purchase of Development Rights
PDS	Planning & Development Services
PEIR	Program Environmental Impact Report
PM10	Respirable particulate matter
$PM_{2.5}$	Fine particulate matter
PPV	peak particle velocity
PV	photovoltaic
REVI	Regional Electric Vehicle Infrastructure
RMS	root mean square
RPO	Resource Protection Ordinance
RPO	Resource Protection Ordinance, referring to the County of San Diego Code of Regulatory Ordinances Sections 86.601-86.608
SANDAG	San Diego Association of Government
SB	Senate Bill
SCIC	South Coast Information Center
SDAPCD	San Diego Air Pollution Control District
SDCFA	San Diego County Fire Authority
SDCRAA	San Diego County Regional Airport Authority
SDG&E	San Diego Gas & Electric
SO_2	Sulfur dioxide
SR	State Route
SWMA	Solid Waste Management Agreements
SWRCB	State Water Resources Control Board
TDM	Transportation Demand Management
USACE	U.S. Army Corps of Engineers
USBR	U.S. Bureau of Reclamation
USFS	U.S. Forest Service
VdB	vibration decibels
WPO	Watershed Protection, Stormwater Management, and Discharge Control Ordinance, referring to the County of San Diego Code of Regulatory Ordinances Sections 67.801-67.814
ZNE	Zero Net Energy

SUMMARY

This chapter describes the proposed County of San Diego (County) Climate Action Plan CAP Update and an associated amendment to the General Plan (GPA) to revise Goal Conservation and Open Space (COS)-20: Reduction of community-wide and County operations greenhouse gas emissions; Policy COS-20.1: Climate Change Action Plan; revisions to *San Diego County General Plan Update Final Environmental Impact Report* (hereafter 2011 GPU PEIR) Mitigation Measure (MM) CC-1.2 (Prepare a County Climate Change Action Plan), MM CC-1.7 (County Guidelines for Determining Significance for Climate Change, which includes a threshold of significance for GHG emissions[1]); and MM CC-1.8 (Revise County Guidelines for Determining Significance based on the Climate Change Action Plan). Table S-1 at the end of this chapter provides the following information: (1) the direct and cumulative impacts that would occur with implementation of the CAP Update; (2) the level of significance of impacts before mitigation; (3) the recommended mitigation measures that would avoid or reduce significant environmental impacts; (4) the level of significance of impacts after mitigation measures are implemented; and (5) whether new or more severe significant impacts (compared with the impact conclusions in the earlier CEQA analysis) would occur with the CAP Update after mitigation.

S.1 Project Synopsis

S.1.1 Project Location

San Diego County is in the southwestern corner of California. It is bordered by the Pacific Ocean to the west, Riverside County to the north, Imperial County to the east, Orange County at the northwest corner, and the Republic of Mexico to the south. Approximately 35 percent of the total land area in the county is within the County's land use jurisdiction. Incorporated cities and federal, state, and tribally owned lands (including Marine Corps Base Camp Pendleton) are outside of the County's jurisdiction. The remaining approximately 772,239 acres of land and County facilities (regardless of location) are within the County's jurisdiction and comprise the planning area for both the San Diego County General Plan, as evaluated in the 2011 GPU PEIR, and the CAP Update.

S.1.2 Project Description

S.1.2.1 Project Background

In August 2011, the County adopted the current General Plan, which was an update to the 1979 General Plan. The General Plan update made modifications to the County's land use designations and influenced future development of the county by locating 80 percent of the future dwelling unit capacity in the western third of the unincorporated areas, within the San Diego County Water Authority boundary; focusing development within the village

[1] Revisions to GPU Mitigation Measure CC-1.7 will include a Greenhouse Gas Emission threshold through compliance with the CAP Consistency Checklist. This threshold of significance and CAP Consistency Checklist will be adopted for general use through this CAP Update process following public review of the CAP and SEIR. The requirements to adopt a threshold of general use are detailed in State CEQA Guidelines Section 15064.7(b).

core areas away from rural areas; and reducing the overall land use capacity by 15 percent.

In conjunction with the General Plan, the County prepared and certified the 2011 GPU PEIR, which assessed the potential environmental effects of future development anticipated with implementation of the General Plan. A total of 19 separate mitigation measures were adopted to reduce the greenhouse gas (GHG) emissions of County operations and from activities within the unincorporated county to below a level of significance. One of the 19 measures, designated CC 1.2, called for the preparation of a CAP. Mitigation Measure CC-1.2 was incorporated into the General Plan as Goal COS-20 and Policy COS-20.1. Specifically, Goal COS-20 in the Conservation and Open Space Element of the General Plan requires reduction of community and County operations GHG emissions and Policy COS-20.1 requires preparation, maintenance, and implementation of a CAP. Further, the mitigation measures identified in the 2011 GPU PEIR called for the preparation of a CAP designed to reach specified GHG reduction targets from community and local government operations, modifications to the *County of San Diego Guidelines for Determining Significance: Climate Change* to provide guidance on the evaluation of GHG impacts and determine a project's consistency with the CAP, and adoption of a GHG threshold to reduce GHG emissions.

With the adoption of the General Plan, the County committed to reducing GHG emissions while seeking to balance environmental, social, and economic interests. The General Plan recognized that GHG reductions can be achieved in multiple ways, including growing in a compact and efficient manner, using energy more efficiently, harnessing renewable energy to power buildings, improving waste recycling, and improving access to sustainable transportation.

In June 2012, the County adopted the 2012 CAP and an Addendum to the 2011 GPU PEIR. On November 7, 2013, staff approved the County of San Diego Guidelines for Determining Significance: Climate Change. Following the approval of the 2012 CAP, the Sierra Club filed suit challenging the approval and the adequacy of the associated environmental review. In a ruling issued on October 29, 2014 (*Sierra Club v. County of San Diego*, 231 Cal. App. 4th 1152 [2014]), the Fourth District Court of Appeal held that the 2012 CAP did not meet the description set forth in the adopted mitigation measure (2011 GPU PEIR Mitigation Measure CC-1.2) and that a supplemental SEIR was needed for the plan. In response to the court's decision and considering state legislative changes that had occurred since preparation of the 2012 CAP, the County prepared the 2018 CAP and 2018 CAP SEIR.

After the County adopted the 2018 CAP and certified the 2018 CAP SEIR on February 14, 2018, the Sierra Club, Center for Biological Diversity, Cleveland National Forest Foundation, Climate Action Campaign, Endangered Habitats League, Environmental Center of San Diego, and Preserve Wild Santee filed a petition challenging the 2018 CAP as violating CEQA. In a separate action, Golden Door Properties, LLC, also challenged the 2018 CAP as violating CEQA. On December 24, 2018, the Superior Court ruled that the 2018 CAP approval did not comply with CEQA. The Superior Court ordered the County to decertify the 2018 CAP SEIR. This decision was later affirmed in part by the

California Court of Appeal, Fourth Appellate District (Appellate Court), on June 12, 2020, in *Golden Door Properties, LLC, v. County of San Diego*, 50 Cal. App. 5th 467. Specifically, the Appellate Court affirmed the Superior Court's decision that the 2018 CAP and 2018 SEIR failed to adequately account for potential environmental impacts of GPA projects due to reliance on Mitigation Measure M-GHG-1, which allowed for use of carbon offset credits. The Appellate Court also held that the 2018 SEIR should have included at least one project alternative focused on substantially reducing vehicle miles traveled (VMT), and that the document failed to adequately address the cumulative impacts of probable future projects requiring GPAs. Consistent with the Appellate Court's final judgement the trial court issued a writ of mandate directing the County to rescind approval of the 2018 CAP and certification of the 2018 CAP SEIR. As a result, the County Board of Supervisors (Board) rescinded the 2018 CAP and 2018 CAP SEIR, and associated approvals, on September 30, 2020. An update to the CAP was required.

This SEIR was prepared in response to the writ and to analyze the impacts of the proposed CAP Update. Table 1-1, "Summary of SEIR Response to 2020 Appellate Court Ruling," indicates the location in this draft SEIR where specific court direction is addressed.

The foundation of the CAP Update is a comprehensive inventory of GHG emissions that identifies and quantifies the sources and amounts of GHG emissions generated from activities in the county. The County's base inventory of GHG emissions evaluated activities within the unincorporated county in the year 2019, the most recent year data are available.

S.1.2.2 Project Objectives

Section 15124 of the State CEQA Guidelines requires an EIR to include a statement of objectives sought to be achieved by the proposed project. The project's objectives help public agencies and the general public understand the underlying purpose of the proposed project. Because the objectives establish the purpose of the project, they also assist the County, as lead agency, in developing a reasonable range of alternatives to be evaluated in the SEIR. The project objectives also aid the County in preparing findings if the project is to be approved and, if necessary, a statement of overriding considerations. The statement of objectives also includes the underlying purpose of the project.

The underlying purpose of the project is to reduce GHG emissions that could be generated by development under the General Plan, and to reduce those emissions consistent with state legislative requirements and the requirement to prepare a CAP pursuant to Mitigation Measure CC-1.2 of the 2011 GPU PEIR. This mitigation measure sets out to reduce GHG emissions from community-wide sources and County local government operations (County operations) that are consistent with the General Plan.

The following objectives have been developed to assist in achieving the underlying fundamental purpose of the proposed project while implementing the Guiding Principles of the General Plan and supporting sustainability efforts in the region:

- Reduce community-related GHG emissions within the unincorporated county and County operations-related GHG emissions to meet and exceed the County's GHG reduction targets for 2030 and 2045, as aligned with state reduction targets (as set forth in Senate Bill (SB) 32 [2016] and Assembly Bill (AB) 1279 [2022]), that does not rely on the purchase of carbon offsets to meet emission reduction targets.

- Incorporate feasible and effective GHG reduction strategies, measures, and actions that reduce GHG emissions from community-wide activities in the unincorporated county and from County operations to establish actions to meet a goal of net zero carbon emissions by 2045 as aligned with AB 1279.

- Implement 2011 GPU PEIR Mitigation Measure CC-1.2 to prepare a CAP to reduce GHG impacts from implementation of the General Plan, and update Mitigation Measure CC-1.2 to be consistent with changes in state law, and the State CEQA Guidelines.

- Develop a CAP that supports the sustainability principles found in the County of San Diego General Plan Guiding Principles by doing the following: support a reasonable share of projected regional growth; promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in compact development patterns to the extent feasible; promote environmental stewardship that protects and/or enhances natural resources and habitats; ensure development that accounts for physical constraints and natural hazards; provide and support a multi-modal transportation network that enhances connectivity; maintain environmentally sustainable communities and reduce GHG emissions; and preserve agriculture as an integral component of the region's economy, character, and open space network.

- Develop a CAP that sets clear goals and identifies metrics (i.e., co-benefits and equity-based outcomes) to guide implementation to make substantial progress toward attaining environmental justice and equity.

- Develop a CAP that includes sufficiently adaptable long-term strategies that will consider and incorporate, as feasible, additional GHG reduction strategies that embrace continued innovation, technological advances, and the creation of high-quality jobs in the County.

- Accomplish the foregoing objectives in a manner that minimizes undue and unnecessary economic impacts on businesses and property owners, and that avoids regulatory takings under the federal and state constitutions.

S.1.2.3 CAP Contents

The CAP contains five chapters, which are briefly summarized below:

- Executive Summary: Summarizes the key information contained in the CAP.

- Chapter 1, "Introduction": This chapter introduces the document, describes the purpose and context of the plan, and identifies the regulatory framework related to global GHG emissions.

- Chapter 2, "Outreach and Engagement": This chapter describes how the CAP was developed through engagement with residents, community organizations, and regional stakeholders.

- Chapter 3, "GHG Emissions Inventory, Projections, and Reduction Targets": This chapter provides detailed accounting of GHG emissions from activities within the unincorporated areas, and from County local government operations. It includes a discussion of the primary sources and annual levels of GHG emissions and establishes a 2019 baseline inventory. Projections of GHG emissions and reduction targets are described and the resultant emissions gap between projected emissions and reduction targets is calculated.

- Chapter 4, "GHG Reduction Measures": This chapter outlines overarching GHG reduction strategies and details specific strategies and supporting measures to be implemented by the County to achieve its GHG reduction targets. The strategies and measures focus on locally based actions to reduce GHG emissions in various categories as a complement to legislative actions taken by the state or federal government.

- Chapter 5, "Implementation and Monitoring": This chapter describes the set of actions that comprise the implementation strategy, possible funding mechanisms, the monitoring and compliance program, and an overview of the CEQA tiering/streamlining options for future projects.

Key components of the CAP are the GHG emissions inventory, GHG emissions projections, GHG emissions reductions targets and net zero goal, GHG emissions reductions strategies, implementation and monitoring, and the public outreach strategy.

S.1.2.4 Consistency Modifications to the General Plan and 2011 GPU PEIR

The proposed CAP would be consistent with current regulatory standards that supersede the regulatory basis for the goals, policies, and mitigation measures in the San Diego County General Plan and 2011 GPU PEIR. The General Plan and 2011 GPU PEIR do not address GHG reductions or GHG reduction goals beyond 2020 for community emissions or County operations. Amendments to the San Diego County General Plan and revisions to mitigation measures adopted in the 2011 GPU PEIR would be required to achieve consistency among the County's planning documents and modernize the adopted targets.

Mitigation Measures CC-1.2, CC-1.7, and CC-1.8 identified in the 2011 GPU PEIR called for the preparation of a CAP designed to reach specified GHG reduction targets from community and local government operations, modifications to the *County of San Diego*

Guidelines for Determining Significance: Climate Change to provide guidance on the evaluation of GHG impacts considering current regulatory requirements and determine a project's consistency with the CAP, and adoption of a GHG Threshold. The proposed modifications to these mitigation measures would update the regulatory requirements and goals that would be achieved by each of these actions to make them current with existing regulatory requirements. As described below, the modifications would continue to require the same or more stringent requirements for the reduction of GHG emissions.

Specifically, Goal COS-20 in the San Diego County General Plan sets a target to reduce local GHG emissions to 1990 levels by 2020 to be consistent with the statewide goal established by Assembly Bill (AB) 32. To meet this goal, the County adopted Policy COS-20.1. The 2011 GPU PEIR incorporated a mitigation measure (MM CC-1.2) which, in combination with other identified mitigation measures, would achieve General Plan Goal COS-20 and Policy COS-20.1 to reduce cumulative GHG emissions within the unincorporated county to 1990 levels by 2020. The same mitigation measure also established a 2020 target for County operations.

2011 GPU PEIR MM CC-1.7 requires the County to incorporate CARB's recommendations for climate change CEQA thresholds into the *County of San Diego Guidelines for Determining Significance: Climate Change*. If CARB does not release the recommendations, then the County is required to prepare its own threshold(s).

2011 GPU PEIR MM CC-1.8 requires the County to revise the *County of San Diego Guidelines for Determining Significance: Climate Change* based on the CAP.

The County has determined that Goal COS-20 and Policy COS- 20.1, and 2011 GPU PEIR Mitigation Measure CC-1.2 need to be updated to reflect the requirements of SB 32 (as amended, Pavley California Global Warming Solutions Act of 2006: emissions limit), which requires statewide GHG emission reductions to 40 percent below the 1990 levels by 2030 and AB 1279, which requires net zero emissions no later than 2045. Further, modifications to the 2011 GPU PEIR Mitigation Measures CC-1.7 and CC-1.8 are needed. The proposed changes are shown below in underline (underline) for new text and strikeout (~~strikeout~~) for deleted text.

General Plan Goal COS-20 (Governance and Administration)

Reduction of ~~local~~ community-wide (i.e., unincorporated county) and County operations GHG emissions contributing to climate change that meet or exceed requirements of the Global Warming Solutions Act of 2006, as amended by Senate Bill 32 (as amended, Pavley. California Global Warming Solutions Act of 2006: emissions limit) and Assembly Bill 1279 (2022) to achieve net zero greenhouse gas emissions no later than 2045.

General Plan Policy COS-20.1 (Climate ~~Change~~ Action Plan)

Prepare, maintain, and implement a ~~climate change action plan with a baseline inventory of GHG emissions from all sources; GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures.~~ Climate

Action Plan for the reduction of community-wide (i.e., unincorporated county) and County operations GHG emissions consistent with the California Environmental Quality Act (CEQA) Guidelines Section 15183.5 (or as amended).

2011 GPU PEIR Mitigation Measure (MM) CC-1.2

Prepare a ~~County Climate Change Action Plan with an updated baseline inventory of GHG emissions from all sources, more detailed GHG emissions reduction targets and deadlines; and a comprehensive and enforceable GHG emissions reduction measures that will achieve a 17% reduction in emissions from County operations from 2006 by 2020 and a 9% reduction in community emissions between 2006 and 2020. Once prepared, implementation of the plan will be monitored and progress reported on a regular basis.~~ Climate Action Plan for the reduction of community-wide (i.e., unincorporated county) and County operations greenhouse gas emissions consistent with state-legislative targets, as described in General Plan Goal COS-20, and consistent with State CEQA Guidelines Section 15183.5 or as amended, as referenced in General Plan Policy COS-20.1. As described in Section 15183.5, the key elements of the Climate Action Plan would include:

"State CEQA Guidelines Section 15183.5(b)(1):

(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;

(F) Be adopted in a public process following environmental review."

Once prepared, implementation of the Climate Action Plan will be monitored and progress reported on a regular basis, as follows:

- Implementation Monitoring Report – prepared annually;
- Greenhouse Gas Emissions Inventory – updated every two years; and
- Climate Action Plan – updated at least every five years.

2011 GPU PEIR MM CC-1.7

~~Incorporate the California ARB's recommendations for a climate change CEQA threshold into the County Guidelines for Determining Significance for Climate Change. These recommendations will include energy, waste, water, and transportation performance measures for new discretionary projects in order to reduce GHG emissions. Should the recommendation not be released in a timely manner,~~ T~~t~~he County will prepare and adopt its own threshold for GHG emissions and shall include this threshold in the *County of San Diego Guidelines for Determining Significance: Climate Change*.

2011 GPU PEIR MM CC-1.8

~~Revise~~ Prepare *County of San Diego Guidelines for Determining Significance: Climate Change* ~~based on the Climate Change Action Plan~~. The ~~revisions~~ guidelines will ~~include guidance for~~ identify the specific actions proposed discretionary projects will need to take to ~~achieve greater energy, water, waste, and transportation efficiency~~ demonstrate consistency with the Climate Action Plan pursuant to Section 15183.5 of the State CEQA Guidelines or as amended, as described in the 2011 General Plan Update Program EIR Mitigation Measure CC-1.2, as amended.

S.1.2.5. GHG Threshold, Guidelines for Determining Significance for Climate Change

The project includes the preparation of the *County of San Diego Guidelines for Determining Significance: Climate Change* document, which includes the following components:

a) GHG Threshold: Establishes the County's Threshold of Significance for evaluation of GHG impacts as noted below. Adoption of a GHG Threshold is considered as a separate discretionary action.

b) CAP Requirements: This section discusses the requirements for projects to demonstrate compliance with the CAP and the streamlining provisions that may be applicable under CEQA.

c) CAP Consistency Review Checklist: An appendix to the *County of San Diego Guidelines for Determining Significance: Climate Change* would contain a checklist that would include reduction measures to be implemented by proposed discretionary projects and would be used to determine consistency with the CAP Update.

The *County of San Diego Guidelines for Determining Significance: Climate Change* would be brought forward to the Board for approval as a separate document from the CAP Update, but are to be considered concurrently with the CAP Update. All discretionary projects that are subject to CEQA, no matter the size of the project, would be evaluated for consistency with the CAP Update. The Checklist has been incorporated as an appendix to the *County of San Diego Guidelines for Determining Significance: Climate Change* and would be the mechanism that is utilized to demonstrate compliance with the CAP Update. The proposed threshold of significance is "consistency with the CAP," which would be determined through the Checklist. Consistency with the CAP Update would be the only threshold of significance for County projects.

If the project is consistent with the County's General Plan, then the project could use the CEQA streamlining provision, State CEQA Guidelines Section 15183.5, which would allow the project to tier from and incorporate by reference the GHG emissions analysis presented in this SEIR, upon certification. To show consistency with the CAP Update, the project would be required to implement applicable GHG reduction measures as adopted in the CAP Update and outlined in the Checklist.

If the project is not consistent with the General Plan and would require a GPA, then the project would not qualify for the CEQA streamlining provision and would be required to prepare a project-specific GHG emissions analysis. If the project is requesting a GPA but not requesting an increase in density or intensity beyond what is allowed in the General Plan and GHG emission projections contained in the CAP Update, then the project could potentially achieve consistency with the CAP by implementing applicable GHG reduction measures as adopted in the CAP Update and outlined in the Checklist. Project-specific analysis would be required to demonstrate how the project would achieve consistency with the CAP through implementation of the measures outlined in the Checklist.

S.2 Summary of Significant Impacts and Mitigation Measures

Table S-1, "Summary of Significant Impacts and Mitigation Measures," summarizes the results of the environmental analysis completed for the project. It also identifies mitigation measures proposed to reduce or avoid the environmental effects, with a conclusion as to whether the impact has been mitigated to less than significant. Detailed analyses of significant environmental impacts are discussed in Chapter 2, and effects found not to be significant during preparation of the Draft SEIR are identified in Chapter 3.

S.3 Areas of Controversy

A Notice of Preparation (NOP) was distributed on December 10, 2020, for a 57-day public review and comment period (refer to Appendix A for the NOP). Public comments were received through February 4, 2021, and reflect concern or controversy regarding a number of environmental issues. A scoping meeting was held virtually on January 28, 2021. The NOP and written comments received during the NOP review period are included in Appendix A.

Approximately 75 comment letters were received on the NOP from state and local agencies, Native American groups, private companies, groups and organizations, and individuals. The state and local agencies that provided comments were the California Department of Transportation, California Department of Fish and Wildlife, City of San Diego, and City of San Diego Planning. The Native American groups that provided comments were the San Pasqual Band of Mission Indians and Rincon Band of Luiseno Indians. Private companies that provided comments were San Diego Gas & Electric Company, Ecoscape Pavement, and New Leaf Biofuel.

The groups and organizations that provided comments were the Sierra Club, The Climate Reality Project, StopCottonwoodSandMine.org, the California Native Plant Society, the California Native Plant Society San Diego Chapter, Golden Door, SanDiego350, the Southwest Wetlands Interpretive Association, the Cleveland National Forest Foundation, the League of Women Voters, the League of Women Voters of San Diego, the Endangered Habitats League, the Climate Action Campaign, Southwest Wetlands Interpretive Association, Audubon Society Conservation Committee, San Diego Audubon Society Conservation Committee, Endangered Habitats League, ARC Animal Rescue, the Mt. Helix Park Foundation, the San Diego Regional Urban Forests Council, the Descanso Community Planning Group, the Building Industry Association of San Diego County, and the San Diego County Farm Bureau.

Issues raised in the NOP comment letters include concerns regarding the following issue areas related to the scope and content of this SEIR:

- ecosystem impacts, including impacts on birds and wildlife,
- impacts on tribal traditional use areas,
- impacts on disadvantaged communities and support/benefits associated with CAP,
- use of offsets,
- recommendations for future project mitigation and restrictions to ensure significant reduction of GHG emissions, and
- smart growth alternatives.

Issues raised within these letters are evaluated in Chapters 2–4 of this Draft SEIR.

S.4 Issues to Be Resolved by the Board of Supervisors

The Board serves as the decision-making body for the project. Before the Board takes final action on any project-related issues, recommendations will be developed by the Planning & Development Services Department and the Planning Commission. In developing these recommendations and rendering a decision, the County will consider input provided by the public, other agencies, the community planning groups, and advisory groups. In addition, the decisions of the Planning Commission and Board are

made in public hearings at which public comment is invited. The following issues related to the project must be resolved by the Board before or at the time of project approval and Final SEIR certification:

- final composition of the CAP Update,
- General Plan Amendment text,
- County of San Diego Guidelines for Determining Significance: Climate Change text, and
- benefits of the project compared to environmental risk.

Further, the Board must consider the significant effects of the project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. In addition, the Board must determine whether significant effects related to aesthetics, agricultural resources, air quality, biological resources, cultural resources, GHG emissions, hazards and hazardous materials, hydrology, land use, noise, transportation, tribal cultural resources, and wildfire can be reduced further. Finally, the Board must determine whether any of the project alternatives would substantially reduce the significant effects associated with aesthetics, agricultural resources, air quality, biological resources, cultural resources, GHG emissions, hazards and hazardous materials, hydrology, land use, noise, transportation, tribal cultural resources, and wildfire while still meeting key project objectives. The Board must respond by making "findings" regarding each significant impact identified in this Draft SEIR. Preparation of a statement of overriding considerations (explaining the overriding value of the project despite adverse effects) would be required for any remaining significant and unmitigated impacts.

S.5 Project Alternatives

In accordance with Section 15126.6(a) of the State CEQA Guidelines, an EIR must describe a range of reasonable alternatives to the project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and it must evaluate the comparative merits of the alternatives. Section 15126.6(a) also states that an EIR need not consider every conceivable alternative to a project. Instead, the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation, but it is not required to consider alternatives that are infeasible. There is no ironclad rule governing the nature or scope of the alternatives to be discussed in an EIR other than the "rule of reason." State Guidelines Section 15126.6(f) states, "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." It further states that "[t]he range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making."

The following discussion covers a reasonable range of feasible alternatives that focuses on avoiding or substantially lessening the significant effects of the project, even if these alternatives would not attain all the project objectives or would be more costly. According to the State CEQA Guidelines, many factors may be considered when addressing the feasibility of alternatives, such as environmental impacts, site suitability as it pertains to various land use designations, economic viability, availability of infrastructure, regulatory limitations, and jurisdictional boundaries. An EIR need not consider an alternative whose effects cannot be reasonably identified, one whose implementation is remote or speculative, or one that would not achieve most of the basic project objectives. However, CEQA requires that a no project alternative be included in the range of alternatives. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. CEQA also requires that the EIR identify the environmentally superior alternative. Based on impact comparison between the project and the evaluated alternatives, the Distributed Generation Only Alternative has been identified as the environmentally superior alternative. Below is a brief description of the alternatives. A full analysis of each alternative and impact comparisons are provided in Chapter 5.

S.5.1 No Project Alternative

The No Project Alternative assumes the CAP Update would not be adopted and implemented. As a result, the County would not adopt strategies, measures, and supporting efforts to reduce GHG emissions in accordance with state-mandated reduction targets. New developments would continue to be reviewed under CEQA. This alternative would not meet any of the project objectives.

S.5.2 Distributed Generation Only Alternative

Under the Distributed Energy Only Alternative, Action E-3.3 would be modified to develop a program to provide 100 percent renewable energy to residents and businesses through distributed generation. The first step in establishing this program would be to prepare a feasibility study that assesses the distributed energy generation potential of the unincorporated county to determine how much energy could be generated. Based on the results of the feasibility study and the types of distributed generation systems appropriate for various geographies and land uses, incentives would be identified to promote construction of these renewable energy systems. Distributed generation systems are currently allowed within the county and would be encouraged through mechanisms such as permit process improvements, and zoning and code updates, potentially including a renewable energy zoning overlay.

This alternative would not increase demand for large-scale renewable energy systems. Overall impacts that are specific to the conversion of undeveloped open space to energy infrastructure would be reduced compared to the project.

The Distributed Generation Only Alternative may not meet the project objectives related to meeting the SB 32 target in 2035. However, this alternative would support the sustainability principles in the General Plan, contribute to progress toward environmental justice and equity, include other adaptable measures and actions, and minimize undue and unnecessary economic impacts on businesses and property owners.

S.5.3 Fire Safe and VMT Efficient Alternative

The Fire Safe and VMT Efficient Alternative is a smart growth alternative that the County developed through stakeholder outreach. The smart growth geographies were defined as areas that are both outside of areas mapped by the California Department of Forestry as areas with High or Very High fire risk and within areas mapped by the County as at least 15 percent below the regional average for residential VMT (based on the County of San Diego SB 743 Location-Based Screening Maps developed as part of the County's Transportation Study Guidelines adopted in September of 2022). Generally, fire safe and VMT efficient areas were identified in areas of the unincorporated county that immediately border the incorporated cities of Vista, San Marcos, Escondido, El Cajon, and National City, as well as an area in the northwest of the unincorporated county in the community of Fallbrook. This alternative would focus future growth away from rural areas and closer to existing and planned job centers and public facilities. All measures and actions in the CAP Update would be implemented in conjunction with this alternative. This alternative would meet established project objectives.

S.5.4 Village Support Areas Alternative

To spur redevelopment in the portions of the county identified in the General Plan as "Villages" and create a synergy for smart growth, this alternative would establish 0.5-mile buffers around the established Villages, referred to as Village Support Areas, wherein housing development would be encouraged. As with the other smart growth alternatives discussed in this SEIR, this alternative would be implemented through a zoning overlay and development incentives. Supporting efforts are also assumed to include transit and connectivity improvements between the Villages and Village Support Areas. Further, it is assumed that all measures and actions in the CAP Update would be implemented as proposed. This alternative would meet established project objectives.

S.5.4 Sustainable Communities Strategy Alternative

In the Regional Plan, SANDAG has identified strategies that generally align with and encourage smart growth development. The Regional Plan incorporates smart growth planning concepts into a regional growth pattern focused around "Mobility Hubs." Mobility Hubs are envisioned as places of activity where capital transportation investment will support future housing and jobs. Future capital investment in Mobility Hubs, as identified by the Regional Plan, would include: "transit leap" (i.e., improvements on transit accessibility an efficiency); "complete corridors" (i.e., network investments to improve efficiency of all transportation types); investment in alternative transportation options that provide last-mile connections to transit centers; and improvements to technology and communication systems.

If the Board were to adopt a smart growth alternative that would aspire to achieve development outcomes in alignment with the SANDAG Regional Plan Mobility Hub framework, a broader and more comprehensive set of General Plan land use map and Zoning Ordinance changes would be required. In this case, the Board would likely consider both up-planning in areas around the SANDAG Mobility Hubs and down-planning in areas outside of those locations. This would require a more comprehensive update to the General Plan due to the large geographic scope of land use map changes and scale of community engagement required. All measures and actions in the CAP Update would be implemented as proposed.

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
2.1 Aesthetics					
1. Scenic Vistas and Scenic Resources The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. There is a potential for large-scale renewable energy projects to detract from views of a scenic vista from a public viewing location. Even with compliance with existing regulations related to scenic vistas and scenic resources and implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Aes-1, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation beyond compliance with the County's adopted General Plan policies, 2011 GPU PEIR mitigation measures, and MUP discretionary process is available and could be applied to large-scale renewable energy projects.	Significant	Significant	**Adopted Mitigation Measure Aes-1.2**: Protect sensitive biological habitats and species through regulations that require avoidance and mitigation of impacts. Existing programs include the County MSCP and associated BMOs, RPO, and California Environmental Quality Act (CEQA) Guidelines. While protecting biological resources, these programs also preserve natural open space that contributes to the quality of many of the County's scenic vistas. **Adopted Mitigation Measure Aes-1.6**: Require that project approvals with significant potential to adversely affect the scenic quality of a community require community review and specific findings of community compatibility. Examples can be found in the Zoning Ordinance with the numerous special uses or exceptions allowed pursuant to Administrative and Use Permits, and Site Plans. This practice has been proven useful for reducing impacts to aesthetic resources and their usefulness will increase as community plans and design guideline are updated pursuant to Aes-1.3 and Aes-1.4. **Adopted Mitigation Measure Aes-1.7**: Develop and implement programs and regulations that preserve agricultural lands. Agricultural lands are often key components of scenic vistas and community character. Therefore, preservation of these lands will help to minimize potential impacts to scenic resources.	Significant and unavoidable	CAP Update Only: Yes CAP Update Cumulative Contribution: Yes

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			Adopted Mitigation Measure Aes-1.8: Continue to develop and implement programs and regulations that minimize landform alteration and preserve ridgelines and steep slopes where appropriate. Examples include the County's Grading Ordinance, RPO, and CEQA Guidelines. **Adopted Mitigation Measure Aes-1.9**: Work with communities and other stakeholders to identify key scenic vistas, viewsheds of County scenic road and highways, and other areas of specific scenic value. Apply Resource Conservation Area designations or other special area designators, guidelines, and tools to guide future development of parcels within these viewsheds to avoid impacts to the scenic vistas. **Adopted Mitigation Measure-M-AES-1**: During the environmental review process for future Major Use Permits for wind turbines, the County Guidelines for Determining Significance for Visual Resources and Dark Skies and Glare shall be applied. When aesthetic impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: siting/location considerations; minimizing development and grading of steep slopes; natural screening and landscaping; undergrounding utilities; inclusion of buffers; and lighting restrictions. (2013 Wind Energy Ordinance EIR) **CAP Update Mitigation Measure Aes-1**: During the environmental review process for future Major Use Permits for all large-scale renewable energy		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			projects, the County Guidelines for Determining Significance for Visual Resources and Dark Skies and Glare shall be applied. When aesthetic impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: siting/location considerations; minimizing development and grading of steep slopes; natural screening and landscaping; undergrounding utilities; inclusion of buffers; and lighting restrictions.		
2. Visual Character or Quality The CAP Update would further existing programs and provide new and modified infrastructure in new and established communities to reduce GHG emissions. Implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the project impacts associated with the deterioration of visual character and quality. Even with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Aes-1 that reduce impacts to visual character, impacts could remain significant. No other feasible project-related mitigation beyond compliance with the County's adopted General Plan policies or 2011 GPU PEIR mitigation measures is available and could be applied to large-scale renewable energy projects.	Significant	Significant	See **Adopted Mitigation Measures Aes-1.2, Aes-1.6, Aes-1.8, M-AES-1**, and **CAP Update Mitigation Measures Aes-1.**	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No
3. Light and Glare Implementation of the CAP Update may result in limited development with the potential to introduce new sources of light or glare. Implementation of these projects would be within the scope of the changes to the day and nighttime	Significant	Significant	**Adopted Mitigation Measure Aes-4.1**: County to coordinate with communities and stakeholders to review light pollution controls and consider amendments or expansions to those controls as determined necessary to reduce impacts to dark	Significant and unavoidable	CAP Update Only: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
views evaluated in the 2011 GPU PEIR. Based on the type of subsequent projects anticipated, implementation of the CAP Update is not expected to generate substantial sources of light or glare due to use of outdoor light fixtures that do not conform to the San Diego County Light Pollution Code, use of highly reflective materials, or other features that do not conform to applicable federal, state, or local statute or regulation related to dark skies or glare. With implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures, impacts related to light and glare resulting from CAP Update implementation would be reduced. Even with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measures Aes-1 through Aes-3 that reduce light and glare impacts, impacts could remain significant. No other feasible project-related mitigation beyond compliance with the County's adopted General Plan policies or 2011 GPU PEIR mitigation measures is available and could be applied to large-scale renewable energy projects.			skies that are important to community character. This will ensure that potential artificial lighting impacts from development are monitored and controlled as needed to preserve community character. **Adopted Mitigation Measure Aes-4.2**: County to maintain light and glare regulations that minimize impacts to adjacent properties, sensitive areas, community character, observatories, and dark skies. These regulations are currently found in the Light Pollution Code and Zoning Ordinance. Additional reviews are implemented on discretionary projects in accordance with CEQA and the County's CEQA guidelines. These efforts will help protect the existing unincorporated area and surrounding environment from excessive artificial lighting impacts. See **Adopted Mitigation Measure-M-AES-1.** **Adopted Mitigation Measure-M-AES-2**: Require that a Lighting Mitigation Plan be prepared as part of the MUP discretionary review process. The Lighting Mitigation Plan would demonstrate that the design and installation of all permanent lighting for large wind turbine ancillary facilities is such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. The Lighting Mitigation Plan would demonstrate consistency with the Light Pollution Code (Section 59.100 et al.) and Sections 6322 and 6324 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky		CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			do not result in a detrimental effect on astronomical research and to ensure reflected glare and light trespass is minimized. (2013 Wind Energy Ordinance EIR) **Adopted Mitigation Measure-M-AES-3**: Require that a Shadow Flicker Study be prepared as part of the MUP discretionary review process. The Shadow Flicker Study would utilize a shadow flicker model run to determine the potential shadow flicker that could occur at sensitive receptors within 2,000 meters (6,562 feet) of the proposed turbines. Due to the fact that some receptors may lie within 60° due north of the turbines, outside of the sun's path at any given point in the year, those receptors may be excluded from the study. Beyond 2,000 meters, the human eye would not be able to discern a shadow cast from a wind turbine. The modeling should utilize many different inputs, including: 1) Real Data • Actual coordinates of turbines • Actual coordinates of receptors • Actual topographic data 2) Conservative Assumptions • Specifications of the turbines being considered with the highest hub height and longest rotor diameter • 100 percent turbine operation • No vegetative screening • Receptors can be impacted from all directions (i.e., "greenhouse mode")		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			3) Realistic Features • Actual wind data from a local meteorological tower to account for the percentage of time wind blows from each direction • National Weather Service sunshine probability data to approximate average cloud cover. (2013 Wind Energy Ordinance EIR) Implement **CAP Update Mitigation Measure Aes-1** **CAP Update Mitigation Measure Aes-2**: Require that a Lighting Mitigation Plan be prepared as part of the MUP discretionary review process for all large-scale renewable energy projects. The Lighting Mitigation Plan shall demonstrate that the design and installation of all permanent lighting for large wind turbines is such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. The Lighting Mitigation Plan shall demonstrate consistency with the Light Pollution Code (Section 59.100 et al.) and Sections 6322 and 6324 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky do not result in a detrimental effect on astronomical research and to ensure reflected glare and light trespass is minimized. **CAP Update Mitigation Measure Aes-3**: Require that a Shadow Flicker Study be prepared as part of the MUP discretionary review process for large-scale wind turbine projects. The Shadow Flicker Study shall utilize a shadow flicker model run to determine the potential shadow flicker that could		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			occur at sensitive receptors within 2,000 meters (6,562 feet) of the proposed turbines. Due to the fact that some receptors may lie within 60 degrees due north of the turbines, outside of the sun's path at any given point in the year, those receptors may be excluded from the study. Beyond 2,000 meters, the human eye would not be able to discern a shadow cast from a wind turbine. The modeling shall utilize many different inputs, including: 1) Real Data • Actual coordinates of turbines • Actual coordinates of receptors • Actual topographic data 2) Conservative Assumptions • Specifications of the turbines being considered with the highest hub height and longest rotor diameter • 100 percent turbine operation • No vegetative screening • Receptors can be impacted from all directions (i.e., "greenhouse mode") 3) Realistic Features • Actual wind data from a local meteorological tower to account for the percentage of time wind blows from each direction • National Weather Service sunshine probability data to approximate average cloud cover.		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
2.2 Agriculture and Forestry Resources					
1. Direct or Indirect Conversion of Agricultural Resources With implementation of the CAP Update, large-scale renewable energy projects have potential to result in the direct or indirect conversion of agricultural resources. Even with compliance with existing regulations related to agricultural resources and implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Agr-1, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation is available that could be applied to large-scale renewable energy projects.	Significant	Significant	**Adopted Mitigation Measure Agr-1.1**: Implement the General Plan Regional Category map and Land Use Maps which protect agricultural lands with lower density land use designations that will support continued agricultural. **Adopted Mitigation Measure Agr-1.2**: Develop and implement programs and regulations that protect agricultural lands (such as the CEQA guidelines, Zoning Ordinance, Right to Farm Act, Open Space Subvention Act, Farm and Ranch Lands Protection Program, San Diego County Agricultural Enterprises and Consumer Information Ordinance, BOS Policy I-133, and the San Diego County Farming Program), as well as, those that support implementation of the Williamson Act (including the CEQA Guidelines, Zoning Ordinance, and Subdivision Ordinance). **Adopted Mitigation Measure Agr-1.3**: Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary with the goal of promoting conservation of natural resources and open space (including agricultural lands) while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted. **Adopted Mitigation Measure Agr-1.4**: Develop and implement the PACE program which	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			compensates landowners for voluntarily limiting future development on their land. **Adopted Mitigation Measure Agr-1.5**: Revise community plans to identify important agricultural areas within them and specific compatible uses and desired buffers necessary to maintain the viability of that area. Community plans are used to review development projects (including General Plan Amendments). **Adopted Mitigation Measure M-AGR-1**: During the environmental review process for future Major Use Permits for wind turbines, the County Guidelines for Determining Significance for Agricultural Resources shall be applied. When impacts to Farmland are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of agricultural resources; preservation of agriculture; and inclusion of compatibility buffers near areas intended for agricultural uses. (2013 Wind Energy Ordinance EIR) **CAP Update Mitigation Measure Agr-1**: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Agricultural Resources shall be applied. When impacts to Important Farmland are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			mitigation measures within the County Guidelines include: avoidance of agricultural resources; preservation of agriculture; and inclusion of compatibility buffers near areas intended for agricultural uses.		
2. Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands With implementation of the CAP Update, large-scale renewable energy projects have potential to result in conflicts with agricultural zoning or Williamson Act contracts. Even with compliance with existing regulations related to agricultural resources and implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Agr-1, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation is available that could be applied to large-scale renewable energy projects.	Significant	Significant	**Adopted Mitigation Measure Agr-2.1**: Prior to the approval of any Zoning Ordinance Amendment that would result in the removal of an "A" designator from a certain property, an analysis shall be conducted to ensure that the action removing such a designation will not result in any significant direct or indirect adverse impact to a Williamson Act Contract lands. See **Adopted Mitigation Measure M-AGR-1** and **CAP Update Mitigation Measure Agr-1.**	Significant and unavoidable (agriculture) Less than significant (forest)	CAP Update Only: Yes (agriculture) No (forest) CAP Update Cumulative Contribution: Yes (agriculture) No (forest)
3. Direct and Indirect Conversion or Loss of Forest Land With implementation of the CAP Update, large-scale renewable energy projects have potential to result in the loss or conversion of forest land. Even with compliance with existing regulations related to forest resources and implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Agr-2, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation is available that could be applied to large-scale renewable energy projects.	Significant	Significant	**Adopted Mitigation Measure M-AGR-2**: During the environmental review process for future Major Use Permits for wind turbines, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts to forest land are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management. (2013 Wind Energy Ordinance EIR)	Significant and unavoidable	CAP Update Only: Yes CAP Update Cumulative Contribution: Yes

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			CAP Update Mitigation Measure Agr-2: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts to forest land are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management.		
2.3 Air Quality					
1. Air Quality Plans The proposed CAP Update would not conflict with or obstruct implementation of the San Diego RAQS and/or applicable portion of the SIP. Therefore, there is no new significant impact related to obstruction of the implementation of the San Diego RAQS and/or applicable portion of the SIP and the impact is not substantially more severe than the impact identified in the 2011 GPU PEIR.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
2. Air Quality Violations Construction and operation of may result in emissions of criteria pollutants that would exceed the SLTs for PM_{10}, $PM_{2.5}$, NO_X, and VOCs. Implementation of the 2011 GPU PEIR Mitigation Measures Air-2.1 through Air-2.13, 2011 General Plan policies, along with various CAP measures would reduce construction and operational emissions. While these measures and policies would result in a decrease in criteria pollutants during construction and operation, the	Significant	Significant	**Adopted Mitigation Measure Air-2.1**: Provide incentives such as preferential parking for hybrids or alternatively fueled vehicles such as compressed natural gas (CNG) vehicles or hydrogen- or electric-powered vehicles. The County shall also establish programs for priority or free parking on County streets or in County parking lots for hybrids or alternatively fueled vehicles. **Adopted Mitigation Measure Air-2.2**: Replace existing vehicles in the County fleet as needed with	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
impact related to conformance to federal and state air quality standards would be significant and unavoidable.			the cleanest vehicles commercially available that are cost-effective and meet vehicle use needs. **Adopted Mitigation Measure Air-2.3**: Implement transportation fleet fueling standards to improve the number of alternatively fueled vehicles in the County fleet. **Adopted Mitigation Measure Air-2.4**: Provide incentives to promote the siting or use of clean air technologies where feasible. These technologies shall include, but not be limited to, fuel cell technologies, renewable energy sources, and hydrogen fuel. **Adopted Mitigation Measure Air-2.5**: Require that the following measures be implemented on all construction projects where project emissions are above the SLTs: • multiple applications of water during grading between dozer/scraper passes; • paving, chip sealing, or chemical stabilization of internal roadways after completion of grading; • use of sweepers or water trucks to remove "track-out" at any point of public street access; • termination of grading if winds exceed 25 miles per hour; • stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control; • use of low-sulfur fuels in construction equipment;		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			• use of low VOC paints; and • projects exceeding SLTs will require 10 percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NO_X), CO, and PM. Tier I standards are for engines over 50 horsepower (hp) (such as bulldozers) built between 1996 and 2000, and engines under 50 hp (such as lawn tractors) prop built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are for engines rated over 50 hp from 2006 to 2008. Tier IV standards apply to engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV. **Adopted Mitigation Measure Air-2.6**: Use County Guidelines for Determining Significance for Air Quality to identify and mitigate adverse environmental effects on air quality. **Adopted Mitigation Measure Air-2.7**: Implement County Air Pollution Control District regulations for air emissions from all sources under its jurisdiction. **Adopted Mitigation Measure Air-2.8**: Require NSRs to prevent permitting projects that are "major sources."		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			Adopted Mitigation Measure Air-2.9: Implement the Grading, Clearing, and Watercourses Ordinance by requiring all clearing and grading to be conducted with dust control measures. **Adopted Mitigation Measure Air-2.10**: Revise Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County-funded renovation and new building projects. This could be achieved by making the guidelines within the policy mandatory rather than voluntary. **Adopted Mitigation Measure Air-2.11**: Implement County RAQS to attain state air quality standards for ozone. **Adopted Mitigation Measure Air-2.12**: Revise Board Policy G-15 to require County facilities to comply with Silver Leadership in Energy and Environmental Design (LEED) standards or other equivalent Green Building rating systems. **Adopted Mitigation Measure Air-2.13**: Revise Board Policy G-16 to require the County to: • adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability, and • require government contractors to use low-emission construction vehicles and equipment. **CAP Update Mitigation Measure Air-2.1**: Require construction contractors to reduce construction-related exhaust emissions by ensuring that all off-		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			road equipment greater than 50 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall operate on at least an EPA-approved Tier 3 or newer engine. Exemptions can be made for specialized equipment where Tier 3 engines are not commercially available within 200 miles of the proposed project location. The construction contract must identify these pieces of equipment, document their unavailability, and ensure that they operate on no less than an EPA-approved Tier 2 engine.		
3. Non-Attainment Criteria Pollutants Construction and operation of subsequent future projects may result in a cumulatively considerable increase in nonattainment pollutants (PM_{10}, $PM_{2.5}$, NO_X, and VOCs). Implementation of the 2011 GPU PEIR Mitigation Measures Air-2.1 through Air-2.13, 2011 General Plan policies, along with various CAP Update measures would reduce construction and operational emissions. While these measures and policies would result in a decrease in nonattainment pollutants during construction and operation, the impact related to emissions of nonattainment criteria pollutants would remain significant.	Significant	Significant	See **Adopted Mitigation Measures Air-2.1** through **Air-2.13** and **CAP Update Mitigation Measure Air-2.1.**	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No
4. Sensitive Receptors Future projects related to implementation of the measures and their associated actions could result in the exposure of sensitive receptors to TACs. Because of the programmatic approach of this analysis, it is not possible to determine the location, or size of projects that would be built, nor the details of their construction typically used to estimate emissions of TACs and exposure to sensitive receptors	Significant	Significant	**Adopted Mitigation Measure Air-4.1**: Use the policies set forth in the CARB's Land Use and Air Quality Handbook as a guideline for siting sensitive land uses. Implementation of this measure will ensure that sensitive land uses such as residences, schools, day care centers, playgrounds, and medical facilities are sited appropriately to minimize exposure to emissions of TACs.	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
such as construction duration, equipment use, location and intensity. Implementation of the 2011 GPU PEIR Mitigation Measure Air-4.1, 2011 General Plan policies, along with various CAP Update measures would reduce sensitive receptor exposure to TAC emissions. While these measures and policies would reduce sensitive receptor exposure to TAC emissions, the impact related to sensitive receptor exposure to TAC emissions would remain significant.			See **CAP Update Mitigation Measure Air-2.1.**		
5. Odors Implementation of the proposed CAP Update could result in impacts related to odors because measures within the measures and actions related to solid waste could result in the construction of new waste handling facilities which are typically associated with odor complaints. Additionally, the operation of new composting/anaerobic digestion facilities and on-farm digesters could result in new sources of odors within existing agricultural lands, which are often near residences. SDAPCD rules, including Rule 51, along with and County Code Sections 63.401 and 63.402, prohibit nuisance odors and identify enforcement measures to reduce odor impacts to nearby receptors. Development of any waste handling, composting, or digester facilities would be required to comply with these regulations. Compliance with existing rules would ensure objectionable odors are not a nuisance on nearby receptors.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
2.4 Biological Resources					
1. Special-Status Plant and Wildlife Species Construction and operation of new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, small wind turbines, transportation infrastructure, and large-scale renewable energy facilities could result in significant direct impacts on special-status plant and wildlife species and sensitive habitat. These impacts would be more severe than those identified in the 2011 GPU PEIR and the 2012 Wind Energy EIR and would be significant. Implementation of General Plan policies identified in Section 2.4.2.3 and 2011 GPU PEIR mitigation measures, in addition to compliance with applicable regulations, would reduce impacts on special-status plant and wildlife species and sensitive habitat, but not below a level of significance.	Significant	Significant	**Adopted Mitigation Measure Bio-1.5**: Utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources. Also, utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special-status species populations on or near project sites. This information will be used to avoid or mitigate impacts as appropriate. **Adopted Mitigation Measure Bio-1.6**: Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species. **Adopted Mitigation Measure Bio-1.7**: Minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance. **Adopted Mitigation Measure Bio-2.1**: Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development.	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			Adopted Mitigation Measure M-Bio-1: During the environmental review process for future MUPs for wind turbines, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts on biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise. **Adopted Mitigation Measure M-Bio-2**: Update the County Guidelines for Determining Significance for Biological Resources to include, or incorporate by reference, recommendations from the California Department of Fish and Game, the Avian Power Line Interaction Committee, the USFWS Draft Guidance, and the California Energy Commission (e.g., California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development). Examples of recommended mitigation measures include: site screening; pre-permitting monitoring; acoustic monitoring; buffer zone inclusion; reduction of foraging resources near turbines; specific lighting to reduce bird collisions; post-construction monitoring; and avian protection plans. **CAP Update Mitigation Measure Bio-1**: During the environmental review process for future MUPs for large-scale renewable energy projects, the County Guidelines for Determining Significance for		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			Biological Resources shall be applied. When impacts on biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise. **CAP Update Mitigation Measure Bio-2**: Update the County Guidelines for Determining Significance for Biological Resources to include, or incorporate by reference, recommendations from the California Department of Fish and Wildlife, the Avian Power Line Interaction Committee, the USFWS Draft Guidance, and the California Energy Commission (e.g., California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development). Examples of recommended mitigation measures include: site screening; pre-permitting monitoring; acoustic monitoring; buffer zone inclusion; reduction of foraging resources near turbines and transmission lines; specific lighting to reduce bird collisions; post-construction monitoring; and avian protection plans.		
2. Riparian Habitat and Other Sensitive Natural Communities Construction and operation of new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, small wind turbines, and transportation infrastructure could result in significant direct	Significant	Significant	See **Adopted Mitigation Measures Bio-1.6, Bio-1.7,** and **Bio-2.1**. **Adopted Mitigation Measure Bio-2.2**: Require that development projects obtain CWA Section 401/404 permits issued by the California Regional Water Quality Control Board and US Army Corps of Engineers for all project-related disturbances of	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
impacts on riparian habitat and other sensitive natural communities. . Implementation of General Plan policies identified in Section 2.4.2.3 and 2011 GPU PEIR mitigation measures, in addition to compliance with applicable regulations, would reduce impacts on riparian habitat and other sensitive natural communities but not below a level of significance.			waters of the US and/or associated wetlands. Also, continue to require that projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Game for all project-related disturbances of streambeds. See also **CAP Update Mitigation Measures Bio-1** and **Bio-2**.		
3. State and Federally Protected Wetlands Implementation of the project could have the potential to result in the loss of state or federally protected wetlands. However, implementation of General Plan policies identified in Section 2.4.2.3 and 2011 GPU PEIR mitigation measures, in addition to compliance with federal, state, and local regulations, would reduce this project-level impact to less than significant.	Significant	Significant	See **Adopted Mitigation Measures Bio-1.6, Bio-1.7, Bio-2.1,** and **Bio-2.2**. **Adopted Mitigation Measure Bio-2.3**: Ensure that wetlands and wetland buffer areas are adequately preserved whenever feasible to maintain biological functions and values. **Adopted Mitigation Measure Bio-2.4**: Implement the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
4. Wildlife Movement Corridors and Nursery Sites Construction and operation of new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, small wind turbines, transportation infrastructure, and large-scale renewable energy facilities could result in significant direct impacts on wildlife movement corridors and nursery sites. These impacts would be more severe than those identified in the 2011 GPU PEIR and the 2012 Wind Energy EIR and would be significant. Implementation of General Plan policies identified in Section 2.4.2.3 and 2011 GPU PEIR mitigation measures, in addition to compliance with applicable regulations, would	Significant	Significant	See **Adopted Mitigation Measures Bio-1.6** and **Bio-1.7**.	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
reduce impacts on wildlife movement corridors and nursery sites but not below a level of significance.					
5. Local Policies and Ordinances Implementation of the project would not conflict with any local policies or ordinances that protect biological resources or result in project-level impacts. Less-than-significant impacts would occur. The proposed project impacts would be equivalent or less severe than those analyzed by the 2011 GPU PEIR.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
6. Habitat Conservation Plans and Natural Community Conservation Plans Implementation of the project would not conflict with any HCPs or NCCPs or result in project-level impacts. Impacts would be less than significant. The proposed project impacts would be equivalent or less severe than those analyzed by the 2011 GPU PEIR.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
2.5 Cultural and Paleontological Resources					
1. Historical Resources Even with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures that prevent significant impacts to historical resources, and compliance with federal, state, and local regulations intended to protect historical resources, impacts could remain significant. No other feasible project-related mitigation is available and could be applied to small-scale wind and solar energy projects because of the lack of discretionary review and ability to mitigate as a condition of a permit. The project's impacts related to historical resources from GHG reduction measures that would result in the	Significant	Significant	**Adopted Mitigation Measure Cul-1.1**: Utilize the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant. **Adopted Mitigation Measure Cul-1.6**: Implement, and update as necessary, the "County's Guidelines for Determining Significance for Cultural Resources" to identify and minimize adverse impacts to historic and archaeological resources.	Significant and unavoidable	CAP Update Only: Yes CAP Update Cumulative Contribution: Yes

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
installation of small wind turbines or solar photovoltaic facilities would remain significant.					
2. Archaeological Resources 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 that prevent significant impacts to archaeological resources, impacts could remain significant. No other feasible project-related mitigation is available and could be applied to small-scale renewable energy projects because of the lack of discretionary review and ability to mitigate as a condition of a permit. The project's impacts related to archaeological resources related to the installation of small wind turbines would remain significant.	Significant	Significant	See **Adopted Mitigation Measures CuI-1.1** and **CuI-1.6**. **Adopted Mitigation Measure CuI-2.1**: Develop management and restoration plans for identified and acquired properties with cultural resources. **Adopted Mitigation Measure CuI-2.2**: Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information. **Adopted Mitigation Measure CuI-2.3**: Support the dedication of easements that protect important cultural resources by using a variety of funding methods, such as grants or matching funds, or funds from private organizations. **Adopted Mitigation Measure CuI-2.5**: Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys. **Adopted Mitigation Measure CuI-2.6**: Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the South Coast Information Center (SCIC) and consultation with the Native	Significant and unavoidable	CAP Update Only: Yes CAP Update Cumulative Contribution: Yes

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			American Heritage Commission (NAHC) and local tribal governments, including SB-18 review, while maintaining the confidentiality of sensitive cultural information.		
3. Paleontological Resources 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 paleontological resources, impacts could remain significant. No other feasible project-related mitigation is available and could be applied to small-scale renewable energy projects because of the lack of discretionary review and ability to mitigate as a condition of a permit. The project's impacts related to paleontological resources from GHG reduction measures that would result in the installation of small wind turbines would remain significant.	Significant	Significant	**Adopted Mitigation Measure CuI-3.1**: Implement the Grading Ordinance and CEQA to avoid or minimize impacts to paleontological resources, require a paleontological monitor during grading when appropriate, and apply appropriate mitigation when impacts are significant. **Adopted Mitigation Measure CuI-3.2**: Implement, and update as necessary, the County's Guidelines for Determining Significance for Paleontological Resources to identify and minimize adverse impacts to paleontological resources.	Significant and unavoidable	CAP Update Only: Yes CAP Update Cumulative Contribution: Yes
4. Human Remains 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 human remains, impacts could remain significant. No other feasible project-related mitigation is available and could be applied to small-scale renewable energy projects because of the lack of discretionary review and ability to mitigate as a condition of a permit. The project's impacts related to disturbance of human remains from GHG reduction measures that would result in the installation of small wind turbines would remain significant.	Significant	Significant	**Adopted Mitigation Measure CuI-4.1**: Include regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant.	Significant and unavoidable	CAP Update Only: Yes CAP Update Cumulative Contribution: Yes

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
2.6 Energy					
1. Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources While construction related to the CAP Update implementation would consume some energy, the measures and actions would result in overall net improvements in energy efficiency. Thus, implementation of the CAP Update would not result in wasteful, inefficient, or unnecessary consumption of energy during project construction. This impact would be less than significant.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
2. State and Local Plans for Renewable Energy or Energy Efficiency All GHG-related measures within the CAP Update would support the 2022 Scoping Plan and the 2021 Regional Plan's goal of achieving GHG reduction targets because the CAP Update is intended to reduce GHG emissions generated within the Plan Area. The proposed CAP Update would not conflict with or obstruct implementation of 2022 Scoping Plan or the 2021 Regional Plan as the measures themselves have been developed in consideration of these plans and their GHG reduction goals. Therefore, implementation of the measures and actions would not conflict with these plans and the impact would be less than significant.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
2.7 Environmental Justice					
1. Disproportionately High and Adverse Human Health or Environmental Impact on an EJ Community The project would not result in significant impacts related to causing a disproportionately high and adverse human health or environmental impact on a tribal community. Impacts related to EJ would be less than significant. Implementation of the CAP Update would not result in a new significant impact not discussed in the 2011 GPU PEIR.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
2.8 Greenhouse Gas Emissions					
1. GHG Emissions That May Have a Significant Impact on the Environment The goal of the CAP Update is to reduce GHG emissions generated within the county by increasing the use of alternatively fueled vehicles, reducing VMT, generating and utilizing renewable energy, reducing waste generation, and increasing carbon sequestration. While construction related to the CAP Update implementation would result in some GHG emissions, the measures and actions would result in an overall net reduction in GHG emissions. Thus, implementation of the CAP Update would not result in the generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulatively Considerable Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
2. Conflict with an Applicable Plan, Policy, or Regulation for Reducing the Emission of GHGs All GHG-related measures within the CAP Update would support the 2022 Scoping Plan and the 2021 Regional Plan's goal of achieving GHG reduction targets because the CAP Update is intended to reduce GHG emissions generated within the Plan Area. The proposed CAP Update would not conflict with or obstruct implementation of 2022 Scoping Plan or the 2021 Regional Plan as the measures themselves have been developed in consideration of these plans and their GHG reduction goals. Therefore, implementation of the measures and actions would not conflict with these plans and the impact would be less than significant.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulatively Considerable Contribution: No
2.9 Hazards and Hazardous Material					
1. 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) With implementation of adopted General Plan policies and compliance with existing federal, state, and local regulations related to hazardous materials, implementation of the CAP Update would not result in project impacts associated with the transport, use, and disposal of hazardous materials, accidental release of hazardous materials, use of hazardous materials in proximity to schools, and contaminated sites. Therefore, impacts from implementation of the CAP Update would remain less than significant.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
2. Public and Private Airports The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although there is a potential for some types of projects to result in airport-related safety hazards, compliance with existing federal, state, and local regulations related to airports and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that project-level impacts associated with potential airport hazards would remain less than significant.	Significant	Significant	**Adopted Mitigation Measure Haz-1.1**: Implement the Guidelines for Determining Significance, Airport Hazards, when reviewing new development projects to ensure compatibility with surrounding airports and land uses and apply appropriate mitigation when impacts are significant. **Adopted Mitigation Measure Haz-1.3**: Review the AICUZ when reviewing new development projects within the study area. Ensure that such development projects are consistent with the land use compatibility and safety policies therein. **Adopted Mitigation Measure Haz-1.5**: Coordinate with the San Diego County Regional Airport Authority (SDCRAA) and County Airports for issues related to airport planning and operations.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
3. Emergency Response and Evacuation Plans The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although there is a potential for some types of projects to impair emergency response and evacuation plans, implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that project-level impacts associated with impairing implementation of emergency response and evacuation plans would remain less than significant with mitigation.	Significant	Significant	**Adopted Mitigation Measure Haz-3.1**: Facilitate coordination between DPLU (now PDS) and the Office of Emergency services to implement and periodically update the Hazard Mitigation Plan. **Adopted Mitigation Measure Haz-3.2**: Implement the CEQA Guidelines for Determining Significance to ensure that discretionary projects do not adversely impact emergency response or evacuation plans. Also implement the County Public Road Standards and County Private Road Standards during these reviews and ensure that road improvements are consistent with Emergency Response and Evacuation Plans. Apply appropriate mitigation when impacts are significant. **Adopted Mitigation Measure Haz-3.3**: Prepare Fire Access Road network plans and include in	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			Community Plans or other document as appropriate. Also implement the County Fire Code and require fire apparatus access roads and secondary access for projects.		
4. Wildland Fires The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county, including areas susceptible to wildland fires. Compliance with existing regulations related to wildfire protection and implementation of adopted General Plan policies and 2011 GPU PEIR Mitigation Measures Haz-4.1 through Haz-4.4 and Pub-1.5 through Pub-1.7 would reduce the project-level impacts but not to a less-than-significant level. Therefore, impacts associated with exposing people or structures to significant risks of loss, injury, or death involving wildland fires would be significant and unavoidable. This impact would be consistent with the conclusion of the 2011 GPU PEIR.	Significant	Significant	**Adopted Mitigation Measure Haz-4.1**: Identify and minimize potential fire hazards for future development by using and maintaining a database that identifies fire prone areas, locating development away from Fire Hazard areas whenever practicable, and adhering to the County Guidelines for Determining Significance for Wildland Fires & Fire Protection and applying appropriate mitigation when impacts are significant. **Adopted Mitigation Measure Haz-4.2**: Conduct effective and environmentally sensitive brush management measures such as: addressing habitat-specific fire controls within Resource Management Plans; implementation of the Weed Abatement Ordinance and enforcing proper techniques for maintaining defensible space around structures; coordination with the local FAHJ to ensure that district goals for fuel management and fire protection are being met; and recognizing the Memorandum of Understanding between the wildlife agencies and fire authorities that guides the abatement of flammable vegetation without violating environmental regulations for habitat protection. **Adopted Mitigation Measure Haz-4.3**: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas. **Adopted Mitigation Measure Haz-4.4**: Create a Conservation Subdivision Program that facilitates conservation-oriented, fire-safe, project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary. **Adopted Mitigation Measure Pub-1.5**: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times. **Adopted Mitigation Measure Pub-1.6**: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review. **Adopted Mitigation Measure Pub-1.7**: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.		
5. Vectors The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although there is a potential for some types of projects to create new vector breeding sources, compliance with existing federal, state, and local regulations related to vector control and implementation of adopted General Plan policies would ensure that project impacts associated with vectors would remain less than significant.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
2.10 Hydrology and Water Quality					
1. Surface Water and Groundwater Quality The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although compliance with existing federal, state, and local regulations related to surface water and groundwater quality and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce project-level impacts, these impacts would not be reduced to a less-than-significant level because of the uncertainty of the types, locations, and scale of projects implemented under the CAP Update. Therefore, similar to the conclusions in the 2011 GPU PEIR, the CAP Update would have a significant and unavoidable impact.	Significant	Significant	**Adopted Mitigation Measure Hyd-1.1**: Update and implement the County of San Diego's Jurisdictional Runoff Management Program (JRMP). **Adopted Mitigation Measure Hyd-1.2**: Implement and revise as necessary the Watershed Protection Ordinance to reduce the adverse effects of polluted runoff discharges on waters and to encourage the removal of invasive species and restore natural drainage systems. **Adopted Mitigation Measure Hyd-1.3**: Establish and implement low impact development (LID) standards for new development to minimize runoff and maximize infiltration. **Adopted Mitigation Measure Hyd-1.4**: Revise and implement the Stormwater Standards Manual requiring appropriate measures for land use with a	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			high potential to contaminate surface water or groundwater resources. **Adopted Mitigation Measure Hyd-1.5**: Utilize the County Guidelines for Determining Significance for Hydrology and Water Quality and Groundwater Resources to identify adverse environmental effects.		
2. Groundwater Supply and Recharge The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although compliance with existing federal, state, and local regulations related to groundwater supply recharge and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce project-level impacts, these impacts would not be reduced to a less-than-significant level because of the uncertainty of the types, locations, and scale of projects implemented under the CAP Update. Therefore, similar to the conclusions in the 2011 GPU PEIR, the CAP Update would have a significant and unavoidable impact.	Significant	Significant	**Adopted Mitigation Measure Hyd-2.1**: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available water districts. Also implement and revise as necessary Board Policy G-15 to conserve water at County facilities. **Adopted Mitigation Measure Hyd-2.2**: Implement the Groundwater Ordinance to balance groundwater resources with new development. Also revise the Ordinance Relating to Water Conservation for Landscaping (currently Zoning Ordinance Sections 6712 through 6725) to further water conservation through the use of recycled water. **Adopted Mitigation Measure Hyd-2.3**: Establish a water credits program between the County and the Borrego Water District to provide a streamlined and consistent process for the permanent cessation of outdoor water intensive uses such as irrigated agricultural or golf course land. **Adopted Mitigation Measure Hyd-2.4**: Coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and implementation and enhancement of water conservation programs.	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			Adopted Mitigation Measure Hyd-2.5: Implement and revise as necessary the Resource Protection Ordinance and Policy I-68 Proposed Projects in Flood Plains / Floodways to restrict development in flood plains / floodways.		
3. Surface Hydrology and Drainage The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although there is a potential for some types of projects to alter surface hydrology and drainage, compliance with existing federal, state, and local regulations and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that project-level impacts on surface hydrology and drainage would remain less than significant.	Significant	Significant	**Adopted Mitigation Measure Hyd-3.1**: Implement, and revise as necessary, ordinances to require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater. **Adopted Mitigation Measure Hyd-3.2**: Implement, and revise, as necessary the Resource Protection Ordinance to limit development on steep slopes. Also incorporate Board Policy I-73, the Hillside Development Policy, into the Resource Protection Ordinance to the extent that it will allow for one comprehensive approach to steep-slope protections. **Adopted Mitigation Measure Hyd-3.3**: Implement the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability. **Adopted Mitigation Measure Hyd-4.1**: Implement the Flood Damage Prevention Ordinance to reduce flood losses in specified areas. **Adopted Mitigation Measure Hyd-4.2**: Implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			Adopted Mitigation Measure Hyd-4.3: Implement and revise as necessary Board Policies such as: Policy I-68, which establishes procedures for projects that impact floodways; Policy I-45, which defines watercourses that are subject to flood control; and Policy I-56, which permits, and establishes criteria for, staged construction of off-site flood control and drainage facilities by the private sector when there is a demonstrated and substantial public, private or environmental benefit. **Adopted Mitigation Measure Hyd-6.1**: Implement the Resource Protection Ordinance to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological and drainage problems. **Adopted Mitigation Measure Hyd-8.2**: Review discretionary projects for dam inundation hazards through application of the County's Guidelines for Determining Significance for Hydrology and Guidelines for Determining Significance for Emergency Response Plans.		
2.11 Land Use and Planning					
1. Physically Divide an Established Community With implementation of the CAP Update, large-scale renewable energy projects have potential to result in the physical division of established communities. Even with compliance with existing land use regulations and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures, impacts from large-scale renewable energy projects could remain significant. No	Significant	Significant	**Adopted Mitigation Measure Lan-1.1**: Coordinate with adjacent cities and other agencies regarding planning efforts and resource protection. This includes working with SANDAG during updates to the RTP to ensure that regional roads are properly planned, sited, and designed. Additional on-going consultations include coordination with state,	Significant and unavoidable	CAP Update Only: Yes CAP Update Cumulative Contribution: Yes

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
other feasible project-related mitigation is available that could be applied to large-scale renewable energy projects. Therefore, the project's impact related to the physical division of established communities would be significant and unavoidable.			federal, and local agencies regarding the high speed rail, the Sunrise Powerlink, and tribal casinos. **Adopted Mitigation Measure Lan-1.2**: Coordinate with land owners, other departments, and community groups to ensure that both public and private development projects and associated infrastructure minimize impacts to established communities. This involves community input and General Plan conformance reviews on County road projects to insure that County road planning and development is consistent with the General Plan. This also includes analysis of potential environmental impacts for public and private road projects and application of mitigation measures pursuant to CEQA. DPW policies and procedures shall be evaluated to ensure that such reviews are conducted and that issues regarding potential division of communities are identified and addressed. General Plan Amendments that propose changes to the circulation network shall be kept consistent with the General Plan Goals and Policies, and such proposals will also be reviewed by the communities. In addition, Board Policy I-63 and/or department procedures will be updated to meet this standard. **Adopted Mitigation Measure Lan-1.3**: Maintain plans and standards for infrastructure and roads so that divisions of communities do not occur. This will include: 1) updates to County Road Standards to ensure that roads are designed and built in a safe manner consistent with the General Plan and community context; 2) adherence to Community		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			Plans to guide infrastructure planning in the individual and unique communities of the County; 3) evaluation and, if necessary, revisions to the subdivision ordinance to ensure future project designs, and corresponding infrastructure designs, are consistent with the General Plan and with established community character; 4) preparation of local public road network plans to improve mobility, connectivity, and safety; and 5) preparation of community road standards that supplement the County road standards in order to recognize the unique constraints and character of different communities.		
2. Conflict with Land Use Plans, Policies, or Regulations Measures and actions that would be implemented under the CAP Update would result in a less-than-significant impact related to conflicts with land use plans, policies, and regulations.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
2.12 Noise					
1. Excessive Noise Levels The CAP Update would further existing programs and provide new and modified infrastructure in new and established communities to reduce GHG emissions. Implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the project impacts associated with the excessive noise levels. However, it is possible for a noise waiver to be granted for a large-scale wind turbines project within the designated Noise Waiver Area on the Wind Resources Map subject to specific conditions. Consistent with the Wind Energy EIR, the development of large wind turbines	Significant	Significant	**Adopted Mitigation Measure Noi-1.1**: Require an acoustical analysis whenever a new development may result in any existing or future noise sensitive land uses being subject to on-site noise levels of 60 dBA (CNEL) or greater, or other land uses that may result in noise levels exceeding the "Acceptable" standard in the Noise Compatibility Guidelines (Table N-1 in the Noise Element). **Adopted Mitigation Measure Noi-1.3**: Require an acoustical study for projects proposing amendments to the County General Plan Land Use Element	Significant and unavoidable	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
under the proposed project would result in a significant and unavoidable impact related to low-frequency noise.			and/or Mobility Element that propose a significant increase to the average daily traffic due to trips associated with the project beyond those anticipated in the General Plan. **Adopted Mitigation Measure Noi-2.4**: Require an acoustical study whenever a proposed extractive land use facility may result in a significant noise impact to existing noise sensitive land uses, or when a proposed noise sensitive land use may be significantly affected by an existing extractive land use facility. The results of the acoustical study may require a "buffer zone" to be identified on all Major Use Permit applications for extractive facilities whenever a potential for a noise impact to noise sensitive land uses may occur.		
2. Excessive Groundborne Vibration Implementation of the CAP Update may result in development with the potential to generate groundborne vibration during construction. Implementation of these projects would be within the scope of proposed development und the build out of the General Plan evaluated in the 2011 GPU PEIR. Based on the type of subsequent projects anticipated, implementation of the CAP Update is not expected to generate excessive groundborne vibration. Implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the project impacts associated with excessive groundborne vibration. The project's impacts related to excessive groundborne vibration from development would remain less than significant with mitigation.	Significant	Significant	**Adopted Mitigation Measure Noi-2.1**: For Land Use Designations defined in Table 2.11-14, a groundborne vibration technical study shall be required for proposed land uses within the following distances from the Sprinter Rail Line right-of-way and the property line: 600 feet of a Category 1 Land Use, 200 feet of a Category 2 Land Use, and 120 feet of a Category 3 Land Use. If necessary, mitigation shall be required for land uses in compliance with the standards listed in Tables 2 and 3 of the County of San Diego Guidelines for Determining Significance - Noise. See **Adopted Mitigation Measure Noi-2.4**.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
3. Excessive Noise from a Public or Private Airport The CAP Update would further existing programs and provide new and modified infrastructure in new and established communities to reduce GHG emissions. Implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the project impacts associated with excessive noise from a public or private airport. The project's impacts related to excessive noise from a public or private airport would remain less than significant with mitigation.	Significant	Significant	**Adopted Mitigation Measure Noi-5.1**: Use the applicable Airport Land Use Compatibility Plan's (ALUCP) as guidance/reference during development review of projects that are planned within an Airport Influence Area (AIA). Any projects that are within the AIA shall be submitted to the SDCRAA for review. **Adopted Mitigation Measure Noi-5.3**: Consult with the FAA standards and the County Noise Ordinance as a guide for assessing noise impacts from private airports and helipads.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
2.13 Transportation					
1. Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System Implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions would result in a less-than-significant impact related to alternative transportation. Implementation of the CAP Update would not result in new or more severe impacts than disclosed the 2011 GPU PEIR.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
2. Exceed VMT Threshold Implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions that would be implemented under the CAP Update would result in a less than significant impact related to VMT.	Less than significant	Less than significant	No mitigation is required.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
3. Substantially Increase Hazards Due to a Design Feature Implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions that would be implemented under the CAP Update would result in a less-than-significant impact with mitigation incorporated related to transportation hazards.	Potentially significant	Potentially significant	**Adopted Mitigation Measure Tra-1.3**: Implement the County Public Road Standards during review of new development projects. Also revise the Public Road Standards to include a range of road types according to Regional Category context. **Adopted Mitigation Measures Tra-1.4:** Implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
4. Result in Inadequate Emergency Access Implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions that would be implemented under the CAP Update would result in a less-than-significant impact with mitigation incorporated related to emergency access.	Potentially significant	Potentially significant	See **Adopted Mitigation Measures Tra-1.3 and Tra-1.4** **Adopted Mitigation Measure Tra-4.4**: Implement and revise as necessary the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
2.14 Tribal Cultural Resources					
1. Tribal Cultural Resources No other feasible project-related mitigation beyond existing federal and state permitting requirements and compliance with the 2011 GPU PEIR mitigation is available and could be applied to individual projects under the CAP Update. Where a project would comply with existing regulations and mitigation, it would reduce its project-specific impacts to a less-than-significant level. However, because the reduction of impacts to a less-than-significant level cannot be guaranteed, the project would have a significant and unavoidable impact to TCRs.	Significant	Significant	**Adopted Mitigation Measure Cul-2.2**: Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information. **Adopted Mitigation Measure Cul-2.4**: Protect significant cultural resources through regional coordination and consultation with the NAHC and local tribal governments, including SB-18 review.	Significant and unavoidable	CAP Update Only: Yes CAP Update Cumulative Contribution: Yes

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			Adopted Mitigation Measure Cul-2.5: Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys. **Adopted Mitigation Measure Cul-2.6**: Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the South Coast Information Center (SCIC) and consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review, while maintaining the confidentiality of sensitive cultural information. **Adopted Mitigation Measure Cul-4.1**: Include regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant. **CAP Update Mitigation Measure TCR-1:** Require development to avoid tribal cultural resources, if feasible. If complete avoidance is not possible, require development to mitigate impacts to tribal cultural resources pursuant to Assembly Bill 52 and CEQA Sections 21080.3.1 and 21084.3.		

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
2.15 Wildfire					
1. Exacerbate Wildfire Risks Compliance with existing regulations related to wildfire protection and implementation of 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 project impacts associated with exacerbation of wildfire risks would be less than significant.	Significant	Significant	**Adopted Mitigation Measure Haz-4.3**: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas. **Adopted Mitigation Measure Pub-1.5**: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times. **Adopted Mitigation Measure Pub-1.6**: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No

Table S-1 Summary of Impacts and Mitigation Measures

Impacts	Potential Direct Impact	Potential Cumulative Impact	Mitigation Measures	Significance after Mitigation	New or More Severe Significant Impact after Mitigation
			Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.		
2. Install Infrastructure That Exacerbates Fire Risk Compliance with existing regulations related to wildfire protection and implementation of 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 project impacts associated with exacerbation of wildfire risks from installation and maintenance of new infrastructure would be less than significant.	Significant	Significant	See **Adopted Mitigation Measures Haz-4.3, Pub-1.5, Pub 1.6,** and **Pub-1.7**.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No
3. Expose People or Structures to Post-Fire Risks Compliance with existing regulations related to wildfire protection and implementation of 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 project impacts associated with exposing people or structures to post-fire risks would be less than significant.	Significant	Significant	See **Adopted Mitigation Measures Haz-4.3, Pub-1.5, Pub 1.6,** and **Pub-1.7**.	Less than significant	CAP Update Only: No CAP Update Cumulative Contribution: No

Notes: AIA = airport influence area; AICUZ = Air Installations Compatible Use Zone; ALUCP = Airport Land Use Compatibility Plan; BMO = Biological Mitigation Ordinance; BOS = Board of Supervisors; CAP = climate action plan; CARB = California Air Resources Board; CEQA = California Environmental Quality Act; CNEL = community equivalent noise level; CNG = compressed natural gas; CWA = Clean Water Act; CO = carbon monoxide; dBA = a-weighted decibel; DPLU = Department of Planning and Land Use; DPW = Department of Public Works; EIR = environmental impact report; EJ = environmental justice; EPA = Environmental Protection Agency; FAA = Federal Aviation Administration; FAHJ = Fire Authority Having Jurisdiction; GHG = greenhouse gas; GIS = geographic information system; GPU = general plan update; HCP = habitat conservation plan; HLP = Habitat Loss Permit; hp = horsepower; JRMP = Jurisdictional Runoff Management Program; LEED = Leadership in Energy and Environmental Design; LID = low impact development; MSCP = multiple species conservation program; MUP = major use permit; NAHC = Native American Heritage Commission; NCCP = natural community conservation plan; NO_X = nitrous oxide; NSR = New Source Review; PACE = Purchase of Agricultural Conservation Easement; PDS = Planning & Development Services; PEIR = program environmental impact report; PM = particulate matter; $PM_{2.5}$ = particulate matter 2.5 micrometers or less in diameter; PM_{10} = particulate matter 10 micrometers or less in diameter; RAQS = Regional Air Quality Strategy; RPO = Resource Protection Ordinance; RTP = Regional Transportation Plan; SANDAG = San Diego Association of Governments; SB = Senate Bill; SCIC = South Coast Information Center; SDAPCD = San Diego County Air Pollution Control District; SDCRAA = San Diego County Regional Airport Authority; SIP = State Implementation Plan; SLT = screening level threshold; TAC = toxic air contaminant; TCR = Tribal cultural resource; US = United States; USFWS = United States Fish and Wildlife Service; VMT = vehicle miles traveled; VOC = volatile air contaminant

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CHAPTER 1 PROJECT DESCRIPTION

The County of San Diego (County) adopted the *San Diego County General Plan* (General Plan) in August of 2011, which provides a framework for land use and development decisions in the unincorporated county. The probable environmental impacts of implementing the update to the General Plan, including "potential future development in the unincorporated county based on build-out of the General Plan, as well as associated updates to plans, programs and policies that support the General Plan" (County of San Diego 2011: 1-17) were evaluated in a program environmental impact report (PEIR) certified in 2011. The *San Diego County General Plan Update Final Environmental Impact Report* (hereafter 2011 GPU PEIR) identifies feasible mitigation measures, one of which calls for the preparation of a Climate Action Plan (CAP) designed to reach specified greenhouse gas (GHG) reduction targets from community and local government operations, modifications to the County's guidance on the evaluation of GHG impacts and determining a project's consistency with the CAP, and adoption of a GHG threshold to reduce GHG emissions[1].

In response to this requirement, the County prepared a CAP in 2012 and a revised version in 2018, but the related California Environmental Quality Act (CEQA) documents for both were litigated and the 2018 CAP Supplemental EIR (SEIR) was decertified. Pursuant to the 2020 Appellate Court ruling on the validity of the 2018 SEIR and subsequent Superior Court order and to meet current California legislative emissions reductions requirements, the County has prepared a CAP Update. This SEIR analyzes the environmental impacts of the proposed CAP Update and associated actions. Additional details regarding project background and the relationship of this document to the 2020 Appellate Court decision are discussed in more detail later in this chapter. A summary of the primary issues identified in the 2020 Appellate Court ruling is included below in Section 1.3.1.1, and Table 1-1 at the end of this chapter identifies where each issue is addressed in this draft SEIR.

This chapter describes the proposed CAP Update; an associated amendment to the General Plan (GPA) to revise Goal Conservation and Open Space (COS)-20: Reduction of community-wide and County operations greenhouse gas emissions; Policy COS-20.1: Climate Change Action Plan; revisions to GPU PEIR Mitigation Measure (MM) CC-1.2 (Prepare a County Climate Change Action Plan), MM CC-1.7 (County Guidelines for Determining Significance for Climate Change, which includes a threshold of significance for GHG emissions[2]); and MM CC-1.8 (Revise County Guidelines for Determining Significance based on the Climate Change Action Plan). All revisions to General Plan goal, policy, and GPU PEIR mitigation measures are to make these components consistent with the CAP Update and current state law. All components of the CAP Update

[1] GPU PEIR Mitigation Measure (MM) CC-1.2 (Prepare a County Climate Change Action Plan).

[2] Revisions to GPU Mitigation Measure CC-1.7 will include a Greenhouse Gas Emission threshold through compliance with the CAP Consistency Checklist. This threshold of significance and CAP Consistency Checklist will be adopted for general use through this CAP Update process following public review of the CAP and SEIR. The requirements to adopt a threshold of general use are detailed in State CEQA Guidelines Section 15064.7(b).

listed above and discussed further in Section 1.4 constitute the "project."[3] Because approval of the CAP Update, GPA, GHG threshold, and *County of San Diego Guidelines for Determining Significance: Climate Change* require discretionary approval by the County, these actions are subject to CEQA. The County is the lead agency for the project.

The CAP Update establishes a target of 43.6 percent below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045, along with a goal of net zero by 2045. To do that, the CAP establishes nine strategies, 21 measures, and 70 implementing actions that the County must take to reduce GHG emissions from five emissions reduction sectors: Built Environment and Transportation; Energy; Solid Waste; Water and Wastewater; and Agriculture and Conservation. CAP Update measures also include supporting actions that would put the County on a path to the long-term goal of net zero emissions.

The County's CAP serves two purposes: first, and more broadly, it reflects the County's attempts to reduce its share of statewide GHG emissions; second, and more specifically, it is required by the General Plan PEIR as a CEQA mitigation measure to reduce GHG impacts from the General Plan. Because the CAP mitigates for the General Plan, it cannot and does not make land use changes (although some of those changes are analyzed as Alternatives and can be directed by the Board along with CAP approval). Because of the limited scope of the CAP tool, the County is also simultaneously working on a range of other programs to address climate change: a Sustainable Land Use Framework to address potential land use changes; a Regional Decarbonization Framework to provide a voluntary regional framework for governments and private entities to reduce carbon emissions; and a Transportation Program that will address VMT mitigation measures for development within the unincorporated county.

1.1 Project Location

San Diego County is in the southwestern corner of California. It is bordered by the Pacific Ocean to the west, Riverside County to the north, Imperial County to the east, Orange County at the northwest corner, and the Republic of Mexico to the south (Figure 1-1, presented at the end of this chapter).

The unincorporated area of the county is characterized by its vast size, rural nature and dispersed development patterns, and diverse natural habitats. San Diego County is recognized as one of the most biologically diverse counties in the United States due to the wide variety of vegetation, animals, and habitats found across the region's microclimates, topography, soils, and other natural features. In the unincorporated area, inland valleys and hills blanketed with chaparral and oak woodlands give way to mountains that rise more than 5,000 feet above sea level before dropping into the desert.

The unincorporated county is home to 28 distinct communities that vary in land use and density. In general, these communities include a core of local-serving commercial uses, services, schools, and public facilities surrounded by residential neighborhoods. They

[3] As described further below, while all of these CAP Update components constitute the "project" for CEQA purposes, the focus of the analysis in this SEIR is on the proposed GHG reduction strategies, measures, and actions, because these are the components that would result in physical impacts on the environment.

range from semi-suburban residential neighborhoods that transition in scale and density from adjoining, incorporated cities to low-density rural communities surrounded by hillsides, deserts, and agricultural lands.

In total, the unincorporated area encompasses approximately 2.3 million acres. Much of the unincorporated county, in excess of 90 percent, is open space or undeveloped and contains several large federal, state, and regional parklands in the eastern portion of the county. In addition, the San Diego region is home to 18 federally recognized tribes located across the eastern portions of the county. Only 35 percent, or about 772,239 acres of the unincorporated county, is within County land use jurisdiction.

Approximately 35 percent of the total land area in the county is within the County's land use jurisdiction. Incorporated cities and federal, state, and tribally owned lands (including Marine Corps Base Camp Pendleton) are outside of the County's jurisdiction. The remaining approximately 772,239 acres of land and County facilities (regardless of location) are within the County's jurisdiction and comprise the planning area for both the San Diego County General Plan, as evaluated in the 2011 GPU PEIR, and the CAP Update (Figure 1-2, presented at the end of this chapter).

1.2 Project Objectives

Section 15124 of the State CEQA Guidelines requires an environmental impact report (EIR) to include a statement of objectives sought to be achieved by the proposed project. The project's objectives help public agencies and the general public understand the underlying purpose of the proposed project. Because the objectives establish the purpose of the project, they also assist the County, as lead agency, in developing a reasonable range of alternatives to be evaluated in the SEIR. Alternatives are developed so they can potentially meet most project objectives while reducing significant effects. Alternatives must be feasible, which means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. The project objectives also aid the County in preparing findings if the project is to be approved and, if necessary, a statement of overriding considerations.

The underlying purpose of the project is to reduce GHG emissions that could be generated by development under the General Plan, and to reduce those emissions consistent with state legislative requirements and the requirement to prepare a CAP pursuant to Mitigation Measure CC-1.2 of the 2011 GPU PEIR. This mitigation measure sets out to reduce GHG emissions from community-wide sources and County local government operations (County operations) that are consistent with the General Plan.

The following objectives have been developed to assist in achieving the underlying fundamental purpose of the proposed project while implementing the Guiding Principles of the General Plan and supporting sustainability efforts in the region:

- Reduce community-related GHG emissions within the unincorporated county and County operations-related GHG emissions to meet and exceed the County's GHG

reduction targets for 2030 and 2045, as aligned with state reduction targets (as set forth in Senate Bill (SB) 32 [2016] and Assembly Bill (AB) 1279 [2022]), that does not rely on the purchase of carbon offsets to meet emission reduction targets.

- Incorporate feasible and effective GHG reduction strategies, measures, and actions that reduce GHG emissions from community-wide activities in the unincorporated county and from County operations to establish actions to meet a goal of net zero carbon emissions by 2045 as aligned with AB 1279.
- Implement 2011 GPU PEIR Mitigation Measure CC-1.2 to prepare a CAP to reduce GHG impacts from implementation of the General Plan, and update Mitigation Measure CC-1.2 to be consistent with changes in state law, and the State CEQA Guidelines.
- Develop a CAP that supports the sustainability principles found in the County of San Diego General Plan Guiding Principles by doing the following: support a reasonable share of projected regional growth; promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in compact development patterns to the extent feasible; promote environmental stewardship that protects and/or enhances natural resources and habitats; ensure development that accounts for physical constraints and natural hazards; provide and support a multi-modal transportation network that enhances connectivity; maintain environmentally sustainable communities and reduce GHG emissions; and preserve agriculture as an integral component of the region's economy, character, and open space network.
- Develop a CAP that sets clear goals and identifies metrics (i.e., co-benefits and equity-based outcomes) to guide implementation to make substantial progress toward attaining environmental justice and equity.
- Develop a CAP that includes sufficiently adaptable long-term strategies that will consider and incorporate, as feasible, additional GHG reduction strategies that embrace continued innovation, technological advances, and the creation of high-quality jobs in the County.
- Accomplish the foregoing objectives in a manner that minimizes undue and unnecessary economic impacts on businesses and property owners, and that avoids regulatory takings under the federal and state constitutions.

1.3 Project Background

The County adopted the current General Plan in August of 2011, which was an update to the 1979 General Plan. The General Plan update made modifications to the County's land use designations and influenced future development of the county by locating 80 percent of the future dwelling unit capacity in the western third of the unincorporated areas, within the San Diego County Water Authority boundary; focusing development within the village core areas away from rural areas; and reducing the overall land use capacity by 15 percent.

In conjunction with the General Plan, the County prepared and certified the 2011 GPU PEIR, which assessed the potential environmental effects of future development

anticipated with implementation of the General Plan. A total of 19 separate mitigation measures were adopted to reduce the GHG emissions of County operations and from activities within the unincorporated county to below a level of significance. One of the 19 measures, designated CC 1.2, called for the preparation of a CAP. Mitigation Measure CC-1.2 was incorporated into the General Plan as Goal COS-20 and Policy COS-20.1. Specifically, Goal COS-20 in the Conservation and Open Space Element of the General Plan requires reduction of community and County operations GHG emissions and Policy COS-20.1 requires preparation, maintenance, and implementation of a CAP. Further, the mitigation measures identified in the 2011 GPU PEIR called for the preparation of a CAP designed to reach specified GHG reduction targets from community and local government operations, modifications to the *County of San Diego Guidelines for Determining Significance: Climate Change* to provide guidance on the evaluation of GHG impacts and determine a project's consistency with the CAP, and adoption of a GHG threshold to reduce GHG emissions.

With the adoption of the General Plan, the County committed to reducing GHG emissions while seeking to balance environmental, social, and economic interests. The General Plan recognized that GHG reductions can be achieved in multiple ways, including growing in a compact and efficient manner, using energy more efficiently, harnessing renewable energy to power buildings, improving waste recycling, and improving access to sustainable transportation.

In June 2012, the County adopted the 2012 CAP and an Addendum to the 2011 GPU PEIR. On November 7, 2013, staff approved the *County of San Diego Guidelines for Determining Significance: Climate Change*. Following the approval of the 2012 CAP, the Sierra Club filed suit challenging the approval and the adequacy of the associated environmental review. In a ruling issued on October 29, 2014 (*Sierra Club v. County of San Diego*, 231 Cal. App. 4th 1152 [2014]), the Fourth District Court of Appeal held that the 2012 CAP did not meet the description set forth in the adopted mitigation measure (2011 GPU PEIR Mitigation Measure CC-1.2) and that an SEIR was needed for the plan. In response to the court's decision and considering state legislative changes that had occurred since preparation of the 2012 CAP, the County prepared the 2018 CAP and 2018 SEIR.

After the County adopted the 2018 CAP and certified the 2018 SEIR on February 14, 2018, the Sierra Club, Center for Biological Diversity, Cleveland National Forest Foundation, Climate Action Campaign, Endangered Habitats League, Environmental Center of San Diego, and Preserve Wild Santee filed a petition challenging the 2018 CAP as violating CEQA. In a separate action, Golden Door Properties, LLC, also challenged the 2018 CAP as violating CEQA. On December 24, 2018, the Superior Court ruled that the 2018 CAP approval did not comply with CEQA. The Superior Court ordered the County to decertify the 2018 SEIR. This decision was later affirmed in part by the California Court of Appeal, Fourth Appellate District (Appellate Court), on June 12, 2020, in *Golden Door Properties, LLC, v. County of San Diego*, 50 Cal. App. 5th 467. Specifically, the Appellate Court affirmed the Superior Court's decision that the 2018 CAP and 2018 SEIR failed to adequately account for potential environmental impacts of GPA projects due to reliance on Mitigation Measure M-GHG-1, which allowed for use of carbon offset credits. The Appellate Court also held that the 2018 SEIR should have included at least one project alternative focused

on substantially reducing vehicle miles traveled (VMT), and that the document failed to adequately address the cumulative impacts of probable future projects requiring GPAs. Consistent with the Appellate Court's final judgement the trial court issued a writ of mandate directing the County to rescind approval of the 2018 CAP and certification of the 2018 SEIR. As a result, the County Board of Supervisors rescinded the 2018 CAP and 2018 SEIR, and associated approvals, on September 30, 2020. An update to the CAP was required.

The 2020 appellate court ruling included discussion of five primary concerns: the adequacy of 2018 SEIR Mitigation Measure M-GHG-1, cumulative impacts from projects in early stages of environmental review that could result in land use changes (referred to as "in-process GPAs"), potential for conflicts with SANDAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), consideration of a "smart growth" alternative, and analysis of environmental justice. This SEIR is being prepared in response to the writ and to analyze the impacts of the proposed CAP Update. Table 1-1, "Summary of SEIR Response to 2020 Appellate Court Ruling," indicates the location in this draft SEIR where specific court direction is addressed. The table is presented at the end of this chapter.

As described in further detail below, the foundation of the CAP Update is a comprehensive inventory of GHG emissions, which identifies and quantifies the sources and amounts of GHG emissions that are generated from current and future activities within the County. The County's base inventory of GHG emissions evaluated activities within the unincorporated county in the year 2019, the most recent year data is available. The following sections discuss prior GHG inventories conducted for the unincorporated county, including the 2014 inventory, which was used as the baseline for the 2018 CAP.

1.3.1.1 Previous Greenhouse Gas Inventories

An inventory for the San Diego Region was developed by the Energy Policy Initiatives Center (EPIC) at the University of San Diego for 1990. EPIC's 1990 inventory was developed before the *US Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions* was available in 2010 as guidance to help local governments develop effective community GHG emissions inventories. The County's GHG analysis in the 2011 GPU PEIR reported 1990 and 2006 emissions by scaling emissions from EPIC's regional inventory to apply to the unincorporated areas. The scaling was done on a simplified per-capita or per-VMT basis. At that time, the reported emissions were based on prevailing standards. For example, for the electricity sector, all emissions in the San Diego region (from electricity use in the residential, commercial, industrial, mining, agriculture, transportation, communication and utilities, and street lighting) were divided by the region's population to derive a per-capita electricity-related emissions figure. This per-capita metric was then multiplied by the unincorporated areas' population to derive electricity-related emissions. It is now known that this method, while reducing the complexity of the inventory, loses accuracy in the process for various reasons. First, it assumes that all consumers of electricity (e.g., residential, commercial, industrial) are uniformly distributed in the San Diego region. In reality, the unincorporated area is rural in nature and does not have the same density of commercial and industrial uses as the

urban areas. Second, it assumes that all consumers of electricity are directly proportional to population. While this may be roughly applicable for residential uses, electricity use in commercial, industrial, mining and agricultural uses would not be dependent on population directly. This methodology was followed for other sectors and is not as accurate as using activity data for the unincorporated areas.

While the 1990 EPIC inventory was based on the best available regional data at that time, applying the inventory and scaling its data to the unincorporated area now would be problematic for the reasons described above. For the same reasons, data reported in the 2011 GPU PEIR are now outdated and not as reliable as the current baseline and methods. However, while inventory methodologies and data collection techniques have evolved since certification of the 2011 GPU PEIR, the overall framework of reduction targets is inherently based on state legislation as reflected in proposed updates to Mitigation Measure CC-1.2, described below.

An updated inventory was completed in 2014 that was based on actual activities and reported consumption data. The 2014 inventory reported lower base emissions than calculated for 2006 in the 2011 GPU PEIR. This is attributable to state and local actions to reduce GHG emissions, but also reflects improvements in data and methods to develop inventories. This inventory was used as the baseline for the 2018 CAP.

The inventory has again been updated using a base year of 2019 to reflect current conditions in the unincorporated county.[4] The 2019 inventory represents the most complete data available that are unaffected by COVID-19 impacts (e.g., reduced traffic patterns) and was used as the baseline for the CAP Update. The CAP Update 2019 inventory is discussed in Section 1.4.1.1.

1.3.2 Regulatory Background

Climate action planning requires action from all levels of government. Federal and state climate regulations and goals guide and provide examples for local government actions to reduce GHG emissions. At the national level, Executive Order 14057: Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability, signed by President Biden in December 2021, sets goals of reaching 100 percent carbon pollution-free electricity by 2035 and a net zero emissions economy by 2050 for federal operations. In addition, federal investments to tackle climate change such as the Inflation Reduction Act and Bipartisan Infrastructure Law are leading the push to advance environmental justice, strengthen energy security and green the grid, lower energy costs for households, strengthen the nation's resilience, and reduce air pollution.

In California, AB 32 (known as the Global Warming Solutions Act of 2006) established the country's first comprehensive, long-term approach to addressing climate change, and led to the development of state programs and standards, such as the Advanced Clean Car Standard and Renewable Portfolio Standard, that target GHG emission reductions from cars and trucks, electricity production, fuels, and other sources. Since the passage

4 The methods used for both the 1990 and 2014 inventories use the best-practice pursuant to the *U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions*.

of AB 32, the state has continued to enact complementary legislation that addresses GHG emissions from specific sectors including land use, transportation, energy, and water, as well as environmental justice and public health issues. This includes SB 32, signed in 2016, that sets the state's 2030 GHG emissions reduction target of 40 percent below 1990 levels and AB 1279, signed in 2022, requiring the state to achieve net zero GHG emissions no later than 2045, and requiring that statewide anthropogenic GHG emissions are reduced to at least 85 percent below 1990 levels by 2045. California's commitment to reduce GHG emissions and improve climate resiliency extends responsibilities to local governments to help achieve these ambitious targets, opens new markets, and establishes climate planning as a core principle for business practices.

The California Air Resources Board (CARB) released the *Final 2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on November 16, 2022, as directed by AB 1279. The 2022 Scoping Plan traces the pathway for the state to achieve its carbon neutrality and an 85 percent reduction in anthropogenic emissions below 1990 levels by 2045. CARB adopted the 2022 Scoping Plan on December 16, 2022.

1.3.2.1 County Climate Leadership

Regional action and collaboration are needed to solve the climate emergency. Ambitious climate targets at the state level have made climate action planning at the local level more challenging than ever. The County actively works with other local governments and public agencies, local nonprofits, universities, and businesses to prepare plans and implement programs that complement state efforts to reduce GHG emissions and combat climate change. The County partners with these stakeholders through outreach, education, advocacy, and collaboration. Through this collaboration and coordination, the County can bring funding and resources to the region to support future long-range emissions reduction efforts within the unincorporated county, as well as highlight the climate action efforts that are occurring across the San Diego region.

Examples of existing County programs that reduce GHG emissions and advance sustainability include:

- **Multiple Species Conservation Program.** Conserves open space and natural habitats.
- **General Plan.** Focuses development in villages and closer to services in western portion of unincorporated area.
- **Purchase of Agricultural Conservation Easement Program.** Preserves land for long-term agricultural use.
- **Green Fleet Action Plan.** Reduces emissions from the County fleet.
- **Solar and EV Ready Ordinance.** Increases installation of solar and EV charging stations.
- **Strategic Energy Plan.** Reduces energy use in County operations.
- **EV Charger Permit Program.** Streamlines EV charger permit applications.

- ***Live Well San Diego* Food System Initiative.** Supports a robust and resilient local food system.
- **Strategic Plan to Reduce Waste.** Establishes goal of 90 percent waste diversion from landfills by 2040.
- **Zero Net Energy Portfolio Plan.** Cuts County facility energy use by 50 percent by 2030.
- **Active Transportation Plan.** Increases active transportation options.
- **Electric Vehicle Roadmap.** Increases EV ownership and charging stations.
- **Borrego Valley Groundwater Sustainability Plan.** Sustainably manages groundwater.
- **Construction and Demolition Debris Recycling Ordinance.** Increases recycling and diversion of construction debris from landfills.
- **Landscape Ordinance Update.** Requires tree planting and outdoor water use reductions.
- **Accelerate-to-Zero Emissions Collaboration.** Increases regional collaboration to support the transition to ZEVs.
- **County Building Reach Code.** Requires energy and water efficient fixtures and appliances.
- **Office of Equity and Racial Justice.** Leads the County's efforts to address systemic bias and disparities.
- **Environmental Justice and Safety Element of the General Plan.** Addresses and evaluates pollution, vulnerability to climate change impacts, and other hazards that disproportionately impact low-income and communities of color.
- **Office of Sustainability and Environmental Justice.** Leads the County's efforts to reduce community exposures to health hazards.
- **Solid Waste Ordinance and Non-Exclusive Franchise Agreement.** Expands organic materials recycling.
- **Organic Materials Ordinance Update.** Expands composting standards to help divert organic materials from landfills.
- **Community Choice Aggregation Program.** Joined San Diego Community Power in 2021 and committed to 100 percent renewable electricity by 2030.
- **Green Streets Clean Water Plan.** Identifies and prioritizes green street project opportunities.
- **Zero Carbon Portfolio Plan.** Reduces operational emissions at County facilities.
- **Organic Materials Ordinance Update.** Expands access to organic materials composting.

- **San Diego County Native Landscape Program.** Increases native plant landscaping across the region.
- **Butterflies Habitat Conservation Plan.** Protects sensitive butterfly species and habitats.
- **Integrated Regional Decarbonization Framework.** Identifies local policy opportunities to support decarbonization.
- **Sustainable Land Use Framework.** Identifies principles of sustainable development to inform future land use decisions.
- **North County Multiple Species Conservation Plan.** Conserves open space and natural habitats in North County.
- **Equity-Driven Tree Planting Program.** Increases tree planting in frontline communities.
- **Carbon Farming Pilot Program.** Reduces and sequesters GHG emissions through carbon farming efforts.
- **Department Sustainability Plans.** Creates a comprehensive strategy to achieve sustainability in internal and external County operations.

Additionally, the County's "Framework for our Future for Bold Climate Action" establishes actions to achieve a goal of net zero carbon emissions by 2035-2045, which means addressing as many emissions as are being produced. This goal requires the pursuit of all opportunities to reduce and avoid GHG emissions from waste generation, water and energy use, and the burning of fossil fuels, among other sources, as well as opportunities to remove GHGs or capture and store GHGs that have already been emitted through practices like planting trees or habitat restoration.

1.3.2.2 The County's General Plan

The County's General Plan, updated in 2011, provides a policy framework and long-range vision for growth in the unincorporated area. It establishes goals, policies, and programs to foster healthy, livable, and sustainable communities and provides a guide for future land use, housing, and economic development. When the General Plan was updated in 2011, it included changes that shifted growth capacity from the eastern backcountry areas to western communities, guiding development closer to existing infrastructure and services and helping to protect the county's natural resources and maintain the character of its communities. The General Plan includes specific goals and policies aimed at reducing GHG emissions by encouraging growth in a compact and efficient manner, using renewable energy to power buildings, improving waste recycling, and increasing access to sustainable transportation.

As discussed further in Chapter 5, "Alternatives," the 2011 General Plan included the following environmentally sustainability accomplishments:

- reduced Land Use Capacity by 46,363 units (15 percent) to 239,984 units,

- focused development in village cores to retain the county's rural character,
- shifted 20 percent of the remaining dwelling unit capacity to the most western portions of the unincorporated area, and
- located 80 percent of the dwelling unit capacity where water can be imported and distributed by the County Water Authority.[5]

1.4 Project Elements

The proposed CAP Update is shaped by community input, utilizes the latest data and modeling scenarios available, does not rely on the purchase of carbon offsets, and is comprehensive and legally enforceable. In implementation of the CAP Update, investments will prioritize environmental justice and advance equitable outcomes for communities and populations in San Diego that have been historically left behind and are most impacted by climate change.

As described in further detail below, the CAP Update is a multi-objective plan that sets policy and programmatic commitments to reduce GHG emissions through the implementation of measures and actions to reach net zero carbon emissions in the unincorporated area of the county and in County operations. In addition to GHG emission reductions, CAP measures also provide important benefits to the environment and our residents, including preserving the environment, reducing health disparities, increasing access to green jobs, improving quality of life, and advancing environmental and social justice. The CAP Update aligns with multiple County initiatives that, collectively taken, will make the unincorporated area and County operations more sustainable, healthy, and resilient.

The following sections describe the project, including the contents of the CAP, and the scope of the associated GPA, GHG Threshold amendment, and *County of San Diego Guidelines for Determining Significance: Climate Change* amendment.

1.4.1 Climate Action Plan

The CAP Update establishes strategies and measures to reduce GHG emissions generated from current and future activities within the county's unincorporated areas and emissions generated by County facilities and operations. The CAP Update is structured to meet state mandates to reduce GHG emissions and advance the vision and guiding principles of the County's General Plan, which accommodates future growth while retaining or enhancing the County's rural character, economy, environmental resources, and unique communities. The CAP Update includes a GHG emissions inventory to provide a baseline of major sources of GHG emissions, an estimate of existing and future carbon stored in vegetation and soils on natural and working lands, a projection of future GHG emissions expected to occur in the unincorporated area and from County

[5] To track the progress towards implementing the General Plan, visit the Housing Production and Capacity Portal, which illustrates housing production and land use capacity since the General Plan update in 2011. Accessed July 2023 here: https://www.sandiegocounty.gov/content/sdc/pds/HPCP-UA.html.

operations, targets for future GHG emission levels, and strategies and measures to reduce GHG emissions to meet the targets.

The CAP Update addresses equity through preparation of a cost analysis, which was prepared to understand how populations and communities may experience disproportionate costs or impacts from climate change, and through development of an Equity Implementation Framework, to prioritize climate action in frontline communities. Frontline communities are defined in the CAP Update as EJ communities that experience the most immediate and worst impacts of climate change and other injustices. Climate actions in the CAP Update would be prioritized in frontline communities by utilizing the Equity Implementation Framework to ensure equity-based outcomes and co-benefits are realized equitably throughout the unincorporated county. Co-benefits to EJ communities are addressed in greater detail in Section 2.7, "Environmental Justice," of this SEIR.

The CAP Update would be regularly monitored to track and annually report progress toward achieving its GHG emissions reductions targets. The CAP Update is intended to be a living document and would continuously evolve and be refined as new legislation is adopted, science and technology advances, and progress towards GHG reduction targets is evaluated. Implementation would require long-term commitment and ongoing collaboration with private and public sector partners, as well as the community-at-large.

In summary, the CAP identifies:

- a summary of baseline GHG emissions and the potential increase of these emissions over time for the unincorporated county (community) and County operations (local government facilities);
- GHG emissions reduction targets for 2030 and 2045, and a net zero 2045 goal to reduce the County's contribution to global GHG emissions; and
- strategies, measures, and actions to comply with established 2030 and 2045 GHG reduction targets and the net zero 2045 GHG reduction goal.

1.4.1.1 CAP Contents

The CAP contains five chapters, which are briefly summarized below:

- Executive Summary: Summarizes the key information contained in the CAP.
- Chapter 1, "Introduction": This chapter introduces the document, describes the purpose and context of the plan, and identifies the regulatory framework related to global GHG emissions.
- Chapter 2, "Outreach and Engagement": This chapter describes how the CAP was developed through engagement with residents, community organizations, and regional stakeholders.
- Chapter 3, "GHG Emissions Inventory, Projections, and Reduction Targets": This chapter provides detailed accounting of GHG emissions from activities within the unincorporated areas, and from County local government operations. It includes a

discussion of the primary sources and annual levels of GHG emissions and establishes a 2019 baseline inventory. Projections of GHG emissions and reduction targets are described and the resultant emissions gap between projected emissions and reduction targets is calculated.

- Chapter 4, "GHG Reduction Measures": This chapter outlines overarching GHG reduction strategies and details specific strategies and supporting measures to be implemented by the County to achieve its GHG reduction targets. The strategies and measures focus on locally based actions to reduce GHG emissions in various categories as a complement to legislative actions taken by the state or federal government.
- Chapter 5, "Implementation and Monitoring": This chapter describes the set of actions that comprise the implementation strategy, possible funding mechanisms, the monitoring and compliance program, and an overview of the CEQA tiering/streamlining options for future projects.

Each key component of the CAP Update is discussed below.

GHG Emissions Inventory

The foundation of the CAP is a comprehensive inventory of GHG emissions, which identifies and quantifies the sources and amounts of GHG emissions that are generated from activities within the county. Conducting an inventory of emissions allows reduction targets to be established and reduction measures to be quantified. The County's base inventory of GHG emissions evaluated activities within the unincorporated county in the year 2019, the most recent year data is available. The 2019 inventory is organized into GHG Emissions Categories, which represent a distinct subset of a market, society, industry, or economy whose components share similar characteristics. The nine major GHG Emissions Categories are shown in order of contribution, which include the following:

1. *On-Road Transportation*: On-road transportation emissions associated with gasoline and diesel consumption from driving that occurs on roadways, in addition to emissions from County fleet operations and employee commute.
2. *Electricity Use*: Emissions associated with electricity generation because of electricity consumption in residential, commercial, industrial, and agricultural facilities. This includes electricity consumption at local government facilities such as County buildings, streetlights, and stormwater pumps.
3. *Natural Gas Use*: Emissions associated with natural gas consumption in residential, commercial, industrial, and agricultural facilities. This includes natural gas use at County facilities located outside the unincorporated areas.
4. *Solid Waste*: Waste emissions associated with landfills in the county (including County-operated closed landfills) and waste generated by the unincorporated county, discounting any overlap. Solid waste generated by local government facilities is also included in this category.

5. *Agriculture*: Agricultural emissions associated with livestock, fertilizer use, soil management, and agricultural equipment. No agricultural emissions are attributed to local government operations.
6. *Propane Use*: Emissions associated with propane consumption in residential, commercial, industrial, and agricultural facilities. This includes propane use at County facilities located outside the unincorporated areas.
7. *Off-Road Transportation*: Off-road vehicle and equipment emissions associated with gasoline and diesel consumption in the unincorporated areas. This includes County government operations off-road vehicle use.
8. *Water*: Water-related emissions associated with energy and fuel used to convey, extract, treat, and distribute water used in the unincorporated areas for domestic, irrigation, and industrial purposes. This includes a small amount of water use at County facilities located outside the unincorporated areas.
9. *Wastewater*: Wastewater treatment emissions associated with the energy consumed and emissions produced to process domestic sewage and industrial wastewater either at on-site septic systems or centralized wastewater treatment plants. This includes a small amount of wastewater generation at County facilities located outside the unincorporated county.

The GHG inventory includes both emissions attributable to the activities within the unincorporated areas as well as emissions generated by County-operated facilities, even if they are located outside of the unincorporated areas. The inventory excludes emissions from activities on lands under tribal and military jurisdiction.

Carbon dioxide (CO_2) is the largest contributor to global warming and the most recognized GHG; however, there are two additional primary GHGs that must be addressed to meet state-mandated reduction targets: methane (CH_4) and nitrous oxide (N_2O). To simplify discussion of these emissions collectively, CAPs use a measurement known as carbon dioxide equivalent (CO_2e). The CO_2e measurement translates each GHG to CO_2 by weighting it by its relative global warming potential. For example, according to the Intergovernmental Panel on Climate Change, CH_4 and N_2O are 25 and 298 times more potent, respectively, than CO_2 in their ability to trap heat in the atmosphere (IPCC 2007). Converting these gases into CO_2e allows consideration of all the gases in comparable terms and makes it easier to communicate how various sources and types of GHG emissions contribute to global warming. A metric ton of carbon dioxide equivalent ($MTCO_2e$) is the standard measurement of the amount of GHG emissions produced and released into the atmosphere.

In 2019, activities in the unincorporated county and County operations accounted for 2,984,000 $MTCO_2e$. Most of the emissions were due to on-road vehicle activity and building energy use. Emissions from gasoline and diesel consumption in on-road transportation accounted for 45 percent of the County's emissions in 2019. Approximately 40 percent of the County's emissions were due to electricity, natural gas, and propane used for heating and cooling applications, powering devices, equipment, and other energy loads. The contributions from community activities and County operations are summarized below for the nine major GHG Emissions Categories.

1. On-Road Transportation (45 percent)
2. Electricity (20 percent)
3. Natural Gas (16 percent)
4. Solid Waste (6 percent)
5. Agriculture (4 percent)
6. Propane (4 percent)
7. Off-Road Transportation (2 percent)
8. Water (1 percent)
9. Wastewater (1 percent)

GHG Emissions Projections

The 2019 GHG emissions were projected through 2050 based on population, housing, and job growth in the county and the future impact of adopted federal and California regulations, policies, and programs and in place in 2022 that reduce GHG emissions. For details, see Appendix 3 (Unincorporated County of San Diego 2019 Greenhouse Gas Emissions Inventory and Projections) to the CAP Update.

The County's emissions projections are:

- 2,397,000 $MTCO_2e$ by 2030,
- 1,947,000 $MTCO_2e$ by 2035,
- 1,693,000 $MTCO_2e$ by 2040,
- 1,678,000 $MTCO_2e$ by 2045, and
- 1,705,000 $MTCO_2e$ by 2050.

GHG Emissions Reduction Targets and Net Zero Goal

The County's GHG reduction targets were developed in the context of the County Board of Supervisors' direction, and statewide plans and laws addressing statewide limits. On January 13, 2021, the Board of Supervisors approved the Framework for the Future, "Actions to Achieve Bold Climate Action at the County of San Diego", which created policy recommendations for the CAP Update that include achieving at a minimum Senate Bill 32 GHG emissions reductions of 40 percent below 1990 levels by 2030 and establishing actions to meet a goal of net zero carbon emission by 2035-2045. In addition, the California Climate Crisis Act (Assembly Bill 1279, adopted 2022), enacted policy to achieve net zero emissions as soon as possible, but no later than 2045, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below 1990 levels as a pathway to the net zero goal. In 2022, CARB released an updated Scoping Plan to address AB 1279 emissions limits. The Scoping Plan reports statewide GHG emissions for eight economic sectors: agriculture, residential and commercial, electric power, high global warming potential (GWP) gases, industrial, recycling and

waste, transportation, and carbon dioxide removal (CARB 2022a). The Scoping Plan identifies a path to keep California on track to meet its SB 32 reduction target of at least 40 percent below 1990 emission levels by 2030 but concludes that additional reductions are needed by 2030 – to 48 percent below 1990 levels – for the state to stay on track to achieve net zero emissions no later than 2045 pursuant to AB 1279. Additionally, the Scoping Plan shows that it is economically and technologically feasible to reduce anthropogenic emissions to 85 percent below 1990 levels by 2045 but that mitigation of 100 percent of anthropogenic emissions by 2045 is not feasible and that carbon dioxide removal should be utilized to achieve California's carbon neutrality target.

Emissions reduction targets for 2030 and 2045 were developed based on the most current guidance from CARB. For 2030, the CAP's target is aligned with the 2022 Scoping Plan, which concludes that statewide GHG emissions levels need to be reduced to 48 percent below 1990 levels by 2030 for the state to stay on track to achieve net zero GHG emissions no later than 2045 (as required by AB 1279). This is a steeper reduction than set forth in SB 32, which establishes a statutory limit of reducing statewide emissions to 40 percent below 1990 levels by 2030. For 2045, the CAP Update's target is aligned with AB 1279, which requires that the State's target of net zero emissions by 2045 include reducing statewide anthropogenic emissions by at minimum 85 percent below 1990 levels by 2045. Anthropogenic emissions include the primary sources and activities within the County's GHG emissions categories: On-road Transportation, Electricity, Natural Gas, Waste, Agriculture, Propane, Off-road Transportation, Water, and Wastewater. To go beyond an 85 percent anthropogenic emissions reduction and achieve statewide net zero emissions by 2045, the 2022 Scoping Plan relies on large-scale deployment of CCS technologies and mechanical CDR strategies like direct air capture machines. The County government does not have the jurisdiction or other ability to construct and operate CCS and mechanical CDR strategies at the pace and scale needed to achieve net zero emissions by 2045. The 2022 Scoping Plan also assumes that additional reduction in anthropogenic emissions beyond 85 percent by 2045 would not be cost-effective or technologically feasible. As a result, the CAP's 2045 target is aligned with the AB 1279 target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045.

To develop County-specific target percentages for the CAP that align with statewide targets, the 2022 Scoping Plan was reviewed to identify the emissions sectors in this statewide plan that are relevant and applicable to the County of San Diego. The emissions reduction trajectory of each applicable sector in the 2022 Scoping Plan is then applied to the County's emissions levels to calculate reduction levels and target percentages for the CAP. Review of the 2022 Scoping Plan demonstrates that the County has direct or indirect jurisdiction over activities that generate emissions and contribute to reductions in six of the eight emissions sectors included in the statewide emissions inventory: agriculture, residential and commercial, electric power, industrial, recycling and waste, and transportation. The high global warming potential (GWP) gases and carbon dioxide removal (CDR) sectors are excluded for the following reasons. First, the County has limited to no ability to control or influence emissions of high GWP gases because it has limited or no jurisdiction or influence over the following activities in the unincorporated area: substitution of ozone-depleting substances with high GWP gas substitutes; emissions of sulfur hexafluoride (SF6) from electricity transmission lines; and

semiconductor manufacturing processes. Second, the state's CDR sector identifies significant reductions from engineered strategies to remove significant levels of emissions from the atmosphere using technologies like direct air capture and carbon capture and storage (CCS). Constructing and operating direct air capture machines to remove GHG emissions from the atmosphere is outside the scope of local governments in California, including the County. In addition, the unincorporated area does not include large-scale petroleum refineries, GHG-emitting electric power plants, cement manufacturing facilities, or other large-scale industrial facilities that could have their GHG emissions reduced using CCS technologies. By excluding these sectors under this approach, GHG reduction targets for the County can be established in proportion with statewide reductions for all sectors relevant to County jurisdiction to the extent feasible using available data. This target setting approach is consistent with the California Supreme Court decision in Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming (2015) 62 Cal.4th 204, which determined that the approach of assessing a project's consistency with statewide emissions reduction goals must include a "reasoned explanation based on substantial evidence" that links the project's emissions (in this case, the project is the CAP) to statewide GHG reduction goals.

Statewide target percentages are then translated to the unincorporated area. The analysis uses 2019 data from the State's emission inventory and future emissions reductions in 2030, 2035, 2040, and 2045 from the 2022 Scoping Plan (CARB 2022b and 2022c). The future emissions targets in the 2022 Scoping Plan are 48 percent below statewide 1990 levels in 2030 and 85 percent below 1990 levels in 2045. Statewide emissions in future years from the applicable sectors are compared to 2019 statewide emissions from applicable sectors to determine the percentage reduction for the unincorporated area. Data for 2019 are used because 1990 emissions data are not available for the unincorporated county and because 2019 is the baseline year of the GHG emissions inventory prepared for the CAP Update.

Thus, consistent with CARB's Scoping Plan, the following adjusted reduction targets should be achieved in the county:

- 43.6 percent below 2019 levels by 2030, and
- 85.4 percent below 2019 levels by 2045.

The CAP also includes an aspirational goal to achieve net zero carbon emissions by 2045, consistent with the Board of Supervisors' Framework for the Future. This goal is in addition to the 2045 target aligned with reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. By including a goal for net zero carbon emissions in the CAP Update, the County can demonstrate how it is going above and beyond reductions in anthropogenic emissions and working towards net zero emissions in the unincorporated area, for example through measures to increase carbon stored in natural and working (e.g., agricultural) lands and through actions that do not result in quantified reductions but contribute towards net zero efforts.

Attaining a 43.6 percent reduction in GHG emissions would require that annual emissions be reduced to approximately 1,683,156 $MTCO_2e$ in 2030, which is approximately

1,300,844 $MTCO_2e$ lower than 2019 levels. To achieve long-term GHG reductions, the County would need to reduce emissions to 434,185 $MTCO_2e$ by 2045, or approximately 2,549,815 $MTCO_2e$ (85.4 percent) below 2019 GHG emissions levels.

As described in Chapter 3 of the CAP, the County has established 2030 and 2045 GHG emissions reduction targets (43.6 percent and 85.4 percent below 2019 levels, respectively), and a 2045 net zero emissions goal (100 percent below 2019 levels) to reduce annual emissions levels, consistent with state regulations and guidelines and Board of Supervisors' direction. To meet the County's 2030 and 2045 targets, the County would need to achieve an annual reduction of 713,844 $MTCO_2e$ by 2030 and 1,243,815 $MTCO_2e$ by 2045 beyond emissions projections.

To close the emissions gap, the CAP proposes nine GHG Reduction Strategies, 21 GHG reduction measures, and 35 quantified implementing actions that the County would implement to reduce GHG emissions to reach emission reduction targets. Of the 35 quantified implementing actions, four of these implementing actions reduce emissions in natural and working lands through measures that increase carbon storage, and an additional 35 unquantified "Path to Net Zero" actions outline steps the County will take to reach the 2045 net zero emissions goal. These GHG reduction strategies, measures, and actions are discussed in further detail below and described in full in Table 1-2, "Proposed GHG Reduction Strategies, Measures, and Actions," presented at the end of this chapter.

GHG Emissions Reductions Strategies

The CAP Update includes strategies, measures, and actions intended to reduce GHG emissions from five emissions sectors, as described below. To put the County on a pathway to net zero emissions, measures and actions within each sector are guided by a vision statement that describes what an equitable, net zero emissions future would look like. Vision statements were formed by the public through robust community outreach and engagement as described in Chapter 2 of the CAP Update.

The strategies, measures, and actions are defined in detail in Table 1-2, below. Strategies describe the overall approach and expected results to achieve the sector's vision statement and focus efforts to improve equitable outcomes by prioritizing complimentary benefits such as clean air and access to sustainable energy and efficient water supplies. Measures detail the specific programs and actions that the County will carry out to achieve the strategies and reduce GHG emissions. As implementation of the measures and actions associated with each overarching strategy represents the element of the CAP Update that could result in physical impacts to the environment, this project component is the focus of this SEIR analysis. As described in Chapter 2, "Environmental Effects of the Project," of this SEIR, the analysis of impacts that would result from implementation of the CAP Update is conducted at a program level; therefore, many of the specific projects that would be implemented consistent with the CAP Update strategies, measures, and actions (as detailed in Table 1-2, below) would require subsequent CEQA review. Following is a summary of the types of activities that would occur under each grouping of strategies.

Solid Waste

Measures and actions in this group would increase waste diversion and reduce waste generation. Although the County does not collect solid waste from the community, it influences and supports waste diversion through solid waste management agreements with waste collectors, zero waste policies and programs for County operations and the community, and ordinances that direct material separation and diversion. By advancing waste reduction, reuse, recycling, and composting, the County strives for zero-waste (90-percent diversion) from County operations by 2030 and in the unincorporated area by 2045. The County would continue to implement and expand upon the Strategic Plan to Reduce Waste by employing the concepts of a circular economy, which includes reducing and reusing materials and recapturing waste as a resource to create new materials and products. Additionally, the County would expand education campaigns around zero-waste, increase evaluation of recycling streams to ensure only recyclable products are in the recycling stream, and provide more opportunities for community members to participate in reuse events.

Although the County-operated, closed landfills and former refuse burning sites no longer accept municipal solid waste, the County's Landfill Management Unit monitors and maintains these sites to minimize impacts to the environment and to protect public health and safety. Action SW-3.1 would expand upon existing waste management practices (e.g., cover improvement, and system upgrades) to reduce surface and fugitive emissions at County landfills. These practices would also be incentivized at privately managed landfills to reduce surface and fugitive emissions in the unincorporated county. In addition, measures and actions would incentivize the development of new composting/anaerobic digestion facilities and on-farm digesters (e.g., amend zoning ordinance to pre-zone or permit land for composting/anaerobic digestion, provide technical assistance) to divert compostable waste from landfills in the unincorporated area. Any new composting/anaerobic digestion facilities would be located in areas of the county zoned for industrial land use or subject to a use permit and subject to future discretionary action.

Water and Wastewater

This category includes measures to decrease potable water consumption and increase stormwater collection and reuse. Through implementation of these measures and actions, the County would ensure that all County facilities are installing water efficiency and water reuse systems wherever feasible; new development meets certain water efficiency standards and explores reuse opportunities; existing development is mandated and/or incentivized to increase water efficiency and reuse (through building permits); and County programs are expanded to reduce emissions associated with wastewater. Measures and actions would increase water savings and reuse through incentives, policy changes, and expansion to existing County-led programs.

Agriculture and Conservation

This category includes agricultural programs, carbon farming, and natural lands restoration. The CAP Update includes measures and actions that would support the

agricultural community and have important co-benefits such as water conservation and associated savings on utility bills and improved air and soil quality. Opportunities for the construction of farmworker housing also would be explored through the CAP Update. Measures and actions would reduce emissions from agricultural off-road equipment, energy, and water use by incentivizing replacements of diesel-powered farm equipment to lower emission, or electric, equipment and water and energy efficiency improvements. In addition, a carbon farming program would be developed to incentivize a variety of techniques on natural and working lands that reduce GHG emissions and provide co-benefits such as water and land conservation.

The County would also acquire conservation land and develop a framework for restoring these lands to their natural state. Acquisition of conservation land reduces emissions that would have occurred if the land were developed (as assumed in the 2011 GPU PEIR) and prevents loss of the region's unique, native habitats and wildlife biodiversity. A Habitat Restoration Resource Management Framework would guide the restoration and management of lands to increase carbon storage within the conserved areas. Measures and actions would also promote the preservation and expansion of tree canopy in the unincorporated area through the implementation of an Equity Driven Tree Planting Program to improve air and water quality, and community health. Tree planting requires increased water use to establish trees. The GHG emissions associated with this water demand are factored into the GHG benefits reported for this measure in the CAP Update. Ultimately, tree planting enriches local ecosystems, supports biodiversity, provides shade, prevents soil erosion, and buffers against wind and noise. Tree planting would be consistent with the County's established tree ordinance policies related to the types of trees (e.g., requiring drought tolerant, native species).

Energy

Measures and actions in this category would increase building energy efficiency, renewable energy, and electrification. This category includes ground or roof-mounted photovoltaic solar, and energy efficiency requirements for new construction. Through implementation of measures within this sector, County facilities would reduce emissions through zero net energy construction, building electrification, and on-site renewable energy generation. For new and existing development, the County would develop policies and programs to transition to renewable energy powered buildings and electrification. Modifications to the County's building codes would require subsequent action and would be developed in a manner consistent with federal preemption, allowing for appropriate exemptions.

Built Environment and Transportation

This category of measures would include strategies to decarbonize the on-road and off-road vehicle fleet, support active transportation, and reduce single occupancy vehicle trips. This category includes enhancements to bicycle and pedestrian infrastructure, modifications to existing roadways, and transportation demand programs. Through implementation of CAP Update measures and actions within this sector, the County would prioritize clean transportation by supporting and incentivizing access to electric vehicles

and charging infrastructure, converting the County fleet to zero-emission vehicles, and reducing transportation emissions from commercial and industrial development. The County would also influence commute trips, both in the community and in its own operations, by implementing transportation strategies and incentive programs that encourage non-vehicle mode choices, teleworking, and non-traditional work schedules. Measures and actions would implement roadway infrastructure improvements that improve transit service efficiencies and create incentive programs that expand transit access and affordability for children, seniors, and low-income families. The County would also emphasize opportunities to transition landscaping, construction, and other off-road equipment fuel types from fossil fuels to zero-emission and clean fuel options.

Implementation and Monitoring

Implementation of the CAP Update includes a combination of regulations, programs, incentives, and outreach and educational activities to reduce GHG emissions. This includes existing County initiatives such as the Multiple Species Conservation Program, Purchase of Agricultural Conservation Easement Program, and Strategic Plan to Reduce Waste, as well as the creation of new programs and efforts like an equity-driven tree planting program. County efforts complement and build upon other federal and state efforts. As noted above, a cost analysis was prepared to understand how some populations or local communities may experience disproportionate costs or impacts from CAP Update implementation. The CAP Update then applies the Equity Implementation Framework to prioritize climate action and ensure outcomes and co-benefits are realized equitably throughout the unincorporated area.

The CAP Update would be a living document that is regularly updated at least every 5 years to reflect and respond to changing technology, federal and state regulations, demographics, and market conditions. County staff would evaluate and monitor plan performance over time and make recommendations to alter or amend the plan if it is not achieving the proposed reduction targets. This would include conducting periodic GHG emissions inventory updates at least every 2 years and analyzing measure performance. Measures and actions would be annually assessed and continuously monitored to ensure that:

- all measures include clearly defined steps necessary for implementation,
- individual measures are contributing to the overall GHG reduction targets and net zero goal,
- the CAP is on track to achieve its overall GHG reduction targets, and
- equity-based outcomes are attained.

Consistent with the requirements of State CEQA Guidelines Section 15183.5(b)(1)(E), an agency is required to monitor the CAP's progress and amend it if it is determined that the plan is not achieving its specified targets. Regular monitoring and performance measuring of CAP Update activities would allow the County to make timely adjustments to existing measures; replace ineffective or obsolete actions; or add new measures as technology, federal and state programs, and circumstances change. Adjustments would be made to the CAP Update if measures fall short of the target or additional measures become

available. If amendments to the CAP are required, they will be reviewed considering CEQA's requirements for subsequent environmental review as outlined in Sections 15162–15164.

Implementation Responsibilities

After adoption, the CAP Update would be maintained by the County's Planning & Development Services Department (PDS). PDS would coordinate with other County departments to facilitate and oversee implementation, including tracking and reporting on the progress of each measure. The County's Sustainability Task Force, an internal working group is comprised of representatives from multiple County departments who lead energy efficiency, solid waste reduction, and renewable energy, and other sustainability plans, policies, and programs across the County enterprise, would also support CAP implementation and monitoring. Staff would track progress relative to the expected quantified outcomes of each GHG reduction measure and action using the Implementation and Monitoring Program described and summarized in Chapter 5 of the CAP Update. All measures and actions that would contribute to the achievement of the County's reduction targets and goals are identified. Measurable outcomes, implementation timelines, County department lead, enforcement mechanism, estimated GHG reduction potential, relative cost, and potential funding sources are summarized in a tabular format.

CAP Annual Monitoring Report

The County would conduct annual monitoring beginning 1 year after the approval of the CAP Update to track progress and identify where further efforts and additional resources may be needed. Monitoring reports would be published annually and would include the status of measure implementation using monitoring metrics to show progress in meeting the reduction targets.

Public Outreach Strategy

The County facilitated and participated in a variety of community outreach and engagement strategies throughout the development of the CAP Update as detailed in the Community Outreach and Engagement Plan (see Appendix One of the CAP). The goals of the outreach and engagement efforts were to engage the County's stakeholders early in the process to raise public awareness, solicit feedback, and provide an avenue to communicate information throughout the development of the CAP Update. The Community Outreach and Engagement Plan provides a timeline of outreach activities during the CAP Update and SEIR development process and identifies milestones during which the County has committed to engage stakeholders and to receive feedback. Further, the accompanying Outreach Plan provides contact information for responsible County staff and provides a link to the project website for ease of access to all current events related to the CAP and this draft SEIR. If the CAP Update is adopted, the County would continue its public outreach efforts so that County departments, external stakeholders, and the general public can monitor the progress and effectiveness of each CAP Update measure.

1.4.2 Consistency Modifications to the General Plan and 2011 GPU PEIR

The proposed CAP would be consistent with current regulatory standards that supersede the regulatory basis for the goals, policies, and mitigation measures in the San Diego County General Plan and 2011 GPU PEIR. The General Plan and 2011 GPU PEIR do not address GHG reductions or GHG reduction goals beyond 2020 for community emissions or County operations. Amendments to the San Diego County General Plan and revisions to mitigation measures adopted in the 2011 GPU PEIR would be required to achieve consistency among the County's planning documents and modernize the adopted targets.

Mitigation Measures CC-1.2, CC-1.7, and CC-1.8 identified in the 2011 GPU PEIR called for the preparation of a Climate Change Action Plan designed to reach specified GHG reduction targets from community and local government operations, modifications to the *County of San Diego Guidelines for Determining Significance: Climate Change* to provide guidance on the evaluation of GHG impacts considering current regulatory requirements and determine a project's consistency with the CAP, and adoption of a GHG Threshold. The proposed modifications to these mitigation measures would update the regulatory requirements and goals that would be achieved by each of these actions to make them current with existing regulatory requirements. As described below, the modifications would continue to require the same or more stringent requirements for the reduction of GHG emissions.

Specifically, Goal COS-20 in the San Diego County General Plan sets a target to reduce local GHG emissions to 1990 levels by 2020 to be consistent with the statewide goal established by AB 32. To meet this goal, the County adopted Policy COS-20.1 (County of San Diego 2011a: 5-38 and 5-39). The 2011 GPU PEIR incorporated a mitigation measure (MM CC-1.2) which, in combination with other identified mitigation measures, would achieve General Plan Goal COS-20 and Policy COS-20.1 to reduce cumulative GHG emissions within the unincorporated county to 1990 levels by 2020. The same mitigation measure also established a 2020 target for County operations (County of San Diego 2011b: 2.17-30).

2011 GPU PEIR MM CC-1.7 requires the County to incorporate CARB's recommendations for climate change CEQA thresholds into the *County of San Diego Guidelines for Determining Significance: Climate Change*. If CARB does not release the recommendations, then the County is required to prepare its own threshold(s).

2011 GPU PEIR MM CC-1.8 requires the County to revise the *County of San Diego Guidelines for Determining Significance: Climate Change* based on the CAP.

The County has determined that Goal COS-20 and Policy COS- 20.1, and 2011 GPU PEIR Mitigation Measure CC-1.2 need to be updated to reflect the requirements of SB 32 (as amended, Pavley California Global Warming Solutions Act of 2006: emissions limit), which requires statewide GHG emission reductions to 40 percent below the 1990 levels by 2030 and AB 1279, which requires net zero emissions no later than 2045. Further,

modifications to the 2011 GPU PEIR Mitigation Measures CC-1.7 and CC-1.8 are needed. The proposed changes are shown below in underline (underline) for new text and strikeout (~~strikeout~~) for deleted text.

General Plan Goal COS-20 (Governance and Administration)

Reduction of ~~local~~ community-wide (i.e., unincorporated county) and County operations GHG emissions contributing to climate change that meet or exceed requirements of the Global Warming Solutions Act of 2006, as amended by Senate Bill 32 (as amended, Pavley. California Global Warming Solutions Act of 2006: emissions limit) and Assembly Bill 1279 (2022) to achieve net zero greenhouse gas emissions no later than 2045.

General Plan Policy COS-20.1 (Climate ~~Change~~ Action Plan)

Prepare, maintain, and implement a ~~climate change action plan with a baseline inventory of GHG emissions from all sources; GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures.~~ Climate Action Plan for the reduction of community-wide (i.e., unincorporated county) and County operations GHG emissions consistent with the California Environmental Quality Act (CEQA) Guidelines Section 15183.5 (or as amended).

2011 GPU PEIR Mitigation Measure (MM) CC-1.2

Prepare a ~~County Climate Change Action Plan with an updated baseline inventory of GHG emissions from all sources, more detailed GHG emissions reduction targets and deadlines; and a comprehensive and enforceable GHG emissions reduction measures that will achieve a 17% reduction in emissions from County operations from 2006 by 2020 and a 9% reduction in community emissions between 2006 and 2020. Once prepared, implementation of the plan will be monitored and progress reported on a regular basis.~~ Climate Action Plan for the reduction of community-wide (i.e., unincorporated county) and County operations greenhouse gas emissions consistent with state-legislative targets, as described in General Plan Goal COS-20, and consistent with State CEQA Guidelines Section 15183.5 or as amended, as referenced in General Plan Policy COS-20.1. As described in Section 15183.5, the key elements of the Climate Action Plan would include:

"State CEQA Guidelines Section 15183.5(b)(1):

(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;

(F) Be adopted in a public process following environmental review."

Once prepared, implementation of the Climate Action Plan will be monitored and progress reported on a regular basis, as follows:

- Implementation Monitoring Report – prepared annually;
- Greenhouse Gas Emissions Inventory – updated every two years; and
- Climate Action Plan – updated at least every five years.

2011 GPU PEIR MM CC-1.7

~~Incorporate the California ARB's recommendations for a climate change CEQA threshold into the County Guidelines for Determining Significance for Climate Change. These recommendations will include energy, waste, water, and transportation performance measures for new discretionary projects in order to reduce GHG emissions. Should the recommendation not be released in a timely manner,~~ T~~t~~he County will prepare and adopt its own threshold for GHG emissions and shall include this threshold in the *County of San Diego Guidelines for Determining Significance: Climate Change*.

2011 GPU PEIR MM CC-1.8

~~Revise~~ Prepare *County of San Diego Guidelines for Determining Significance: Climate Change* ~~based on the Climate Change Action Plan~~. The ~~revisions~~ guidelines will ~~include guidance for~~ identify the specific actions proposed discretionary projects will need to take to ~~achieve greater energy, water, waste, and transportation efficiency~~ demonstrate consistency with the Climate Action Plan pursuant to Section 15183.5 of the State CEQA Guidelines or as amended, as described in the 2011 General Plan Update Program EIR Mitigation Measure CC-1.2, as amended.

1.4.3 GHG Threshold, Guidelines for Determining Significances

The project includes the preparation of the *County of San Diego Guidelines for Determining Significance: Climate Change* document, which includes the following components:

a) GHG Threshold: Establishes the County's Threshold of Significance for evaluation of GHG impacts as noted below. Adoption of a GHG Threshold is considered as a separate discretionary action.

b) CAP Requirements: This section discusses the requirements for projects to demonstrate compliance with the CAP and the streamlining provisions that may be applicable under CEQA.

c) CAP Consistency Review Checklist: An appendix to the *County of San Diego Guidelines for Determining Significance: Climate Change* would contain a checklist that would include reduction measures to be implemented by proposed discretionary projects and would be used to determine consistency with the CAP.

The *County of San Diego Guidelines for Determining Significance: Climate Change* would be brought forward to the County Board of Supervisors for approval as a separate document from the CAP Update, but are to be considered concurrently with the CAP Update. The guidelines would include a GHG Threshold of Significance of general applicability to be considered for approval by the Board of Supervisors per State CEQA Guidelines Section 15064.7. The proposed threshold of significance is "consistency with the CAP," which would be determined through the CAP Consistency Review Checklist (Checklist). Consistency with the CAP Update would be the only threshold of significance for County projects.

All discretionary projects that are subject to CEQA, no matter the size of the project, would be evaluated for consistency with the CAP Update. The Checklist has been incorporated as an appendix to the *County of San Diego Guidelines for Determining Significance: Climate Change* and would be the mechanism that is utilized to demonstrate compliance with the CAP Update.

1.5 Type and Intended Uses of This Supplemental Environmental Impact Report

1.5.1 Type of Document

An EIR is used to inform public agency decision makers and the public of the significant environmental effects of a project, identify ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental effects. CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before acting on those projects (Public Resources Code

[PRC] Section 21000 et seq.). According to State CEQA Guidelines Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental effect. The County, acting as lead agency, has prepared this SEIR based on direction from the Board of Supervisors to provide the public and responsible and trustee agencies with information about the potential environmental effects of the proposed project. Public agencies are charged with the duty to consider and minimize environmental impacts of projects, where feasible, and an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

1.5.1.1 Program Environmental Impact Report

The 2011 GPU PEIR is a programmatic document. As a programmatic EIR, this document enables the County to consider broad environmental implications on a conceptual basis, recognizing that a series of actions, potentially including additional CEQA review, will occur prior to development of specific projects. The 2011 GPU PEIR identifies and mitigates the effects of the overall program of development within the county, and the County incorporates feasible mitigation measures and alternatives developed in the PEIR into subsequent actions to implement the General Plan. Once a PEIR has been prepared, subsequent activities within the program must be evaluated to determine if additional CEQA documentation is required to address the potentially significant impacts of such activities. Subsequent activities could be found to be within the PEIR scope if impacts of the subsequent activities are covered in the PEIR and additional environmental documents may not be required (State CEQA Guidelines Section 15168[c]).

1.5.1.2 Supplemental Environmental Impact Report

State CEQA Guidelines Sections 15162–15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously certified EIR covering the project for which a subsequent discretionary action is required. This EIR has been prepared as a Supplement to the 2011 GPU PEIR consistent with the State CEQA Guidelines.

If a subsequent activity could result in effects not within the scope of the PEIR, including the potential for new or more severe significant impacts than identified in the PEIR, the lead agency must prepare a negative declaration, mitigated negative declaration, or an EIR. Pursuant to State CEQA Guidelines Section 15163, an SEIR should be prepared if an EIR has been certified for a project, but one or more of the following conditions from State CEQA Guidelines Section 15162 are met:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative

Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration.

B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The County certified the 2011 GPU PEIR (State Clearinghouse No. 2002111067) and adopted the General Plan. As noted above, the proposed CAP Update is a comprehensive plan that identifies strategies, measures, and actions for addressing state GHG legislation and implementing the 2011 GPU PEIR mitigation; the GPA for the CAP is related to a limited set of policies of the County's General Plan; and the *County of San Diego Guidelines for Determining Significance: Climate Change* establish the regulatory framework for determining significance in compliance with existing 2011 GPU PEIR mitigation including the adoption of a GHG Threshold. Due to the proposed modifications to the adopted General Plan, and pursuant to the Appellate Court decision requiring the County to rescind certification of the 2018 SEIR, the County has determined that preparation of an SEIR is appropriate, per the requirements of State CEQA Guidelines Section 15163. This document will address whether the CAP Update, GPA, *County of San Diego Guidelines for Determining Significance: Climate Change*, and GHG Threshold (including the CAP Consistency Review Checklist) would result in any new or substantially more severe environmental impacts than those previously evaluated in the certified 2011 GPU PEIR.

Throughout Chapter 2, "Environmental Effects of the Project," of this draft SEIR, the resource evaluations rely on pertinent information that is provided in the 2011 GPU PEIR, including the existing conditions and regulatory framework discussions and impact conclusions, to determine whether the proposed CAP Update would result in any new or more significant impacts as compared to the conclusions of the 2011 GPU PEIR. Where necessary, setting and regulatory information is updated with any changes that have

occurred since the adoption of the General Plan. Where potentially significant impacts would occur with implementation of the CAP Update, a determination is made with respect to whether there would be any new or more significant impacts after application of relevant 2011 GPU PEIR mitigation measures. The approach to the SEIR analysis is discussed in further detail in the introduction to Chapter 2, "Environmental Effects of the Project."

In accordance with Section 15150 of the State CEQA Guidelines, information from the 2011 GPU PEIR is hereby incorporated by reference into this draft SEIR. The 2011 GPU PEIR can be accessed online at:

http://www.sandiegocounty.gov/content/sdc/pds/gpupdate/environmental.html

Also incorporated by reference, the General Plan, as amended, is available online at:

https://www.sandiegocounty.gov/pds/generalplan.html

As an informational document for decision makers, a draft SEIR is not intended to recommend either approval or denial of a project. CEQA requires the decision makers to balance the benefits of a project against its unavoidable environmental impacts. If environmental impacts are identified as significant and unavoidable (i.e., no feasible mitigation is available to reduce the impact to a less-than-significant level), the County may still approve the project if it believes that social, economic, or other benefits outweigh the unavoidable impacts. The County would then be required to make findings and state, in writing, the specific reasons for approving the project, based on information in this draft SEIR and other information in the administrative record. In accordance with Section 15093 of the State CEQA Guidelines, the document containing such reasons is called a "statement of overriding considerations."

1.5.2 Future CEQA Streamlining of Greenhouse Gas Analyses

Under CEQA, projects that require discretionary approval must disclose whether they would generate GHG emissions that would have a significant impact on the environment, or if they would conflict with a plan or regulation adopted to reduce emissions. Recognizing that addressing GHG emissions may be best achieved through local government programs that approach the topic holistically, Section 15183.5 of the State CEQA Guidelines establishes a mechanism for agencies to prepare a plan for the reduction of GHG emissions that analyzes and mitigates the effects of GHG emissions at a programmatic level. Pursuant to State CEQA Guidelines Section 15182.5(b)(2), if adopted following certification of this SEIR, the CAP Update may then be used in the cumulative impacts analysis of later projects. Such "later activities" could include actions to implement CAP Update measures and actions, measures required of future discretionary projects, and actions to implement buildout of the General Plan through the planning horizon (e.g., wireless facilities, roadway improvements, County parks and libraries). These "later activities" that are consistent with the General Plan could show consistency with the CAP Update via the CAP Consistency Review Checklist and streamline future GHG analysis. Proposed or future GPAs would not be eligible for streamlining because they are not, by definition, consistent with the General Plan.

To use the tiering and streamlining provisions of Section 15183.5, agencies must prepare a plan that meets certain requirements described as follows in Section 15183.5(b)(1):

"(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;

(F) Be adopted in a public process following environmental review."

The CAP Update has been prepared in accordance with the plan elements described in State CEQA Guidelines Section 15183.5(b)(1). This draft SEIR provides the appropriate level of environmental review to allow future projects to tier from and streamline their analysis of GHG emissions pursuant to State CEQA Guidelines Section 15183.5(a) and (b)(2). An environmental document that relies on demonstrated CAP Update consistency to reduce GHG emissions would be required to identify those requirements specified in the CAP Update that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. Consistent with State CEQA Guidelines 15168, because this SEIR does not provide project-level review of specific development projects within the county, future discretionary activities may require subsequent CEQA analysis if their impacts are not adequately considered and mitigated, as necessary, within this SEIR.[6] If there is substantial evidence that the effects of a particular project may be cumulatively considerable notwithstanding the project's compliance with the specified requirements in the plan for the reduction of GHG emissions (i.e., the CAP), a CEQA analysis of GHG emissions would be prepared for the project.

Therefore, the qualified CAP Update, this SEIR, and the CAP's Guidelines for Determining Significance (including the Consistency Review Checklist) are based on substantial evidence and work together to provide the programmatic environmental review and streamlining mechanism for the evaluation of GHG emissions of future development projects.

[6] The Appellate Court ruling requires analysis of in-process GPAs considering what project-level information is available. The cumulative impacts analysis section will evaluate relevant information for in-process GPAs available at the time of writing this draft SEIR and prior to public review. This section on streamlining does not apply to GPAs.

1.5.2.1 Determining GHG Emissions at the Project Level

After adoption of the CAP Update, all discretionary projects that are subject to CEQA would be evaluated for consistency with the CAP Update. The CAP Consistency Review Checklist (Checklist) has been incorporated as an appendix to the *County of San Diego Guidelines for Determining Significance: Climate Change* and would be the mechanism that is used to demonstrate compliance with the CAP Update. The determination of consistency with the CAP would be evaluated utilizing the following two approaches:

- First Approach: If the project is consistent with the County's General Plan, then the project could use the CEQA streamlining provision, State CEQA Guidelines Section 15183.5, which would allow the project to tier from and incorporate by reference the GHG emissions analysis presented in the SEIR, upon certification. To show consistency with the CAP Update, the project would be required to implement applicable GHG reduction measures as adopted in the CAP Update and outlined in the Checklist.
- Second Approach: If the project is not consistent with the General Plan and would require a GPA, then the project would not qualify for the CEQA streamlining provision and would be required to prepare a project-specific GHG emissions analysis. If the project is requesting a GPA but not requesting an increase in density or intensity beyond what is allowed in the General Plan and GHG emission projections contained in the CAP Update, then the project could potentially achieve consistency with the CAP by implementing applicable GHG reduction measures as adopted in the CAP Update and outlined in the Checklist. The analysis conducted in the Checklist would need to demonstrate how the project would achieve consistency with the CAP through implementation of the measures outlined in the Checklist.

1.6 Required Approvals and Review Process

1.6.1 Required Project Approvals

The discretionary actions associated with the project are listed in Table 1-3, "Required Project Approvals," presented at the end of this chapter.

The SEIR is intended to apply to all listed project approvals as well as to any other approvals necessary or desirable to implement the project.

1.6.2 EIR Review Process

This section describes the environmental review process required under CEQA, including (1) the public and agency review requirements for this draft SEIR; (2) the required draft SEIR approvals; and (3) CEQA Findings, Mitigation Monitoring and Reporting Program (MMRP), and Statement of Overriding Considerations. The County of San Diego PDS is the custodian of all CAP Update and SEIR records.

1.6.2.1 Public and Agency Review

In compliance with State CEQA Guidelines Section 15082, a Notice of Preparation (NOP) for this draft SEIR was distributed to the California State Clearinghouse; relevant responsible and trustee agencies; other local, state, and federal agencies; and interested individuals and organizations. The 57-day public comment period for the NOP began on December 10, 2020, and ended on February 4, 2021. The NOP was published in the San Diego Union-Tribune newspaper, posted to the project's webpage, and distributed to the CAP Update email notification list. The NOP was posted at the PDS Zoning Counter and distributed to all public libraries located within the unincorporated county. In addition, a scoping meeting was held virtually on January 28, 2021, to allow for input from the public, affected agencies, and interested organizations. The NOP and written comments received during the NOP review period are included in Appendix A of this draft SEIR.

Comments on this draft SEIR should be sent to CAP@sdcounty.ca.gov or at the following address:

County of San Diego
ATTN: Meghan Kelly
Climate Action Plan SEIR
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

This draft SEIR is available for public review at:

County of San Diego PDS
Project Processing Counter
5510 Overland Avenue, Suite 110
San Diego, CA 92123
(8:00 a.m. to 4:00 p.m., Monday through Friday).

The following County Public Library Branches
(Visit http://www.sdcl.org/locations_ALL-BRANCHES.html for locations and hours):

- Fallbrook, 124 South Mission Road, Fallbrook, CA 92028, (760) 731-4650
- Ramona, 1275 Main Street, Ramona, CA 92065, (760) 788-5270
- Rancho San Diego, 11555 Via Rancho San Diego, El Cajon, CA 92019, (619) 660-5370
- Rancho Santa Fe, 17040 Avenida de Acacias, Rancho Santa Fe, CA 92067, (858) 756-2512
- Spring Valley, 836 Kempton Street, Spring Valley, CA 91977, (619) 463-3006

Online at http://www.sandiegocounty.gov/content/sdc/pds/ceqa_public_review.html and https://www.sandiegocounty.gov/content/sdc/sustainability/cap.html and https://engage.sandiegocounty.gov/cap.

A USB drive containing the draft SEIR can also be obtained by contacting Meghan Kelly at (619) 323-6462 or Meghan.Kelly@sdcounty.ca.gov.

1.6.2.2 SEIR Approvals

Written comments received on this draft SEIR during the 60-day public review period will be responded to in writing in a response to comments document. The response to comments document, together with this draft SEIR, will constitute the final SEIR. If any text changes are identified to address public comments received during the public review period for this draft SEIR, such changes will be reflected in the final SEIR.

The County Board of Supervisors will review and consider the final SEIR for the CAP Update, GPA, GHG Threshold, and *County of San Diego Guidelines for Determining Significance: Climate Change* to decide whether the final SEIR is consistent with the requirements of CEQA and conclude whether to certify the document.

1.6.2.3 CEQA Findings, Mitigation Monitoring and Reporting Program, and Statement of Overriding Considerations

Following certification of an EIR, CEQA requires that a lead agency make written findings for each of the potentially significant environmental effects associated with the project.

In addition, PRC Section 21081.6 requires that lead agencies adopt an MMRP for any project with significant environmental effects. An MMRP is required for the CAP Update, GPA, *County of San Diego Guidelines for Determining Significance: Climate Change*, and GHG Threshold, and will be prepared as part of the final SEIR. The MMRP will provide a list of all proposed mitigation measures; define the parties responsible for implementation and review/approval; and identify the timing for implementation of each measure. This information is contained in Chapter 8, “Mitigation Measures,” of this draft SEIR.

For significant unavoidable impacts (if required), a Statement of Overriding Considerations will be included in the Final SEIR for the project which will provide reasoning as to why the significant unavoidable environmental impacts are outweighed by the benefits that would result with implementation of the project.

1.6.2.4 Additional Review and Consultation Requirements

The project is subject to other review and consultation requirements in addition to the discretionary approvals identified in Table 1-3, “Required Project Approvals,” below. To date, the County has engaged in consultation with the following entities regarding the project:

- **Tribal Governments.** California Native American tribes culturally affiliated with the unincorporated county that had previously requested to be notified of projects subject to AB 52 consultation have been contacted for input regarding the potential impacts the project would have on TCRs. The following tribal representatives were contacted on June 21, 2021, by email and/or on June 23, 2021, by certified mail:

- Barona Group of the Capitan Grande, Art Bunce
- Campo Kumeyaay Nation, Jonathan Meza
- Jamul Indian Village, Lisa Cumper, Tribal Historic Preservation Officer
- Kwaaymii Band of Mission Indians, Carmen Lucas
- Manzanita Band of the Kumeyaay Nation, Angela Elliott-Santos, Chairperson, and Lisa Haws
- Pala Band of Mission Indians, Shasta Gaughen, Tribal Historic Preservation Officer
- Pechanga Band of Mission Indians, Juan Ochoa, Assistant Tribal Historic Preservation Officer; Michele Fahley, Counsel; and Ebru Ozdil
- Rincon San Luiseno Band of Mission Indians, Cheryl Madrigal
- San Luis Rey Band of Mission Indians, Cami Mojado
- San Pasqual Band of Mission Indians, Angelina Guitierrez
- lipay Nation of Santa Ysabel, Virgil Perez, Chairperson
- Soboba Band of Mission Indians, Joseph Ontiveros
- Sycuan Band of the Kumeyaay Nation, Cody Martinez, Chairperson; Adam Day, Chief Administrative Officer; and Kristie Orosco
- Viejas Band of Kumeyaay Indians, Ernest Pingleton, and /Ray Teran

The Viejas Band of Kumeyaay Indians and the Rincon Band of Luiseño Indians have requested consultation. Meetings with the Viejas Band of Kumeyaay Indians took place on July 28, 2021; October 27, 2021; and September 21, 2022. Meetings with the Rincon Band of Luiseño Indians took place on September 2, 2021; December 2, 2021; March 15, 2022; October 12, 2022; March 20, 2023; April 24, 2023; June 20, 2023; and August 7, 2023. Both tribes have concluded consultation.

- **Planning and Sponsor Groups.** The County has engaged all 26 planning and sponsor groups within the County to obtain input on the project throughout the process.
- **Community and Stakeholder Groups.** In addition, the County provided over 112 meetings with various organizations and individuals to obtain input and provide updates on the CAP Update and smart growth alternative development process.
- **State and Federal Agencies.** The County has engaged the following agencies to obtain input on the project:
  - California Department of Forestry and Fire Protection;
  - California Department of Transportation-District 11;
  - California Coastal Commission;
  - California Department of Conservation;

- California Energy Commission;
- California Department of Fish and Wildlife- South Coast Region 5;
- California Department of Food and Agriculture;
- California Department of Resources Recycling and Recovery Integrated Waste Management Board;
- Native American Heritage Commission;
- California Office of Emergency Services;
- California Office of Historic Preservation;
- California Department of Parks and Recreation;
- Regional Water Quality Control Board-Regions 7 and 9;
- California State Lands Commission; California Department of Water Resources;
- United States Fish and Wildlife Service.

- **Other.** The County sent the Notice of Completion of the availability of this draft SEIR to the State Clearinghouse on October 19, 2023, for distribution to all potential responsible and trustee agencies.

In addition to required consultation, the CAP Update process involved extensive public outreach, including over 300 organizations. The goals of the County's outreach efforts are to raise awareness and inform the public about the CAP Update, provide multiple opportunities for input at various stages of the CAP Update development, provide opportunities to influence decision-making on the CAP Update, and meet the requirements of CEQA. In recognition of the importance of public participation in the planning process, PDS undertook an effort to develop a Community Outreach and Engagement Plan to establish specific opportunities for the public to collaborate with staff on key strategies to achieve GHG reduction targets and reduce the effects of a changing climate in their local communities. Outreach efforts are summarized below and described in detail in Chapter 2 of the CAP Update.

1.7 Project Consistency with Applicable Plans

There are 19 jurisdictions in San Diego County, including the unincorporated County, with local land use authority and the responsibility for preparing their own general plans and general plan EIRs. Regional coordination is necessary to guide overall development and ensure an efficient allocation of infrastructure funding. The San Diego Association of Governments (SANDAG) serves as the region's Metropolitan Planning Organization responsible for area-wide coordination and the technical and informational resource for the region's local jurisdictions. SANDAG prepares regional transportation plans, which provide a basis for allocating federal and state funds used for specific items such as land use incentives and transportation improvements. The County works with the San Diego County Regional Airport Authority on a regular basis to ensure land use compatibility with regional airports. Other agencies with regional plans that affect land use in the county are

the San Diego Regional Water Quality Control Board, the San Diego Air Pollution Control District, the San Diego County Water Authority, the San Diego Metropolitan Transit System, the North County Transit District, and Marine Corps Base Camp Pendleton.

Additionally, the CAP Update must maintain internal consistency with the General Plan, community plans, specific plans, and other applicable countywide plans. The following represents a non-exhaustive list of applicable plans that are evaluated for consistency within the draft SEIR:

- General Plan goals and policies,
- General Plan elements,
- Community Plans,
- 2020-2030 County Operations Strategic Sustainability Plan Comprehensive Renewable Energy Plan,
- Multi-Jurisdictional Hazard Mitigation Plan,
- Local Coastal Program Land Use Plan, and
- Strategic Plan to Reduce Waste.

The project complies with all the above-named plans and programs and with the proposed GPA portion of the project which would amend Goal COS-20 and Policy COS-20.1 of the General Plan and Mitigation Measures CC-1.2, CC-1.7, and CC-1.8 adopted in the 2011 GPU PEIR. The project's compliance with plans and programs is specifically evaluated in Section 2.10, "Land Use and Planning," and throughout this draft SEIR as applicable.

1.8 SEIR Organization

The content and organization of the draft SEIR is designed to meet the requirements of CEQA and the State CEQA Guidelines, as well as to present issues, analysis, mitigation, and other information in a logical and understandable way. This draft SEIR includes the following sections:

- "Summary" provides the project description and a summary of the environmental impacts that would result with CAP Update implementation, proposed mitigation measures, and the level of significance of impacts prior to and after mitigation. The section also describes the areas of controversy and issues to be resolved by the decision-making body; and identifies a summary of the CAP Update alternatives.
- Chapter 1, "Project Description," provides CEQA compliance information; an overview of the environmental review and decision-making process; purpose of the CAP, GPA, *County of San Diego Guidelines for Determining Significance: Climate Change*, and GHG Threshold; a list of responsible and trustee agencies; a summary of relevant documents incorporated by reference; a description of the project location, characteristics, and objectives; the relationship of the CAP Update to other plans and policies; the existing regional environmental setting; list of past, present, and reasonably anticipated future projects; and a discussion of growth inducing impacts.

- Chapter 2, *"*Environmental Effects of the Project*,"* contains a detailed analysis of the existing conditions; regulatory framework; direct, indirect, and cumulative impacts; and mitigation measures for each relevant environmental issue area. The analysis of each environmental category in Chapter 2 is organized as follows:
  - *"*Existing Conditions*"* describes the physical conditions that exist at the time of the 2011 GPU PEIR conditions if unchanged, or the NOP for this draft SEIR if the baseline changed, that may influence or affect the topic being analyzed.
  - *"*Regulatory Framework*"* provides federal, state, and local laws, including applicable San Diego County General Plan policies, that apply to the topic being analyzed.
  - *"*Analysis of Effects and Significance Determinations*"* discusses the impacts of the project in each category, including direct, indirect, and cumulative impacts and presents the *determination of the level of significance.*
  - *"*Summary of New or More Severe Significant Impacts*"* provides a brief summary of all new or substantially more severe impacts anticipated to result from implementation of the CAP Update.
  - *"*Mitigation Measures*"* provides a discussion of feasible mitigation measures to reduce any impacts.
  - *"*Significance Conclusions*"* reiterates the conclusions of the subsequent analysis considering the application of all feasible mitigation.
- Chapter 3, *"*Environmental Effects Found Not to Be Significant*,"* discusses effects found not to be significant during the NOP or the draft SEIR process.
- Chapter 4, *"*Other CEQA Sections*,"* discusses growth inducement, significant and unavoidable adverse impacts, and significant irreversible environmental changes. This chapter also includes a discussion of the cumulative impacts of in-process GPAs.
- Chapter 5, *"*Alternatives*,"* evaluates the range of alternatives to the CAP Update. The environmentally superior alternative is identified. This chapter includes the smart growth alternatives.
- Chapter 6, *"*References*,"* identifies reference sources for this draft SEIR.
- Chapter 7, *"*Preparers*,"* lists the organizations and persons contacted during preparation of this draft SEIR.
- Chapter 8, *"*Mitigation Measures*,"* lists applicable mitigation measures by topic.

1.9 Key Terminology

GHG Emissions Inventory. Using internationally established and accepted protocols for GHG accounting, the inventory identifies and measures the major sources of GHG emissions from activities occurring within the unincorporated area and from County operations. The 2019 inventory forms the basis of future projections and reduction targets.

Emissions Projections. Emissions projections illustrate what the County's GHG emissions would look like without implementation of the CAP Update. Projections show the scale of reductions needed to meet the established reduction targets and goal of achieving net zero emissions. The CAP Update's emissions projections estimate future emissions by considering forecasted growth in population, housing units, and employment, and the impact of adopted legislation and regulations on future emissions.

Emissions Reduction Targets. Emissions targets identify the level of emissions reductions that need to be achieved by the target year (i.e., level that emissions need to be reduced *to*). The CAP Update sets 2030 and 2045 emissions reduction targets for the County that are consistent with emission reduction targets established by the state.

CAP Update Measures and Actions. Measures and actions are the specific programs and activities that the County will carry out to implement the strategies in the CAP Update. Measures require that the County has jurisdiction to carry out the action, be additional to existing regulations from the state or federal government, be achievable, and be able to be monitored for progress over time. Measures reduce GHG emissions in three primary ways. First, some measures focus on creating new opportunities to avoid emissions, such as replacing gas-powered appliances with electric alternatives. Second, some measures seek to reduce emissions, such as implementing a County employee teleworking program that reduces the number of miles employees drive to work every week. Finally, some measures function to sequester, or capture and store carbon, such as in tree planting programs or other natural lands preservation and management. Measures include implementing actions that result in quantifiable GHG emissions reductions that provide other co-benefits like improved community health or air quality, new renewable energy and manufacturing jobs, and increased access to clean transportation, among others. Measures also include supporting, or "Path to Net Zero," actions that contribute to achievement of the sector's vision and put the County on a path to net zero emissions.

Table 1-1 Summary of SEIR Response to 2020 Appellate Court Ruling

Topic	Issue	SEIR Response
2018 SEIR Mitigation Measure M-GHG-1	M-GHG-1 violates CEQA because it contains unenforceable performance standards and improperly defers and delegates mitigation.	M-GHG-1 is a mitigation measure that was included in the 2018 SEIR. It provided two options for in-process and futures GPAs to "ensure that CAP emission forecasts are not substantially altered such that attainment of GHG reduction targets could not be achieved" - a "No Net Increase" option and a "Net Zero" option. These options included the potential to purchase carbon offset credits after all feasible onsite design features and mitigation measures had been incorporated. No equivalent mitigation is proposed in this SEIR for in-process or future GPAs, and the CAP Update and this SEIR do not provide a pathway for GPAs to comply with the CAP Update. In-process and future GPAs will have to conduct their own GHG analysis. See Chapter 4, "Other CEQA Sections." This SEIR includes documentation as to whether the County can meet its GHG reduction target through implementation of the CAP Update. The SEIR assumes that future projects consistent with the CAP Update, and which can rely upon such consistency to streamline the analysis of and mitigate their GHG impacts, consist of future projects anticipated in the General Plan and included in the CAP Update's GHG emission projections. This SEIR does not identify mitigation that includes an option to purchase carbon offset credits and the CAP Update does not rely upon offsets to meet established targets.
Cumulative Impacts from In-Process GPAs	The County abused its discretion in approving the CAP because the projected additional GHG emissions from projects requiring general plan amendments are not supported by substantial evidence.	This SEIR includes a discrete evaluation of the effect of all known, in-process GPAs on cumulative conditions in the unincorporated county. The discussion includes quantification of GHG emissions from the identified GPAs. See Chapter 4, "Other CEQA Sections."

Topic	Issue	SEIR Response
Conflicts with Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)	Substantial evidence was not provided to support the determination that the CAP was consistent with RTP/SCS and SB 375 in that the impacts of in-process GPAs would be mitigated by M-GHG-1. GPAs are not included in SANDAG'S RTP/SCS land use forecasts.	M-GHG-1 is a mitigation measure that was included in the 2018 SEIR. It provided two options for in-process and futures GPAs to "ensure that CAP emission forecasts are not substantially altered such that attainment of GHG reduction targets could not be achieved" - a "No Net Increase" option and a "Net Zero" option. No equivalent mitigation is proposed in this SEIR. This SEIR includes evaluation of the CAP Update's consistency with the RTP/SCS. Section 2.6, "Energy," addresses consistency with RTP/SCS goals and strategies related to energy use in its analysis of whether the CAP Update would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Section 2.8, "Greenhouse Gas Emissions," addresses consistency/conflicts with the RTP/SCS in terms of the CAP Update's alignment with the overall goals of the RTP/SCS. Section 2.11, "Land Use and Planning," addresses the CAP Update's consistency with the projects, policies, and programs presented in the RTP/SCS. Section 2.13, "Transportation," addresses VMT impacts associated with the proposed CAP Update and the project's consistency with the RTP/SCS. Chapter 4, "Other CEQA Sections," provides an analysis of the cumulative effect of known, in-process GPA projects related to consistency with the RTP/SCS.
Smart Growth Alternatives	The County failed to include at least one "smart growth" alternative focused primarily on significantly reducing VMT.	Chapter 5, "Alternatives," of this SEIR includes an analysis of four smart growth alternatives to the project: a Fire Safe and VMT Efficient Alternative, a Village Support Areas Alternative, an alternative consistent with the RTP/SCS, and an alternative that includes potential amendments to General Plan goals and policies. These alternatives were crafted based on their ability to reduce VMT and on extensive stakeholder engagement.
Environmental Justice	The SEIR fails to address environmental justice (EJ).	Section 2.7, "Environmental Justice," has been included in the SEIR to address the potential for disproportionate effects of CAP Update implementation on EJ communities. This section identifies EJ populations within the unincorporated county, summarizes existing regulatory requirements, and evaluates the potential for CAP Update implementation to result in adverse environmental impacts that might be disproportionally borne by minority and low-income communities within the unincorporated county. Chapter 1, "Project Description," also describes climate actions in the CAP Update that would be prioritized in frontline communities by utilizing the Equity Implementation Framework to ensure equity-based outcomes and co-benefits are realized throughout the unincorporated county.

Source: Compiled by Ascent Environmental in 2023.

Table 1-2 Proposed GHG Reduction Strategies, Measures, and Actions

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
Solid Waste					
Increase Solid Waste Diversion in Unincorporated Area and in County Operations	SW-1: Achieve zero waste in County operations	SW-1.1	Adopt a County operations zero waste policy by 2030 to achieve zero waste (90% diversion).	Construction and operation of new and/or expanded solid waste processing facilities	All resource topics
		SW-1.1.a	Revise the County's Environmentally Preferred Purchasing policy (B-67) to increase the effectiveness and enforcement of the policy.	N/A	N/A
		SW-1.1.b	Educate County staff on zero waste practices to encourage greater participation and develop monitoring tools to track waste diversion.	N/A	N/A
	SW-2: Achieve zero waste within the unincorporated area	SW-2.1	Update the County's Strategic Plan to Reduce Waste by 2028 to include strategies to achieve 80% diversion by 2030 and zero waste (90% diversion) by 2045.	Construction and operation of new and/or expanded solid waste processing facilities	All resource topics
		SW-2.1.a	Monitor and evaluate contamination rates in waste, recycling, and organics containers, and establish educational programs to reduce contamination and increase the effectiveness of recycling efforts.	N/A	N/A
		SW-2.1.b	Support materials reuse events for the unincorporated area.	N/A	N/A
		SW-2.1.c	Educate the public about zero waste and encourage use of low carbon materials.	N/A	N/A

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
Increase Availability of Sustainable Solid Waste Facilities in the Unincorporated Area and County Operations	SW-3: Improve waste management practices at County-owned solid waste facilities to reduce emissions	SW-3.1	Expand landfill gas systems at County-owned landfills to exceed State requirements by 5% by 2030 and 10% by 2045.	Construction related to alteration of existing facilities	Air quality, biological resources, hazards and hazardous material, noise
	SW-4: Improve waste management practices in the unincorporated area to reduce emissions and increase waste diversion	SW-4.1	Conduct a feasibility study by 2027 and implement a landfill gas system pilot project at privately managed landfills by 2030 to exceed State requirements by 10% by 2045 in the unincorporated area.	Construction related to alteration of existing facilities	Air quality, biological resources, hazards and hazardous material, noise
		SW-4.1.a	Incentivize the development of new composting/anaerobic digestion facilities and on-farm digesters to divert compostable waste from landfills in the unincorporated area.	Construction and operation of new facilities	All resource topics
		SW-4.1.b	Study options to expand existing and/or identify new opportunities to manage hard to recycle materials in the unincorporated area through additional hauler services, drop-off locations and/or a Center for Hard to Recycle Materials.	Operation of drop-off locations including new haul routes	Air quality, noise, transportation
Water and Wastewater					
Decrease Potable Water Consumption in the Unincorporated Area and County Operations	W-1: Develop policies and programs to increase water efficiency, retention, recycling, and reuse to reduce potable water consumption in County operations	W-1.1	Implement the County's Water Efficiency Plan to require water-efficiency measures in new and existing County buildings/operations to reduce potable water use by 19% by 2030.	Minor ground disturbing effects related to construction of purpose pipe	All resource topics

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
	W-2: Develop policies and programs to increase indoor and outdoor water conservation (including water efficiency, retention, recycling, and reuse) in new and existing development in the unincorporated area	W-2.1	Amend the County's Code of Regulatory Ordinances by 2026 to require (Tier 2) CALGreen or similar water efficiency requirements and reduced outdoor water use for landscaping requirements for new development to reduce potable water consumption from new development by 17% in the unincorporated area.	N/A	N/A
		W-2.2	Amend the County's Code of Regulatory Ordinances by 2026 to require (Tier 2) CALGreen or similar water efficiency requirements for existing development projects with qualifying improvements.	N/A	N/A
		W-2.3	Update the Green Building Incentive program by 2026 to include incentives for water efficiency, conservation, and reuse improvements for new and existing development to reduce potable water consumption by in the unincorporated area.	N/A	N/A
		W-2.3.a	Collaborate across County departments to streamline and simplify graywater capture permitting process to reduce potable water use in the unincorporated area.	N/A	N/A
		W-2.3.b	Develop and distribute materials to assist renters with implementing water efficiency and conservation improvements.	N/A	N/A
		W-2.4	Implement the Waterscape Rebate Program to incentivize water efficiency and conservation to reduce outdoor water consumption in the unincorporated area.	N/A	N/A

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
Increase Stormwater Collection, Water Pumping, and Wastewater Treatment Efficiency	W-3: Develop programs to increase stormwater and wastewater treatment efficiency to reduce imported potable water use in the unincorporated area	W-3.1	Increase wastewater treatment efficiency through the East County Advanced Water Purification Program to produce 12,900 acre feet of water each year by 2030.	N/A	N/A
		W-3.1.a	Evaluate Waterscape Rebate Program septic system improvements for opportunities to reduce wastewater emissions in the unincorporated area.	N/A	N/A
Agriculture and Conservation					
Preserve Natural Lands and Improve Land Management Practices to Protect Habitat and Increase Carbon Storage	A-1: Acquire and manage conservation lands to preserve natural lands and maximize carbon storage potential in the unincorporated area	A-1.1	Acquire 11,000 acres of conservation lands by 2030 and 1,000 acres per year thereafter to preserve land in perpetuity.	N/A	Beneficial impacts related to agricultural and biological resources
		A-1.2	Develop a Habitat Restoration Resource Management Framework for County-owned land by 2030 and 80 acres per year thereafter to increase carbon storage.	Potential construction activities related to vegetation management and water use for establishment	Air quality and hydrology and water quality Beneficial impacts related to agricultural and biological resources
		A-1.2.a	Partner with tribal governments to incorporate tribal ecological knowledge and apply indigenous land management practices to contribute towards habitat restoration efforts on County land.	N/A	N/A Beneficial impacts related to agricultural and biological resources

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
	A-2: Develop a tree planting program that expands canopy across unincorporated area and prioritizes underserved communities	A-2.1	Expand the County's existing tree planting initiative and implement an Equity Driven Tree Planting Program to plant 70,560 trees by 2030 and 6,650 trees per year thereafter on County property and in the unincorporated area.	Minor ground disturbance and use of equipment related to tree planting, use of water for plant establishment	All resource topics
		A-2.1.a	Develop a program to preserve native trees in unincorporated area.	N/A	N/A
		A-2.1.b	Educate the public on the benefits and maintenance of native, fire-resistant, and drought-tolerant tree plantings.	N/A	N/A
		A-2.2	Implement the County's Landscaping Ordinance to require tree planting in new single family residential development in the unincorporated area.	Minor ground disturbance related to tree planting	Beneficial impacts related to aesthetics, air quality, greenhouse gas emissions, hydrology and water quality
Support Climate-Friendly Farming Practices and Preserve Agricultural Land	A-3: Preserve agricultural lands to prioritize carbon storage and balance economic and development goals	A-3.1	Implement the Purchase of Agricultural Conservation Easement (PACE) Program to preserve 6,058 acres of agricultural land by 2030 and 400 acres per year thereafter.	Potential physical changes related to the loss of future development potential due to conversion of existing agricultural land for agricultural uses in perpetuity	Land use and planning Beneficial impacts related to agricultural resources
	A-4: Incentivize carbon farming to expand carbon storage capacity on agricultural land and support climate-friendly farming practices in the unincorporated area	A-4.1	Develop a Carbon Farming Program by 2026 to increase carbon sequestration on 3,000 acres by 2030 and 36,214 acres by 2045.	N/A	Beneficial impacts related to greenhouse gas emissions
		A-4.1.a	Support the local food system through development of a food sourcing policy that prioritizes contracts with local, equitable, and sustainable food suppliers in County operations.	N/A	N/A

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
		A-4.1.b	Evaluate opportunities to increase farmworker housing in the unincorporated area to reduce emissions from farmworker transportation.	Potential development of farmworker housing	All resources topics
		A4.1.c	Evaluate options to incentivize voluntary alternative manure management and livestock feed projects to reduce manure management and enteric fermentation emissions in the unincorporated area.	N/A	N/A
		A-4.1.d	Evaluate options to incentivize the voluntary reduction of the use of synthetic fertilizers in the unincorporated area.	N/A	N/A
	A-5: Reduce greenhouse gas emissions from agricultural operations	A-5.1	Develop a program by 2026 to incentivize a transition to cleaner fuels and the efficient use of energy to reduce agricultural operations emissions in the unincorporated area.	N/A	N/A
		A-5.1.a	Partner with the local utility to advocate for agricultural pump rates that would incentivize electrification.	N/A	N/A
Energy					
Increase Building Energy Efficiency, Renewable Energy, and Electrification in the Unincorporated Area and County Operations	E-1: Develop policies and programs to increase energy efficiency, renewable energy use, and electrification in County operations	E-1.1	Implement the County Facilities Zero Carbon Portfolio Plan to achieve 90% reduction in operational carbon emissions by 2030 through building electrification and zero net energy construction, energy efficiency, energy management, and renewable energy use and generation.	Physical changes would be attributed to the installation, operation, and maintenance of small-scale solar systems and battery storage, or small-scale wind turbines with new residential construction which may include roof or ground-mounted systems.	All resource topics

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
	E-2: Develop policies and programs to increase energy efficiency and electrification in the unincorporated area	E-2.1	Amend the County's Code of Regulatory Ordinances by 2026 to require all-electric equipment in new residential, commercial, and industrial construction to reduce energy emissions from new development in the unincorporated area.	N/A	N/A
		E-2.2	Increase energy efficiency and reach 30% electrification in residential and 17% electrification in non-residential existing development in the unincorporated area by 2030 by: - Amending the County's Code of Regulatory Ordinances by 2026 to require (Tier 2) CALGreen or similar energy efficiency requirements for existing development projects with qualifying improvements. - Adopting a Building Energy Performance Standard by 2026 for commercial and multi-family residential properties. - Developing a program by 2026 to incentivize building electrification and energy efficiency.	Physical changes would be attributed to the installation, operation, and maintenance of small-scale solar systems and battery storage, or small-scale wind turbines with new residential construction which may include roof or ground-mounted systems.	All resource topics
		E-2.2.a	Develop and distribute materials to assist renters with implementing energy efficiency improvements.	N/A	N/A
		E-2.2.b	Develop a voluntary energy assessment/benchmarking program for existing development to identify opportunities for energy efficiency improvements.	N/A	N/A
		E-2.2.c	Develop a program to phase out propane use for existing buildings.	N/A	N/A
		E-2.2.d	Develop a program to increase energy resiliency in the unincorporated area to ensure continued access to electricity and services during extreme weather events.	N/A	N/A

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
	E-3: Develop policies and programs to increase renewable energy use, generation, and storage in the unincorporated area	E-3.1	Amend the County's Code of Regulatory Ordinances by 2026 to require (Tier 2) CALGreen or similar renewable energy requirements for new residential and non-residential construction to increase renewable energy generation in new development.	N/A	N/A
		E-3.2	Expand and implement the County's streamlined solar permitting process to install 5,002 kW of renewable energy on existing development by 2030 and 12,505 kW by 2045.	Construction and operation of solar systems and battery storage	All resources topics
		E-3.2.a	Develop a program to incentivize renewable energy on low-income homes.	N/A	N/A
		E-3.2.b	Work with partners to promote and support on-site renewable energy generation and storage to increase renewable energy generation and use in the unincorporated area.	Construction and operation of small-scale renewable energy projects (including solar and wind)	All resources topics
		E-3.2.c	Support local job training program for solar installation to support green economy workforce development.	N/A	N/A
		E-3.3	Develop a program to provide 100% renewable energy to residents and businesses participating in San Diego Community Power by 2030 in the unincorporated area.	Construction and operation of large-scale renewable energy projects (including solar and wind)	All resource topics
Built Environment and Transportation					
Decarbonize the On-Road and Off-Road Vehicle Fleet	T-1: Reduce fleet and small equipment emissions in County operations	T-1.1	Implement the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan to reduce fleet emissions 35% by 2030 and 100% by 2045.	N/A	N/A
		T-1.1a	Use alternative fuel and/or zero-emission construction equipment in County projects to reduce emissions from medium- and heavy-duty vehicles and equipment.	N/A	N/A

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
		T-1.1b	Adopt a County operations anti-idling policy to reduce emissions from vehicle idling.	N/A	N/A
		T-1.2	Amend Board policy to require 100% of landscaping equipment used on County property to be zero-emissions by 2030.	N/A	N/A
	T-2: Increase the use of low-carbon and zero-emission landscaping and off-road construction equipment in the unincorporated area	T-2.1	Develop a program by 2026 to provide residents and businesses incentives to purchase alternative fuel and/or zero-emission construction and landscaping equipment to reduce emissions by 3% by 2030.	N/A	N/A
		T-2.2	Develop and adopt a landscaping equipment ordinance to require the use of zero emission landscaping equipment by 2030 and zero emission construction equipment by 2045 in the unincorporated area.	N/A	N/A
	T-3: Install electric vehicle charging stations and provide incentives for zero-emissions vehicles in the unincorporated area	T-3.1	Increase the use of electric and other zero-emission vehicles in the unincorporated area by: - Installing 2,040 publicly available electric vehicle charging stations by 2028. - Requiring the electrification of loading docks and idling reduction in new commercial and industrial development by 2030. - Amending the County's Code of Regulatory Ordinances by 2026 to require (Tier 2) CALGreen or similar electric vehicle charging infrastructure installations and preferential parking for ZEVs for new multi-family residential and non-residential construction. - Developing a program by 2026 to incentivize EV purchases and school bus electrification.	Minimal physical effects related to installation of electric vehicle charging stations	All resource topics

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
		T-3.1a	Support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts in the unincorporated area.	Potential construction impacts and operational impacts	All resources topics
		T-3.1b	Continue to collaborate with regional partners to increase investments in zero-emission vehicles and infrastructure in the unincorporated area.	N/A	N/A
		T-3.1c	Continue updating the EV Consumer Guide website to serve as a regional resource for consumer-friendly and up-to-date information on EV-related topics and available incentives.	N/A	N/A
Support Active Transportation and Reduce Single-Occupancy Vehicle Trips	T-4: Reduce emissions from County employee commutes	T-4.1	Expand County Benefit Program by 2026 to provide County employees with tax-free transportation benefits, alternative work schedules, and expand part-time or full-time teleworking options to reduce vehicle miles traveled from employee commutes by 40% in 2030 and 60% in 2045.	N/A	N/A
		T-4.1a	Provide educational programs and campaigns to encourage County staff to walk, bike, and take transit.	N/A	N/A
		T-4.2	Develop a rebate program by 2026 for County employees to purchase electric vehicles, bicycles, and scooters for commute use.	N/A	N/A
	T-5: Improve County roadways to encourage walking, biking, rolling to/from transit and destinations and increase transportation efficiency	T-5.1	Implement the County's Active Transportation Plan to install 345 miles of sidewalk and 315 miles of bikeways by 2030 to encourage alternative modes of transportation in the unincorporated area.	Construction impacts related to new bike and/or pedestrian infrastructure	All resources topics
		T-5.1a	Develop educational materials to encourage residents and businesses to use alternative modes of transportation.	N/A	N/A

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
		T-5.1b	Use improved materials and engineering designs to make walking and transit easier.	N/A	N/A
		T-5.2	Develop a countywide Safe Routes to Schools program to reduce vehicle miles traveled to schools by 1.2% by 2030.	N/A	N/A
	T-6: Support transit and transportation demand management to reduce single occupancy vehicle trips in the unincorporated area	T-6.1	Develop a program to provide free transit passes and/or free trips in the unincorporated area to reduce vehicle miles traveled in the unincorporated area by 1.2% by 2030.	N/A	N/A
		T-6.2	Increase access to Transit Priority Areas by 5% in the unincorporated area and implement transit-supportive roadway treatments such as traffic signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians by 2030.	Construction impacts related to new infrastructure	All resources topics
		T-6.2a	Adopt a Transportation Demand Management ordinance to include pre-approved options for new development to reduce single occupancy vehicle trips in the unincorporated area.	N/A	N/A
		T-6.2b	Evaluate options for increasing transit service to unincorporated communities.	N/A	N/A
		T-6.3	Increase access to first/last mile transportation services and connections (e.g., neighborhood electric vehicles, microtransit, bike/scooter-share) to reduce vehicle miles traveled by 7% within the unincorporated area by 2030.	N/A	N/A

Source: Compiled by Ascent Environmental in 2023.

Table 1-3 Required Project Approvals

Project Approval	Approving Authority
Approval of Climate Action Plan	County Board of Supervisors
Approval of General Plan Amendment Including Amendment to the 2011 General Plan Update Mitigation Monitoring and Reporting Program.	County Board of Supervisors
Approval of *County of San Diego Guidelines for Determining Significance: Climate Change*	County Board of Supervisors
Approval of GHG Threshold	County Board of Supervisors
Certification of the SEIR	County Board of Supervisors

Note: The EIR is intended to apply to all listed project approvals as well as to any other approvals necessary or desirable to implement the project.

Source: Compiled by Ascent Environmental in 2023.



Figure 1-1 **Regional Location**



Source: San Diego County

Figure 1-2 **County of San Diego Boundary**

CHAPTER 2 ENVIRONMENTAL EFFECTS OF THE PROJECT

Approach to Analysis

Environmental and Regulatory Setting

As described in Chapter 1, "Project Description," this draft SEIR has been prepared subsequent to the 2011 GPU PEIR and evaluates and discloses the environmental impacts related to implementation of the CAP Update, which is a mitigation requirement of the 2011 GPU PEIR. Each of the resource sections that follow begins with a description of applicable environmental and regulatory settings that represent the conditions against which potential impacts are evaluated. The environmental and regulatory settings for this SEIR are based on information in the 2011 GPU PEIR but have been updated to reflect physical environmental and regulatory changes over time.

Where the setting information provided in the 2011 GPU PEIR remains applicable to the analysis of the CAP Update, it is incorporated by reference in the resource section. Where changes to the environmental or regulatory setting (e.g., new information, regulatory changes) are relevant to understanding the CAP Update's potential impacts, updated or additional background information is provided in the draft SEIR resource sections. In accordance with State CEQA Guidelines Section 15125, the discussions of the environmental setting focus on information relevant to the issue under evaluation. The baseline conditions for this draft SEIR are generally consistent with the 2008 environmental baseline that was used in the 2011 GPU PEIR. (Refer to Table 1-13 in Chapter 1, "Project Description," of the 2011 GPU PEIR [page 1-59], which summarizes the baseline year for each issue and is hereby incorporated by reference.) The 2011 GPU PEIR is available for reference on the County's website: https://www.sandiegocounty.gov/content/sdc/pds/gpupdate/environmental.html.

Evaluation of Effects

The setting description in each section is followed by a discussion of impacts and mitigation.[1] In this draft SEIR, each impact discussion is divided into two parts: "Guidelines for Determination of Significance" and "Impact Analysis." The "Impact Analysis" section presents a summary of the impact discussion and conclusion in the 2011 GPU PEIR and an evaluation of the environmental impacts of the CAP Update. Relevant adopted mitigation measures from the 2011 GPU PEIR are applied, and new mitigation measures are described, where needed to feasibly address residual environmental impacts. Each impact evaluation concludes with a summary that presents an impact determination.

The thresholds used to determine the level of significance of the environmental impacts for each resource topic are provided in each resource section, in accordance with State CEQA Guidelines Sections 15126, 15126.2, and 15143. These thresholds are based on the County's published Guidelines for Determining Significance, updated as appropriate

[1] "Impacts" and "effects" are used interchangeably in CEQA.

to reflect the example questions provided in Appendix G of the State CEQA Guidelines, best available data, and applicable regulatory standards. In turn, impact statements are based on the thresholds of significance and are prefaced by a number in bold-faced type.

The impact evaluations in this SEIR update the 2011 GPU PEIR assessments to reflect the anticipated impacts of the project. The discussion includes the analysis, rationale, and substantial evidence upon which conclusions are drawn. The level of significance for each impact is determined by comparing the impacts of physical changes anticipated with implementation of the CAP Update (the project) to the environmental setting, with a focus on how the subsequent projects that may be associated with implementation of the CAP Update strategies, measures, and actions could change the significance of the impacts. As appropriate, these discussions identify whether adopted General Plan policies and 2011 GPU PEIR mitigation measures would address the potential impacts and include a statement regarding whether there would be a new significant effect and/or if the impact could be more severe than the impact identified in the 2011 GPU PEIR.

A “less-than-significant” impact is one that would not result in a substantial adverse change in the physical environment. A “potentially significant” impact or “significant” impact is one that would result in a substantial adverse change in the physical environment; both are treated the same under CEQA in terms of procedural requirements and the need to identify feasible mitigation. In accordance with State CEQA Guidelines Section 15364, “feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. Where mitigation measures are identified, a discussion of impact significance with the implementation of these measures follows.

As noted above, 2011 GPU PEIR mitigation measures are applied to the CAP Update as appropriate to avoid or minimize the impacts of its implementation. Additional mitigation measures are identified, as needed and feasible, to avoid, minimize, rectify, reduce, or compensate for significant or potentially significant impacts, in accordance with the State CEQA Guidelines Section 15126.4. A list of applicable mitigation measures follow the impact analyses and are compiled in Chapter 8 of this SEIR. The degree to which the identified mitigation measure(s) would reduce the impact is also described.

Environmental effects that are not evaluated in detail in this chapter are discussed in Chapter 3, “Environmental Effects Found Not To Be Significant.”

Chapter 4, “Other CEQA Sections,” presents an analysis of the CAP Update’s growth-inducing impacts, as required by State CEQA Guidelines Section 15126, as well as a summary of significant and unavoidable impacts and significant and irreversible environmental changes that could occur as a result of the CAP Update. Chapter 4 also includes a discussion of the cumulative effects of other projects before the County that would modify the adopted General Plan through a General Plan amendment (“in-process GPAs”).

For an evaluation of alternatives to the project that could reduce environmental effects, the reader is referred to Chapter 5, “Alternatives,” which presents a reasonable range of

alternatives and evaluates the environmental effects of those alternatives relative to the CAP Update, as required by Section 15126.6 of the State CEQA Guidelines. Chapter 5 also includes the smart growth alternatives analysis.

Buildout Assumptions

2011 General Plan

The buildout projections used in the evaluation of the General Plan in the 2011 GPU PEIR were based on a population forecast model that was developed by the County and that identified the population capacity associated with buildout of the General Plan land use map. The number of residential units that would result from buildout pursuant to the General Plan land use map was calculated by multiplying acreage by allowed density, after accounting for factors such as areas with existing development, areas reserved for public right-of-way, and areas with physical and environmental constraints.

The County's population model forecasted a buildout population of 678,270 with 235,861 housing units under the proposed land use map (approximately 15 percent fewer units than the previous general plan because lower-density development was identified for areas with land use constraints, such as those that lack sufficient infrastructure and services or that are prone to safety concerns, such as wildfires). The General Plan focused development in Village cores to retain the county's rural character, shifted 20 percent of the remaining dwelling unit capacity to the most western portions of the unincorporated area, and located 80 percent of the dwelling unit capacity where water can be imported and distributed by the San Diego County Water Authority.

As discussed in further detail below, the buildout assumptions under the General Plan that were evaluated in the 2011 GPU PEIR represent a conservative estimate of population growth in the unincorporated county. Given changes in regional population forecasts, changes in market conditions, and recent development patterns, the 2011 GPU PEIR forecast model no longer represents a realistic picture of buildout capacity in the unincorporated county. Therefore, the CAP Update and this SEIR analysis rely on the San Diego Association of Governments (SANDAG) population projections as a more current and realistic estimate of development potential in the unincorporated county. The rationale to consider the SANDAG estimates as a more realistic projection is provided below.

San Diego Association of Governments

SANDAG estimates and forecasts population, housing, and employment for all jurisdictions in the San Diego region, including the unincorporated county. As noted above, SANDAG's population projections were used in the CAP Update forecasting. SANDAG's population projections are based on data from the US Census Bureau, as well as SANDAG employment, population, and housing estimates for 18 cities and the unincorporated county. These projections reflect the Regional Housing Needs Assessment (RHNA) process for the San Diego region, which is overseen by SANDAG. The RHNA process identifies the need for housing and guides land use planning by addressing existing and future housing needs resulting from population, employment, and household growth.

SANDAG also builds and maintains a regional travel demand model that is used to forecast transportation metrics within the region. Travel demand models use input data such as land uses (population/employment), roadway and transportation network data, and socioeconomic information to understand existing and future travel behavior. The model is validated and calibrated to a "base year" to represent existing conditions as closely as possible. As part of the development of the 2021 Regional Transportation Plan/Sustainable Communities Strategy (2021 Regional Plan), SANDAG modeled several different scenarios using an activity-based model referred to as Activity-Based Model Version 2+, or ABM2+. Each scenario includes different land use and regional growth forecast assumptions developed by SANDAG regarding the location and amount of future residential and non-residential growth in the region, the location and type of future transportation investments that would be made in the region (e.g., highway improvements, public transit infrastructure and operations), and assumptions about future transportation policies and behaviors that would be in place in the region (e.g., the costs of owning and operating a vehicle, the rate of teleworking by employees). The population, housing, and employment forecast for the CAP Update was based on SANDAG's 2021 Regional Plan EIR (SANDAG 2021) Alternative 2 growth assumption (land use data set "DS" 39 scenario) because it most closely resembled observed patterns of growth. The County has reviewed the underlying assumptions of the DS 39 scenario and confirmed that the 2016 estimates are representative of current (2019) conditions based on dwelling unit construction history in the unincorporated county and reasonably anticipated transportation investments.[2]

The population, housing, and employment projections were calculated by subtracting the population in Marine Corps Base Camp Pendleton and on tribal reservations from the total for the unincorporated county, because the County has no jurisdiction over these lands. For the purpose of the analysis in this draft SEIR, the 2050 population is projected to be 505,485, and the number of residential units is projected to total 191,208 in 2050. These forecast population numbers are scaled down from the maximum development capacity assumed in the County's General Plan and 2011 GPU PEIR to reflect a more realistic projection of development that is anticipated to occur in unincorporated San Diego County through 2050. The appropriateness of this reduced projection of future population and housing growth within the county, which assumes nearly 173,000 fewer people and 45,000 fewer residential units than the General Plan buildout projections, was verified through an independent market study prepared for unincorporated San Diego County (see Appendix 3 to the CAP Update). This market study identified reasonably foreseeable development based on an understanding of housing growth considering population growth expectations, physical site conditions, market factors derived from historical trends, and current regulatory capacity. Two projections were prepared: a Base Growth estimate based on housing and population trends (in which a portion of units planned in specific plan areas would build out), and a High Growth estimate that adds an allowance for development of all the entitled but unbuilt specific plan area units, which include previously adopted General Plan amendment (GPA projects). These county-specific market projections were closely aligned with the SANDAG forecast in the DS 39

[2] The County tracks progress towards implementing the General Plan through the Housing Production and Capacity Portal. The portal was accessed in July 2023 here: https://www.sandiegocounty.gov/content/sdc/pds/HPCP-UA.html.

scenario. The Base Growth estimate projects a slightly higher 2050 population (540,504) than SANDAG and approximately 1,000 fewer units than the SANDAG projections (188,849). Based on all these considerations, the SANDAG model is considered a reasonable estimate of population growth.

Evaluation of Project Elements

As described in Chapter 1, "Project Description," the project includes the proposed CAP Update (which consists of strategies, measures, and actions to reduce GHG emissions); modifications to the General Plan and 2011 GPU PEIR to make them consistent with the CAP Update; and revisions to the County's GHG Threshold and Guidelines for Determining Significance (i.e., the CAP Consistency Checklist). As detailed further below, the project elements that could result in physical environmental effects consist of the proposed GHG reduction strategies, measures, and actions that would be implemented under the CAP Update. The GHG reduction strategies, measures, and actions that are applicable to future projects are incorporated into the CAP Consistency Checklist; and a project's compliance with the Checklist is intended to demonstrate that it meets the County's GHG Threshold. The GPA for the project (i.e., amendments to Goal COS-20 and Policy COS-20.1) and the GHG Guidelines for Determining Significance and GHG Threshold are combined in the overall impact analysis of the CAP Update, and conclusions regarding the impact of future projects that meet the GHG Threshold are supported by the substantial evidence contained in this SEIR.

CAP Update Measures and Actions

Implementation of the proposed GHG reduction strategies, measures, and actions under the CAP Update is the main component of the project evaluated in this SEIR, because as noted above, these represent the component of the project that could result in physical impacts on the environment. The overarching strategies and associated measures and actions proposed in the CAP Update encompass a range of potential tactics, from proposed ordinances, plans, and support of legislation to specific programs designed to reduce GHG emissions in the unincorporated county and from County operations. Implementation of all CAP Update measures and actions was considered during preparation of this draft SEIR, to the degree specific information about implementation is known. However, the analysis focuses on the measures and actions with the potential to result in physical environmental impacts, as indicated in Table 1-2 in Chapter 1, "Project Description." Further, this draft SEIR does not speculate about the potential site-specific physical impacts that could occur if and when a specific site improvement is proposed in the future at a site location still to be determined. This approach is supported by State CEQA Guidelines Section 15145, Speculation, which directs that if the County finds, after thorough investigation, that an impact is too speculative for evaluation, the County should note its conclusion and terminate discussion of the impact. Rather, this SEIR considers the types of impacts that could occur with implementation of future projects that are anticipated to directly or indirectly result from implementation of the proposed GHG reduction measures and actions.

Consistency Modifications to the General Plan and 2011 GPU PEIR

The CAP Update, and the targets and strategies identified therein, result in necessary changes to General Plan Goal COS-20 and Policy COS-20.1 and mitigation adopted in the 2011 GPU PEIR (Mitigation Measures CC-1.2, CC-1.7, and CC-1.8) in order to attain consistency with current legislative requirements. These changes require a GPA, specific to Goal COS-20 and Policy COS-20.1, as part of the approval process. This draft SEIR evaluates the GPA as part of the actions associated with the CAP Update because the changes reflected in the GPA support, and are consistent with, implementation of the CAP Update and its GHG targets and GHG reduction strategies. Because its impacts are included in the overall impact analysis of the CAP Update, the GPA is not addressed as a separate impact discussion in the resource sections that follow.

In addition, the County prepared additional potential GPAs to goals and policies to further reduce vehicle miles traveled (VMT) and other impacts as part of the Appellate Court-directed smart growth alternatives. These additional GPAs could be selected by the Board of Supervisors, in whole or in part, to further reduce impacts from VMT and other impacts evaluated in the 2011 GPU PEIR. These GPAs would also reduce impacts from the CAP Update. These are evaluated as a smart growth alternative in Chapter 5, "Alternatives," and are not part of the project GPA to Goal COS-20 and Policy COS-20.1.

Guidelines for Determining Significance and GHG Threshold

This draft SEIR also evaluates impacts associated with the implementation of the proposed *County of San Diego Guidelines for Determining Significance: Climate Change* and GHG Threshold. These elements of the proposed project represent updates to existing County standards to reflect the CAP Update. The proposed GHG Threshold is "consistency with the CAP." This threshold can be met by projects that are consistent with the growth forecast used in the CAP Update that would apply all applicable GHG reduction measures in the CAP Update. The CAP Update demonstrates that the proposed measures and actions applied to projected growth would not considerably contribute to climate change. Therefore, projects that are consistent with the CAP Update would be determined to result in a less-than-significant GHG impact (see CEQA Guidelines Section 15183.5(b)).

To achieve consistency, a project must implement the applicable GHG reduction measures and actions outlined in the CAP Update, the implementation of which is evaluated throughout this draft SEIR. Adoption of a GHG Threshold that establishes a requirement to be consistent with the CAP Update does not require a separate impact analysis, because the impacts of establishing that threshold, and what it would take to meet the threshold, have been fully evaluated.

The *County of San Diego Guidelines for Determining Significance: Climate Change* would provide direction to project applicants regarding how a project could achieve consistency with the CAP Update. The guidelines are proposed to include the CAP Consistency Checklist, which applicants would be required to use to demonstrate how a project would be consistent with the CAP Update, including through implementation of GHG reduction measures and

actions. The specific actions that would result from the proposed changes to the guidelines would be project-specific implementation of approved GHG reduction measures and actions, the environmental impacts of which are evaluated throughout this draft SEIR.

Scope of Analysis

This draft SEIR is programmatic in nature. It analyzes the potential environmental effects of all GHG reduction measures and actions but does not specifically analyze individual projects or actions resulting from implementation of the CAP Update, because the details of such projects and actions are not yet available (e.g., specific location of infrastructure). This is consistent with the requirements of State CEQA Guidelines Section 15152, related to programmatic analyses used for tiering.

Although CEQA coverage is provided on the program of activities proposed under the CAP Update, specific GHG reduction measures and actions would require subsequent implementation actions by the County and/or project applicants. When the County implements (or requires implementation of) specific activities proposed under the CAP Update, a determination would be made as to whether such actions are consistent with the activities identified in the CAP Update, and whether sufficient evaluation of the potential environmental impacts associated with these later activities has been provided in this draft SEIR. These later activities would be examined in light of the information in this draft SEIR to determine whether additional environmental documentation must be prepared.

During this examination, if the County finds, consistent with the direction provided in State CEQA Guidelines Section 15162, that no new significant effects are identified or no new mitigation measures would be required to avoid or minimize the effects of a subsequent project, the activity can be approved as being within the scope of the project covered by this draft SEIR. In this situation, the County must incorporate all relevant project requirements and all feasible mitigation measures from the SEIR into the later activity to address significant or potentially significant effects on the environment.

If a subsequent project or later activity would have significant effects that were not examined in this SEIR, the County would determine the appropriate environmental document to be prepared. If an additional environmental document is needed and a mitigated negative declaration or supplement to this draft SEIR is prepared, the SEIR can be used to simplify the task of preparing the follow-up environmental document by allowing the County to focus on the issues that were not previously addressed in the SEIR, as indicated in State CEQA Guidelines Section 15168(d).

Environmental Resources Evaluated

The CAP Update is a comprehensive plan for reducing community GHG emissions in the unincorporated county, as well as the GHG emissions from County operations. This chapter evaluates the following 15 resource topics in detail based on the environmental issues considered in the 2011 GPU PEIR and Appendix G of the State CEQA Guidelines,

as amended, as well as public comment and direction provided by the Superior Court of San Diego County:

- aesthetics
- agriculture and forestry resources
- air quality
- biological resources
- cultural and paleontological resources
- energy
- environmental justice
- greenhouse gas emissions
- hazards and hazardous materials
- hydrology and water quality
- land use and planning
- noise
- transportation
- tribal cultural resources
- wildfire

In accordance with State CEQA Guidelines Section 15128, Chapter 3, "Environmental Effects Found Not to Be Significant," of this draft SEIR provides the reasons why some environmental impacts were not considered significant and, therefore, are not analyzed in detail.

Cumulative Impact Assessment Overview

CEQA requires that an EIR evaluate a project's cumulative impacts. Cumulative impacts are a project's impacts combined with the impacts of other related past, present, and reasonably foreseeable future projects. An assessment of cumulative impacts examines whether individual effects may increase in scope or intensity when considered together. As set forth in the State CEQA Guidelines, the discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. As stated in CEQA Section 21083(b)(2), a project may have a significant effect on the environment if "the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

Section 15130(a) of the State CEQA Guidelines states that an EIR shall discuss cumulative impacts of a project when the project makes a cumulatively considerable contribution to an existing significant cumulative impact or would result in a new cumulative impact. "Cumulatively considerable" means the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. If an incremental effect is not cumulatively considerable, such an effect is not required to be considered significant; however, the reasoning for a determination of why such effects are not significant shall be provided by the lead agency. Implementation of appropriate mitigation measures can reduce a project's contribution to impacts to less than cumulatively considerable, as allowed by CEQA.

Scope of the Cumulative Analysis

The cumulative impact analysis provided in this SEIR evaluates whether the proposed CAP Update could result in new significant cumulative impacts or an increase in the severity of the cumulative impacts that were identified in the 2011 GPU PEIR. 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. This analysis is based on the second approach.

The cumulative environmental setting has been updated from the 2011 GPU PEIR based on the development forecasts in SANDAG's 2021 Regional Plan EIR (SANDAG 2021) Alternative 2 DS 39 model (including military bases, tribal reservations, and 18 incorporated cities). As explained above, the County has determined that the DS 39 modeling scenario represents a reasonably foreseeable pattern and rate of growth. Because it assumes less ambitious VMT reduction programs and growth limitations than the Regional Plan, the model provides an appropriately conservative picture of cumulative growth, VMT, and associated GHG emissions.

Cumulative Impact Analysis Methodology

For purposes of this SEIR, the project would have a significant cumulative effect if it meets either one of the following criteria:

- The cumulative effects of related projects (past, current, and probable future projects) without the project are not significant, but the project's incremental impact is substantial enough, when added to the cumulative effects, to result in a new significant impact.
- The cumulative effects of related projects (past, current, and probable future projects) without the project are already significant, and the project represents a considerable contribution to the already significant effect. The standards used herein to determine "considerable contribution" are that the impact either must be substantial or must exceed an established threshold of significance.

The cumulative analysis first discloses whether there is a significant impact in the cumulative condition. As appropriate, based on the topic and reasonably available information, quantitative evaluation of the cumulative condition is presented. The analysis then discusses the incremental increase in the potential severity of the impact with implementation of the CAP Update. The significance criteria used for analysis are the same as those used throughout the topical sections of this chapter. State CEQA Guidelines Section 15130(a)(3) states that a project's contribution to an impact is "less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable." The geographic scope considered for the cumulative analysis varies depending on the environmental issue area being discussed.

Therefore, a description of the geographic scope for each environmental issue analyzed in this Draft SEIR is provided in individual sections of this chapter.

As noted in Chapter 1 of this draft SEIR, a list-based analysis of the cumulative effects of implementation of (unapproved) in-process GPAs in combination with the proposed project is included in Chapter 4 of this draft SEIR in response to the Court of Appeal decision.

2.1 Aesthetics

This section describes the existing conditions in the unincorporated county related to aesthetics and the potential effects that implementation of the CAP Update may have on aesthetic resources. Specifically, this section evaluates the potential for the CAP Update to result in impacts on scenic vistas and resources, visual character and quality, and light and glare. Because this analysis is subsequent to the certified 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since certification of the 2011 GPU PEIR.

This section incorporates by reference the aesthetic setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with updates to setting conditions since certification of the 2011 GPU PEIR.

Table 2.1-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. As indicated, implementation of the proposed project would result in new or more severe significant impacts on aesthetic resources.

Table 2.1-1 Summary of Aesthetics-Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Scenic Vistas and Scenic Resources	General Plan Only: Less-Than-Significant Impact after Mitigation	CAP Update Only: Yes	CAP Update Only: Yes
		General Plan Cumulative Contribution: Less-Than-Significant Impact after Mitigation	CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: Yes
2	Visual Character or Quality	General Plan Only: Significant and Unavoidable Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable Cumulative Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
3	Light and Glare	General Plan Only: Significant and Unavoidable Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable Cumulative Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

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

Source: Compiled by Ascent Environmental in 2023.

The evaluation of scenic vistas and scenic resources has been consolidated into one discussion because the physical changes resulting from implementation of the CAP Update measures and actions would result in a similar potential to affect both scenic vistas and resources.

The County did not receive comments related to aesthetics during the Notice of Preparation (NOP) scoping process. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

2.1.1 Existing Conditions

The 2011 GPU PEIR includes a discussion of existing conditions of the unincorporated county related to aesthetics in Section 2.1, "Aesthetics."

Open space within the county, including areas that the County has designated resource conservation areas due to attributes that include aesthetic quality, coastal wetlands, native wildlife habitats, astronomical dark skies areas, scenic geologic formations, and significant archaeological and historical sites is an important scenic resource in the county, contributing to scenic vistas and contributing to the county's visual character and quality. Many of these resources can be viewed from transportation corridors throughout the county. Two state-designated scenic highways are also located in the unincorporated county: State Route (SR) 78 through the Anza-Borrego Desert State Park and SR 125 between Interstate (I-) 8 and SR 94. Eligible scenic highways include portions of I-5, I-15, SR 94, I-8, SR 79, SR 78, and SR 76 within the unincorporated county. The County has identified additional roads as scenic in its County Scenic Highway System Priority List. Recreational areas available for public use throughout the county include parks, open space preserves and reserves, and public trails. Additionally, the county contains publicly owned land that provides open space and visual relief from the human-made environment, including Cleveland National Forest in the Peninsular Ranges region and the Anza-Borrego Desert State Park in the Desert region.

Since certification of the 2011 GPU PEIR, there have been no newly designated visual resources or resource conservation areas. Similarly, there have been no newly identified scenic highways (California Department of Transportation 2023) or premier astronomical sites[1] within the unincorporated county. Therefore, the existing conditions described by the 2011 GPU PEIR adequately reflect baseline conditions and are hereby incorporated by reference.

2.1.2 Regulatory Framework

Section 2.1, "Aesthetics," of the 2011 GPU PEIR (pages 2.1-27 through 2.1-32), describes the regulatory framework related to aesthetics and visual resources and is

[1] Premier astronomical sites are high-quality astronomical research sites meeting the following five criteria: elevation over 5,000 feet above sea level; clear, cloud-free night sky; proximity to the Pacific Ocean; distance from urban areas; and freedom from nearby sources of light, dust, and smoke.

hereby incorporated by reference. Specific regulations discussed in the 2011 GPU PEIR that are applicable to the CAP Update include the following:

2.1.2.1 State

- State Scenic Highways Program

2.1.2.2 Local

- San Diego County Board of Supervisors Policy I-73, Hillside Development Policy
- Community Plans
- County Community Right-of-Way Development Standards
- Design Review Guidelines
- I-15 Corridor: Scenic Preservation Guidelines
- County of San Diego Code of Regulatory Ordinances Sections 86.601–86.608, Resource Protection Ordinance (RPO)
- County of San Diego Code of Regulatory Ordinances Sections 59.101–59.115, Light Pollution Code (aka, Dark Sky Ordinance)
- Multiple Species Conservation Program (MSCP) and the County of San Diego Code of Regulatory Ordinances Sections 86.501–86.509, Biological Mitigation Ordinance (BMO)
- San Diego County Scenic Highway Program
- San Diego County Zoning Ordinance pertaining to aesthetic character and resources

The regulatory framework discussed in the 2011 GPU PEIR regarding aesthetic and visual resources has not changed since certification of the 2011 GPU PEIR and continues to apply to the unincorporated county.

San Diego County Zoning Ordinance, Renewable Energy Regulations

Sections 6950–6959 of the County Zoning Ordinance prescribe reasonable standards and procedures for the installation and operation of solar energy systems and wind turbines.

Photovoltaic (PV) solar energy systems for on-site use are allowed as an accessory use in all zones upon approval of a building permit unless the property is subject to a Special Area Designator or is governed by a Discretionary Permit. Setback and height requirements are established in Section 6954(a).

Ordinance 10261 amended the San Diego County Zoning Ordinance to update and streamline provisions related to small wind energy turbines. This ordinance is consistent with state laws that encourage the construction of small wind energy turbines. The amendments made by this ordinance are intended to set forth reasonable standards and procedures for the installation and operation of small wind turbines to improve and

enhance public welfare and safety, and to implement the Energy Element of the San Diego County General Plan. The amendments to Section 6951 allow a maximum of three small wind turbines on a legal lot as an accessory use to the primary use of the lot in accordance several requirements, including height restrictions (the wind turbine height may exceed the height limit of the zone in accordance with Section 4620.j, but shall not exceed 80 feet), lighting restrictions (a small wind turbine shall not include any exterior lights unless required by law), locations restrictions (a small wind turbine tower shall not be located on a ridgeline, and the turbine blades shall not exceed the height of the ridgeline in an area within 150 feet of the ridgeline), and design guidelines (which prohibit use of trellis towers and guy wires and require that power lines connecting turbine towers to structures are installed underground). Installation of a small wind turbine requires approval of a Building Permit to ensure the turbine meets current Uniform Building Code and approval of a Zoning Verification Permit to ensure the turbine complies with County zoning regulations.

2011 San Diego County General Plan

The General Plan policies related to aesthetics that are applicable to the CAP Update include the following:

> Policy LU-6.6: Integration of Natural Features into Project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.
>
> Policy LU-6.9: Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of the site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.
>
> Policy LU-10.2: Development Environmental Resource Relationship. Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.
>
> Policy LU-11.2: Compatibility with Community Character. Require that commercial, office, and industrial development be located, scaled, and designed to be compatible with the unique character of the community.
>
> Policy LU-12.4: Planning for Compatibility. Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts; for Mobility Element roads identified in Table M-4, an LOS D or better may not be achieved.

Policy COS-11.1: Protection of Scenic Resources. Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.

Policy COS-11.3: Development Siting and Design. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:

- Creative site planning;
- Integration of natural features into the project;
- Appropriate scale, materials, and design to complement the surrounding natural landscape;
- Minimal disturbance of topography;
- Clustering of development to preserve a balance of open space vistas, natural features, and community character; and
- Creation of contiguous open space networks.

Policy COS-11.5: Collaboration with Private and Public Agencies. Coordinate with the California Public Utilities Commission, power companies, and other public agencies to avoid siting energy generation, transmission facilities, and other public improvements in locations that impact visually sensitive areas, wherever feasible. Require the design of public improvements within visually sensitive areas to blend into the landscape.

Policy COS-11.7: Underground Utilities. Require new development to place utilities underground and encourage "undergrounding" in existing development to maintain viewsheds, reduce hazards associated with hanging lines and utility poles, and to keep pace with current and future technologies.

Policy COS-12.2: Development Location on Ridges. Require development to preserve the physical features by being located down and away from ridgelines so that structures are not silhouetted against the sky.

Policy COS-13.1: Restrict Light and Glare. Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.

Policy COS-13.2: Palomar and Mount Laguna. Minimize, to the maximum extent feasible, the impact of development on the dark skies surrounding Palomar and Mount Laguna observatories to maintain dark skies which are vital to these two world-class observatories by restricting exterior light sources within the impact areas of the observatories.

Policy COS-13.3: Collaboration to Retain Night Skies. Coordinate with adjacent federal and State agencies, local jurisdictions, and tribal governments to retain the quality of night skies by minimizing light pollution.

Policy H-2.1: Development that Respects Community Character. Require that development in existing residential neighborhoods be well-designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element.

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Aes-1.2: Protect sensitive biological habitats and species through regulations that require avoidance and mitigation of impacts. Existing programs include the County MSCP and associated BMOs, RPO, and California Environmental Quality Act (CEQA) Guidelines. While protecting biological resources, these programs also preserve natural open space that contributes to the quality of many of the County's scenic vistas.

Adopted Mitigation Measure Aes-1.6: Require that project approvals with significant potential to adversely affect the scenic quality of a community require community review and specific findings of community compatibility. Examples can be found in the Zoning Ordinance with the numerous special uses or exceptions allowed pursuant to Administrative and Use Permits, and Site Plans. This practice has been proven useful for reducing impacts to aesthetic resources and their usefulness will increase as community plans and design guidelines are updated pursuant to Aes-1.3 and Aes-1.4.

Adopted Mitigation Measure Aes-1.7: Develop and implement programs and regulations that preserve agricultural lands. Agricultural lands are often key components of scenic vistas and community character. Therefore, preservation of these lands will help to minimize potential impacts to scenic resources.

Adopted Mitigation Measure Aes-1.8: Continue to develop and implement programs and regulations that minimize landform alteration and preserve ridgelines and steep slopes where appropriate. Examples include the County's Grading Ordinance, RPO, and CEQA Guidelines.

Adopted Mitigation Measure Aes-1.9: Work with communities and other stakeholders to identify key scenic vistas, viewsheds of County scenic road and highways, and other areas of specific scenic value. Apply Resource Conservation Area designations or other special area designators, guidelines, and tools to guide future development of parcels within these viewsheds to avoid impacts to the scenic vistas.

Adopted Mitigation Measure Aes-4.1: County to coordinate with communities and stakeholders to review light pollution controls and consider amendments or expansions to those controls as determined necessary to reduce impacts to dark skies that are important to community character. This will ensure that potential artificial lighting impacts from development are monitored and controlled as needed to preserve community character.

Adopted Mitigation Measure Aes-4.2: County to maintain light and glare regulations that minimize impacts to adjacent properties, sensitive areas, community character, observatories, and dark skies. These regulations are currently found in the Light Pollution Code and Zoning Ordinance. Additional reviews are implemented on discretionary projects in accordance with CEQA and the County's CEQA guidelines. These efforts will help protect the existing unincorporated area and surrounding environment from excessive artificial lighting impacts.

2.1.3 Analysis of Effects and Significance Determinations

2.1.3.1 Significance Criteria

Based on guidance provided in Appendix G of the State CEQA Guidelines, the *County of San Diego Guidelines for Determining Significance: Visual Resources* (County of San Diego 2007), and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Dark Skies and Glare* (County of San Diego 2009), except as provided in CEQA Section 21099, the proposed project would result in a significant impact if it would:

- have a substantial adverse effect on a scenic vista;
- substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- in non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surrounding, and in urbanized areas, conflict with applicable zoning and other regulations governing scenic quality;
- create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

2.1.3.2 Approach to Analysis

Impacts related to aesthetics are analyzed qualitatively based on a review of the CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area is analyzed in the context of existing laws and regulations as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant 2011 GPU PEIR mitigation measures are applicable to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update.

Scope of SEIR Impact Analysis

The impact analysis contained within this draft SEIR focuses on whether implementation of the CAP Update would result in new or more severe impacts than were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward the GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impacts of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unicorporated county) and its role as a programmatic planning document designed to guide future decision-making related to the reduction of GHGs within the unincorporated county, the study area for aesthetics is the unincorporated area of the county within the County's jurisdiction (i.e., all unincorporated lands excluding tribal lands, state and federal owned lands, and military installations).

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

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies and associated measures and actions, proposed in the CAP Update (see Table 1-2) have been grouped into categories for the purpose of analysis, based on the sector they target (e.g., solid waste, water/wastewater). CAP Update measures and actions that would have the potential to affect aesthetics are summarized below.

CAP Update actions and measures that would involve development of policies and programs that would not result in direct physical effects or those that would result in limited physical improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to aesthetics.

Solid Waste Measures and Actions. This category includes strategies, measures, and implementing actions aimed at achieving zero solid waste in County operations and within the unincorporated county. Key measures and actions with potential to result in new or more severe impacts related to aesthetics include Measures SW-1 through SW-4, which have the potential to result in the construction of new or expanded solid waste facilities to

meet waste diversion targets, and increase the prevalence of composting, anaerobic digestion, recycling throughout the county.

Water and Wastewater Measures and Actions. This category includes strategies to decrease water consumption and increase wastewater and stormwater treatments, which would not be anticipated to result in substantial changes to the physical environment. Key measures and actions with potential to result in new or more severe impacts related to aesthetics include Measures W-1 through W-3, which would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency.

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural land and agricultural land, planting and protecting trees, and providing incentive to encourage carbon farming. Key measures and actions with potential to result in new or more severe impacts related to aesthetics include Measures A-1 through A-2. Implementation of Action A-4.1b would have the potential to result in new farmworker housing in unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified.

Energy Measures and Actions. This category includes strategies to develop policies and programs to increase energy efficiency and renewable energy use. Key measures and actions with potential to result in new or more severe impacts related to aesthetics include Action E-1.1 and Action E-3.2, which could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. Through Action E-3.2.b, the County would work with partners to promote and support on-site renewable (wind and solar) energy generation and storage (microgrids, site-specific and/or community scale) to increase renewable energy generation and use in the unincorporated area, which would be regulated by existing County ordinances and policies. Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the vehicle fleet, install electric vehicle charging stations, incentivize the use of alternative fuels and landscaping practices, and to promote and support transit and ridesharing to reduce single-occupancy vehicle use. Key measures and actions with potential to result in new or more severe impacts related to aesthetics include Actions T-1.1, T-3.1, T-3.1.a, T-5.1, and T-6.2.

2.1.3.3 Issue 1: Change or Obstruct Scenic Vistas and Scenic Resources

This section describes potential project impacts on scenic vistas and scenic resources, including resource conservation areas, with implementation of the project. As noted above the evaluation of scenic vistas and scenic resources has been consolidated into one discussion because the physical changes resulting from implementation of the CAP Update would result in similar effects on both scenic vistas and resources.

Guidelines for Determination of Significance

The following analysis is based on the sample questions provided in Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance: Visual Resources* (County of San Diego 2007), which provides supplemental guidance for determination of significance. Based on these guidelines, the CAP Update would result in a significant impact if it would:

- obstruct, interrupt, or detract from a scenic vista that is visible from a:
  - public road,
  - trail within an adopted County or state trail system,
  - scenic vista or highway, or
  - recreational area.
- result in the removal or substantial adverse change in one or more features that contribute to the valued scenic resources in the unincorporated county including, but not limited to, the following:
  - designated landmarks
  - historic resources or unique structures
  - County public trails
  - public views of bays, lagoons, canyons, trees, rock outcroppings, established native vegetation, or agricultural lands in the Coastal Plain region
  - public views of water resources (e.g., reservoirs) and extensive open space including County reserves and parks in the Peninsular Ranges
  - public views supporting unique or memorable landforms, native habitat, and desert valleys

These thresholds are consistent with the guidelines for determination of significance applied in the 2011 GPU PEIR.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts to scenic vistas and visual resources related to the adoption of the goals and policies contained within the plan and development anticipated throughout the planning horizon. The evaluation determined that anticipated development under the General Plan would result in potentially significant project impacts to scenic vistas and visual resources in the unincorporated county.

The 2011 GPU PEIR determined that implementation of the General Plan would result in potentially significant impacts to scenic vistas and scenic resources due to future development consistent with the land use designations established in the General Plan land use map. These impacts would be reduced to a less-than-significant level by:

- Complying with a combination of federal, state, and local regulations and existing County regulatory processes that would require design review for future development and preservation of scenic vistas and resources, including but not limited to:
  - County Zoning Ordinance Sections 5200–5212 (Scenic Area Regulations)
  - County Zoning Ordinance Section 5749, Adopted 7-29-92 (Specific Historic Districts)
  - County Zoning Ordinance Sections 5750–5758 (Community Design Review Area Regulations)
  - County Zoning Ordinance Sections 5900–5910, Adopted 11-18-81 (Design Review Area Regulations)
  - County Zoning Ordinance Sections 5700–5749 (Historic/Archaeological Landmark and District Area Regulations)
  - County Zoning Ordinance Section 6320, Amended by Ord. No 9620 (New Series), Adopted 12-10-03 (Humidity, Heat, Cold, and Glare)
  - County Zoning Ordinance Section 6322, Amended by Ord. No. 7110 (New Series), Adopted 4-02086 (Outdoor Lighting)
  - County Zoning Ordinance Section 6324, Amended by Ord. No. 9690 (New Series), Adopted 12-15-04 (Lighting Permitted in Required Yard)
  - County Zoning Ordinance Section 6980, Adopted 4-30-03 (Wireless Telecommunications Facilities)
- Implementing the General Plan goals and policies to protect scenic vistas and resources (e.g., Policies LU 6.2 to LU 6.4, M-2.3, and COS-11.1 through COS-11.3); and
- Implementing the mitigation measures (Adopted Mitigation Measures Aes-1.1 through Aes-1.11) identified in the 2011 GPU PEIR.

The General Plan includes Policies LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, LU-6.8, and LU-10.2 that direct development away from undeveloped areas with intact sensitive natural resources and set requirements for the design of new development that includes contiguous open space and conformance to natural topography. Policies in the Conservation and Open Space Element require the protection of scenic vistas and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes. The discussion of impacts related to scenic vistas and scenic resources can be found in 2011 GPU PEIR Section 2.1, “Aesthetics” (pages 2.1-32 through 2.1-37 and pages 2.1-54 through 2.1-55), and is incorporated by reference. Specific policies related to the protection of scenic vistas and visual resources are listed above in Section 2.1.2, “Regulatory Framework.”

CAP Update Impact Analysis

The following sections describe the effects on scenic vistas and scenic resources that could result from the implementation of the measures and actions proposed in the CAP Update.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and more generally in the unincorporated county. Implementing CAP Update measures and actions could result in potential construction of new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 include development of zero waste policies which may result in new or expanded composting and recycling facilities to divert solid waste from landfills. Specific locations for new and expanded facilities have not been identified. Therefore, these improvements are analyzed at a programmatic level.

Construction of new facilities in rural or semi-rural areas would have the potential to affect views of scenic vistas and scenic resources. The county contains visual resources providing opportunities for scenic vistas in every community. The CAP Update would apply to the entire unincorporated county. New or expanded solid waste facilities could be sited in areas close to scenic resources and would have the potential to result in the obstruction, interruption, or detraction of a scenic vista, or to remove or change a feature that contributes to a valued scenic resource. Implementation of the CAP Update solid waste measures and actions would result in similar impacts related to scenic vistas and scenic resources as identified in the 2011 GPU PEIR through future development that could affect views of important scenic vistas (e.g., canyons, natural vegetation, and agricultural lands) and that could result in removal of features contributing to the valued character of scenic resources (e.g., State Scenic Highway, historic structures, and public view of open space).

The following 2011 GPU PEIR mitigation measures would be applied to reduce this impact: Aes-1.2 requires avoidance and mitigation of impacts to natural open space that contributes to the quality of the county's scenic vistas; Aes-1.6 requires community review on projects that would significantly affect scenic quality of a community; Aes-1.7 requires the preservation of agricultural lands; Aes-1.8 requires the preservation of ridgelines and steep slopes; and, Aes-1.9 requires working with communities to identify areas of specific scenic value for preservation.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded solid waste facilities would be required to comply with the County zoning ordinances related to design review and scenic resources protection, implement adopted General Plan goals and policies related to scenic vistas and scenic resources protection, and implement mitigation measures identified in the 2011 GPU PEIR (Adopted Mitigation Measures Aes-1.2, Aes-1.6, Aes-1.7, Aes-1.8, and Aes-1.9, described above), which would minimize impacts related to scenic vistas and resources. With implementation of adopted 2011 GPU PEIR mitigation measures and compliance with adopted General Plan policies and existing regulations, implementation of the CAP Update measures and actions would result in less-than-significant impacts to scenic vistas and resources.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water

conservation and increase water and wastewater efficiency. Measures W-1 and W-2 include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. Implementation of these measures would not result in impacts to scenic vistas and scenic resources because any new or expanded physical structures associated with implementing water conservation measures and actions would be ancillary to existing or proposed development and consistent with the character of the area.

Agriculture and Conservation Measures and Actions

Implementation of Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. Natural vegetation and agricultural lands are considered aesthetic resources in the county. Therefore, implementation of these measures would contribute to the preservation of aesthetic resources in the unincorporated county.

Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified. Development of farmworker housing would be required to comply with County policies and ordinances related to design review and scenic resources protection and to implement adopted General Plan goals and policies related to scenic vistas and scenic resources protection. In addition, 2011 GPU PEIR Mitigation Measure Aes-1.2 requires avoidance and mitigation of impacts to natural open space that contributes to the quality of the county's scenic vistas and Mitigation Measure Aes-1.6 requires community review on projects that would significantly affect scenic quality of a community. Implementation of adopted Mitigation Measures Aes-1.2 and Aes-1.6 would substantially reduce the potential for adverse effects to scenic resources. With implementation of adopted 2011 GPU PEIR mitigation measures and compliance with adopted General Plan policies and existing regulations, implementation of the CAP Update measures and actions would result in less-than-significant impacts to scenic vistas and resources.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects.

Implementation of CAP Update Measure E-3, Action E-3.2.b, and Action E-3.3 could result in energy efficiency retrofits on existing residential and non-residential structures

and County facilities. These retrofits could include rooftop or ground-mounted PV solar arrays or small wind turbines, upgraded mechanical systems, and other similar improvements. The addition of energy infrastructure may be required to support implementation of some measures; these projects have the potential to alter existing views. However, while the location of improvements associated with potential future projects is unknown, it is likely that retrofits would occur in areas of existing development. Further, because of the small scale and nature of the energy measures, building retrofits generally would not be expected to result in perceptible changes to a scenic vista or scenic resource.

Renewable energy projects, including on-site renewable energy generation supported through proposed CAP Update Action E-3.2.b, would be regulated by existing County ordinances and policies. The placement of small-scale PV solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance Section 6954(a) that regulates the height and scale of these facilities. Rooftop PV solar energy panels generally do not involve construction that would substantially change roof lines or add substantial massing or height such that the altered buildings would result in the potential to substantially alter or obstruct views. The County's Renewable Energy Zoning Ordinance Section 6954(a) requires the height of on-site PV solar energy systems be no taller than the height designator of the zone, except for on-site energy use systems that may extend no more than 5 feet above the roofline.

Additionally, installation operation of small-scale wind turbines would be regulated by the County's Wind Energy Ordinance Sections 6950–6952. A small wind turbine is defined as a wind turbine, with or without a tower, which has a rated capacity of not more than 50 kilowatts; is consistent with the requirements of existing Zoning Ordinance Sections 6156 and 6951; and generates electricity primarily for use on the same lot on which the wind turbine is located. These turbines would be allowed as an accessory use in all zones, provided the turbine complies with the Renewable Energy Regulations in Zoning Ordinance Section 6950 and the turbine proponent obtains a Zoning Verification Permit prior to issuance of a building permit. Small wind turbines are limited to a height of no more than 80 feet (but not more than the height designator of the Zoning District in which they are located) and have relatively small blades on a vertical or horizontal axis. In addition, these structures cannot include guy wires for structural support or aboveground power lines and cannot be located on prominent ridgelines. Therefore, although these facilities may introduce a new vertical element within the viewshed of a scenic vista that would have the potential to interrupt or detract from a visual resource that previously did not include infrastructure or development, the limited, on-site renewable energy development supported by the CAP Update would not be anticipated to substantially obstruct, interrupt, or detract from a scenic vista that is visible from a: public road, trail within an adopted County or state trail system, scenic vista or highway, or recreational area. Further, the energy measures and actions would not result in the removal or substantial adverse change in one or more features that contribute to the valued scenic resources in the unincorporated county, including designated landmarks and key public views. Similarly, CAP Update implementation may result in construction of microgrids to support on-site and community scale energy storage to support adjacent development. Microgrids would appear similar to existing power infrastructure and would not result in unique effects to scenic vistas or scenic resources not evaluated in the 2011 GPU PEIR.

In addition, the adopted General Plan policies pertaining to visual resources would further limit project impacts to scenic vistas and scenic resources. Additionally, the following 2011 GPU PEIR mitigation measures also would be applied to a project to minimize impacts to scenic vistas and resources: Mitigation Measure Aes-1.6, which requires community review and specific finding of community compatibility for project with significant impacts on scenic quality; Mitigation Measure Aes-1.7, which requires preservation of agricultural lands; and Mitigation Measure Aes-1.8, which requires preservation of ridgelines and steep slopes. Implementation of these 2011 GPU PEIR mitigation measures would ensure protection of sensitive scenic resources and limit the potential for obstruction of scenic vistas.

Implementation of proposed CAP Update Action E-3.3 could result in the construction of new large-scale renewable energy systems, including large-scale solar and wind turbines. It is unknown at this time what type of solar technology will be used in future development. The following analysis is based on the two main types of solar technologies: concentrator solar and PV solar. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level. The potential for construction of large-scale renewable energy infrastructure was not evaluated in the 2011 GPU PEIR, but potential wind energy impacts were evaluated in the 2013 Wind Energy Ordinance EIR and are incorporated by reference as applicable.

Large-scale renewable energy infrastructure generally would be constructed in primarily undeveloped locations that are productive for generating renewable energy. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Typical construction activities associated with large-scale renewable energy systems would require the use of trucks for transport of materials, staging areas for supplies and equipment, parking for workers, and signage and grading. All construction activities would be temporary effects of the construction process and would not likely result in permanent significant impacts to scenic vistas and scenic resources.

The types of infrastructure and facilities that would likely accompany large-scale PV solar or concentrator solar renewable energy systems include the following:

- PV arrays or concentrated solar on ground-mounted posts, or systems that track the sun;
- A collector substation site, including concrete pad and switchgear, and battery storage;
- A direct-current underground collection system and an overhead and underground transmission system that steps up the voltage to alternating current, linked to the substation;

- An operations and maintenance site (unless remotely monitored), including concrete pad with building(s);
- Transmission lines;
- Water tanks;
- Internal and external access roads; and
- Security and open space fencing.

Large-scale renewable solar systems can range in size from 2 to several thousand acres. The location of large-scale PV solar systems is limited by the County's Zoning Ordinance Section 6954(b)(3), which requires a Major Use Permit (MUP) for projects over 10 acres. Projects that would require less than 10 acres would be required to obtain an Administrative Permit in accordance with the County's Zoning Ordinance Section 6954(b)(1). If PV solar systems are utilized, the dark panels that absorb sunlight are mounted to fixed or tracking systems. Fixed-tilt mounted PV solar panels are oriented towards the sun as it rises and sets. Tracking systems allow the panels to move as the sun moves. If concentrator solar panels are used, the system utilizes curved and mirrored panels mounted on a tracker, which allows direct sunlight to be concentrated and captured at higher efficiencies. A typical size for trackers is approximately 50 feet wide and 25 feet tall. At the maximum height during the day, the trackers would not exceed approximately 30 feet at grade. However, many systems, especially fixed-mounted PV solar arrays are as low as 8 to 12 feet above grade.

Both PV solar and concentrator solar systems could result in direct impacts to scenic vistas and scenic resources. Any solar system that would result in the operation of curved panels of solar trackers or fixed tilt-mounted arrays in pastures, meadows, or desert environments could interrupt and degrade existing views of scenic vistas available to motorists along public roads or scenic highways, to persons utilizing County or state trails, or to recreational areas as they pass the large arrays and associated components. Depending on the proximity to roadways, trails, or recreational areas, motorists and recreationists could be drawn visually to the solar farm sites because of the juxtaposition of the solar elements against the natural landscape. The degree of interruption would vary depending on the height and width of trackers (horizontal with the earth to nearly vertical) as the trackers move with the sun during the day, or the degree of reflectivity that accompanies the solar systems. As a result, solar systems would be apparent from some distance away. While implementation of adopted General Plan policies (e.g., Policies LU-10.2, LU-12.4, COS-11.1 and COS-11.3) and 2011 GPU PEIR mitigation measures (e.g., Mitigation Measures Aes-1.6, Aes-1.7, and Aes-1.9) would require new development to conserve and protect unique and sensitive visual features and the scenic quality of the environment, the size and magnitude of the development associated with these solar energy generation systems may make it infeasible for future individual projects to fully mitigate impacts to scenic vistas and scenic resources to a less-than-significant level.

Large-scale wind energy systems generally include the following components:

- Wind turbines ranging in height from approximately 200 to 330 feet to the wind turbine hub, and approximately 300 feet to 500 feet to the topmost blade tip;

- An overhead and underground collector cable system linking the wind turbines to the collector substation;
- A collector substation site and an operations and maintenance building (unless remotely monitored) with battery storage;
- Several permanent meteorological towers and one sonic detecting and ranging unit or one light detecting and ranging unit;
- An overhead transmission line running from the collector substation to the nearest substation;
- Water tanks;
- Internal and external access roads; and
- Security and open space fencing.

As described on pages 2.1-9 to 2.1-10, "Scenic Vistas – Large Turbines," and pages 2.1-11 to 2.1-12, "Scenic Resources – Large Turbines," of the 2013 Wind Energy Ordinance EIR, large-scale production of energy from wind turbines could result in direct impacts related to scenic vistas and scenic resources (County of San Diego 2013). The size of large-scale wind turbine farms can range from 30 acres to several hundred or thousand acres. However, wind turbines are spaced in a linear fashion and often require less direct acreage compared to solar systems. The location of large-scale wind turbine farms would be limited by the County's Wind Energy Ordinance which sets forth requirements related to setbacks, noise, height, and locations where large turbines are allowed. All large wind turbine projects would be required to obtain an MUP and undergo CEQA review. In addition, all large wind turbine projects would also be required to implement measures to minimize visual impacts to the extent feasible as part of the County's discretionary review process. However, the Wind Energy Ordinance reduced the required setbacks (changed from four and eight times to 1.1 times the wind turbine height) and increase allowable height (changed from maximum 80 feet to Federal Aviation Administration [FAA] height requirements) for large wind turbines installation. The setback reduction and increased height could block scenic vistas and/or viewsheds that were previously available for viewing and or previously undisturbed. Therefore, development of large wind turbine projects may result in a potentially significant adverse impact to a scenic vista or scenic resource because it could potentially introduce tall vertical elements near viewsheds of a scenic vista or scenic resource.

The 2013 Wind Energy Ordinance EIR identified Mitigation Measure M-AES-1 to reduce potentially significant impacts to scenic vistas and scenic resources, which requires that all new large-scale wind turbine projects apply the *County of San Diego Guidelines for Determining Significance: Visual Resources* (County of San Diego 2007) and *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Dark Skies and Glare* (County of San Diego 2009) through the MUP discretionary review process. When aesthetic impacts are determined to be significant, these projects are required to implement feasible and appropriate project-specific mitigation measures. However, the County determined that implementation of Mitigation Measure M-AES-1 would not reduce impacts to a less-than-significant level.

Mitigation Measure M-AES-1 has been modified and incorporated into CAP Update Mitigation Measure Aes-1, which requires that all large-scale renewable energy projects (including both solar and wind projects) apply the *County of San Diego Guidelines for Determining Significance: Visual Resources* (County of San Diego 2007) and *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Dark Skies and Glare* (County of San Diego 2009) through the MUP discretionary review process. In addition, CAP Update Mitigation Measure Aes-1 would require that feasible and appropriate project-specific mitigation measures shall be incorporated to mitigate aesthetic impacts. However, it is still not possible to guarantee that all projects and cumulative impacts to scenic vistas and scenic resources would be reduced to a less-than-significant level due to uncertainty of the type of technology, locations, and scale of future renewable energy projects. Therefore, impacts to scenic vistas and scenic resources would be significant and unavailable.

In summary, implementation of CAP Update energy measures and actions would result in less than significant impacts to scenic vistas and scenic resources with the exception of Action E-3.3 which would result in the potential development of large-scale renewable energy projects. Because of the size and magnitude of the development associated with large-scale solar and wind energy projects, it may not be feasible for future individual projects to fully mitigate impacts to scenic vistas or scenic resources to a less-than-significant level. Therefore, impacts to scenic vistas or scenic resources would remain significant with mitigation incorporated.

Built Environment and Transportation Measures and Actions

These measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Action T-1.1) and Active Transportation Program (Action T-5.1). Other measures and actions would affect the design of existing and planned roadways. Action T-6.2 would Implement transit-supportive roadway treatments such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Action T-3.1 would result in the installation of publicly available electric vehicle charging stations. Action T-3.1.a would support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts that could facilitate future infrastructure construction. Several measures and actions would further support alternative modes of transportation without resulting in physical changes that could affect scenic vistas and scenic resources.

Because of the nature of such improvements (i.e., limited size, along existing roadways, not accompanied by tall or expansive buildings), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. These improvements would not result in substantial changes to the visual landscape compared to that contemplated under the General Plan in the 2011 GPU PEIR. All future development projects would be required to follow County development requirements,

including compliance with regulatory requirements, ordinances, and applicable permitting procedures related to protection of scenic vistas and scenic resources.

In addition, as explained in the 2011 GPU PEIR, implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures pertaining to visual resources located in Section 2.1, "Aesthetics" (pages 2.1-32 through 2.1-36), of the 2011 GPU PEIR, including Mitigation Measure Aes-1.2 (protecting sensitive habitats), Mitigation Measure Aes-1.6 (requiring community review on projects adversely affecting the scenic quality), Mitigation Measure Aes-1.7 and Aes-1.8 (requiring preservation of scenic resources and minimizing landform alteration), and Mitigation Measure Aes-1.9 (requiring identification of scenic vistas and viewsheds) would reduce project impacts to scenic vistas and scenic resources. Adopted General Plan Policies LU-6.6, LU-6.9, LU-10.2, LU-11.2, LU-12.4, COS-11.3, and COS-12.2 require future development to conform to the natural environment and to protect scenic resources. Applicable 2011 GPU PEIR Mitigation Measures Aes-1.2, Aes-1.6, Aes-1.7, Aes-1.8, and Aes-1.9 require protection of scenic resources (e.g., sensitive habitat and agricultural lands), minimization of landform alteration, community review, and identification of scenic vistas and viewshed. Implementation of the General Plan policies and the 2011 GPU PEIR mitigation measures would ensure that new development would conserve and protect unique and sensitive visual features and the scenic quality of the environment. The impact would remain less than significant.

Summary

As explained in the 2011 GPU PEIR, implementation of adopted General Plan Policies LU-6.6, LU-6.9, LU-10.2, LU-11.2, LU-12.4, COS-11.3, and COS-12.2 and adopted 2011 GPU PEIR mitigation measures would ensure that new development would conserve and protect unique and sensitive visual features and the scenic quality of the environment. Adopted General Plan policies require future development to conform to natural environment and to protect scenic resources. Applicable 2011 GPU PEIR Mitigation Measures Aes-1.2, Aes-1.6, Aes-1.7, Aes-1.8, and Aes-1.9 require protection of scenic resources (e.g., sensitive habitat and agricultural lands), minimization of landform alteration, community review, and identification of scenic vistas and viewshed.

With implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, CAP Update Mitigation Measure Aes-1, and additional regulatory requirements, implementation of the CAP Update solid waste, water and wastewater, agriculture and conservation, and built environment, and transportation measures and actions would not result in new or substantial increase in magnitude of impacts related to scenic vistas and scenic resources compared to the 2011 GPU PEIR. However, as described above, implementation of the CAP Update Action E-3.3 has the potential to result in development of large-scale renewable energy systems (including, PV solar, concentrated solar, and wind turbines). While development of large-scale renewable energy systems is subject to the County's renewable energy ordinances, MUP, Administrative Permit, and/or discretionary environmental review, it is not possible to ensure that impacts related to scenic vistas or scenic resources would be reduced to a less-than-significant level. Therefore, implementation of CAP Update Action E-3.3 would

result in a potentially significant impact to scenic vistas and scenic resources **(Impact Aes-1)**. Implementation of the CAP Update **would result in a new significant impact** not disclosed in the 2011 GPU PEIR.

2.1.3.4 Issue 2: Substantially Degrade Visual Character or Quality

This section describes potential for implementation of the proposed CAP Update measures and actions to result in effects to visual character or quality.

Guidelines for Determination of Significance

Appendix G of the State CEQA Guidelines establishes the following guidelines for determining significance of effects to visual character or quality:

- In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surrounding.
- In urbanized areas, conflict with applicable zoning and other regulations governing scenic quality.

In addition, the *County of San Diego Guidelines for Determining Significance: Visual Resources* provides the following direction:

- Implementation of the project would result in a significant impact if it would substantially degrade the existing visual character or quality of the site and its surroundings through the following:
  - introducing features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style, setbacks, density, size, massing, coverage, scale, color, architecture, building materials, etc.) or
  - being inconsistent with applicable design guidelines.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts to visual character related to the adoption of the goals and policies contained within the plan and the development anticipated throughout the planning horizon. The discussion of impacts related to visual character and quality can be found in Section 2.1, “Aesthetics” (pages 2.1-37 through 2.1-49 and page 2.1-55), and is incorporated by reference. The 2011 GPU PEIR determined that anticipated development under the General Plan would result in increased development densities in the unincorporated county that would have the potential to degrade the existing visual character or quality of a community. Therefore, the 2011 GPU PEIR determined that implementation of the General Plan would result in potentially significant project impacts on visual character or quality in the unincorporated county.

The 2011 GPU PEIR determined that the impacts to visual character and quality would be reduced through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; General Plan goals and policies; and mitigation measures identified in the 2011 GPU PEIR. General Plan policies that would protect the visual character and quality of the unincorporated county include Policy LU-1.4 limiting expansion of the villages; Policy LU-2.1 requiring maintenance of community plans; Policy LU-2.2 related to development densities and lot sizes; Policy LU-2.4 to identify an maintain greenbelts; Policies LU-4.1 through LU-4.4 related to regional planning and compatibility with adjacent jurisdictions; and Policies LU-11.2, LU-12.4, and H-2.1 regarding compatibility of development and infrastructure with community character. In addition, Mitigation Measures Aes-1.1 through Aes-1.11 would be implemented, as well as Mitigation Measure Aes-3.1 related to improving road standards and design guidelines related to elements including road design, parking, and landscaping. However, even with these policies and identified mitigation measures, implementation of the General Plan could substantially degrade the existing visual character or quality of the unincorporated county. This impact was to be found significant and unavoidable.

The 2011 GPU PEIR considered the following additional mitigation that was found to be infeasible: incorporating revised goals and policies into community plans that would severely limit the potential for development growth in order to maintain the existing visual character or quality of each community; comprehensive expansion of the Zoning Ordinance to specifically dictate the exact development type and design allowed in the various areas of the county to avoid impacts to community character; and approving only development that is comparable in size, scope, and use as existing development in order to avoid impacts to the visual character and quality of the county's communities. These mitigation options were rejected by the County for the following reasons: (1) restrictions on development would conflict with goals to provide housing, (2) restrictions on future development in areas identified for increased growth in the General Plan and/or areas where existing land uses are not the same as the land uses proposed by the General Plan would be inconsistent with the General Plan, and (3) the preparation of detailed plans for all development within the county to match existing community character would be infeasible. Mitigation rejected as infeasible within the 2011 GPU PEIR is described in detail in Section 2.1.6.1 of the 2011 GPU PEIR.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures and actions to affect visual character and quality.

Solid Waste Measures and Actions

Implementation of CAP Update Measures SW-1 through SW-4 and associated implementing actions have the potential to result in the construction of new or expanded solid waste facilities. These facilities could be located in rural areas or in proximity to developed communities. New or expanded solid waste facilities would not generally result in a degradation of visual character or quality through introducing incompatible uses, bulk,

scale, or materials to the area. Construction activities would introduce features (e.g., construction trucks, equipment, and materials) that may detract from or contrast with the existing visual character and/or quality of an established community. However, construction-related impacts would be temporary. Development of new or expanded solid waste facilities would be required to comply with regulations that relate to the built form of a community, such as design guidelines and design review. Additionally, the Zoning Ordinance contains development standards that relate to visual characteristics, such as density, size, and building materials requirements. Future development of solid waste facilities would be required to comply with design review guidelines that would ensure future structures would complement both the site and surrounding areas of existing development; therefore, the impacts to visual character or quality of an established community would be less than significant.

Potential projects resulting from implementation of CAP Update solid waste measures and actions would not generate new impacts to visual character and quality that is substantially more severe than is evaluated in the 2011 GPU PEIR. Development of new or expanded solid waste facilities would be required to comply with County development requirements, including local policies and ordinances related to design review and protection of visual character and quality. Accordingly, implementation of the CAP Update solid waste measures and actions would not result in a new or substantial increase in magnitude of impacts related to visual character or quality compared to what was analyzed in the 2011 GPU PEIR.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Implementation of CAP Update Measures W-1 and W-2 would have the potential to result in installation of water efficient appliance, smart irrigation system, and stormwater and greywater capture systems. Implementation of CAP Update Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. The water efficient appliance, irrigation systems, and stormwater and wastewater treatment systems would generally be installed indoor or on ground level, which would result in minimal physical impacts. Accordingly, implementation of the CAP Update water and wastewater measures and actions would not result in new or substantial increase in magnitude of impacts related visual character or quality compared to what was analyzed in the 2011 GPU PEIR. This impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, planting and protecting trees, providing incentive to encourage carbon farming, and developing a program to incentivize transition to cleaner fuels. These measures would result in new conservation lands, preservation of existing natural and agricultural lands, new trees, and the use of

cleaner fuels in the unincorporated county. The CAP Update would result in increased conservation of natural and agricultural lands in the unincorporated county. These lands are key components of scenic vistas and community character. Therefore, implementing agriculture and conservation measures and actions would result in beneficial impacts to existing visual character and quality.

Implementation of Action A-4.1b would result in evaluation of opportunities to increase affordable farmworker housing in the unincorporated county. This action has potential to indirectly result in the development of farmworker housing to reduce emissions from farmworker transportation. If development of new farmworker housing results from opportunities identified through implementation of this action, such development would introduce features (e.g., construction trucks, equipment, and materials) during construction that may detract from or contrast with the existing visual character and/or quality of an established community. However, construction-related impacts would be temporary. The new farmworker housing would be designed in accordance with the Zoning Ordinance, which includes development standards that relate to visual character, such as density, size, and building materials requirements. For the purpose of this evaluation, it is assumed that any such development would be consistent with the General Plan and reflected in the buildout conditions evaluated in the 2011 GPU PEIR. The agriculture and conservation measures would have a less-than-significant impact on visual character and quality.

Energy Measures and Actions

Implementation of the CAP Update would generally result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. Through Action E-3.2.b, the County would work with partners to promote and support on-site renewable (wind and solar) energy generation and storage (microgrids, site-specific and/or community scale) to increase renewable energy generation and use in the unincorporated area.

As described above in Section 2.1.3.3, “Issue 1: Change or Obstruct Scenic Vistas and Scenic Resources,” the project would include retrofits of mechanical equipment and the installation of rooftop or ground-mounted solar arrays or small wind turbines on new or existing buildings. The placement of small-scale PV solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance Section 6954(a) which limits the height and scale of these facilities. Rooftop PV solar energy panels generally do not involve construction that would substantially change roof lines or add substantial massing or height such that the altered buildings would have the potential to substantially affect visual character or quality. The County’s Renewable Energy Zoning Ordinance Section 6954(a) requires the height of on-site PV solar energy systems be no taller than the height designator of the zone, except for on-site energy use systems that may extend no more than 5 feet above the roofline.

Potential PV solar, small-scale wind turbines, and other building retrofits and improvements would occur in areas of existing development, and in association with new development, which would include energy-efficient mechanical equipment at the time of construction. Implementation of new mechanical equipment or new renewable energy equipment would be regulated by existing County codes and policies and would be

consistent with the existing visual character of the area. In addition, the General Plan policies and 2011 GPU PEIR mitigation measures pertaining to scenic resources (Adopted Mitigation Measures Aes-1.2, Aes-1.6, and Aes-1.8) would further limit the project impacts to visual character and quality by preserving natural open space that contributes to the quality of scenic vistas, requiring review for projects that would adversely impact scenic quality, and developing programs to preserve ridgelines and steep slopes.

Furthermore, wind turbines of all sizes are regulated by the County's Wind Energy Ordinance Sections 6950–6952 and would be required to comply with regulations specific to size and scale of the turbines. Small wind turbines that meet the zoning verification requirements would be limited to a height of no more than 80 feet for small turbines, would have relatively small blades on a vertical or horizontal axis, and would be prohibited on ridgelines. In addition, these structures cannot include guy wires for structural support or aboveground power lines. Small wind turbines could result in increased visual contrasts, view blockage, or skylining (showing the outline of the facilities) from sensitive viewing locations (County of San Diego 2013).

The County's Wind Energy Ordinance establishes requirements related to the design and placement of small wind turbines. Due to the nature and scale of the infrastructure, small scale wind turbines would be noticeable additions to the skyline. On-site renewable energy development supported by the CAP Update would not be expected to conflict with important visual elements or the quality of an area in a manner that would substantially degrade existing visual character or quality. Similarly, the CAP update could result in construction of microgrids to support on-site and community scale energy storage to support adjacent development. Microgrids would appear similar to existing power infrastructure and would not result in unique effects to visual character or quality not anticipated with buildout of the General Plan. These facilities would support a discrete parcel (in the case of energy generation facilities) or community (microgrids). At the program level, promotion and support for on-site renewable energy generation would not be expected to substantially increase the potential for buildout of the General Plan to degrade visual character or quality.

As described in detail in Section 2.1.3.3, "Issue 1: Change or Obstruct Scenic Vistas and Scenic Resources," implementation of CAP Update Action E-3.3 could result in new large-scale renewable energy systems including PV solar, concentrator solar, and wind turbines. Because the amount of demand generated by such a program and mix of renewable energy types that would be constructed to satisfy demand is unknown, this SEIR evaluates the potential for impacts at the program level. As previously noted, large-scale renewable energy infrastructure would generally be constructed in primarily undeveloped locations that are productive for generating renewable energy. Specific locations for projects have not been identified. Also, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. However, because of the size of large-scale renewable energy infrastructure, impacts related to visual character or quality could be potentially significant. In remote areas of

the unincorporated county, there are land uses that are considered sensitive to visual changes to their settings, which include residential areas; designated park areas, recreation (including off-highway vehicle staging and use), and natural areas; major transportation systems; and designated and eligible state historic routes and scenic highways.

Similar to the description of impacts described in detail in Section 2.1.3.3, permanent impacts could result from the alteration of the visual landscape with the introduction of, for example, large buildings for equipment, wind turbines, and PV arrays. If feasible based on location and height, screening, and landscaping of the facilities as suggested by the *County of San Diego Guidelines for Determining Significance: Visual Resources* would provide some visual relief from some aspects of the facilities including accessory buildings; however, large-scale renewable energy facilities would likely remain visible from varying distances.

Typical construction activities associated with development of renewable energy systems would require the use of trucks, staging areas for supplies and equipment, parking for workers, and grading. These construction activities could result in temporary disruption of visual character or quality of the area. All large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to visual character and quality to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. However, it may be infeasible to fully mitigate the impacts to a less-than-significant level because of the size of the development associated with these systems.

As described on page 2.1-13 of the 2013 Wind Energy Ordinance EIR, all large-scale wind turbine projects would be required to obtain an MUP. As part of the County's discretionary review process, all large wind turbine projects would also be subject to environmental review and would be required to implement measures to minimize visual impacts to the extent feasible. However, because of the allowable height, direct or indirect effects may occur related to increased visual contrasts, view blockage, or skylining (showing the outline of the facilities) from sensitive viewing locations. The 2013 Wind Energy Ordinance EIR identified Mitigation Measure M-AES-1, as described below in Section 2.1.5, which would require compliance with the *County of San Diego Guidelines for Determining Significance: Visual Resources* and *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Dark Skies and Glare*. The County determined that Mitigation Measure M-AES-1 would not reduce impacts to a less-than-significant level. Mitigation Measure M-AES-1 has been modified and incorporated into CAP Update Mitigation Measure Aes-1 which applies to all large-scale renewable energy projects, including solar and wind projects. Large-scale solar systems would have similar results to visual character or quality with implementation of CAP Update Mitigation Measure Aes-1.

While all large-scale renewable energy projects would be required to obtain an MUP, undergo a discretionary review, evaluate project-specific impacts under CEQA, and mitigate to the extent feasible, it is not possible to ensure that impacts related to visual character and quality would be reduced to less-than-significant level. Projects would be

required to implement the adopted General Plan policies, 2011 GPU PEIR mitigation measures listed in Section 2.1.2.2, and CAP Update Mitigation Measure Aes-1, which would require new development to protect visual character and quality. However, because of the size and magnitude of the development associated with these systems it may be infeasible to fully mitigate the impact to visual character and quality from future individual projects to a less-than-significant level. Therefore, implementation of CAP Update Action E-3.3 would result in a potentially significant impact to visual character or quality.

Built Environment and Transportation Measures and Actions

The built environment and transportation measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Action T-1.1) and Active Transportation Program (Action T-5.1). Other measures and actions would affect the design of existing and planned roadways. Action T-6.2 would implement transit-supportive roadway treatments such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Action T-3.1 would result in the installation of publicly available electric vehicle charging stations. Action T-3.1.a would support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts that could facilitate future infrastructure construction. Several measures and actions would further support alternative modes of transportation without resulting in physical changes that could affect visual character or quality.

Where CAP Update measures and actions result in physical changes to the environment, these improvements would be located throughout the county and would occur in areas that are developed with existing residential and commercial uses. While these improvements may alter the visual quality or character of a community, these alterations would not generally result in a degradation of visual character or quality through introducing incompatible uses, bulk, scale, or materials to the area. The construction and maintenance of this infrastructure is within the scope of the development evaluated in the 2011 GPU PEIR.

Furthermore, all future development projects would be required to comply with County development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to protection of visual character. In addition, as explained in the 2011 GPU PEIR, implementation of the General Plan policies listed above in Section 2.1.2, "Regulatory Framework," and implementation of 2011 GPU PEIR Mitigation Measure Aes-1.2 (protecting sensitive biological habitats), Mitigation Measure Aes-1.6 (requiring community review on projects adversely affecting the scenic quality), and Mitigation Measure Aes-1.8 (minimizing landform alteration and preserving ridgelines and steep slopes) would conserve and protect natural resources that contribute to the county's scenic resources and protect visual character or quality of an existing community. The built environment and transportation measures would have a less-than-significant impact on visual character and quality.

Summary

The CAP Update would further existing programs and provide new and modified infrastructure in new and established communities to reduce GHG emissions. Implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Aes-1 would reduce the project impacts associated with the deterioration of visual character and quality. Although the locations of most projects that would be constructed to achieve the targets of the CAP Update are not known because they would be driven by implementation and participation in CAP Update programs, it is reasonable to assume that development would be consistent with applicable design guidelines and generally consistent with the visual character of the county. Impacts related to visual character and quality associated with implementation of the solid waste, water and wastewater, agriculture and conservation, and built environment and transportation measures and actions in the CAP Update would be less than significant with mitigation.

However, even with implementation of 2011 General Plan policies, 2011 GPU PEIR mitigation measures, and 2013 Wind Energy Ordinance EIR Mitigation Measure M-AES-1, and CAP Update Mitigation Measure Aes-1, impacts related to large-scale renewable energy facilities could result in significant impacts to visual character and/or quality. Implementation of the CAP Update **would not result in new significant impacts than** disclosed in the 2011 GPU PEIR.

2.1.3.5 Issue 3: Adversely Affect Views due to New Light and Glare

This section describes the potential for implementation of the proposed CAP Update measures and actions to result from light or glare effects.

Guidelines for Determination of Significance

Appendix G of the State CEQA Guidelines establishes the following guidelines for determining significance of effects related to light and glare:

- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

In addition, the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Dark Skies and Glare* provides the following direction:

- The project will generally be considered to have a significant effect if it proposes any of the following features, absent specific evidence to the contrary:
    - The project will install outdoor light fixtures that do not conform to the lamp type and shielding requirements described in Section 59.105 (Requirements for Lamp Source and Shielding) and are not otherwise exempt pursuant Section 59.108 or Section 59.109 of the San Diego County Light Pollution Code.

- The project will operate Class I or Class III outdoor lighting between 11:00 p.m. and sunrise that is not otherwise exempted pursuant Section 59.108 or Section 59.109 of the San Diego County Light Pollution Code.
- The project will generate light trespass that exceeds 0.2 foot-candles measured five feet onto the adjacent property.
- The project will install highly reflective building materials, including but not limited to reflective glass and high-gloss surface color, that will create daytime glare and be visible from roadways, pedestrian walkways or areas frequently used for outdoor activities on adjacent properties.
- The project does not conform to applicable federal, state, or local statute or regulation related to dark skies or glare, including but not limited to the San Diego County Light Pollution Code.

Conversely, if a project does not propose any of the above features, it will generally not be considered to have a significant effect on dark skies or from glare, absent specific evidence of such an effect.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts from light and glare related to the adoption of the goals and policies within the general plan and development anticipated through the planning horizon. The General Plan would allow for additional growth that would result in increased light and glare in the county, which would adversely affect day or nighttime views. Therefore, the 2011 GPU PEIR determined that anticipated development under the General Plan would result in potentially significant impacts related to light and glare.

The 2011 GPU PEIR determined that the impacts from light and glare would be reduced through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; adopted General Plan policies CO-13.1 (restricting outdoor lighting and glare from development in semi-rural and rural areas), CO-13.2 (maintaining dark skies to the maximum extent feasible around the Palomar Mountain and Mount Laguana observatories), and CO-13.3 (coordinating with adjacent agencies to minimize light pollution); and the 2011 GPU PEIR Mitigation Measure Aes-4.1 (coordinating with communities and stakeholder to review and amend light pollution controls), Mitigation Measure Aes-4.2 (maintaining light and glare regulation), and Mitigation Measure Aes-4.3 (Participating in regional planning and agencies planning). However, even with these programs in place, the impacts would not be reduced to a less-than-significant level. The 2011 GPU PEIR Mitigation Measures Aes-4.1 through Aes-4.3 require the County to coordinate with communities and stakeholders to review light pollution controls and maintain light and glare regulations. This impact was found significant and unavoidable.

Additional mitigation considered to reduce light and glare impacts would create more stringent lighting standards in the unincorporated county that would include a nighttime

lighting curfew of 10:00 p.m. for certain areas and a prohibition of development requiring any light in other areas. This mitigation was found to be infeasible by the County because the measures would have required restrictions on future development identified in the General Plan because lighting is necessary for safety and other reasons. Mitigation rejected as infeasible within the 2011 GPU PEIR is described in detail in Section 2.1.6.4 of the 2011 GPU PEIR. The discussion of impacts related to light or glare can be found in Section 2.1, "Aesthetics" (pages 2.1-49 through 2.1-53 and pages 2.1-55 through 2.1-56) of the 2011 GPU PEIR, and it is incorporated by reference.

CAP Update Impact Analysis

The following sections describe the potentially significant impacts related to light and glare that could result from the implementation of the proposed CAP Update measures and actions.

Solid Waste Measures and Actions

The CAP Update includes zero waste policies that exceed the state's diversion targets and implementation of landfill gas capture systems that exceed state requirements (Actions SW-1.1, SW-1.1.b, SW-2.1 and SW-2.1.c). In addition, Action SW-4.1.a would incentivize the development of new composting/anaerobic digestion facilities and on-farm digesters. Implementation of the measures and actions in this group may result in the need for new or expanded facilities to process the waste and result in the development of new or expanded solid waste facilities. The new or expanded facilities would require the use of lighting during construction and operation. Development of new or expanded solid waste facilities would result in similar light and glare impacts as those discussed in the 2011 GPU PEIR (pages 2.1-49 through 2.1-53). Solid waste facilities could include the use of reflective building materials and include new lighting sources during construction and operation.

Development of new or expanded solid waste facilities would be required to comply with the San Diego County Light Pollution Code for outdoor light fixtures standards to minimize impacts on the dark skies and on astronomical observatories, comply with General Plan Policies COS-13.1 and COS-13.2 to restrict outdoor light and glare from development projects and minimize impact on dark skies surrounding Palomar and Mount Laguna observatories, and implement 2011 GPU PEIR Mitigation Measures Aes-4.1 and Aes-4.2 to reduce impacts to dark skies and adjacent properties and communities.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Implementation of Measures W-1 and W-2 would generally result in installation of water efficient appliance, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. Installation of

water efficient appliances, irrigation systems, stormwater and grey water capture systems, and stormwater and wastewater treatment systems would not require new lighting sources and would not require the use of highly reflective materials. Therefore, no new lighting or glare sources would occur from implementing water and wastewater measures and actions. There would be no impact.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and incentivizing carbon farming. Implementation of Action A-4.1.b would have the potential to identify opportunities for increased farmworker housing in the unincorporated county. Acquisition of conservation lands, preserving natural and agricultural lands, planting and protecting trees, and implementing carbon farming would not require installation of substantial new lighting or the use of highly reflective materials. However, subsequent development of new farmworker housing would result in new lighting in the unincorporated county. Development of farmworker housing would be required to comply with adopted General Plan Policy COS-13.1 to restrict outdoor light and glare in semi-rural and rural areas and Policy COS-13.2 to minimize light and glare impacts on the dark skies surrounding Palomar and Mount Laguna observatories, and the 2011 GPU PEIR Mitigation Measure Aes-4.2 to maintain light and glare regulations, such as the Light Pollution Code and Zoning Ordinance, to minimize light and glare impacts. Furthermore, such development would be required to undergo subsequent CEQA analysis once projects have been defined and located. Therefore, no new lighting or glare sources would occur from implementing agriculture and conservation measures and actions and there would be no impact.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities, and the project could include rooftop or ground-mounted solar arrays or small wind turbines, modern mechanical systems, and other similar improvements.

Retrofits to mechanical equipment would not be anticipated to introduce a new source of light or glare. PV solar arrays that could be installed on the ground or mounted on rooftops for on-site energy use would be relatively small and are regulated by height, scale, and placement by the County's Zoning Ordinance Section 6954(a). In addition, while in certain situations the glass surfaces of PV solar systems can produce glint (a momentary flash of bright light) and glare (a reflection of bright light for a longer duration), light absorption is central to the function of a PV solar panel rather than reflection. PV solar panels are constructed of dark-colored materials and are coated with anti-reflective coatings. Modern PV solar panels reflect as little as 2 percent of incoming sunlight, which is about the same as water and less than soil or wood shingles (DOE 2014). Additionally, small wind turbines would not require FAA obstruction lighting and are required to comply with the County Light Pollution Code. The code addresses and minimizes the impact of new sources of light pollution on nighttime views.

As a result, implementation of retrofits and new mechanical equipment, which would be integrated into an existing developed setting, would not result in new substantial sources of light or glare. Impacts would be further minimized with application of adopted General Plan policies, including Policy COS-13.1, which restricts outdoor light and glare in semi-rural and rural lands; Policy COS-13.2, which requires minimizing impact on the dark skies surrounding Palomar and Mount Laguna observatories; and Policy COS-13.3, which requires coordination with other agencies to retain the night skies quality. Additionally, applicable 2011 GPU PEIR mitigation measures would be applied to the project, including Mitigation Measure Aes-4.1, which requires coordination with communities and stakeholders to review or amend light pollution controls; Mitigation Measure Aes-4.2, which requires maintaining light and glare regulations, such as Light Pollution Code and Zoning Ordinance, to minimize light and glare impacts; and Mitigation Measure Aes-4.3, which requires participating in regional planning and other planning effort to review and comment on potential light or glare impacts resulting from new development. Compliance with County light and glare regulations and adopted General Plan policies, as well as implementation of applicable 2011 GPU PEIR mitigation measures would ensure that light and glare impacts associated with the CAP Update would be minimized.

As described above in Section 2.1.3.3, “Issue 1: Change or Obstruct Scenic Vistas and Scenic Resources,” implementation of CAP Update Action E.3.3 could result in the construction of new large-scale renewable energy infrastructure including PV solar, concentrator solar, and wind turbines. Specific locations for projects have not been identified. Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Large-scale renewable energy infrastructure would be constructed in primarily undeveloped locations that are productive for generating wind and solar energy. Also, it is likely that suitable locations would include areas that are not highly urbanized because of the size, massing, coverage, and scale of this type of infrastructure rely upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. The exact locations of new infrastructure are unknown; however, wind turbines, solar concentrators, and PV solar arrays are typically a source of light and glare.

Concentrator solar systems utilize curved mirrors mounted on a tracker, which allow direct sunlight to be concentrated and captured at higher efficiencies; however, these systems may result in instances of glare. PV solar panels are typically dark in color, coated to be non-reflective, and designed to be highly absorptive of all light that strikes their glass surfaces. It is not likely that these panels would emit significant amounts of glare. However, solar energy systems have other components such as steel support structures and steel containers that house battery storage systems, as well as minimal amounts of glare that could be caused by transmission lines.

As noted above, future solar energy projects would be required to obtain an MUP, undergo a discretionary review, evaluate project-specific impacts under CEQA, and mitigate to the extent feasible. Future large-scale solar projects could also orient PV solar

panels and supporting structures away from highways, roads, or trails where potential impacts from glare could be experienced by motorists and recreationists. Though it is unlikely that PV solar panels would emit glare because they are designed to be efficient and absorb all the light that strikes their surface, it is possible that other components of renewable energy systems could emit some glare. Future discretionary projects would be required to mitigate their impacts from glare to the extent feasible, such as by painting reflective supporting components to reduce glare. Mitigation Measures CAP Aes-1 and Aes-2 require incorporation of mitigation to reduce significant aesthetic impacts and preparation of a Lighting Mitigation Plan for all large-scale renewable energy to reduce light and glare impacts. However, it is not possible to ensure that impacts would be reduced to a less-than-significant level at this program level and would be highly speculative at this stage of analysis.

As described on pages 2.1-15 to 2.1-16 of the 2013 Wind Energy Ordinance EIR, most large wind turbines would meet FAA height regulations and would be subject to the obstruction lighting or other forms of aviation impact avoidance including markers and paint colors or patterns (County of San Diego 2013). Nighttime lighting at these facilities could be visible to residents in rural and undeveloped areas because of a lack of existing nighttime lighting in the area. Lighting may also be visible to motorists in the general area. Also, the height of wind turbines and the repetitive flashing of FAA-required safety lighting may result in a strong, constant source of highly visible light, and nighttime views for area residents may be affected. Large wind turbine projects may be prone to causing shadow flicker, which is commonly defined as alternating changes in light intensity at a given stationary location, if sensitive receptors are within 2,000 meters (6,562 feet) of the proposed turbines. The 2013 Wind Energy Ordinance EIR identified Mitigation Measures M-AES-2 and M-AES-3 described below in Section 2.1.5. Mitigation Measures M-AES-2 and M-AES-3 have been incorporated into this SEIR as CAP Update Mitigation Measures Aes-2 and Aes-3, which require a Lighting Mitigation Plan and Shadow Flicker Study at the time of discretionary review. Additional mitigation, which would require an Obstacle Collision Avoidance System, was considered but rejected as infeasible because the technology is not widely available. Therefore, even though large wind turbine projects would be required to comply with the County's Light Pollution Code, and the projects would be required to minimize the impact of new sources of light pollution, potential impacts would remain significant. Solar energy systems would not require significant sources of nighttime lighting, as they only require minimal perimeter security lighting.

Therefore, while all large-scale renewable energy projects would be required to obtain an MUP, undergo a discretionary review, evaluate project-specific impacts under CEQA, and mitigate to the extent feasible, it is not possible to ensure that impacts related to light and glare would be reduced to a less-than-significant level because it would be infeasible to fully mitigate the impacts of light and glare as described above. Therefore, implementation of CAP Update Action E-3.3 would result in potentially significant light and glare impacts.

Built Environment and Transportation Measures and Actions

These measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Action T-

1.1) and Active Transportation Program (Action T-5.1). Other measures and actions would affect the design of existing and planned roadways. Action T-6.2 would Implement transit-supportive roadway treatments such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Action T-3.1 would result in the installation of publicly available electric vehicle charging stations. Several measures and actions would further support alternative modes of transportation without resulting in physical changes that could affect visual character or quality.

Additional nighttime lighting may be required for security purposes with implementation of these measures and actions, but these lighting sources would be generally smaller in scale and provide less illumination than typical lighting on streetscape. If required, new lighting would be installed within or adjacent to already urbanized corridors where street and building lighting is already present. New lighting would not substantially increase nighttime lighting levels or glare in the area to an extent that would affect views.

In addition, future development would be required to comply with the San Diego County Light Pollution Code for outdoor light fixtures standards to minimize impacts on the dark skies and on astronomical observatories, comply with General Plan Policies COS-13.1 and COS-13.2 to restrict outdoor light and glare from development projects, and implement 2011 GPU PEIR Mitigation Measure Aes-4.1 (coordinating with communities and stakeholders to review or amend light pollution controls) and Mitigation Measure Aes-4.2 (maintaining light and glare regulations) to reduce impacts to dark skies and adjacent properties and communities. Design modifications to existing and planned transportation infrastructure is not anticipated to generate substantial sources of light or glare due to use of outdoor light fixtures that do not conform to the San Diego County Light Pollution Code, use of highly reflective materials, or other features that do not conform to applicable federal, state, or local statute or regulation related to dark skies or glare.

Summary

Implementation of the CAP Update solid waste, water and wastewater, agriculture and conservation, and built environment and transportation measures and actions may result in limited development with the potential to introduce new sources of light or glare. Implementation of these projects would be within the scope of the lighting and nighttime views evaluated in the 2011 GPU PEIR. Based on the type of subsequent projects anticipated, implementation of these measures and actions is not expected to generate substantial sources of light or glare due to use of outdoor light fixtures that do not conform to the San Diego County Light Pollution Code, use of highly reflective materials, or other features that do not conform to applicable federal, state, or local statute or regulation related to dark skies or glare.

As defined in the 2011 GPU PEIR, premier astronomical sites are high-quality astronomical research sites meeting the following five criteria: elevation over 5,000 feet above sea level; clear, cloud-free night sky; proximity to the Pacific Ocean; distance from urban areas; and freedom from nearby sources of light, dust, and smoke. These sites are defined in the *County of San Diego Guidelines for Determining Significance and Report*

Format and Content Requirements: Dark Skies and Glare. No new sites have been added since 2009 and the CAP Update would not result in the potential for new sources of light and glare that could result in effects to these sites that are substantially greater than disclosed in the 2011 GPU PEIR.

Development that occurs as part of implementation of the CAP Update solid waste, water and wastewater, agriculture and conservation, and built environment and transportation measures and actions would be required to comply with adopted General Plan Policy COS-13.1, which restricts outdoor light and glare in semi-rural and rural lands; Policy COS-13.2, which requires minimizing impact on the dark skies surrounding Palomar and Mount Laguna observatories; and Policy COS-13.3, which requires coordination with other agencies to retain the night skies quality. In addition, 2011 GPU PEIR Mitigation Measure Aes-4.1 requires coordination with communities and stakeholders to review or amend light pollution controls; Mitigation Measure Aes-4.2 requires maintaining light and glare regulations, such as Light Pollution Code and Zoning Ordinance, to minimize light and glare impacts. Compliance with the adopted General Plan policies and implementation of applicable 2011 GPU PEIR mitigation measures would ensure that new development would conform to the County's light and glare regulations to protect the scenic values of the county and minimize light and glare impacts. Light and glare from new and expanded facilities would be less than significant with mitigation. However, implementation of CAP Update Action E-3.3, which would result in the development of large-scale renewable energy systems, could result in significant light and glare impacts even with implementation of CAP Update Mitigation Measures Aes-1 through Aes-3 as discussed above. Implementation of the CAP Update **would not result in new or more severe impacts** than discussed in the 2011 GPU PEIR.

2.1.3.6 Cumulative Impact Analysis

The cumulative impact analysis study area for aesthetic and visual resources in the 2011 GPU PEIR was identified as the immediate vicinity of view corridors, viewsheds, or scenic resources in the county, as well as areas near existing community development, and areas surrounding the two astronomical observatory sites (as described on page 2.1-53 of the 2011 GPU PEIR). This analysis uses the same scope identified in the 2011 GPU PEIR. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Change or Obstruct Scenic Vistas and Scenic Resources

Project impacts would be cumulative in nature if the project in combination with cumulative development, would contribute to the loss or impairment of scenic vistas or scenic resources in the county. The 2011 GPU PEIR concluded that cumulative impacts to scenic vistas and scenic resources would be less than significant with implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures listed in Section 2.1.2, "Regulatory Framework," and Section 2.1.5, "Mitigation Measures."

Implementation of the CAP Update solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions

would have the potential to result in construction of new or expanded solid waste, renewable energy, and transportation facilities in the unincorporated county. As discussed in Section 2.1.3.3, "Issue 1: Change or Obstruct Scenic Vistas and Scenic Resources," new facilities would be required to implement applicable General Plan policies and 2011 GPU PEIR Mitigation Measures Aes-1.2 and Aes-1.6 through Aes-1.9, which would reduce the effects of solid waste, renewable energy, and transportation facilities. However, project impacts related to implementation of CAP Update Action E-3.3 could result in the development of large-scale renewable energy systems that would remain potentially significant even with implementation of the adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Aes-1.

The 2011 GPU PEIR did not identify a cumulative impact related to scenic vistas or scenic resources, and the project, in combination with other reasonably foreseeable projects in the unincorporated county, could result in a new significant impact due to development of large-scale renewable energy infrastructure. The 2013 Wind Energy Ordinance EIR concluded that wind turbines would potentially contribute to a significant cumulative impact to scenic vistas and scenic resources, and the proposed project would contribute to that significant impact. Therefore, the project would result in a considerable contribution to an existing cumulative effect. Implementation of the CAP Update **would result in a new impact** not disclosed in the 2011 GPU PEIR **(Impact-C-Aes-1)**.

Issue 2: Substantially Degrade Visual Character or Quality

This section describes potential cumulative impacts on visual character or quality with implementation of the project. Impacts would be cumulative in nature if the project in combination with cumulative development 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 the existing visual character and/or quality of a neighborhood, community, or localized area.

The 2011 GPU PEIR concluded that cumulative impacts to visual character or quality would be significant and unavoidable even with implementation of General Plan policies and 2011 GPU PEIR mitigation measures. Further mitigation measures that would place restrictions on development were determined to be infeasible because they would conflict with goals to provide housing and the character of some communities will change as they continue to grow regardless of the amount of zoning regulation and design review that is imposed.

Implementation of the CAP Update would result in small and dispersed infrastructure improvements within the unincorporated county that are not substantially different than the type of development anticipated with buildout of the General Plan in the 2011 GPU PEIR. All development proposals resulting from implementation of the CAP Update measures and actions would be required to undergo review by the County and comply with applicable local and state regulations, as well as adopted General Plan policies and 2011 GPU PEIR Mitigation Measures Aes-1.2, Aes-1.6, and Aes-1.8 that would protect visual resources, resulting in the mitigation of impacts associated with General Plan buildout. However, even with implementation of General Plan policies, 2011 GPU PEIR mitigation measures, and

CAP Update Mitigation Measure Aes-1, new large-scale renewable energy facilities could result in a substantial effect related to visual character or quality.

Therefore, a significant cumulative impact related to changes in visual character and quality may result from cumulative development within the unincorporated county. Given the nature of the large-scale renewable energy projects that are anticipated to result from renewable energy measures in the CAP Update and the fact that impacts resulting from the proposed CAP Update Action E.3.3 would result in the substantial changes to visual character or quality, the project would result in a considerable contribution to a significant cumulative impact. The cumulative impact would be significant, as identified in the 2011 GPU PEIR. Implementation of the CAP Update **would not result in a new or more severe impact** than discussed in the 2011 GPU PEIR.

Issue 3: Adversely Affect Views due to New Light and Glare

This section describes potential cumulative impacts resulting from light or glare effects with implementation of the project. Cumulative projects would have the potential to result in a cumulative impact related to light and glare if, in combination, they would introduce a new source of substantial light or glare that would adversely affect day or nighttime views in the unincorporated county or that specifically would result in a lighting impact to the dark skies and on astronomical observatories.

Cumulative light and glare impacts were determined to be significant and unavoidable in the 2011 GPU PEIR. Implementation of CAP Update would result in the following improvements in the unincorporated county: new or expanded solid waste facilities, water efficient appliances, smart irrigation systems, stormwater and grey water treatment systems, mechanical retrofits, small-scale renewable energy infrastructure (ground and roof-mounted PV solar panels and small wind turbines), and new or expanded pedestrian and bicycle infrastructure. As discussed in Section 2.1.3.5, “Issue 3: Adversely Affect Views due to New Light and Glare,” implementation of these improvements would be required to comply with the adopted General Plan policies (Policies COS-13.1 through COS-13.3) and to implement the 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Aes-4.1 and Aes-4.2), which would minimize light and glare impacts and ensure that the CAP Update would not result in a new substantial source of light or glare that would adversely affect day or nighttime views in the area and would not create a lighting impact to the Palomar Mountain and Mount Laguna observatories. However, even with implementation of General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measures AES-1 through AES-3, could result in a substantial effect related to light and glare.

Therefore, a significant cumulative impact related to light and glare may result from cumulative development within the unincorporated county. It is foreseeable that future projects proposed in the unincorporated county would be required to comply with the same General Plan policies and 2011 GPU EIR mitigation measures, resulting in the mitigation of impacts associated with General Plan buildout. However, given the nature of the large-scale renewable energy projects that are anticipated to indirectly result from implementation of the CAP Update and the fact that impacts resulting from the proposed

CAP Update Action E.3.3 would result in the substantial effects related to light and glare, implementation of CAP Update would have a considerable contribution to a significant cumulative impact. The cumulative impact would be significant, 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.

2.1.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would result in new or more severe significant impacts and would have considerable contribution to a new significant cumulative impact related to scenic vistas and scenic resources (**Impact Aes-1 and Impact-C-Aes-1**). Impacts related to visual character and quality, and light and glare would be consistent with the 2011 GPU PEIR.

2.1.5 Mitigation Measures

The following section lists the mitigation measures from the 2011 GPU PEIR that are applicable to the proposed project. No new mitigation measures have been proposed to avoid or minimize aesthetic impacts resulting from the proposed project.

2.1.5.1 Issue 1: Change or Obstruct Scenic Vistas and Scenic Resources

The mitigation measures applicable to aesthetic and visual resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Aes-1.2: Protect sensitive biological habitats and species through regulations that require avoidance and mitigation of impacts. Existing programs include the County MSCP and associated BMOs, RPO, and California Environmental Quality Act (CEQA) Guidelines. While protecting biological resources, these programs also preserve natural open space that contributes to the quality of many of the County's scenic vistas.
>
> Adopted Mitigation Measure Aes-1.6: Require that project approvals with significant potential to adversely affect the scenic quality of a community require community review and specific findings of community compatibility. Examples can be found in the Zoning Ordinance with the numerous special uses or exceptions allowed pursuant to Administrative and Use Permits, and Site Plans. This practice has been proven useful for reducing impacts to aesthetic resources and their usefulness will increase as community plans and design guideline are updated pursuant to Aes-1.3 and Aes-1.4.
>
> Adopted Mitigation Measure Aes-1.7: Develop and implement programs and regulations that preserve agricultural lands. Agricultural lands are often key components of scenic vistas and community character. Therefore, preservation of these lands will help to minimize potential impacts to scenic resources.

> Adopted Mitigation Measure Aes-1.8: Continue to develop and implement programs and regulations that minimize landform alteration and preserve ridgelines and steep slopes where appropriate. Examples include the County's Grading Ordinance, RPO, and CEQA Guidelines.
>
> Adopted Mitigation Measure Aes-1.9: Work with communities and other stakeholders to identify key scenic vistas, viewsheds of County scenic road and highways, and other areas of specific scenic value. Apply Resource Conservation Area designations or other special area designators, guidelines, and tools to guide future development of parcels within these viewsheds to avoid impacts to the scenic vistas.

The 2013 Wind Energy Ordinance included the following mitigation measure to minimize the potentially significant impacts related to large wind turbine projects:

> Adopted Mitigation Measure-M-AES-1: During the environmental review process for future Major Use Permits for wind turbines, the County Guidelines for Determining Significance for Visual Resources and Dark Skies and Glare shall be applied. When aesthetic impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: siting/location considerations; minimizing development and grading of steep slopes; natural screening and landscaping; undergrounding utilities; inclusion of buffers; and lighting restrictions.

As described in Section 2.1.3.3, additional wind turbine mitigation was considered but rejected as infeasible through the Wind Energy EIR. Mitigation Measure M-AES-1 shall be incorporated into the Mitigation Monitoring and Reporting Program for the CAP Update and shall be applied to all large-scale renewable energy projects including but not limited to PV solar, concentrator solar, and wind turbines systems during the discretionary review process which would be implemented as a condition of receiving an MUP. As described in the impact analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of discretionary review and project-specific mitigation would minimize or eliminate impacts to scenic vistas and scenic resources to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Mitigation Measure M-AES-1 from the 2013 Wind Energy Ordinance EIR has been revised to include all large-scale renewable energy projects as follows:

> CAP Update Mitigation Measure Aes-1: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Visual Resources and Dark Skies and Glare shall be applied. When aesthetic impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: siting/location considerations; minimizing development and grading of steep slopes; natural screening and landscaping; undergrounding utilities; inclusion of buffers; and lighting restrictions.

CAP Update Mitigation Measure Aes-1 would reduce the potential for significant impacts related to scenic vistas and scenic resources; however, it is not possible to guarantee that all projects and cumulative impacts to scenic vistas and scenic resources would be reduced to a less-than-significant level because of the uncertainty of the types, locations, and scale of future renewable energy projects. Additional mitigation was contemplated as part of this draft SEIR that would implement a development cap upon large-scale renewable energy projects. However, this potential mitigation measure was rejected as infeasible because it may reduce the effectiveness of CAP Update Action E-3.3 and diminish the potential for the County to achieve the 2030 GHG emissions reduction target established by the CAP Update. It is unknown how many individual projects and specific type of large-scale renewable energy systems would be required to meet the GHG reduction goals of the CAP Update because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available.

2.1.5.2 Issue 2: Substantially Degrade Visual Character or Quality

The mitigation measures applicable to aesthetic and visual resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Aes-1.2: Protect sensitive biological habitats and species through regulations that require avoidance and mitigation of impacts. Existing programs include the County MSCP and associated BMOs, RPO, and California Environmental Quality Act (CEQA) Guidelines. While protecting biological resources, these programs also preserve natural open space that contributes to the quality of many of the County's scenic vistas.
>
> Adopted Mitigation Measure Aes-1.6: Require that project approvals with significant potential to adversely affect the scenic quality of a community require community review and specific findings of community compatibility. Examples can be found in the Zoning Ordinance with the numerous special uses or exceptions allowed pursuant to Administrative and Use Permits, and Site Plans. This practice has been proven useful for reducing impacts to aesthetic resources and their usefulness will increase as community plans and design guideline are updated pursuant to Aes-1.3 and Aes-1.4.
>
> Adopted Mitigation Measure Aes-1.8: Continue to develop and implement programs and regulations that minimize landform alteration and preserve ridgelines and steep slopes where appropriate. Examples include the County's Grading Ordinance, RPO, and CEQA Guidelines.

As described above in Section 2.1.5.1, the 2013 Wind Energy Ordinance EIR identified Mitigation Measure M-AES-1 (described above) which would be implemented at the discretionary review process for large wind turbines.

Also, as described above in Section 2.1.3.4, additional wind turbine mitigation was considered but rejected as infeasible through the Wind Energy EIR. CAP Update

Mitigation Measure Aes-1 shall be incorporated into the Mitigation Monitoring and Reporting Program for the CAP Update and shall be applied to all large-scale renewable energy projects including but not limited to PV solar, concentrator solar, and wind turbines systems during the discretionary review process which would be implemented as a condition of receiving an MUP. As described in the impact analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of a discretionary review application and project-specific mitigation would minimize or eliminate impacts to visual character and quality to the extent feasible in compliance with State CEQA Guidelines Section 15126.4.

CAP Update Mitigation Measure Aes-1 would reduce the potential for significant impacts related to visual character and quality; however, it is not possible to guarantee that all projects and cumulative impacts to visual character and quality would be reduced to a less-than-significant level because of the uncertainty of the types, locations, and scale of future renewable energy projects. Additional mitigation was contemplated as part of this draft SEIR that would implement a development cap upon large-scale renewable energy projects. However, this potential mitigation measure was rejected as infeasible because it may reduce the effectiveness of CAP Update Action E-3.3 and diminish the potential for the County to achieve the 2030 GHG emissions reduction target established by the CAP Update. This mitigation would also be infeasible because it would conflict with the County's goal for expanding renewable energy resources. It is unknown how many individual projects and specific type of large-scale renewable energy systems would be required to meet the GHG reduction goals of the CAP because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available.

2.1.5.3 Issue 3: Adversely Affect Views due to New Light and Glare

The mitigation measures applicable to light and glare that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Aes-4.1: County to coordinate with communities and stakeholders to review light pollution controls and consider amendments or expansions to those controls as determined necessary to reduce impacts to dark skies that are important to community character. This will ensure that potential artificial lighting impacts from development are monitored and controlled as needed to preserve community character.
>
> Adopted Mitigation Measure Aes-4.2: County to maintain light and glare regulations that minimize impacts to adjacent properties, sensitive areas, community character, observatories, and dark skies. These regulations are currently found in the Light Pollution Code and Zoning Ordinance. Additional reviews are implemented on discretionary projects in accordance with CEQA and the County's CEQA guidelines. These efforts will help protect the existing unincorporated area and surrounding environment from excessive artificial lighting impacts.

The 2013 Wind Energy Ordinance EIR identified Mitigation Measure M-AES-1 (described above). In addition, Mitigation Measures M-AES-2 and M-AES-3 would be implemented at the discretionary review process for large wind turbines.

> Adopted Mitigation Measure-M-AES-2: Require that a Lighting Mitigation Plan be prepared as part of the MUP discretionary review process. The Lighting Mitigation Plan would demonstrate that the design and installation of all permanent lighting for large wind turbine ancillary facilities is such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. The Lighting Mitigation Plan would demonstrate consistency with the Light Pollution Code (Section 59.100 et al.) and Sections 6322 and 6324 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky do not result in a detrimental effect on astronomical research and to ensure reflected glare and light trespass is minimized.
>
> Adopted Mitigation Measure-M-AES-3: Require that a Shadow Flicker Study be prepared as part of the MUP discretionary review process. The Shadow Flicker Study would utilize a shadow flicker model run to determine the potential shadow flicker that could occur at sensitive receptors within 2,000 meters (6,562 feet) of the proposed turbines. Due to the fact that some receptors may lie within 60° due north of the turbines, outside of the sun's path at any given point in the year, those receptors may be excluded from the study. Beyond 2,000 meters, the human eye would not be able to discern a shadow cast from a wind turbine. The modeling should utilize many different inputs, including:
>
> 1) Real Data
>
>   - Actual coordinates of turbines
>   - Actual coordinates of receptors
>   - Actual topographic data
>
> 2) Conservative Assumptions
>
>   - Specifications of the turbines being considered with the highest hub height and longest rotor diameter
>   - 100 percent turbine operation
>   - No vegetative screening
>   - Receptors can be impacted from all directions (i.e., "greenhouse mode")
>
> 3) Realistic Features
>
>   - Actual wind data from a local meteorological tower to account for the percentage of time wind blows from each direction

- National Weather Service sunshine probability data to approximate average cloud cover.

As described in Section 2.1.3.5, additional wind turbine mitigation was considered but rejected as infeasible through the 2013 Wind Energy Ordinance EIR. An Obstacle Collision Avoidance Systems was considered and would alert pilots if their aircraft is in immediate danger of flying into an obstacle by using ground-based radar to provide detection and tracking of an aircraft's proximity to an obstacle. This capability allows the visual warning lights to remain passive until an aircraft is detected and known to be tracking on an unsafe heading. However, this mitigation was determined to be infeasible because the technology is not widely available.

As described in the impact analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of a discretionary review application and project-specific mitigation would minimize or eliminate impacts to light and glare to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Mitigation Measure M-AES-1 from the 2013 Wind Energy Ordinance EIR has been revised to include all large-scale renewable energy projects as described above. Mitigation Measure M-AES-2 from the 2013 Wind Energy Ordinance also EIR has been revised to include all large-scale renewable energy projects as follows:

> CAP Update Mitigation Measure Aes-2: Require that a Lighting Mitigation Plan be prepared as part of the MUP discretionary review process for all large-scale renewable energy projects. The Lighting Mitigation Plan shall demonstrate that the design and installation of all permanent lighting for large wind turbines is such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. The Lighting Mitigation Plan shall demonstrate consistency with the Light Pollution Code (Section 59.100 et al.) and Sections 6322 and 6324 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky do not result in a detrimental effect on astronomical research and to ensure reflected glare and light trespass is minimized.

Mitigation Measure M-AES-3 from the 2013 Wind Energy Ordinance EIR has been incorporated into this draft SEIR as follows:

> CAP Update Mitigation Measure Aes-3: Require that a Shadow Flicker Study be prepared as part of the MUP discretionary review process for large-scale wind turbine projects. The Shadow Flicker Study shall utilize a shadow flicker model run to determine the potential shadow flicker that could occur at sensitive receptors within 2,000 meters (6,562 feet) of the proposed turbines. Due to the fact that some receptors may lie within 60 degrees due north of the turbines, outside of the sun's path at any given point in the year, those receptors may be excluded from the study. Beyond 2,000 meters, the human eye would not be able to discern a shadow cast from a wind turbine. The modeling shall utilize many different inputs, including:
>
> 1) Real Data

- Actual coordinates of turbines
- Actual coordinates of receptors
- Actual topographic data

2) Conservative Assumptions

- Specifications of the turbines being considered with the highest hub height and longest rotor diameter
- 100 percent turbine operation
- No vegetative screening
- Receptors can be impacted from all directions (i.e., “greenhouse mode”)

3) Realistic Features

- Actual wind data from a local meteorological tower to account for the percentage of time wind blows from each direction
- National Weather Service sunshine probability data to approximate average cloud cover

CAP Update Mitigation Measures Aes-1, Aes-2, and Aes-3 would reduce the potential for significant impacts related to light and glare; however, it is not possible to guarantee that all projects and cumulative impacts to light and glare would be reduced to a less-than-significant level because of the uncertainty of the types, locations, and scale of all future renewable energy projects. Additional mitigation was contemplated as part of this SEIR that would implement a development cap upon large-scale renewable energy projects. However, this potential mitigation measure was rejected as infeasible because it may reduce the effectiveness of CAP Update Action E-3.3 and diminish the potential for the County to achieve the 2030 GHG emissions reduction target established by the CAP Update. This mitigation would also be infeasible because it would conflict with the County’s goal for expanding renewable energy resources. It is unknown how many individual projects and specific type of large-scale renewable energy systems would be required to meet the GHG reduction goals of the CAP Update because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No additional feasible mitigation is available.

2.1.6 Significance Conclusions

2.1.6.1 Issue 1: Change or Obstruct Scenic Vistas and Scenic Resources

The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. There is a potential for large-scale renewable energy projects to detract from views of a scenic vista from a public viewing location.

Even with compliance with existing regulations related to scenic vistas and scenic resources and implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Aes-1, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation beyond compliance with the County's adopted General Plan policies, 2011 GPU PEIR mitigation measures, and MUP discretionary process is available and could be applied to large-scale renewable energy projects. Therefore, the project's impacts related to scenic vistas and scenic resources from development of new small wind turbines and large-scale renewable energy facilities would remain **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact to scenic vistas and resources could occur. This **would be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.1.6.2 Issue 2: Substantially Degrade Visual Character or Quality

The CAP Update would further existing programs and provide new and modified infrastructure in new and established communities to reduce GHG emissions. Implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the project impacts associated with the deterioration of visual character and quality. Even with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Aes-1 that reduce impacts to visual character, impacts could remain significant. No other feasible project-related mitigation beyond compliance with the County's adopted General Plan policies or 2011 GPU PEIR mitigation measures is available and could be applied to large-scale renewable energy projects. Therefore, the project's impacts related to visual character or quality from development of small wind turbines and large-scale renewable energy facilities would remain **significant and unavoidable** and the project **would result in a considerable contribution** to an existing significant and unavoidable cumulative impact. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.1.6.3 Issue 3: Adversely Affect Views due to New Light and Glare

Implementation of the CAP Update may result in limited development with the potential to introduce new sources of light or glare. Implementation of these projects would be within the scope of the changes to the day and nighttime views evaluated in the 2011 GPU PEIR. Based on the type of subsequent projects anticipated, implementation of the CAP Update is not expected to generate substantial sources of light or glare due to use of outdoor light fixtures that do not conform to the San Diego County Light Pollution Code, use of highly reflective materials, or other features that do not conform to applicable federal, state, or local statute or regulation related to dark skies or glare.

With implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures, impacts related to light and glare resulting from CAP Update implementation would be reduced. Even with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measures Aes-1 through Aes-3 that reduce light and glare impacts, impacts could remain significant and

unavoidable. No other feasible project-related mitigation beyond compliance with the County's adopted General Plan policies or 2011 GPU PEIR mitigation measures is available and could be applied to large-scale renewable energy projects. Therefore, the project's light and glare impacts from large scale renewable energy facilities would remain **significant and unavoidable** and the project **would result in a considerable contribution** to an existing significant cumulative impact. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

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2.2 Agriculture and Forestry Resources

This section describes existing conditions for agricultural resources (including Prime Farmland, Unique Farmland, and Farmland of Statewide or Local Importance ["Important Farmland"]); zoning for agricultural use, Williamson Act contracts, and other agricultural uses in the county; and evaluates the potential effects that implementation of the CAP Update may have on these resources. This section also describes existing conditions for forest land in the county and evaluates potential effects that implementation of the CAP Update may have on these forestry resources. Because this analysis is subsequent to the certified 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the agriculture resources setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the 2011 GPU PEIR. In 2009, Appendix G of the State CEQA Guidelines was amended to include additional significance criteria to evaluate a project's potential impact on forestry resources. Because the amended significance criteria addressing forestry resources were not yet adopted in 2008, when the Notice of Preparation (NOP) for the 2011 GPU PEIR was released, an evaluation of potential impacts on forestry resources was not included in the 2011 GPU PEIR.

Table 2.2-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. The impact evaluations presented in the 2011 GPU PEIR related to the direct and indirect conversion of agricultural resources have been consolidated in this draft SEIR because the physical changes associated with implementation of the CAP Update would result in similar impacts in these issue areas. As indicated in Table 2.2-1, implementation of the CAP Update would result in new or more severe significant impacts on agriculture and forestry resources.

During the NOP scoping process, the County received several comments regarding agriculture and forestry resources. The comments generally expressed support for reducing GHG emissions through carbon sequestration on agricultural lands. Other comments expressed that the County should consider using agricultural land as local GHG mitigation banks; estimating net carbon sequestration in agricultural lands; engaging experts on carbon farming to advance agricultural strategies in the region; making CAP measures applicable to farming voluntary; working with the County Farm Bureau and agriculture community to develop carbon farming as a viable strategy for the CAP; and encouraging carbon sequestration with regenerative soil practices and climate friendly agriculture. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

Table 2.2-1 Summary of Agriculture and Forestry Resources–Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			Potential New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Direct or Indirect Conversion of Agricultural Resources[1]	General Plan Only: Significant and Unavoidable	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
2	Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands	General Plan Only: Less than Significant (agriculture)[2]	CAP Update Only: Yes (agriculture) No (forest)	CAP Update Only: Yes (agriculture) No (forest)
		General Plan Cumulative Contribution: Less than Significant (agriculture)[2]	CAP Update Cumulative Contribution: Yes (agriculture) No (forest)	CAP Update Cumulative Contribution: Yes (agriculture) No (forest)
3	Direct and Indirect Conversion or Loss of Forest Land	Not evaluated[2]	CAP Update Only: Yes	CAP Update Only: Yes
			CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: Yes

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

[1] **The impact evaluations presented in the 2011 GPU PEIR related to the direct and indirect conversion of agricultural resources have been consolidated in this draft SEIR because the physical changes associated with implementation of the CAP Update would result in similar impacts in these issue areas.**

[2] **Evaluation of forestry resources was not required at the time the Notice of Preparation for the 2011 General Plan Update Program Environmental Impact Report was released.**

Source: Compiled by Ascent Environmental in 2023.

2.2.1 Existing Conditions

2.2.1.1 Agriculture Resources

Pages 2.2-1 through 2.2-8 in Section 2.2, "Agricultural Resources," of the 2011 GPU PEIR include a discussion of existing conditions related to agriculture resources in the unincorporated county. The following discussion includes a summary of changes to the existing conditions related to agricultural resources in the unincorporated county since certification of the 2011 GPU PEIR.

The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data used for analyzing impacts on California's agricultural resources. Under the FMMP, agricultural land is rated according to soil quality and irrigation status and the best quality land is classified as Prime Farmland. As shown in Table 2.2-1 of the 2011 GPU PEIR, 2006 data from the FMMP

identified 314,032 acres of land within San Diego County as agricultural land, of which 207,352 acres were categorized as Important Farmland and 106,680 acres were categorized as grazing land (County of San Diego 2011). Based on more recent data from 2018, the DOC FMMP identified 278,541 acres of land within San Diego County as agricultural land, of which 181,635 acres were categorized as Important Farmland and 96,606 acres were categorized as grazing land (DOC 2022) (see Figure 2.2-1). Therefore, there was a decrease of 35,491 acres in agricultural land, as identified by the FMMP, within the unincorporated county between 2006 and 2018.

As described on page 2.2-2 of the 2011 GPU PEIR, the County used 2008 data from the County's Department of Planning and Land Use and Department of Agricultural Weights, Measures, and Commodities; the California Department of Water Resources; and the US Department of Agriculture to better estimate the acreage of agricultural resources within the county. Using these data sources, the County identified approximately 407,600 acres of farmland within its boundaries, which are categorized into one of two commodity categories: grazing lands or croplands (County of San Diego 2011). These data sources are no longer maintained by the County. The San Diego Geographic Information Source (SanGIS), a Joint Powers Authority of the City of San Diego and the County of San Diego, maintains geographic information system data for the San Diego region. SanGIS identified 404,758 acres of agricultural preserves within the unincorporated county, as shown on Figure 2.2-2. An agricultural preserve is an area devoted to either agricultural use, open space use, recreational use, or any combination of such uses, and compatible uses which are designated by the County.

The Williamson Act Program is the California regulation enabling local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. As described on page 2.2-8 of the 2011 GPU PEIR, approximately 80,504 acres of private, federal, and state lands in the unincorporated county were enrolled in a Williamson Act contract, with 40 parcels in the process of non-renewal (i.e., termination of a Williamson Act contract) (County of San Diego 2011). Based on more recent data from 2022, 84,821 acres of land in the unincorporated county is enrolled in a Williamson Act contract, with 950 acres identified in the non-renewal process (see Figure 2.2-3). Therefore, there has been an increase in the acreage of lands enrolled in a Williamson Act contract in the unincorporated county since certification of the 2011 GPU PEIR.

As discussed on page 2.2-7 of the 2011 GPU PEIR, the General Plan identifies two agricultural land use designations: Limited Agricultural Use (A70) and General Agricultural Use (A72). Lands designated for Limited Agricultural use are intended primarily for agricultural crop production. The land use regulations for Limited Agricultural uses are intended for the protection of moderate to high quality agricultural land. Lands designated for General Agricultural use are intended for the raising of crops and animals, as well as the processing of products produced or raised on the premises and certain commercial activities associated with crop and animal raising. The General Agricultural land use designation is applied to areas distant from urban centers where dust, odor, and noise of agricultural operations would not interfere with urban uses, and where urban development would not encroach on agricultural uses. Approximately 31 percent of land

within the unincorporated county is zoned Limited Agricultural Use (A70) and General Agricultural Use (A72) (County of San Diego 2011). The percent of land that is designated for agricultural land use in the unincorporated county remains at 31 percent (716,890 acres) and has not changed since certification of the 2011 GPU PEIR (SanGIS 2023).

2.2.1.2 Forestry Resources

As stated above, the NOP for the 2011 GPU PEIR was released on April 28, 2008. Appendix G of the State CEQA Guidelines was amended in 2009 to include additional significance criteria to evaluate a project's potential impact on forestry resources. Because the amended significance criteria addressing forestry resources were not yet adopted at the time the NOP for the 2011 GPU PEIR was released, an evaluation of potential impacts on forestry resources was not included in the 2011 GPU PEIR. Therefore, this section includes a discussion of existing conditions related to forestry and timberland resources within the unincorporated county.

The US Forest Service (USFS) defines a forested area as "forest land" if it is at least 1 acre in size and at least 10 percent occupied by forest trees of any size or formerly had such tree cover and not currently developed for non-forest use. Non-forest uses may include cropland, pasturelands, residential areas, and other land uses. Forest land also includes transition zones, which are those "areas located between heavily forested and non-forested lands that are at least 10% stocked with forest trees, and forest areas adjacent to urban and built-up lands" (County of San Diego 2016: 2.2-1).

Most federal forest land is managed as the National Forest System, which includes the following:

- national forest lands reserved from the US public domain;
- national forest lands acquired through purchase, exchange, donation, or other means;
- national grasslands; and
- other lands, waters, or interests administered by USFS or designated for administration through USFS as part of the system.

Furthermore, Section 12220(g) of the California Public Resources Code 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. "Timberland" is land owned by the federal government and designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Sections 51112 and 51113(h) of the California Public Resources Code define "Timberland Production Zone" as land used for growing and harvesting timber and compatible uses.

The county does not include lands zoned specifically for forest land, timberland, or timberland production. However, lands that are managed by USFS and included within the Cleveland National Forest are located within the unincorporated county, including portions of Alpine, Central Mountain, Jamul–Dulzura, Julian, Mountain Empire, North Mountain, and Pendleton–De Luz. While the Cleveland National Forest lands are under the jurisdiction of USFS, the private lands adjacent to and surrounding the Cleveland National Forest lands are under the County's jurisdiction.

2.2.2 Regulatory Framework

Section 2.2 of the 2011 GPU PEIR (pages 2.2-9 through 2.2-12) describes the regulatory framework related to agricultural resources and is incorporated herein by reference. Specific regulations discussed in the 2011 GPU PEIR and applicable to the CAP Update include the following:

2.2.2.1 Federal

- Farmland Protection Policy Act

2.2.2.2 State

- California Civil Code Section 3482.5 (Right to Farm Act)
- California Land Conservation Act of 1965 (Williamson Act)
- California Farmland Conservancy Program
- Open Space Subvention Act
- FMMP
- Farm and Ranch Lands Protection Program

2.2.2.3 Local

- County of San Diego Board of Supervisors (BOS) Policy I-38, Agricultural Preserves
- County of San Diego BOS Policy I-133, Support and Encouragement of Farming in San Diego County
- County of San Diego Farming Program
- Local Agricultural Resource Assessment (LARA) Model

The regulatory framework discussed in the 2011 GPU PEIR regarding agricultural resources largely has not changed since adoption of the General Plan in August 2011 (except for the expansion of the Purchase of Agricultural Conservation Easement [PACE] Program described below and the adoption of ordinances and programs that are not applicable to the CAP Update) and continues to apply to the unincorporated county as addressed in this draft SEIR.

Purchase of Agricultural Conservation Easement Program

The PACE Program is an agricultural conservation program that promotes the long-term preservation of agriculture in the county. Under the PACE Program, agricultural property owners are compensated for placing a perpetual easement on their property that limits future uses to agriculture. As a result, the agricultural land is preserved, and the property owner receives compensation making the land's continued use for agriculture more viable. The County's BOS adopted a resolution expanding the properties eligible to participate in the PACE Program on March 3, 2021. Properties must meet the following eligibility criteria to apply for the expanded program: (1) the property has had active agriculture for at least 2 years immediately prior to application; and (2) the property must be zoned A70 (Limited Agriculture), A72 (General Agriculture), RR (Rural Residential), S90 (Holding Area), or S92 (General Rural). The PACE Program also includes a mitigation bank and credit component, which allows PACE Program lands to be utilized as off-site mitigation for agricultural impacts resulting from private development projects.

2011 San Diego County General Plan

The General Plan policies related to agricultural resources and applicable to the CAP Update include the following:

> Policy LU-6.4: Sustainable Subdivision Design. Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities.
>
> Policy LU-7.1: Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.
>
> Policy LU-7.2: Parcel Size Reduction as Incentive for Agriculture. Allow for reductions in lot size for compatible development when tracts of existing historically agricultural land are preserved in conservation easements for continued agricultural use.
>
> Policy LU-16.1: Location of Waste Management Facilities. Site new solid waste management facilities identified in the San Diego County Integrated Waste Management Plan, in a manner that minimizes environmental impacts and prevents groundwater degradation, and in accordance with applicable local land use policies.
>
> Policy LU-16.3: New Waste Management Facilities. Encourage the establishment of additional recycling and resource recovery facilities in areas with Industrial land use designations or other appropriate areas based on the type of recycling.
>
> Policy COS-6.2: Protection of Agricultural Operations. Protect existing agricultural operations from encroachment of incompatible land uses by doing the following:

- Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations.

- Encouraging new or expanded agricultural land uses to provide a buffer of non-intensive agriculture or other appropriate uses (e.g., landscape screening) between intensive uses and adjacent non-agricultural land uses.

- Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural use within the development.

- Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture.

- Supporting local and state right-to-farm regulations.

- Retain or facilitate large and contiguous agricultural operations by consolidation of development during the subdivision process.

Policy COS-6.3: Compatibility with Recreation and Open Space. Encourage siting compatible recreational and open space uses and multi-use trails that are compatible with agriculture adjacent to the agricultural lands when planning for development adjacent to agricultural land uses.

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

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Agr-1.1: Implement the General Plan Regional Category map and Land Use Maps which protect agricultural lands with lower density land use designations that will support continued agricultural.

Adopted Mitigation Measure Agr-1.2: Develop and implement programs and regulations that protect agricultural lands (such as the CEQA guidelines, Zoning Ordinance, Right to Farm Act, Open Space Subvention Act, Farm and Ranch Lands Protection Program, San Diego County Agricultural Enterprises and Consumer Information Ordinance, BOS Policy I-133, and the San Diego County Farming Program), as well as, those that support implementation of the Williamson Act (including the CEQA Guidelines, Zoning Ordinance, and Subdivision Ordinance).

Adopted Mitigation Measure Agr-1.3: Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary with the goal of promoting conservation of natural resources and open space (including agricultural lands) while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted.

Adopted Mitigation Measure Agr-1.4: Develop and implement the PACE program which compensates landowners for voluntarily limiting future development on their land.

Adopted Mitigation Measure Agr-1.5: Revise community plans to identify important agricultural areas within them and specific compatible uses and desired buffers necessary to maintain the viability of that area. Community plans are used to review development projects (including General Plan Amendments).

Adopted Mitigation Measure Agr-2.1: Prior to the approval of any Zoning Ordinance Amendment that would result in the removal of an "A" designator from a certain property, an analysis shall be conducted to ensure that the action removing such a designation will not result in any significant direct or indirect adverse impact to a Williamson Act Contract lands.

2.2.3 Analysis of Effects and Significance Determinations

2.2.3.1 Significance Criteria

Based on Appendix G of the State CEQA Guidelines, the proposed project would result in a significant impact on agriculture and forestry resources if it would:

- convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- conflict with existing zoning for agricultural use, or a Williamson Act contract;
- conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g));
- result in the loss of forest land or conversion of forest land to non-forest use;
- involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

2.2.3.2 Approach to Analysis

Impacts related to agriculture and forestry resources were analyzed qualitatively based on a review of CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant adopted General Plan policies and 2011 GPU PEIR mitigation measures have been applied to the proposed project as needed to avoid or minimize project impacts.

Scope of SEIR Impact Analysis

The impact analysis contained within this draft SEIR focuses on whether approval and implementation of the CAP Update would result in new or more severe impacts than what were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward the established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impact of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unincorporated county) and its role as a planning document designed to guide future decision-making related to the reduction of GHG emissions within the unincorporated county, the study area for the CAP Update is the unincorporated area of the county within the County's jurisdiction (i.e., excluding tribal lands, state and federally owned lands, and military installations).

The analysis in this draft SEIR is programmatic. Implementation of all CAP Update measures and actions were considered during preparation of this draft SEIR, to the degree specific information about their implementation is known. This draft SEIR does not speculate about the potential site-specific physical impacts (i.e., project-level analysis) that could occur if and when specific improvements are proposed in the future at locations still to be determined. Rather, this SEIR considers the types of impacts that could occur with implementation of future that support implementation of the proposed GHG reduction measures and actions. Future discretionary projects would be evaluated by the County to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If additional impacts would result, subsequent CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether impacts are reduced to below a significant impact.

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies and associated measures and actions, proposed in the CAP Update (see Table 1-2) have been grouped into categories for the purpose of analysis, based on the sector they target (e.g., solid waste, water/wastewater). CAP Update actions and measures that would have

the potential to affect agricultural or forestry resources are provided below. CAP Update actions and measures that would involve development of policies and programs that would not result in direct physical effects or those that would result in limited physical improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to agriculture and forestry resources.

Solid Waste Measures and Actions. This category includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to agriculture and forestry resources include those that would result in the development of new or expanded recycling and composting facilities (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

Water and Wastewater Measures and Actions. This category includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Key actions with potential to result in new or more severe impacts related to agriculture and forestry resources include those that would result in the construction of new recycled water and stormwater capture and reuse infrastructure (Actions W-1.1, W-2.2, W-2.3, and W-2.4).

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. These measures and actions are not expected to result in new or more severe impacts related to agriculture and forestry resources. Rather, actions that support Measures A-1 and A-3 would result in the acquisition of conservation lands. Actions that support Measure A-4 would incentivize carbon farming to expand carbon storage capacity on agricultural land and support climate-friendly farming practices in the unincorporated area and encourage the construction of farmworker housing. This group of measures and actions would have potential to benefit agriculture resources.

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

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more severe impacts related to agriculture and forestry resources include those that support

Measures T-3 and T-5, and which would result in the construction of pedestrian, bicycle, and transit network improvements and zero-emission vehicle infrastructure.

2.2.3.3 Issue 1: Directly or Indirectly Convert Agricultural Resources

This section describes the potential impact related to direct or indirect conversion of agricultural resources that would result from implementation of the CAP Update measures.

Guidelines for Determination of Significance

The *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Agricultural Resources* (County of San Diego 2015), which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, provides guidance for addressing the following significance criteria listed in Appendix G of the State CEQA Guidelines:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

Direct Conversion of Agricultural Resources

Based on the County's guidelines, a project would result in a significant direct impact on agricultural resources as a result of project implementation if:

- The project site has important agricultural resources as defined by the County's LARA Model; and the project would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP; and as a result, the project would substantially impair the ongoing viability of the site for agricultural use.

Indirect Conversion of Agricultural Resources

Based on the County's guidelines, a project would result in a significant indirect impact on agricultural resources as a result of project implementation if:

- The project proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act contract and as a result of the project, land use conflicts between the agricultural operation or contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.

- The project proposes a school, church, day care or other use that involves a concentration of people at certain times within 1 mile of an agricultural operation or land under a Williamson Act contract and as a result of the project, land use conflicts between the agricultural operation or contract land and the proposed

project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.

- The project would involve other changes to the existing environment, which due to their location or nature, could result in the conversion of offsite agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Williamson Act contract.

Impact Analysis

2011 GPU PEIR Determination

Direct Conversion of Agricultural Resources

The 2011 GPU PEIR evaluated direct conversion of agricultural resources related to the adoption of the goals and policies contained within the General Plan and development anticipated through the planning horizon. The 2011 GPU PEIR determined that development anticipated through the planning horizon would result in a potentially significant direct impact to agricultural resources. The 2011 GPU PEIR determined that agricultural conversion could be reduced through a combination of the following:

- Complying with a combination of federal, state, and local regulations and existing County regulatory processes to protect agricultural resources in the county from conversion, including the Farmland Protection Policy Act, Right to Farm Act, Williamson Act, California Farmland Conservancy Program, Open Space Subvention Act, Farmland Mapping and Monitoring Program, Farm and Ranch Lands Protection Program, San Diego County BOS Policies I-38 and I-133, the San Diego County Farming Program, San Diego County zoning regulations (e.g., density and lot size restrictions), the County discretionary review process, and policies identified in community plans.
- Implementing the General Plan policies to protect agricultural operations and preserve agricultural lands through requiring sustainable subdivision design, lower-density land use designations, parcel size reductions, and conservation easements (e.g., Policies LU-6.4, LU-7.1, LU-7.2, and COS-6.4).
- Implementing the mitigation measures (Mitigation Measures Agr-1.1 through Agr-1.5) identified in the 2011 GPU PEIR that promote the protection of existing agricultural lands and operations.

Although the General Plan policies and 2011 GPU PEIR mitigation measures would reduce the potential for agricultural conversion, these policies and mitigation measures would not reduce the impact to a less-than-significant level because the General Plan would allow growth and development on land that supports agricultural uses. The impact related to direct agricultural conversion in the 2011 GPU PEIR was, therefore, determined to be significant and unavoidable. The discussion of the impact related to direct agricultural conversion can be found in Section 2.2, “Agricultural Resources” (pages 2.2-12 through 2.2-20, 2.2-27, and 2.2-29), and is incorporated herein by reference.

Indirect Conversion of Agricultural Land

The 2011 GPU PEIR evaluated the potential for other changes to cause indirect conversion of agricultural land related to the adoption of the goals and policies contained within the plan and development anticipated through the planning horizon. The 2011 GPU PEIR determined that the development anticipated through the planning horizon would result in potentially significant indirect impacts to agricultural resources. The 2011 GPU PEIR determined that agricultural conversion could be reduced through a combination of the following:

- Complying with the federal, state, and local regulations and existing County regulatory processes to protect agricultural resources in the county from conversion, as listed in the "Direct Conversion of Agricultural Land" section above.
- Implementing adopted General Plan Policies COS-6.2 and COS-6.3, which would reduce the potential for agricultural conversion from encroachment of incompatible land uses.
- Implementing Mitigation Measures Agr-1.1 through Agr-1.5, which would preserve and protect existing agricultural lands and operations from development and adjacent uses.

The 2011 GPU PEIR concluded that the impact related to indirect agricultural resources conversion would be reduced through implementation of a combination of the adopted General Plan goals and policies and the mitigation measures identified in the 2011 GPU PEIR, but not to a less-than-significant level because the General Plan would designate land uses that would allow additional growth and development that could indirectly result in the conversion of agricultural land uses. The indirect agricultural impacts of the General Plan were, therefore, determined to be significant and unavoidable. The discussion of impacts related to indirect agricultural conversion can be found in Section 2.2, "Agricultural Resources" (pages 2.2-23 through 2.2-27, 2.2-28, and 2.2-31 through 2.2-33), and is incorporated herein by reference.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures to result in direct and indirect agricultural conversion.

Solid Waste Measures and Actions

The CAP Update includes measures and actions to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to agriculture resources include those that would result in the development of new or expanded recycling and composting facilities. For example, Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b include development of zero waste policies and improvements to waste management practices that may result in new or expanded composting and recycling facilities to increase waste diversion from landfills. Specific locations for new and expanded facilities have not been identified. Therefore, these improvements are analyzed at a programmatic level.

As discussed in Section 2.2.1.1, the county contains approximately 181,635 acres of Important Farmland and 404,758 acres of agricultural preserves. Specific locations for new and expanded solid waste facilities have not been identified, but it is assumed that the development of these facilities would occur in accordance with the General Plan. Specifically, Policy LU-16.1 requires that new solid waste management identified in the San Diego County Integrated Waste Management Plan (County of San Diego 2005) are sited in a manner that minimizes environmental impacts and in accordance with applicable local land use policies. Policy LU-16.3 encourages the establishment of new recycling and resource recovery facilities in areas with industrial land use designations or other appropriate areas based on the type of recycling. For example, the General Plan states that some agricultural areas may be appropriate for management or recycling agricultural waste (i.e., composting). Therefore, it is not anticipated that new or expanded solid waste facilities would be sited in areas designated as Important Farmland or in areas defined by the County's LARA Model as important agricultural resources, except in instances where such facilities would support ongoing agricultural operations. Additionally, Policy COS-6.2 requires development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture. Therefore, it is not anticipated that solid waste facilities would be sited in areas where operation of these facilities could interfere with nearby agricultural operations. Because development of new and expanded solid waste facilities would occur in accordance with the General Plan, the indirect or direct conversion of agricultural land to non-agricultural use would be consistent with the potential for conversion disclosed in the 2011 GPU PEIR.

Based on the discussion above, implementation of solid waste measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of agricultural resources.

Water and Wastewater Measures and Actions

The CAP Update includes measures and actions to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Actions W-1.1, W-2.2, W-2.3, and W-2.4 include development of policies that may result in the construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The construction of new recycled water and stormwater capture and reuse infrastructure would occur in conjunction with existing or proposed development and would not result in the potential for substantial conversion of agricultural land in excess of the potential for conversion disclosed in the 2011 GPU PEIR. Rather, these actions would facilitate water efficiency and conservation for existing development and new development as it is approved. Further, these actions could indirectly support agricultural operations by

ensuring that unincorporated areas in the county would continue to have adequate water supplies. Accordingly, the indirect or direct conversion of agricultural land to non-agricultural use is not anticipated.

Based on the discussion above, water and wastewater measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of agricultural resources.

Agriculture and Conservation Measures and Actions

The CAP Update includes measures and actions to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. Actions A-1.1, A-1.2, A-1.2.a, A-3.1, A-4.1, and A-4.1.c would result in acquiring and managing conservation lands and improving land management practices on existing agricultural land to improve carbon sequestration. These actions would be consistent with General Plan Policies LU-7.1, COS-6.2, and COS-6.4, which were adopted for the purpose of protecting agricultural operations and preserving agricultural lands. Some actions could result in the conversion of existing General Plan land uses by dedicating existing agricultural land (including Important Farmland and areas identified as agricultural resources by the County's LARA Model) in the unincorporated county for agricultural uses in perpetuity. Action A-4.1.b would result in the evaluation of opportunities for future construction of farmworker housing. This action has potential to indirectly result in the development of farmworker housing to reduce emissions from farmworker transportation. New farmworker housing would be constructed as an accessory use to support existing agricultural operations. Accordingly, the indirect or direct conversion of agricultural land to non-agricultural use is not anticipated.

Based on the discussion above, implementation of agriculture and conservation measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of agricultural resources.

Energy Measures and Actions

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

Small-Scale Renewable Energy Systems

CAP Update Actions E-1.1, E-2.1, E-2.2, E-3.1, E-3.2a, E-3.2b, and E-3.3 have potential to result in the development of small-scale renewable energy systems. Programs would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small-scale solar and energy storage systems and small-scale wind turbines (roof- or ground-mounted systems). With the exception of wind turbines, these types of improvements would be made to existing

buildings or would be made in connection with new development as it is approved. These energy infrastructure improvements are not expected to occur on or adjacent to agricultural lands, except in instances where such infrastructure would support ongoing agricultural operations.

Specific locations for new small-scale wind turbines have not been identified; however, these facilities would be developed in accordance with the County's Wind Energy Ordinance. Some small wind turbines would be roof-mounted and would not result in ground disturbance, while others would require the erection of turbine towers and construction of concrete foundations. Small-scale wind turbines could be installed in areas designated as Important Farmland; however, these turbines would be permitted as accessory uses and would not convert farmland to a non-agricultural use. The purpose of a small wind turbine is to generate energy that can be used to provide a reliable power source for uses such as homes, agricultural facilities, or small businesses; therefore, small wind turbines would assist in agricultural operations (County of San Diego 2012). Accordingly, the indirect or direct conversion of agricultural land to non-agricultural use is not anticipated.

Large-Scale Renewable Energy Systems

Implementation of CAP Update Action E-3.3 has potential to indirectly result in the development of large-scale renewable energy systems to satisfy increased demand for renewable energy. These systems could include solar photovoltaic (PV), concentrator solar, and large-scale wind turbines. Because the demand generated by such programs and the types of renewable energy systems that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level and assumes impacts would be associated with the most prevalent current technologies.

Large-scale renewable energy facilities would vary in size and could be as large as several thousand acres. It is anticipated that these facilities would be constructed in primarily undeveloped locations that are suitable for generating renewable energy. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses due to the size, massing, coverage, and scale of this type of infrastructure that relies on large amounts of land unencumbered by buildings or shadowed by buildings or trees. Suitable locations could include areas with existing agricultural land or adjacent to existing agricultural land.

The construction of large-scale renewable energy facilities could result in the direct conversion of several thousand acres of agricultural land to non-agricultural use. Additionally, indirect conversion of agricultural resources has potential to occur if the operation of a facility is incompatible with adjacent agricultural land uses. For example, tall structures (e.g., PV panels, wind turbines, water tanks, and measurement towers) could generate shade and prevent crops from receiving adequate sunlight. In addition, construction and maintenance activities could generate air pollutant emissions, dust, and noise that could interfere with adjacent agricultural operations (e.g., cause damage to crops or livestock).

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

In addition, each large-scale renewable energy project would be required to undergo evaluation for project-specific impacts under CEQA at the time of application. As applicable, individual projects would be required to demonstrate consistency with General Plan Policies COS-6.2 and COS-6.3 and implement the 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Agr-1.1 through Agr-1.5) listed in Section 2.2.2.3 that are intended to protect existing agricultural operations from being converted to other land uses and from encroachment of incompatible land uses. Large-scale wind turbine systems would also need to comply with Mitigation Measure M-AGR-1, identified in the 2013 Wind Energy Ordinance EIR, which requires that project-specific mitigation be incorporated, where applicable, to minimize or eliminate impacts related to the direct or indirect conversion of agricultural resources to the extent feasible (see Section 2.2.5.1). Examples of standard mitigation measures include avoidance of agricultural resources, preservation of agriculture, and inclusion of compatibility buffers near areas intended for agricultural uses. Other large-scale renewable energy projects would be required to incorporate similar types of project-specific mitigation, as identified during the CEQA process.

Mitigation Measure M-AGR-1 has been modified and incorporated into CAP Update Mitigation Measure Agr-1, which requires that all large-scale renewable energy projects (including both solar and wind projects) apply the County Guidelines for Determining Significance for Agricultural Resources. When impacts to farmland are determined to be significant, these projects are required to implement feasible and appropriate project-specific mitigation measures, including avoidance of agricultural resources, preservation of agriculture, and inclusion of compatibility buffers near areas intended for agricultural uses. However, it cannot be guaranteed that impacts related to the indirect or direct conversion of agricultural land to non-agricultural use would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, impacts related to the indirect or direct conversion of agricultural land to non-agricultural use would be significant and unavoidable.

Built Environment and Transportation Measures and Actions

The CAP Update includes measures and actions to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Actions T-3.1, T-3.1.a, T-3.1.b, T-5.1, and T-6.2 would include the development of plans and programs that may result in the construction of pedestrian, bicycle, and transit network improvements and

zero-emission vehicle infrastructure. Because of the nature of such improvements (i.e., limited size and within existing transportation corridors), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. These improvements, when considered separately from the future development that they may accompany, are not expected to result in the direct or indirect conversion of agricultural lands.

Based on the discussion above, implementation of built environment and transportation measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of agricultural resources.

Summary

Based on the discussion above, solid waste, water and wastewater, agriculture and conservation, small-scale renewable energy, and built environment and transportation measures and actions that would be implemented under the CAP Update are not anticipated to result in the direct and indirect conversion of agricultural resources. However, large-scale renewable energy projects could result in the direct or indirect conversion of agricultural resources. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts related to direct or indirect conversion of agricultural resources would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, large-scale renewable energy facilities would have a potentially significant impact related to direct or indirect conversion of agricultural resources. The 2011 GPU PEIR concluded that the impact related to direct and indirect agricultural conversion would be significant and unavoidable, and implementation of the CAP Update **would not result in a new or more severe impact**.

2.2.3.4 Issue 2: Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands

This section describes the potential impact related to conflicts with agricultural or forest zoning that would result from implementation of the CAP Update measures. As discussed in Section 2.2.1.2, “Forestry Resources,” the County does not include lands zoned specifically for forest land, timberland, or timberland production. The County also does not have land use authority over development in national forests, such as Cleveland National Forest, where most of the county’s forest land exists. Therefore, implementation of the CAP Update would have no impact related to conflicts with zoning for forest land or timberland and this topic is not discussed further.

Guidelines for Determination of Significance

The *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Agricultural Resources* (County of San Diego 2015), which is

reflective of the guidelines that were utilized in the 2011 GPU PEIR, provides guidance for addressing the following significance criteria listed in Appendix G of the State CEQA Guidelines:

- Conflict with existing zoning for agricultural use, or a Williamson Act contract.

Direct Impacts to Williamson Act Contract Lands

Based on the County's guidelines, any conflict with a Williamson Act contract or the Williamson Act is significant because conflicts with contract provisions and the Williamson Act are prohibited by law. Furthermore, no project may be approved that is in conflict with a Williamson Act contract or the Williamson Act.

Indirect Impacts to Williamson Act Contract Lands

Based on the County's guidelines, a project would result in a significant indirect impact related to conflicts with agricultural zoning or with Williamson Act contract lands as a result of project implementation if:

- The project proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act contract and as a result of the project, land use conflicts between the agricultural operation or contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.

- The project proposes a school, church, day care or other use that involves a concentration of people at certain times within 1 mile of an agricultural operation or land under a Williamson Act contract and as a result of the project, land use conflicts between the agricultural operation or contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.

- The project would involve other changes to the existing environment, which due to their location or nature, could result in the conversion of offsite agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Williamson Act contract.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated potential land use conflicts between Williamson Act contracts, provisions of the Williamson Act, and existing zoning for agricultural use and the adoption of the goals and policies contained within the plan and development anticipated through the planning horizon. The 2011 GPU PEIR determined that the development anticipated through the planning horizon would result in potentially significant impacts to Williamson Act contract lands, but these impacts would be reduced to a less-than-significant level through a combination of the following:

- Complying with a combination of federal, state, and local regulations and existing County regulatory processes to protect agricultural resources in the county, including the Farmland Protection Policy Act, Right to Farm Act, Williamson Act, California Farmland Conservancy Program, Open Space Subvention Act, Farmland Mapping and Monitoring Program, Farm and Ranch Lands Protection Program, San Diego County BOS Policies I-38 and I-133, the San Diego County Farming Program, San Diego County zoning regulations (e.g., density and lot size restrictions), the County discretionary review process, and policies identified in community plans.

- Implementing the General Plan policies that promote the protection of agricultural lands and compatible land uses adjacent to agricultural lands (e.g., Policies LU-7.1, and COS-6.3).

- Implementing the mitigation measure (Mitigation Measure Agr-2.1) identified in the 2011 GPU PEIR that promotes the protection of Williamson Act Contract lands.

The 2011 GPU PEIR determined that the impact related to conflicts with Williamson Act contract lands and agricultural zoning could be reduced to a less-than-significant level through compliance with the regulations and implementation of the adopted General Plan policies and mitigation measure listed above. The discussion of the impact related to conflicts with Williamson Act contracts and agricultural zoning can be found in Section 2.2, “Agricultural Resources” (pages 2.2-20 through 2.2-23, 2.2-28, and 2.2-31), of the 2011 GPU PEIR, and is incorporated herein by reference.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures to result in conflicts with agricultural zoning and Williamson Act contracts.

Solid Waste Measures and Actions

The CAP Update measures and actions to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to agriculture resources include those that would result in the development of new or expanded recycling and composting facilities (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

As discussed in Section 2.2.1.1, approximately 31 percent of lands within the unincorporated county are zoned for agricultural use. Specific locations for new and expanded solid waste facilities have not been identified, but the development of these facilities would occur in accordance with the General Plan. As discussed under Issue 1 above, the development of solid waste management facilities and recycling and resource recovery facilities would comply with General Plan Policies LU-16.1, LU-16.3, and COS-6.2. In accordance with these policies, new recycling and resource recovery facilities would be sited in areas with industrial land use designations or other appropriate areas based on

the type of recycling. Appropriate buffers, setbacks, and project design measures would be required for new development that occurs adjacent to agricultural operations. Certain types of recycling processing and collection facilities and organic materials processing are permitted uses within the County's Limited Agricultural and General Agricultural land use designations, but the development of these facilities would be subject to limitations or use permits. These types of facilities are intended to support existing agricultural operations and would not result in conflicts with existing agricultural land uses.

As discussed in Section 2.2.1.1, approximately 84,821 acres of land within the unincorporated county are enrolled in a Williamson Act contract. As noted in the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Agricultural Resources*, the County would not approve any projects, including any new solid waste facilities, that are in conflict with a Williamson Act contract or the Williamson Act (County of San Diego 2015). Therefore, new or expanded solid waste facilities would not be sited in areas enrolled in a Williamson Act contract, except in instances where such facilities would support ongoing agricultural operations. Accordingly, development of new or expanded solid waste facilities would not result in conflicts with Williamson Act contracts.

Based on the discussion above, solid waste measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to conflicts with agricultural zoning and Williamson Act contracts.

Water and Wastewater Measures and Actions

The CAP Update includes measures and actions to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Actions W-1.1, W-2.2, W-2.3, and W-2.4 include development of policies that may result in the construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The construction of new recycled water and stormwater capture and reuse infrastructure would not result in development that would be incompatible with existing agricultural zoning or Williamson Act contracts; rather, these actions would facilitate water efficiency and conservation for new development as it is approved. These infrastructure improvements, when considered separately from the future development that they may accompany, are not expected to occur on or adjacent to agricultural lands, except in instances where such infrastructure would support water-efficient irrigation practices for ongoing agricultural operations. Accordingly, conflicts with agricultural zoning and Williamson Act contracts from water and wastewater measures and actions are not anticipated.

Based on the discussion above, implementation of water and wastewater measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to conflicts with agricultural zoning or Williamson Act contracts.

Agriculture and Conservation Measures and Actions

The CAP Update includes measures and actions to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. For example, Actions A-1.1, A-1.2, A-1.2.a, A-3.1, A-4.1, and A-4.1.c would result in acquiring and managing conservation lands and improving land management practices on existing agricultural land to improve carbon sequestration. These actions would be consistent with General Plan Policies LU-7.1, COS-6.2, and COS-6.4, which were adopted for the purpose of protecting agricultural operations and preserving agricultural lands. Some actions could result in the dedication of existing agricultural land in the unincorporated county for agricultural uses in perpetuity. Therefore, these actions could increase the acreage of lands designated for agricultural land uses within the unincorporated county. Action A-4.1.b would result in the evaluation of opportunities for future construction of farmworker housing. This action has potential to indirectly result in the development of farmworker housing to reduce emissions from farmworker transportation. New farmworker housing would be constructed as an accessory use to support existing agricultural operations. Accordingly, conflicts with agricultural zoning and Williamson Act contracts from agriculture and conservation measures and actions are not anticipated.

Based on the discussion above, implementation of agriculture and conservation measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to conflicts with agricultural zoning and Williamson Act contracts.

Energy Measures and Actions

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

Small-Scale Renewable Energy Systems

CAP Update Actions E-1.1, E-2.1, E-2.2, E-3.1 E-3.2.a, E-3.2.b, and E-3.3 have potential to result in the development of small-scale renewable energy systems. Requirements for new development would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small-scale solar and energy storage systems and small-scale wind turbines (roof- or ground-mounted systems). With the exception of wind turbines, these types of improvements would be made to existing buildings or would be made in connection with new development as it is approved. These energy infrastructure improvements, when considered separately from the future

development that they may accompany, are not expected to occur on or adjacent to agricultural lands, except in instances where such infrastructure would support ongoing agricultural operations.

Specific locations for new small-scale wind turbines have not been identified; however, these facilities would be developed in accordance with the County's Wind Energy Ordinance. The County's Wind Energy Ordinance permits small wind turbines (as an accessory use) in zones where agricultural production is allowed. Small wind turbines and other accessory uses are not specifically permitted by current Williamson Act regulations but are typically permitted if these uses are compatible with existing agricultural operations. The purpose of a small wind turbine is to generate energy that can be used to provide a reliable power source for uses such as homes, agricultural facilities, or small businesses; therefore, small wind turbines would assist in agricultural operations. Additionally, because the space requirements necessary to construct and operate small wind turbine would be relatively small and because these facilities would be permitted as accessory uses (including [potentially] lands entered into Williamson Act contracts), small wind turbines would not substantially alter or impact the viability of active agricultural operations. Small wind turbines would not preclude agricultural operations on agriculturally zoned lands, existing lands with Williamson Act contracts, or lands entered into Williamson Act contracts (County of San Diego 2012: 2.2-11). Accordingly, conflicts with agricultural zoning and Williamson Act contracts from energy measures and actions are not anticipated.

Large-Scale Renewable Energy Systems

Implementation of CAP Update Action E-3.3 has potential to indirectly result in the development of large-scale renewable energy systems to satisfy increased demand for renewable energy. These systems would include development of solar energy generation technologies such as PV and concentrator solar, and large-scale wind turbines. Because the demand generated by such programs and the types of renewable energy systems that would be constructed to satisfy demand are unknown, this draft SEIR evaluates the potential for impacts at the program level and assumes use of commonly utilized solar and wind generation technologies.

Large-scale renewable energy facilities would vary in size and could be as large as several thousand acres. It is anticipated that these facilities would be constructed in primarily undeveloped locations that are suitable for generating renewable energy. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses due to the size, massing, coverage, and scale of this type of infrastructure that relies on large amounts of land unencumbered by buildings or shadowed by buildings or trees. Suitable locations could include areas with agricultural zoning. Large-scale renewable energy facilities are not likely to be proposed on lands enrolled in a Williamson Act contract, but suitable locations could include areas adjacent to Williamson Act contract lands.

The construction of large-scale renewable energy facilities in areas with agricultural zoning would result in conflicts with the County's Zoning Ordinance. Additionally, indirect

impacts on agriculturally zoned lands or lands enrolled in a Williamson Act contract have potential to occur if the operation of a facility is incompatible with adjacent agricultural land uses. For example, tall structures (e.g., PV panels, wind turbines, water tanks, and measurement towers) could generate shade and prevent crops from receiving adequate sunlight. In addition, construction and maintenance activities could generate air pollutant emissions, dust, and noise that could interfere with adjacent agricultural operations (e.g., cause damage to crops or livestock).

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

Each large-scale renewable energy project also would be required to undergo evaluation for project-specific impacts under CEQA at the time of application. As applicable, individual projects would be required to demonstrate consistency with General Plan policies (Policies LU-7.1 and COS-6.3) and implement the 2011 GPU PEIR mitigation measure (Agr-2.1) listed in Section 2.2.2.3 that are intended to protect existing agricultural operations from being converted to other land uses and from encroachment of incompatible land uses. Large-scale wind turbine systems would also need to comply with Mitigation Measure M-AGR-1, identified in the 2013 Wind Energy Ordinance EIR, which requires that project-specific mitigation be incorporated, where applicable, to minimize or eliminate impacts related to conflicts with agricultural zoning and Williamson Act contracts to the extent feasible (see Section 2.2.5.2). Examples of standard mitigation measures include avoidance of agricultural resources, preservation of agriculture, and inclusion of compatibility buffers near areas intended for agricultural uses. Other large-scale renewable energy projects would be required to incorporate similar types of project-specific mitigation, as identified during the CEQA process.

Mitigation Measure M-AGR-1 has been modified and incorporated into CAP Update Mitigation Measure Agr-1, which requires that all large-scale renewable energy projects (including both solar and wind projects) apply the County Guidelines for Determining Significance for Agricultural Resources. When impacts to farmland are determined to be significant, these projects are required to implement feasible and appropriate project-specific mitigation measures, including avoidance of agricultural resources, preservation of agriculture, and inclusion of compatibility buffers near areas intended for agricultural uses. However, it cannot be guaranteed that impacts related to conflicts with agricultural zoning and Williamson Act contracts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, impacts related to conflicts with agricultural zoning and Williamson Act contracts would be significant and unavoidable.

Built Environment and Transportation Measures and Actions

The CAP Update includes measures and actions to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Actions T-3.1, T-3.1.a, T-3.1.b, T-5.1, and T-6.2 would include the development of plans and programs that may result in the construction of pedestrian, bicycle, and transit network improvements and zero-emission vehicle infrastructure. Because of the nature of such improvements (i.e., limited size and within existing transportation corridors), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. These improvements are not expected to occur on or adjacent to agricultural lands. Accordingly, conflicts with agricultural zoning and Williamson Act contracts from built environment and transportation measures and actions are not anticipated.

Based on the discussion above, implementation of built environment and transportation measures and actions proposed in the CAP Update would result in less-than-significant impacts related to conflicts with agricultural zoning and Williamson Act contracts.

Summary

Based on the discussion above, solid waste, water and wastewater, agriculture and conservation, small-scale renewable energy, and built environment and transportation measures and actions that would be implemented under the CAP Update are not anticipated to result in conflicts with agricultural zoning and Williamson Act contracts. However, large-scale renewable energy projects could result in conflicts with agricultural zoning and Williamson Act contracts. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts related to conflicts with agricultural zoning and Williamson Act contracts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, large-scale renewable energy facilities would have a potentially significant impact related to conflicts with agricultural zoning and Williamson Act contracts **(Impact AG-2)**. The 2011 GPU PEIR concluded that the impact related to direct and indirect agricultural conversion would be less than significant, and implementation of the CAP Update **would result in a new significant impact** not disclosed in the 2011 GPU PEIR.

2.2.3.5 Issue 3: Result in the Loss or Direct or Indirect Conversion of Forest Land

This section describes the potential impact related to direct or indirect conversion of or loss of forest land that would result from implementation of the CAP Update measures.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, a project would result in a significant impact if it would result in the direct or indirect loss of forest land or conversion of forest land to non-forest use. A potentially significant indirect impact to San Diego County forest land would occur if a project would result in compatibility conflicts with forest land. Land use/forest land interface issues often arise from dust, access restrictions, noise, pest introduction, and conflicts with pesticide use. The type of forest land and the type of adjacent land use would be key considerations in determining forest land compatibility. As an example, forest land would be more likely to be compatible with surrounding quiet activities than noise-generating activities in terms of forest land being managed for wildlife. If these conflicts would result in the conversion of forest land to non-forest land, then a potentially significant impact would occur.

The County of San Diego has not published specific guidelines for determining significant impacts related to the loss of forest land or conversion of forest land to non-forest use under CEQA.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR did not analyze direct or indirect loss or conversion of forest land.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures to result in direct or indirect conversion or loss of forest land.

Solid Waste Measures and Actions

The CAP Update includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to forest resources include those that would result in the development of new or expanded recycling and composting facilities (e.g., Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

As discussed in Section 2.2.1.2, the county does not include lands zoned specifically for forest land, timberland, or timberland production. However, forest resources may be present in areas within the County's jurisdiction, including areas surrounding state parks and national forests. 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. Forest land could occur in many portions of the county, but the presence of forest land would need to be verified through site-specific analysis.

As discussed under Issues 1 and 2 above, specific locations for new and expanded solid waste facilities have not been identified, but these facilities would be developed in accordance with the General Plan (i.e., Policies LU-16.1 and LU-16.3 regarding the siting of new solid waste management facilities and recycling and resource recovery facilities). In accordance with these policies, development of new recycling and resource recovery facilities would occur in areas with industrial land use designations or other appropriate areas based on the type of recycling. For example, the General Plan states that some agricultural areas may be appropriate for management or recycling agricultural waste (i.e., composting). Compliance with General Plan policies would ensure that new or expanded solid waste facilities would not be sited in areas managed for forest resources. Accordingly, development of new or expanded solid waste facilities would not result in the direct or indirect conversion of forest land.

Implementation of solid waste measures and actions proposed in the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of forest land due to the limited presence of forest land in the county and compliance with established County policies.

Water and Wastewater Measures and Actions

The CAP Update includes measures and actions to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Actions W-1.1, W-2.2, W-2.3, and W-2.4 include development of policies that may result in the construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The construction of new recycled water and stormwater capture and reuse infrastructure would not result in the conversion of any land uses. Rather, these actions would facilitate water efficiency and conservation for existing development and new development as it is approved. These infrastructure improvements, when considered separately from the future development that they may accompany, are not expected to occur on forest lands. Accordingly, water and wastewater measures and actions would not result in the direct or indirect conversion of forest land. Implementation of water and wastewater measures and actions that would be implemented under the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of forest land.

Agriculture and Conservation Measures and Actions

The CAP Update includes measures and actions to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. For example, Actions A-1.1, A-1.2, A-1.2.a, A-3.1, A-4.1, and A-4.1.c would result in acquiring and managing conservation lands and improving land management

practices on existing agricultural land to improve carbon sequestration. Some actions could result in the conversion of existing General Plan land uses by dedicating existing agricultural land in the unincorporated county for agricultural uses in perpetuity. These actions would apply to areas that are already used for agricultural operations and would not result in the development of agricultural uses in areas with existing forest land. Action A-4.1.b would result in the evaluation of opportunities for future construction of farmworker housing. This action has potential to indirectly result in the development of farmworker housing to reduce emissions from farmworker transportation. New farmworker housing would be constructed as an accessory use to support existing agricultural operations. Therefore, agriculture and conservation measures and actions would result in less-than-significant impacts related to the direct or indirect conversion of forest land.

Energy Measures and Actions

The CAP Update includes measures and actions to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Actions E-1.1, E-2.1, E-2.2, E-3.1, E-3.2.a, E-3.2.b, and E-3.3 include development of policies and programs that may result in the construction of new infrastructure to promote renewable energy use and electrification.

Small-Scale Renewable Energy Systems

CAP Update Actions E-1.1, E-2.1, E-2.2, E-3.1 E-3.2.a, E-3.2.b, and E-3.3 have potential to result in the development of small-scale renewable energy systems. Requirements for new development would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small-scale solar and energy storage systems and small-scale wind turbines (roof- or ground-mounted systems). With the exception of wind turbines, these types of improvements would be made to existing buildings or would be made in connection with new development as it is approved. These energy infrastructure improvements, when considered separately from the future development that they may accompany, are not expected to occur on or adjacent to forest lands.

Specific locations for new small-scale wind turbines have not been identified; however, these facilities would be developed in accordance with the County's Wind Energy Ordinance. As described on page 2.2-14 of the 2013 Wind Energy EIR, some small wind turbines would be roof-mounted and would not result in ground disturbance, while others would require the erection of turbine towers and construction of concrete foundations. However, the Wind Energy Ordinance permits small wind turbines as accessory uses to existing development under the zoning verification and would not convert forest land to a non-forest use (County of San Diego 2012). Accordingly, the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of forest land from the development of small-scale renewable energy systems.

Large-Scale Renewable Energy Systems

Implementation of CAP Update Action E-3.3 has potential to indirectly result in the development of large-scale renewable energy systems to satisfy increased demand for renewable energy. These systems would include solar energy development technologies such as solar PV and concentrator solar, and large-scale wind turbines. Because the demand generated by such programs and the types of renewable energy systems that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level and assuming development of commonly used technologies.

Large-scale renewable energy facilities would vary in size and could be as large as several thousand acres. It is anticipated that these facilities would be constructed in primarily undeveloped locations that are suitable for generating renewable energy. Specific locations that may be chosen for these large-scale utility projects are unknown. It is likely that suitable locations would include areas that are not highly developed with residential and commercial uses due to the size, massing, coverage, and scale of this type of infrastructure that relies on large amounts of land unencumbered by buildings or shadowed by buildings or trees. However, suitable locations for large-scale renewable energy facilities could include areas that qualify as forest land.

The construction of large-scale renewable energy facilities could result in the direct loss or conversion of forest land through ground-disturbing activities, such as excavation and grading. Each large-scale renewable energy project would be required to obtain applicable permits (e.g., Administrative Permit or Major Use Permit). During the permit process, individual projects would be reviewed to ensure that the physical character (i.e., scale, bulk, coverage, and density) of each project is in harmony with the County's zoning regulations and compatible with adjacent properties. In addition, the physical characteristics of the site would be reviewed to determine if the site is suitable for the type and intensity of the proposed use or development. Large-scale wind turbine systems are further governed by the County's Wind Energy Ordinance, which sets forth requirements related to location, size, design, and operating characteristics of proposed facilities.

Each large-scale renewable energy project also would be required to undergo evaluation for project-specific impacts under CEQA at the time of application. Large-scale wind turbine systems would need to comply with Mitigation Measure M-AGR-2, identified in the 2013 Wind Energy Ordinance EIR, which requires that project-specific mitigation be incorporated, where applicable, to minimize or eliminate impacts related to the loss or conversion of forest land to the extent feasible (see Section 2.2.5.3). Examples of standard mitigation measures include avoidance of sensitive resources, preservation of habitat, revegetation, and resource management. Other large-scale renewable energy projects would be required to incorporate similar types of project-specific mitigation, as identified during the CEQA process.

Mitigation Measure M-AGR-2 has been modified and incorporated into CAP Update Mitigation Measure Agr-2, which requires that all large-scale renewable energy projects (including both solar and wind projects) apply the County Guidelines for Determining

Significance for Biological Resources. When impacts to forest land are determined to be significant, these projects are required to implement feasible and appropriate project-specific mitigation measures, including avoidance of sensitive resources, preservation of habitat, revegetation, and resource management. However, it cannot be guaranteed that impacts related to the loss or conversion of forest land would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, impacts related to the direct and indirect conversion of forest land would be significant and unavoidable.

Built Environment and Transportation Measures and Actions

The CAP Update includes measures and actions to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Actions T-3.1, T-3.1.a, T-3.1.b, T-5.1, and T-6.2 would include the development of plans and programs that may result in the construction of pedestrian, bicycle, and transit network improvements and zero-emission vehicle infrastructure. Because of the nature of such improvements (i.e., limited size and within existing transportation corridors), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. These improvements are not expected to occur on forest lands. Accordingly, built environment and transportation measures and actions would not result in the direct or indirect conversion of forest land.

Implementation of built environment and transportation measures and actions proposed in the CAP Update would result in less-than-significant impacts related to the direct and indirect conversion of forest land.

Summary

Based on the discussion above, solid waste, water and wastewater, agriculture and conservation, small-scale renewable energy, and built environment and transportation measures and actions that would be implemented under the CAP Update are not anticipated to result in the loss or conversion of forest land. However, large-scale renewable energy projects could result in the loss or conversion of forest land. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts related to the loss or conversion of forest land would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Therefore, large-scale renewable energy facilities would have a potentially significant impact related to the loss and conversion of forest land **(Impact AG-3)**. Implementation of the CAP Update **would result in a new significant impact** not disclosed in the 2011 GPU PEIR.

2.2.3.6 Cumulative Impact Analysis

The cumulative analysis in the 2011 GPU PEIR provides an evaluation of the San Diego region, including all of San Diego County, Riverside County, Orange County, and Imperial

County. This scope of analysis was defined by the climatic conditions of southern California "that create a subtropical climate that optimizes the production of a variety of crops that would be more difficult to produce elsewhere" (see page 2-2.27 of the 2011 GPU PEIR). This analysis uses the same scope identified in the 2011 GPU PEIR. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Directly or Indirectly Convert Agricultural Resources

Impacts would be cumulative in nature if the CAP Update in combination with cumulative development would contribute to a regional loss of agricultural resources because of direct or indirect conversion. The 2011 GPU PEIR concluded that cumulative development would contribute to significant cumulative impacts related to direct and indirect conversion of agricultural resources resulting from the build-out associated with the General Plan.

As discussed in the 2011 GPU PEIR, agricultural resources are in decline in the San Diego region. The decline can be attributed, in part, to the increasing population in the region and subsequent pressures that would require the direct conversion of lands supporting agricultural resources to be converted to non-agricultural uses (see page 2.2-27 of the 2011 GPU PEIR). Accordingly, there is an existing significant cumulative impact with respect to the conversion of agricultural resources from past, present, and reasonably foreseeable future development in the cumulative impact analysis study area.

As described in Section 2.2.3.3, most CAP Update measures and actions would result in direct and indirect benefits to agricultural resources within the cumulative setting. For example, solid waste measures and actions that would result in new facilities for recycling agricultural wastes (i.e., composting) would support ongoing agricultural operations. In addition, water and wastewater measures and actions would indirectly support agricultural operations by ensuring that unincorporated areas in the county would continue to have adequate water supplies. Agricultural and conservation measures and actions would result in the protection of agricultural operations and preservation of agricultural lands. Further, small-scale renewable energy measures and actions would result in new renewable energy infrastructure that would serve as a reliable power source for supporting agricultural operations. Other CAP Update measures and actions not included in the categories listed above would not involve the development of land uses that would result in the direct or indirect conversion of agricultural resources.

However, large-scale renewable energy projects could result in the direct or indirect conversion of agricultural resources. Because projects would be implemented by utility companies in response to the demand generated by CAP Update policies, there is uncertainty regarding the types, locations, and scale of future large-scale renewable energy projects. 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 level below significance.

Based on the above discussion, implementation of the CAP Update would include measures and actions to ensure the preservation of existing agricultural land and improve land management practices. In addition, implementation of the CAP Update would generally help to prevent the indirect conversion of agricultural resources by ensuring that adequate water and energy resources, as well as agricultural waste facilities, are available to support ongoing agricultural operations. However, large-scale renewable energy projects that could indirectly result from implementation of the CAP Update could result in the conversion of agricultural resources. Accordingly, implementation of the CAP Update would result in a considerable contribution to an existing cumulative effect related to the conversion of agricultural resources, consistent with the conclusion in the 2011 GPU PEIR. There **would not be a new or more severe impact.**

Issue 2: Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands

Agricultural Zoning and Williamson Act Contract Lands

Impacts would be cumulative in nature if the CAP Update in combination with cumulative development would contribute to a regionally significant impact resulting from conflicts with agricultural zoning and Williamson Act contracts. The 2011 GPU PEIR concluded that cumulative impacts related to Williamson Act contracts and agricultural zoning resulting from the build-out of the General Plan would be less than significant with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures listed above.

As discussed in the 2011 GPU PEIR, incorporated cities and surrounding counties designate and adopt Agricultural Preserves, enter lands into Williamson Act Contracts, and adopt agricultural zoning to protect agricultural resources in the San Diego region (see page 2.2-28 of the 2011 GPU PEIR). Because existing regulations are in place, no existing significant cumulative impact exists with respect to conflicts with agricultural zoning or Williamson Act Contract lands from past, present, and reasonably foreseeable future development in the cumulative impact analysis study area.

As described in Section 2.2.3.4, CAP Update measures and actions would result in land management strategies and installation of new infrastructure and facilities that would be compatible with existing agricultural zoning and Williamson Act contracts. For example, solid waste measures and actions that would result in new facilities for recycling agricultural wastes (i.e., composting) would support ongoing agricultural operations in areas that are zoned for agricultural use or enrolled in Williamson Act contracts. In addition, water and wastewater measures and actions would indirectly support areas zoned for agricultural use and areas enrolled in Williamson Act contracts by ensuring that unincorporated areas in the county would continue to have adequate water supplies. Agricultural and conservation measures and actions would increase the acreage of lands designated for agricultural land uses within the unincorporated county. Further, energy measures and actions would result in new renewable energy infrastructure that would serve as a reliable power source for supporting agricultural operations. CAP Update measures and actions would not require rezoning because the types of proposed

infrastructure and facilities would be allowed within any zone, subject to limitations or use permits. Other CAP Update measures and actions not included in the categories listed above would not result in conflicts with agricultural zoning or Williamson Act contracts.

However, large-scale renewable energy projects could result in conflicts with agricultural zoning or Williamson Act contracts. Because projects would be implemented by utility companies in response to the demand generated by CAP Update policies, there is uncertainty regarding the types, locations, and scale of future large-scale renewable energy projects. 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 conflicts with agricultural zoning or Williamson Act contracts would be reduced to a level below significance.

Based on the above discussion, implementation of the CAP Update would generally prevent conflicts with agricultural zoning and Williamson Act contracts in the San Diego region through measures and actions to ensure the preservation of existing agricultural land and improve land management practices. In addition, implementation of the CAP Update would ensure that adequate water and energy resources, as well as agricultural waste facilities, are available to support ongoing agricultural operations within areas zoned for agricultural uses or enrolled in Williamson Act contracts. However, large-scale renewable energy projects under the CAP Update could result in conflicts with agricultural zoning or Williamson Act contracts. Therefore, the CAP Update would result in a considerable contribution to an adverse cumulative condition related to conflicts with agricultural zoning or Williamson Act contracts. There **would be a new significant impact** not disclosed in the 2011 GPU PEIR **(Impact-C-AG-2)**.

Forest Zoning

Impacts would be cumulative in nature if the CAP Update in combination with cumulative development would contribute to a regionally significant impact resulting from conflicts with forest or timberland zoning. The 2011 GPU PEIR did not evaluate cumulative impacts related to the direct or indirect loss or conversion of forest land.

Regional growth and land use changes within the San Diego region have resulted in and will continue to result new urban development in areas with existing forest resources. Accordingly, there is an existing significant cumulative impact with respect to conflicts with forest zoning from past, present, and reasonably foreseeable future development in the cumulative impact analysis study area.

As discussed in Section 2.2.1.2, “Forestry Resources,” the county does not include lands zoned specifically for forest land, timberland, or timberland production. The County also does not have land use authority over development in national forests, such as Cleveland National Forest, where most of the county’s forest land exists. Because implementation of the CAP Update would have no impact related to conflicts with zoning for forest land or timberland, the CAP Update would not result in a new significant cumulative impact

related to conflicts with forestry 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.

Issue 3: Result in the Loss or Direct or Indirect Conversion of Forest Land

Impacts would be cumulative in nature if the CAP Update in combination with cumulative development would contribute to a regionally substantial impact resulting from direct or indirect conversion or loss of forest resources. The 2011 GPU PEIR did not evaluate cumulative impacts related to the conversion or loss of forest resources.

Regional growth and land use changes have resulted in and will continue to result in the conversion or loss of existing forest lands. Accordingly, there is an existing significant cumulative impact with respect to the conversion of forest lands from past, present, and reasonably foreseeable future development in the cumulative impact analysis study area.

As discussed in Section 2.2.1.2, "Forestry Resources," the county does not include lands zoned specifically for forest land, timberland, or timberland production. The County also does not have land use authority over development in national forests, such as Cleveland National Forest, where most of the county's forest land exists. As described in Section 2.2.3.5, most CAP Update measures and actions would not result in the siting new facilities or infrastructure in areas with existing forest land, except in cases where the infrastructure is permitted as an accessory use. However, large-scale renewable energy measures and actions could result in the loss or conversion of forest land. Because projects would be implemented by utility companies in response to the demand generated by CAP Update policies, there is uncertainty regarding the types, locations, and scale of future large-scale renewable energy projects. 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 loss or conversion of forest land would be reduced to a level below significance.

Because large-scale renewable energy infrastructure built in response to measures and actions in the CAP Update could result in the direct or indirect conversion of forest land within the cumulative setting, the CAP Update would result a considerable contribution to an existing cumulative effect related to the conversion or loss of forest land. There **would be a new significant impact** not identified in the 2011 GPU PEIR **(Impact-C-AG-3)**.

2.2.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update may indirectly result in the construction of large-scale renewable infrastructure that would result in new and more severe impacts related to agriculture and forestry resources, as summarized below.

Impact AG-2: Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts

related to conflicts with agricultural zoning and Williamson Act contracts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects.

Impact AG-3: Result in the Loss or Direct or Indirect Conversion of Forest Land. Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, it cannot be guaranteed that impacts related to the loss or conversion of forest land would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects.

Impact-C-AG-2: Result in a Cumulatively Considerable Contribution to Conflicts with Agricultural Zoning and Williamson Act Contract Lands. Based on the above discussion, implementation of the CAP Update would generally prevent conflicts with agricultural zoning and Williamson Act contracts in the San Diego region through measures and actions to ensure the preservation of existing agricultural land and improve land management practices. In addition, implementation of the CAP Update would ensure that adequate water and energy resources, as well as agricultural waste facilities, are available to support ongoing agricultural operations within areas zoned for agricultural uses or enrolled in Williamson Act contracts. However, implementation of large-scale renewable energy projects under the CAP Update could result in conflicts with agricultural zoning or Williamson Act contracts.

Impact-C-AG-3: Result in a Cumulatively Considerable Contribution to the Loss or Direct or Indirect Conversion of Forest Land. Large-scale renewable energy infrastructure built in response to measures and actions in the CAP Update could result in the direct or indirect conversion of forest land within the cumulative setting.

2.2.5 Mitigation Measures

2.2.5.1 Issue 1: Directly or Indirectly Convert Agricultural Resources

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

> Adopted Mitigation Measure Agr-1.1: Implement the General Plan Regional Category map and Land Use Maps which protect agricultural lands with lower density land use designations that will support continued agricultural.
>
> Adopted Mitigation Measure Agr-1.2: Develop and implement programs and regulations that protect agricultural lands (such as the CEQA guidelines, Zoning Ordinance, Right to Farm Act, Open Space Subvention Act, Farm and Ranch Lands Protection Program, San Diego County Agricultural Enterprises and Consumer Information Ordinance, BOS Policy I-133, and the San Diego County Farming Program), as well as, those that support implementation of the Williamson

Act (including the CEQA Guidelines, Zoning Ordinance, and Subdivision Ordinance).

Adopted Mitigation Measure Agr-1.3: Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary with the goal of promoting conservation of natural resources and open space (including agricultural lands) while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted.

Adopted Mitigation Measure Agr-1.4: Develop and implement the PACE program which compensates landowners for voluntarily limiting future development on their land.

Adopted Mitigation Measure Agr-1.5: Revise community plans to identify important agricultural areas within them and specific compatible uses and desired buffers necessary to maintain the viability of that area. Community plans are used to review development projects (including General Plan Amendments).

The 2013 Wind Energy Ordinance EIR included the following mitigation measure to minimize the potentially significant impacts related to large wind turbine projects:

Adopted Mitigation Measure M-AGR-1: During the environmental review process for future Major Use Permits for wind turbines, the County Guidelines for Determining Significance for Agricultural Resources shall be applied. When impacts to Farmland are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of agricultural resources; preservation of agriculture; and inclusion of compatibility buffers near areas intended for agricultural uses.

An additional mitigation was considered that would prohibit construction of large wind turbine projects in areas supporting Important Farmland; however, this measure was determined to be infeasible because areas supporting Important Farmland may be located within high-quality wind resource areas. This prohibition within the wind resource areas would conflict with CAP Update objectives to facilitate the use of renewable wind energy within the county, to maximize the production of energy from renewable wind sources, and to reduce the potential for energy shortages and outages by facilitating local energy supply.

A modified version of Mitigation Measure M-AGR-1 shall be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) for the CAP Update and shall be applied to all large-scale renewable energy projects, including PV and concentrator solar systems, during the discretionary review process which would be implemented as a condition of receiving a Major Use Permit. As described in the impact analysis, future large-scale renewable energy projects would be required to be evaluated for project-

specific impacts under CEQA at the time of discretionary review and project-specific mitigation would minimize or eliminate impacts related to the conversion of agricultural resources to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Mitigation Measure M-AGR-1 from the 2013 Wind Energy Ordinance EIR has been revised to include all large-scale renewable energy projects as follows:

> CAP Update Mitigation Measure Agr-1: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Agricultural Resources shall be applied. When impacts to Important Farmland are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of agricultural resources; preservation of agriculture; and inclusion of compatibility buffers near areas intended for agricultural uses.

CAP Update Mitigation Measure Agr-1 would reduce the potential for significant impacts related to the conversion of agricultural resources; however, it is not possible to guarantee that these impacts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Additional mitigation was contemplated as part of this draft SEIR that would implement a development cap on large-scale renewable energy projects. However, this potential mitigation measure was rejected as infeasible because it may reduce the effectiveness of CAP Update Action E-3.3 and diminish the potential for the County to achieve the 2030 GHG emissions reduction target established by the CAP Update. This mitigation would also be infeasible because it would conflict with the County's goal for expanding renewable energy resources. It is unknown how many individual projects and the specific types of large-scale renewable energy systems that would be required to meet the GHG reduction goals of the CAP Update because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available.

2.2.5.2 Issue 2: Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands

The following mitigation measure was adopted as part of the 2011 GPU PEIR and is applicable to the CAP Update:

> Adopted Mitigation Measure Agr-2.1: Prior to the approval of any Zoning Ordinance Amendment that would result in the removal of an "A" designator from a certain property, an analysis shall be conducted to ensure that the action removing such a designation will not result in any significant direct or indirect adverse impact to a Williamson Act Contract lands.

The 2013 Wind Energy Ordinance EIR identified Mitigation Measure M-AGR-1, described in Section 2.2.5.1, above, which would be implemented during the discretionary review process for large wind turbines.

An additional mitigation was considered that would prohibit construction of large wind turbine projects in areas zoned for agriculture, areas under Williamson Act contract, and areas near Williamson Act contract lands; however, this measure was determined to be infeasible because high-quality wind resource areas may have agricultural zoning or Williamson Act contracts lands. This prohibition within the wind resource areas would conflict with the project objectives to facilitate the use of renewable wind energy within the county, to maximize the production of energy from renewable wind sources, and to reduce the potential for energy shortages and outages by facilitating local energy supply.

CAP Update Mitigation Measure Agr-1, described in Section 2.2.5.1 above, shall be incorporated into the MMRP for the CAP Update and shall be applied to all large-scale renewable energy projects, including PV and concentrator solar systems, during the discretionary review process, which would be implemented as a condition of receiving a Major Use Permit. As described in the impact analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of a discretionary review application and project-specific mitigation would minimize or eliminate impacts to visual character and quality to the extent feasible in compliance with State CEQA Guidelines Section 15126.4.

CAP Update Mitigation Measure Agr-1 would reduce the potential for significant impacts related to conflicts with agricultural zoning and Williamson Act contracts; however, it is not possible to guarantee that all projects and cumulative impacts to conflicts with agricultural zoning and Williamson Act contracts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future renewable energy projects. Additional mitigation was contemplated as part of this draft SEIR that would implement a development cap upon large-scale renewable energy projects. However, this potential mitigation measure was rejected as infeasible because it may reduce the effectiveness of CAP Update Action E-3.3 and diminish the potential for the County to achieve the 2030 GHG emissions reduction target established by the CAP Update. This mitigation would also be infeasible because it would conflict with the County's goal for expanding renewable energy resources. It is unknown how many individual projects and specific type of large-scale renewable energy systems would be required to meet the GHG reduction goals of the CAP because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available.

2.2.5.3 Issue 3: Result in the Loss or Direct or Indirect Conversion of Forest Land

As discussed in Section 2.2.3.5, above, the 2011 GPU PEIR did not analyze the loss or direct or indirect conversion of forest land; therefore, no mitigation measures were adopted as part of the 2011 GPU PEIR for the purpose of reducing the potential for the loss or conversion of forest land.

The 2013 Wind Energy Ordinance EIR included the following mitigation measure to minimize the potentially significant impacts related to large wind turbine projects:

> Adopted Mitigation Measure M-AGR-2: During the environmental review process for future Major Use Permits for wind turbines, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts to forest land are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management.

Additional mitigation was considered that would prohibit construction of large wind turbine projects in areas supporting forest land; however, this measure was determined to be infeasible because forest land may be located within high-quality wind resource areas. This prohibition within the wind resource areas would conflict with CAP Update objectives to facilitate the use of renewable wind energy within the county, to maximize the production of energy from renewable wind sources, and to reduce the potential for energy shortages and outages by facilitating local energy supply.

A modified version of Mitigation Measure M-AGR-2 shall be incorporated into the MMRP for the CAP Update that encompasses all large-scale renewable energy projects, including PV and concentrator solar systems, during the discretionary review process which would be implemented as a condition of receiving a Major Use Permit. As described in the impact analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of discretionary review and project-specific mitigation would minimize or eliminate impacts related to the loss or conversion of forest land to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Mitigation Measure M-AGR-2 from the 2013 Wind Energy Ordinance EIR has been revised to include all large-scale renewable energy projects as follows:

> CAP Update Mitigation Measure Agr-2: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts to forest land are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management.

CAP Update Mitigation Measure Agr-2 would reduce the potential for significant impacts related to the loss or conversion of forest land; however, it is not possible to guarantee that these impacts would be reduced to a level below significance because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. Additional mitigation was contemplated as part of this draft SEIR that would implement a development cap on large-scale renewable energy projects. However, this potential mitigation measure was rejected as infeasible because it may reduce the effectiveness of CAP Update Action E-3.3 and diminish the potential for the County to achieve the 2030 GHG emissions reduction target established by the CAP Update. This mitigation would also be infeasible because it would conflict with the County's goal for expanding renewable energy resources. It is unknown how many individual projects and

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

2.2.6 Significance Conclusions

2.2.6.1 Issue 1: Directly or Indirectly Convert Agricultural Resources

With implementation of the CAP Update, large-scale renewable energy projects have potential to result in the direct or indirect conversion of agricultural resources. Even with compliance with existing regulations related to agricultural resources and implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Agr-1, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation is available that could be applied to large-scale renewable energy projects. Therefore, the project's impact related to the direct and indirect conversion of agricultural resources would be **significant and unavoidable** and the project **would result in a considerable contribution** to a cumulative impact related to the conversion of agricultural resources could occur. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.2.6.2 Issue 2: Conflict with Agricultural or Forest Zoning or Williamson Act Contract Lands

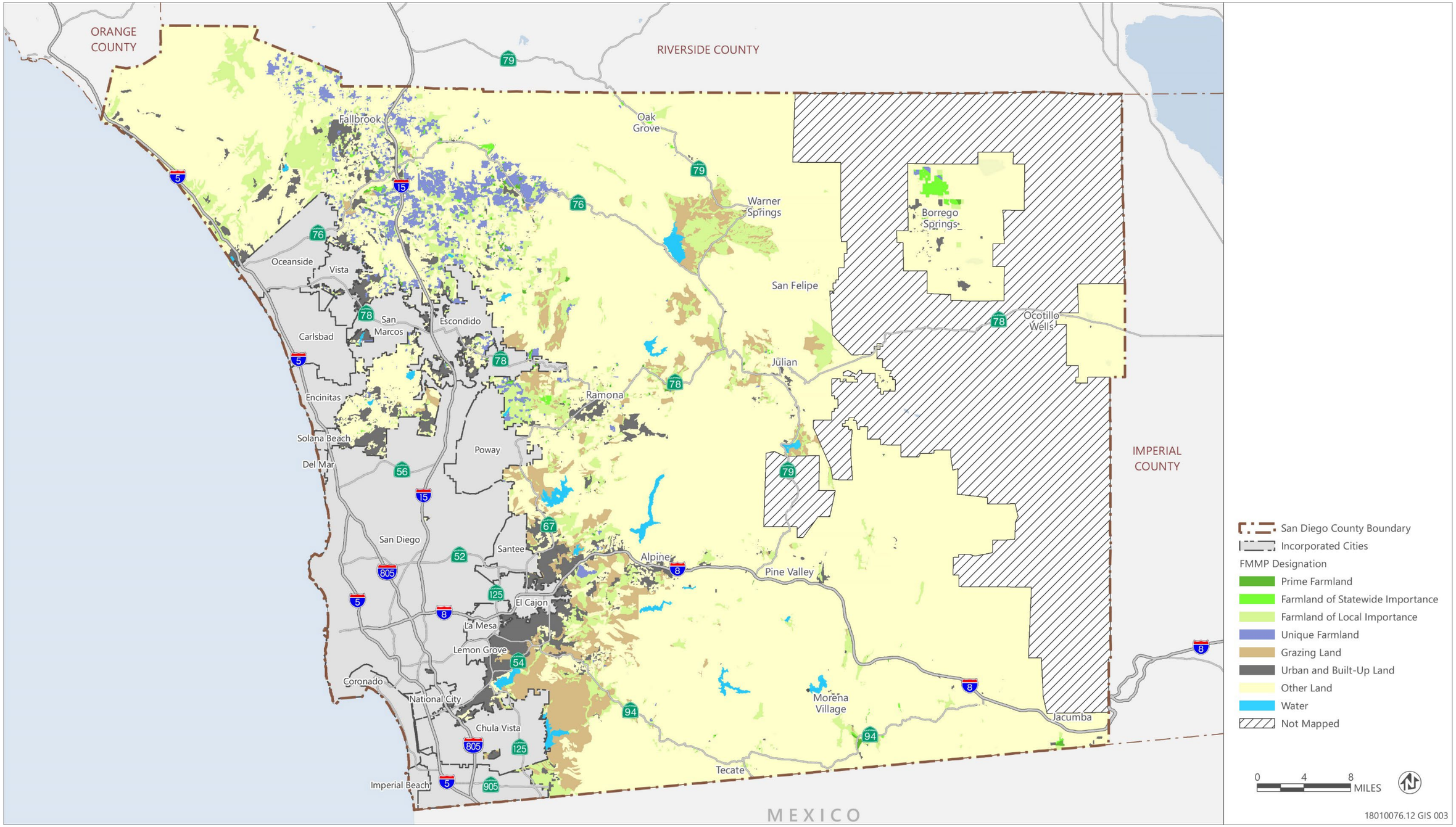
With implementation of the CAP Update, large-scale renewable energy projects have potential to result in conflicts with agricultural zoning or Williamson Act contracts. Even with compliance with existing regulations related to agricultural resources and implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Agr-1, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation is available that could be applied to large-scale renewable energy projects. Therefore, the project's impact related to conflicts with agricultural zoning or Williamson Act contracts would be **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact related to conflicts with agricultural zoning or Williamson Act contracts could occur. This **would be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.2.6.3 Issue 3: Result in the Loss or Direct or Indirect Conversion of Forest Land

With implementation of the CAP Update, large-scale renewable energy projects have potential to result in the loss or conversion of forest land. Even with compliance with existing regulations related to forest resources and implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Agr-2, impacts from large-scale renewable energy projects could remain significant. No other feasible project-related mitigation is available that could be applied to large-scale

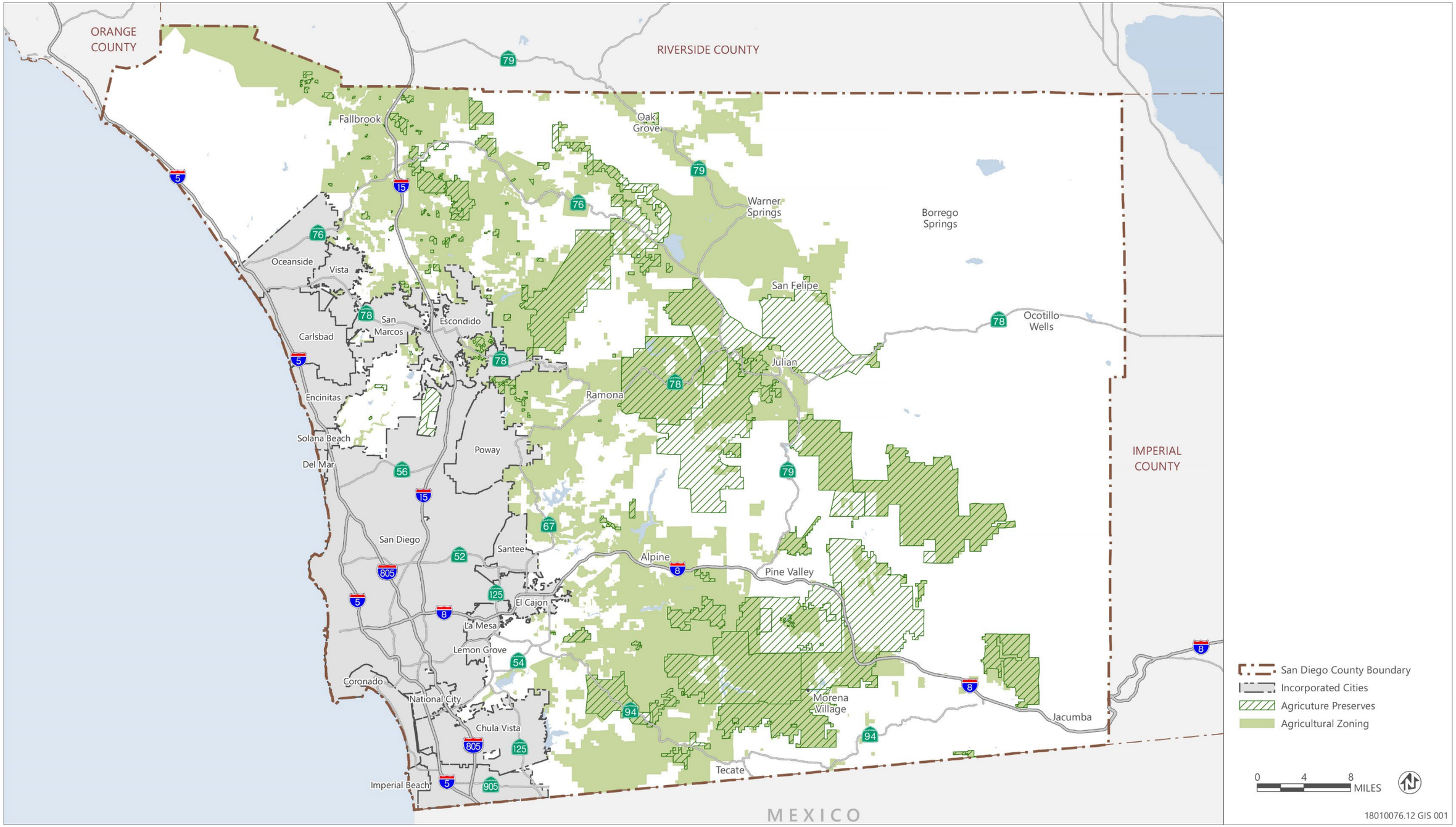
renewable energy projects. Therefore, the project's impact related to the loss or conversion of forest land would be **significant and unavoidable** and the project **would result in a considerable contribution** such that a new significant cumulative impact related to the conversion of agricultural resources could occur. This **would be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

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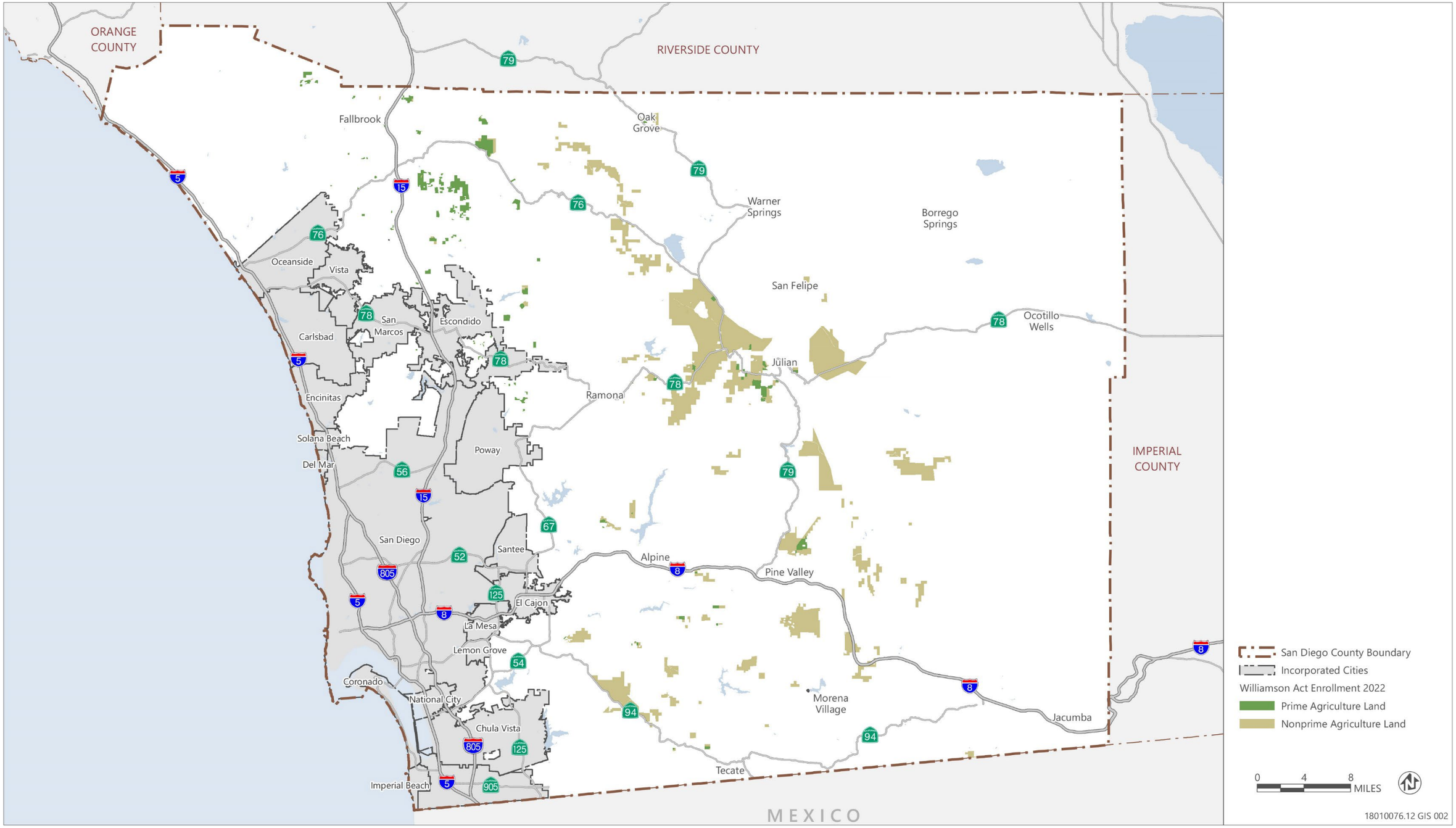
Sources: Data downloaded from the California Department of Conservation in 2023; adapted by Ascent in 2023.

Figure 2.2-1 **Farmland Designations**



Sources: Data downloaded from SanGIS in 2023; adapted by Ascent in 2023.

Figure 2.2-2 **Agricultural Zoning**



Sources: Data downloaded from the California Department of Conservation in 2023; adapted by Ascent in 2023.

Figure 2.2-3 **Williamson Act Enrollment 2022**

2.3 Air Quality

This section includes a discussion of existing air quality conditions, a summary of applicable regulations, and an analysis of potential short-term and long-term air quality impacts that could result from implementation of the project. Because this analysis is subsequent to the adopted 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the air quality setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the 2011 GPU PEIR. In 2018, Appendix G of the State CEQA Guidelines was updated to combine two checklist items (related to air quality violations and nonattainment of criteria pollutants) into a single checklist item and amend the last checklist item to expand the question beyond objectionable odors. However, to distinguish impacts between these two issue areas, the analysis below uses the same separate checklist items used in the 2011 GPU PEIR.

Table 2.3-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. As indicated, implementation of the proposed project would not result in new or more severe significant impacts on air quality (with implementation of mitigation).

Table 2.3-1 Summary of Air Quality–Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Air Quality Plans	General Plan Only: Less-Than-Significant Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less-Than-Significant Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
2	Air Quality Violations	General Plan Only: Significant and Unavoidable Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable Cumulative Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
3	Non-Attainment Criteria Pollutants	General Plan Only: Significant and Unavoidable Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable Cumulative Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
4	Sensitive Receptors	General Plan Only: Significant and Unavoidable Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable Cumulative Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
5	Odors	General Plan Only: Less-Than-Significant Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less-Than-Significant Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

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

Compiled by Ascent Environmental in 2023.

No comments received during the Notice of Preparation (NOP) scoping process included specific concerns regarding air quality. However, several commenters provided suggestions for improvements that should be included in the CAP Update that would positively impact air quality such as increased alternative transportation infrastructure, complete streets, energy efficiency improvements, increased renewable energy, building electrification, and natural resource conservation. Copies of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

2.3.1 Existing Conditions

The 2011 GPU PEIR included a discussion of existing conditions related to air quality in Section 2.3.1 on pages 2.3-1 through 2.3-3. The 2011 GPU PEIR reported data from 2003 to 2007 for criteria air pollutants addressed in the ambient air quality standards. Since certification of the 2011 GPU PEIR in August 2011, more recent ambient background air quality data has been made available by the San Diego County Air Pollution Control District (SDAPCD). Changes to the monitoring station concentration data, ambient risk levels in the county, and attainment designations for the county have been updated and

are provided below; however, this updated information does not substantially change the existing conditions described for air quality in the 2011 GPU PEIR, which are incorporated herein by reference.

Criteria Air Pollutants

The federal and state governments have established air quality standards for six criteria pollutants: ozone (O_3); carbon monoxide (CO); lead (Pb); nitrogen dioxide (NO_2); sulfur dioxide (SO_2); and particulate matter (PM), which consists of particulate matter 10 micrometers or less in diameter (PM_{10}) and particulate matter 2.5 micrometers or less in diameter ($PM_{2.5}$). O_3 is considered a regional pollutant because its precursors affect air quality on a regional scale. Pollutants such as CO, NO_2, SO_2, and Pb are considered local pollutants that tend to accumulate in the air locally. PM is both a local and a regional pollutant. The primary criteria pollutants of concern generated by the project are O_3 precursors (volatile organic compounds [VOCs] and oxides of nitrogen [NO_X, CO, and PM.[1]

All criteria pollutants can have human health and environmental effects at certain concentrations. The ambient air quality standards for these pollutants are set to protect public health and the environment within an adequate margin of safety (Clean Air Act Section 109). Epidemiological, controlled human exposure, and toxicology studies evaluate potential health and environmental effects of criteria pollutants, and form the scientific basis for new and revised ambient air quality standards.

Principal characteristics and possible health and environmental effects from exposure to the primary criteria pollutants generated by the project are provided in Table 2.3-2, presented at the end of this section.

Monitoring Station Data and Attainment Area Designations

SDAPCD operates and maintains nine regional monitoring stations throughout the San Diego Air Basin (SDAB). The Alpine – 2300 Victoria Drive monitoring station is the only station located in unincorporated San Diego County. Alpine is the SDAPCD's easternmost monitoring station and measures for O_3 and fine particulate matter ($PM_{2.5}$) concentrations downwind of the region's major metropolitan areas. The Escondido – 600 East Valley Parkway monitoring station closed in 2015 and has not yet been replaced. Monitoring data from the Escondido monitoring station was used in the 2011 GPU PEIR to establish existing conditions. The next closest monitoring station is the El Cajon – Lexington Elementary station, which is located within the City of El Cajon near unincorporated areas. The El Cajon – Lexington Elementary station reports O_3, respirable particulate matter (PM_{10}), and $PM_{2.5}$ concentrations. Data from the El Cajon – Lexington Elementary station is included below. In general, the local ambient air quality measurements from these stations are representative of the air quality within the unincorporated county. Table 2.3-3, presented at the end of this section, summarizes the

[1] As discussed, there are also ambient air quality standards for SO_2, Pb, sulfates, hydrogen sulfide, vinyl chloride, and visibility particulates. However, these pollutants are typically associated with large stationary sources (such as manufacturing), which are not included as part of the project.

air quality data for the three most recent calendar years for which data are available (i.e., 2019–2021).

Both the California Air Resources Board (CARB) and US Environmental Protection Agency (EPA) use this type of monitoring data to designate areas according to their attainment status for criteria air pollutants. The purpose of these designations is to identify those areas with air quality problems and thereby initiate planning efforts for improvement. The three basic designation categories are "nonattainment," "attainment," and "unclassified." In addition, the California designations include a subcategory of the nonattainment designation, called "nonattainment-transitional." The nonattainment-transitional designation is given to nonattainment areas that are progressing and nearing attainment. Unclassified is designated in an area that cannot be classified based on available information as meeting or not meeting the standards. Attainment designations for San Diego County are shown in Table 2.3-4, presented at the end of this section, for each criteria air pollutant. As of the 2011 GPU PEIR, San Diego County was designated as a nonattainment area for the National Ambient Air Quality Standards (NAAQS), the California Ambient Air Quality Standards (CAAQS), or both for O_3 (NAAQS and CAAQS), PM_{10} (CAAQS), and $PM_{2.5}$ (CAAQS), as well as a maintenance area for CO (NAAQS). San Diego County remains a nonattainment area for O_3 (NAAQS and CAAQS), PM_{10} (CAAQS), and $PM_{2.5}$ (CAAQS), but is no longer considered a maintenance area for CO.

Toxic Air Contaminants

Toxic air contaminants (TACs) are pollutants that have no ambient standard but pose the potential to increase the risk of developing cancer or acute or chronic health risks. The most relevant TAC associated with the proposed project is diesel particulate matter (DPM). DPM was established as a TAC in 1998, while some of the chemicals in diesel exhaust, such as benzene and formaldehyde, had previously been identified as TACs and listed as carcinogens under either the state's Proposition 65 or the federal hazardous air pollutants program.

For TACs like DPM that are known or suspected carcinogens, CARB has consistently found that there are no levels or thresholds below which exposure is risk-free. Therefore, no NAAQS or CAAQS exist for TACs. Individual TACs vary greatly in the risks they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs are identified and their toxicity is studied by the California Office of Environmental Health Hazard Assessment (OEHHA). Adverse health effects of TACs can be carcinogenic (cancer-causing), short-term (acute) noncarcinogenic, and long-term (chronic) noncarcinogenic. Direct exposure to these pollutants has been shown to cause cancer, birth defects, damage to the brain and nervous system, and respiratory disorders.

Odors

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among

the population and overall is quite subjective. Some individuals can smell very minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; an odor that is offensive to one person may be perfectly acceptable to another (e.g., fast food restaurant or a coffee roaster). It is important to also note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity. Odor sources of concern include wastewater treatment plants, sanitary landfills, composting facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting operations, rendering plants, and food packaging plants. Odor sources of concern exist throughout the county.

2.3.2 Regulatory Framework

Air quality in the SDAB is regulated by EPA, CARB, and the SDAPCD. Each of these agencies develops rules, regulations, policies, and/or goals to comply with applicable legislation. The regulatory framework described in Section 2.3.2 on pages 2.3-8 through 2.3-9 of the 2011 GPU PEIR is incorporated by reference. Specific regulations that are discussed in the 2011 GPU PEIR and are applicable to the project include the following:

2.3.2.1 Federal

- Federal Clean Air Act
- NAAQS
- New Source Performance Standards
- National Emissions Standards for Hazardous Air Pollutants Program
- New Source Review (NSR)
- Prevention of Significant Deterioration

2.3.2.2 State

- California Clean Air Act
- CAAQS
- California State Implementation Plan (SIP)
- California Air Toxics “Hot Spots” Information and Assessment Act (Assembly Bill 2588)

2.3.2.3 Local

- San Diego County Regional Air Quality Strategy (RAQS)

- County of San Diego Code of Regulatory Ordinances, Title 8, Division 7, Chapter 4, Section 87.428, Dust Control Measures
- County of San Diego Code of Regulatory Ordinances, Title 6, Division 3, Chapter 4, Sections 63.401 and 63.402, Nuisance

All projects in San Diego County are subject to the adopted SDAPCD rules and regulations. Specific rules applicable may include, but are not limited to the following:

- SDAPCD Rule 10—Permits Required,
- SDAPCD Rule 20.1 et. seq.—New Source Review,
- SDAPCD Rule 50—Visible Emissions,
- SDAPCD Rule 51—Nuisance,
- SDAPCD Rule 52—Particulate Matter,
- SDAPCD Rule 53—Specific Contaminants,
- SDAPCD Rule 54—Dust and Fumes,
- SDAPCD Rule 55—Fugitive Dust,
- SDAPCD Rule 59—Control of Waste Disposal Site Emissions,
- SDAPCD Rule 59.1—Municipal Solid Waste Landfills,
- SDAPCD Rule 62—Sulfur Content of Fuels,
- SDAPCD Rule 67.0—Architectural Coatings,
- SDAPCD Rule 69.4—Stationary Reciprocating Internal Combustion Engines,
- SDAPCD Rule 1200—Toxic Air Contaminants-New Source Review,
- SDAPCD Rule 1210—Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction, and
- SDAPCD Regulation XI, Subpart M, Rule 361.145—National Emission Standards for Asbestos – Standard for Demolition and Renovation.

Applicable local regulations that were not included in or were adopted after adoption of the 2011 GPU PEIR are described below.

Regional Air Quality Strategy and State Implementation Plan

CARB, SDAPCD, and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The San Diego RAQS outlines SDAPCD's plans and control measures designed to attain and maintain the state standards, while San Diego's portions of the SIP are designed to attain and maintain federal standards. The RAQS was initially adopted in 1991 and is updated on a triennial basis. The

RAQS was updated in 1995, 1998, 2001, 2004, 2009, 2016, and most recently in 2022 (SDAPCD 2023).

SDAPCD Rulemaking

SDAPCD Rule 1210 was first adopted in 1996 to establish public notification and risk reduction thresholds and procedures for San Diego County. Rule 1210 was amended in December 2021 to decrease the cancer risk reduction threshold from 100 in one million to 10 in one million. The intent of the regulation is to improve air quality by reducing cancer-causing air pollutants in the region.

2011 San Diego County General Plan

The General Plan policies addressing air quality that are applicable to the CAP Update include the following:

> Policy COS-14.1: Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.
>
> Policy COS-14.2: Villages and Rural Villages. Incorporate a mixture of uses within Villages and Rural Villages that encourage people to walk, bicycle, or use public transit to reduce air pollution and greenhouse gas (GHG) emissions.
>
> Policy COS-14.8: Minimize Air Pollution. Minimize land use conflicts that expose people to significant amounts of air pollutants.
>
> Policy COS-14.9: Significant Producers of Air Pollutants. Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design.
>
> Policy COS-14.10: Low-Emission Construction Vehicles and Equipment. Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.
>
> Policy COS-15.1: Design and Construction of New Buildings. Require that new buildings be designed and constructed in accordance with “green building” programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants.
>
> Policy COS-15.3: Green Building Programs. Require all new County facilities and the renovation and expansion of existing County buildings to meet identified “green

building" programs that demonstrate energy efficiency, energy conservation, and renewable technologies.

Policy COS-15.4: Title 24 Energy Standards. Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.

Policy COS-15.5: Energy Efficiency Audits. Encourage energy conservation and efficiency in existing development through energy efficiency audits and adoption of energy saving measures resulting from the audits.

Policy COS-15.6: Design and Construction Methods. Require development design and construction methods to minimize impacts to air quality.

Policy COS-16.2: Single-Occupancy Vehicles. Support transportation management programs that reduce the use of single-occupancy vehicles.

Policy COS-16.3: Low-Emissions Vehicles and Equipment. Require County operations and encourage private development to provide incentives (such as priority parking) for the use of low- and zero-emission vehicles and equipment to improve air quality and reduce GHG emissions. [Refer also to Policy M-9.3 (Preferred Parking) in the Mobility Element]

Policy COS-20.3: Regional Collaboration. Coordinate air quality planning efforts with federal and state agencies, San Diego Association of Governments (SANDAG), and other jurisdictions.

Policy LU-2.8: Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.

2011 San Diego County GPU PEIR

The mitigation measures addressing air quality that were adopted as part of the 2011 GPU PEIR and are applicable to the project include the following:

Adopted Mitigation Measure Air-2.1: Provide incentives such as preferential parking for hybrids or alternatively fueled vehicles such as compressed natural gas (CNG) vehicles or hydrogen- or electric-powered vehicles. The County shall also establish programs for priority or free parking on County streets or in County parking lots for hybrids or alternatively fueled vehicles.

Adopted Mitigation Measure Air-2.2: Replace existing vehicles in the County fleet as needed with the cleanest vehicles commercially available that are cost-effective and meet vehicle use needs.

Adopted Mitigation Measure Air-2.3: Implement transportation fleet fueling standards to improve the number of alternatively fueled vehicles in the County fleet.

Adopted Mitigation Measure Air-2.4: Provide incentives to promote the siting or use of clean air technologies where feasible. These technologies shall include, but not be limited to, fuel cell technologies, renewable energy sources, and hydrogen fuel.

Adopted Mitigation Measure Air-2.5: Require that the following measures be implemented on all construction projects where project emissions are above the SLTs:

- multiple applications of water during grading between dozer/scraper passes;
- paving, chip sealing, or chemical stabilization of internal roadways after completion of grading;
- use of sweepers or water trucks to remove "track-out" at any point of public street access;
- termination of grading if winds exceed 25 miles per hour;
- stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control;
- use of low-sulfur fuels in construction equipment;
- use of low VOC paints; and
- projects exceeding SLTs will require 10 percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NO_X), CO, and PM. Tier I standards are for engines over 50 horsepower (hp) (such as bulldozers) built between 1996 and 2000, and engines under 50 hp (such as lawn tractors) built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are for engines rated over 50 hp from 2006 to 2008. Tier IV standards apply to engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV.

Adopted Mitigation Measure Air-2.6: Use County Guidelines for Determining Significance for Air Quality to identify and mitigate adverse environmental effects on air quality.

Adopted Mitigation Measure Air-2.7: Implement County Air Pollution Control District regulations for air emissions from all sources under its jurisdiction.

Adopted Mitigation Measure Air-2.8: Require NSRs to prevent permitting projects that are "major sources."

Adopted Mitigation Measure Air-2.9: Implement the Grading, Clearing, and Watercourses Ordinance by requiring all clearing and grading to be conducted with dust control measures.

Adopted Mitigation Measure Air-2.10: Revise Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County-funded renovation and new building projects. This could be achieved by making the guidelines within the policy mandatory rather than voluntary.

Adopted Mitigation Measure Air-2.11: Implement County RAQS to attain state air quality standards for ozone.

Adopted Mitigation Measure Air-2.12: Revise Board Policy G-15 to require County facilities to comply with Silver Leadership in Energy and Environmental Design (LEED) standards or other equivalent Green Building rating systems.

Adopted Mitigation Measure Air-2.13: Revise Board Policy G-16 to require the County to:

- adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability, and
- require government contractors to use low-emission construction vehicles and equipment.

Adopted Mitigation Measure Air-4.1: Use the policies set forth in the CARB's Land Use and Air Quality Handbook as a guideline for siting sensitive land uses. Implementation of this measure will ensure that sensitive land uses such as residences, schools, day care centers, playgrounds, and medical facilities are sited appropriately to minimize exposure to emissions of TACs.

2.3.3 Analysis of Effects and Significance Determinations

2.3.3.1 Significance Criteria

The analysis is informed by the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements*: *Air Quality* (County of San Diego 2007), which has not been updated since the 2011 GPU PEIR was prepared.

Per Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements*: *Air Quality* (County of San Diego 2007), a project's impact to air quality is considered significant if it would:

- conflict with or obstruct implementation of the applicable air quality plan,
- violate any air quality standard or contribute substantially to an existing or projected air quality violation,
- result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors),
- expose sensitive receptors to substantial pollutant concentrations,
- result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The County's Screening Level Thresholds (SLTs), as informed by SDAPCD's Trigger Levels in Rules 20.2 and 20.3, are tied to achieving or maintaining attainment designations with the NAAQS and CAAQS. The NAAQS and CAAQS, in turn, are scientifically substantiated numerical concentrations of criteria air pollutants considered to be protective of human health. Using federal and state guidance pertaining to TACs, SDAPCD developed cancer risk thresholds for TAC exposure. Unlike criteria air pollutants, there are no known safe concentrations of TACs. Moreover, TAC emissions contribute to the deterioration of localized air quality because of the dispersion characteristics of TAC emissions that do not typically cause regional-scale air quality impacts. SDAPCD thresholds are designed to ensure that a source of TACs does not contribute to a localized, significant impact to existing or new receptors. These risk-based TAC thresholds have been incorporated into the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Air Quality* analyses under CEQA.

2.3.3.2 Approach to Analysis

Impacts related to air quality were analyzed qualitatively based on a review of the CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant adopted General Plan policies and 2011 GPU PEIR mitigation measures have been applied to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update.

Scope of SEIR Impact Analysis

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

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

The analysis in this draft SEIR is programmatic. Implementation of all CAP Update measures and actions were considered during preparation of this draft SEIR, to the degree specific information about their implementation is known. Because future projects that would be implemented under the CAP Update have yet to be specifically defined, this SEIR considers the types of impacts that could occur with implementation of future projects. Future discretionary projects would be required to be evaluated to determine if they are within the scope of this SEIR or if they would result in project-specific impacts additional to what is concluded in this analysis. If additional impacts would result, additional CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether impacts are reduced to below a significant impact.

Proposed CAP Update Strategies

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

Solid Waste Measures and Actions. This category includes measures and actions intended to increase organic waste diversion, increase recycling, and increase gas capture. Within these measures are associated actions that would achieve the goals of the measures by implementing actions such as adopting a County operations zero waste policy to achieve zero waste (90 percent diversion) by 2030 (Action SW-1.1) and incentivizing the development of new composting/anaerobic digestion facilities and on-farm digesters (Action SW-4.1a).

Water and Wastewater Measures and Actions. This category includes measures and actions intended to increase water efficiency and conservation. Within these measures are associated actions that would update the County's Water Efficiency Plan to require water-efficiency measures in new and existing County buildings/operations to reduce potable water use by 19 percent (Action W-1.1) and amend the County's Code of Regulatory Ordinances to require Tier 2 California Green Building Standards Code

(CALGreen) water efficiency requirements (water efficiency and conservation requirements include installation of stormwater and greywater capture systems for irrigation) for existing development projects with qualifying improvements (Action W-2.2).

Agriculture and Conservation Measures and Actions. This category includes the acquisition and preservation of natural lands, improvements to land management practices to protect habitat and increase carbon storage, and the reduction of GHG emissions from agricultural operations. Within these measures are associated actions that would achieve the goals of the measures by implementing actions such as acquiring 11,000 acres of conservation lands by 2030 to preserve land in perpetuity (Action A-1.1), implementing the County's Landscaping Ordinance to require tree planting in single family residential development (Action A-2.2), and developing a Carbon Farming Program to increase carbon sequestration on 3,000 acres by 2030 (Action A-4.1). This category also includes an action that would evaluate opportunities for the construction of farmworker housing (Action A-4.1.b).

Energy Measures and Actions. This category includes increases to building energy efficiency, the development of renewable energy generation infrastructure, and increasing electrification. Specific measures and actions include implementing the County Facilities Zero Carbon Portfolio Plan to achieve 90 percent reduction in operational carbon emissions by 2030 (Action E-1.1), updating the Green Building Incentive program to include incentives for energy efficiency and conservation improvements (including installation of efficient energy-use equipment, insulation, and replacement of non-electrically powered equipment) for new and existing development (Action E-2.3), and developing a program to provide 100 percent renewable energy from San Diego Community Power to increase renewable energy use in the unincorporated area (Action E-3.3). Action E-3.3 may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes a shift towards alternative modes of transportation, the encouragement of alternative fuel use, and reduced single-occupancy vehicle trips. Within these measures are associated actions that would achieve the goals of the measures by implementing actions such as using alternative fuel and/or zero-emission construction equipment in County projects (Action T-1.1.a), developing a program to provide residents and businesses incentives for alternative fuel and/or zero-emission construction and landscaping equipment (Action T-2.1), developing a program to fund and/or construct 2,040 publicly available electric vehicle (EV) charging stations at County facilities and in the unincorporated area by 2028 (Action T-3.1), and amending the San Diego County Code of Regulatory Ordinances to require Tier 2 CALGreen EV charging infrastructure installations for new multi-family residential and non-residential construction (Action T-43.1).

2.3.3.3 Issue 1: Conflict with Air Quality Plans

This section describes potential project impacts resulting from conflicts with the RAQS and SIP.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines as well as the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Air Quality* (County of San Diego 2007), which remains the most recent guidance for San Diego County, the project would have a significant impact if it would conflict with or obstruct the implementation of the San Diego RAQS and/or the SIP.

The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O_3. In addition, the SDAPCD relies on the SIP, which includes the SDAPCD's plans and control measures for attaining the O_3 NAAQS. These plans consider emissions from all sources, including natural sources, and seek to achieve the appropriate standards through implementation of feasible control measures on stationary sources. Mobile sources are regulated by EPA and CARB, and the emissions and reduction strategies related to mobile sources are also considered in the RAQS and the SIP.

The RAQS relies on information from CARB and SANDAG, including projected growth in the county, as well as mobile, area and all other source emissions to project future emissions and determine the strategies necessary for the reduction of emissions through regulatory controls. The RAQS is updated on a triennial basis with more current projections for population growth and the resulting effects of increased population on air quality in the region such as vehicle miles traveled (VMT), number of vehicle trips in the area, and electricity demand. The RAQS also details measures that, when enacted, are meant to improve air quality in the region. Each subsequent update of the RAQS provides current projections of the items above but maintains the underlying goal of improving air quality in the region. Therefore, the standards applied to the 2011 GPU PEIR are similar to those applied to the project, as the RAQS remains the applicable plan with updated projections being the primary difference. The CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County. As such, projects that propose development that is consistent with the growth anticipated by the general plans would be consistent with the RAQS and SIP.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR included land use designations that would allow development of residential, commercial, industrial, and other land uses in the unincorporated areas. Based on the requirements for consistency with emission control strategies in the RAQS and SIP, the 2011 GPU PEIR concluded that the General Plan would not conflict with or obstruct the implementation of the RAQS and/or the SIP because future development would be required to demonstrate compliance with the strategies and measures adopted as part of the RAQS and SIP during the County's environmental review process, as well as with the requirements of the County and/or air pollution control district (APCD) to reduce emissions of PM. It was determined that, based on the requirements for consistency with emission control strategies in the RAQS and SIP, the General Plan

would not conflict with or obstruct the implementation of the San Diego RAQS and/or applicable portions of the SIP. The discussion of this impact can be found in Section 2.3.3.1 (pages 2.3-13 to 2.3-15) of the 2011 GPU PEIR and is incorporated by reference. Specific General Plan policies related to the protection of air quality are listed above in Section 2.3.2, "Regulatory Framework." The 2011 GPU PEIR concluded that the General Plan would result in a less-than-significant impact associated with conflicts with applicable air quality plans.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures and actions to result in conflicts with the RAQS and SIP.

Solid Waste Measures and Actions

Implementation of measures and actions within the solid waste group would increase organic waste diversion (Actions SW-1.1, SW-1.1a, and SW-1.1b), increase recycling (Actions SW-2.1, SW-2.1a, SW-2.1b, and SW-4.1b), and increase gas capture (Actions SW-3.1 and SW-4.1). Implementation of the measures within this group and their associated actions include solid waste diversion/recycling programs/incentives, development of new composting/anaerobic digestion facilities and on-farm digesters, and biogas capture at existing landfills (Borrego and Otay). Specific locations for projects have not been identified. Implementation of the measures within this group could result in or facilitate the construction of new facilities, which could result in new sources of temporary emissions. Regarding solid waste, operation of new or expanded organics processing facilities throughout the county would require a small increase in the number of full-time employees, and therefore a small increase in vehicle trips and associated vehicle emissions, to operate and maintain the facilities; however, these types of facilities are not substantial employment generators and would therefore not result in substantial population increases. Therefore, implementation of these measures and actions would not result in population growth that could obstruct the implementation of the San Diego RAQS and/or the SIP by exceeding the projected emissions associated with increases in population such as from vehicle trips, energy consumption, and waste generation. Construction of these projects would result in short-term increases in emissions of criteria pollutants associated with construction activities such as heavy equipment use, hauling trips, and worker commute trips. However, these activities would be temporary and would not likely result in prolonged emissions. Operation of these projects would likely result in improvements to air quality as the actions and measures identified above would collectively reduce the consumption of fossil fuels used for generating electricity by improving building efficiency, improve gas capture at solid waste and recycling facilities as well as on farms, and reduce emissions from decomposition by diverting waste from landfills. Additionally, since the CAP Update does not propose changes in land use types, the emissions that would be generated during construction have been previously accounted for in the 2011 GPU PEIR. Implementation of the measures within the solid waste group would result in a less-than-significant impact, consistent with the 2011 GPU PEIR.

Water and Wastewater Measures and Actions

Implementation of measures and actions within the water and wastewater group would increase water efficiency and conservation (Actions W-1.1, W-2.1, W-2.2, W-2.3, W-2.3.a, W-2.3.b, W-2.4, and W-3.1). Implementation of the measures within this group and their associated actions include new building requirements, building retrofits, expansion of recycled water/greywater infrastructure, the installation of water-efficient appliances and smart irrigation systems, and water efficiency programs. Specific locations for projects have not been identified. Implementation of the measures within this group would result in the installation of new greywater systems, smart irrigation, and stormwater capture systems, which could result in new sources of temporary emissions. The operation of these utilities would likely require small increases in full-time employees and would thus not substantially increase population. Therefore, implementation of these measures and actions would not result in population growth that could obstruct the implementation of the San Diego RAQS and/or the SIP by exceeding the projected emissions associated with increases in population such as from vehicle trips, energy consumption, and waste generation. Construction of these projects would result in short-term increases in emissions of criteria pollutants associated with construction activities, such as heavy equipment use, hauling trips, and worker commute trips. However, these activities would be temporary and would not likely result in prolonged emissions. Additionally, since the CAP Update does not propose changes in land use types, the emissions that would be generated during construction have been previously accounted for in the 2011 GPU PEIR. Implementation of the measures within the water and wastewater group would result in a less-than-significant impact, consistent with the 2011 GPU PEIR.

Agriculture and Conservation Measures and Actions

Implementation of agriculture and conservation measures and actions would result in the acquisition and preservation of natural lands (Action A-1.1) and would improve land management practices to protect habitat and increase carbon storage (Actions A-1.2, A-1.2.a, and A-3.1). Additionally, measures and actions in the group aim to reduce GHG emissions from agricultural operations (Action A-5.1 and Action A-5.1.a). Projects that could result from implementation of these measures could include creating agricultural programs, restoring natural/working lands, reducing on-farm anaerobic digesters, incentivizing manure composting, improving foraging/grazing lands, reducing agricultural water costs, implementing carbon farming programs, preparing open space/habitat restoration plans, planting trees, promoting low-carbon/zero emissions landscaping, and evaluating the potential for increasing farmworker housing. This list is not intended to be exhaustive but represents some of the types of projects that could be considered in the future.

Some measures within this group could involve some type of ground disturbing construction activity and would generate criteria pollutant emissions. For example, Action A-4.1.b would evaluate opportunities for increased farmworker housing, which could involve the subsequent construction of housing for farmworkers. Construction activities and project operations associated with these measures could result in air quality emissions. Implementation of these projects may result in a small number of new jobs,

specifically related to construction and maintenance services, but are not expected to result in new residents or growth in activity or development that would conflict with the RAQS or SIP. Therefore, implementation of these measures and actions would not result in population growth that could obstruct the implementation of the San Diego RAQS and/or the SIP by exceeding the projected emissions associated with increases in population, such as from vehicle trips, energy consumption and waste generation. Construction of these projects would result in short-term increases in emissions of criteria pollutants associated with construction activities such as heavy equipment use, hauling trips, and worker commute trips. However, these activities would be temporary and would not likely result in prolonged emissions. Additionally, since the CAP Update does not propose changes in land use types, the emissions that would be generated during construction have been previously accounted for in the 2011 GPU PEIR. All projects would be required to comply with applicable existing federal, state, and local regulations. Implementation of the measures within the agriculture and conservation group would result in a less-than-significant impact, consistent with the 2011 GPU PEIR.

Energy Measures and Actions

Implementation of measures and actions within the energy group would increase building energy efficiency and increase electrification in the unincorporated county (Measures E-1 and E-2) and develop policies and programs to increase use of renewable energy (Measure E-3). These measures and actions would result in investments in local job training and incentive programs and amendments to County codes regarding energy, among other initiatives. Other measures and actions could result in large-scale wind turbines and solar arrays, as well as energy-storage systems. Additional actions include energy efficiency retrofits on existing residential and non-residential structures, including small-scale rooftop or ground-mounted solar photovoltaic arrays or small wind turbines, and incentivizing the use of renewable energy. Implementation of these measures would generally involve some type of ground-disturbing construction activity. Implementation of these projects would result in a small amount of new jobs, specifically related to construction services, but implementation of these projects is not expected to result in new residents or growth in activity or development that would conflict with the RAQS or SIP. All projects would be required to comply with applicable existing federal, state, and local regulations. Specifically, projects would be evaluated for their consistency with adopted General Plan policies, 2011 GPU PEIR mitigation measures, County Grading Ordinance regulations, and County Resources Protection Ordinance regulations.

Installation and operation of both large- and small-scale solar arrays, wind turbines, and energy storage solutions would not result in an increase in population in the county, and the growth in jobs would be minor and related primarily with construction services. Therefore, implementation of these measures would not result in population growth that could obstruct the implementation of the San Diego RAQS and/or the SIP by exceeding the projected emissions associated with increases in population, such as from vehicle trips, energy consumption, and waste generation. Further, increased renewable energy generation would result in decreased reliance on fossil fuels for energy consumption, which would improve air quality by reducing areawide emissions associated with the generation of electricity, consistent with the goals of the RAQS and SIP.

Construction of these projects would result in short-term increases in emissions of criteria pollutants associated with construction activities such as heavy equipment use, hauling trips, and worker commute trips. However, these activities would be temporary and would not likely result in prolonged emissions. Additionally, since the CAP Update does not propose changes in land use types, the emissions that would be generated during construction have been previously accounted for in the 2011 GPU PEIR. Implementation of the measures within the energy group would result in a less-than-significant impact, consistent with the 2011 GPU PEIR.

Built Environment and Transportation Measures and Actions

Implementation of these measures and actions would encourage a shift towards alternative modes of transportation (Actions T-4.1, T-4.1.a, T-4.2, T-5.1, T-5.1.a, and T-5.1.b), encourage alternative fuel use (Action T-3.1.a), and reduce single-occupancy vehicle trips (Actions T-4.1, T-4.1.a, T-4.2, T-5.1, T-5.1.a, T-5.1.b, and T-5.2). These measures and their associated actions would be implemented through activities such as constructing EV charging stations, implementing transit-supportive roadway treatments (e.g., transit signal priority, bus-only signal phases, queue jumps, curb extensions to speed passenger loading, and dedicated bus lanes), implementing transportation demand management (TDM) programs, improving roadways to encourage/expand multimodal transportation, incentivizing active transportation, and constructing new bicycle and pedestrian projects as well as improving existing infrastructure.

Implementation of these measures and actions would generally involve some type of ground-disturbing construction activity and/or result in temporary or permanent change to air quality due to the installation of new transportation infrastructure features as well as upgrades to existing features. Because of the nature of the built environment and transportation measures and actions, projects anticipated to result from implementation of the CAP Update would most likely occur near existing residential and commercial areas throughout the unincorporated area. Emissions of criteria air pollutants during construction activities typically include emissions CO and O_3 precursors (VOCs and NO_X) from the use of heavy equipment, worker commutes, and delivery hauling trips, as well as emissions of PM_{10} and $PM_{2.5}$ from dust generated by material movement and the combustion of diesel fuels used to power heavy equipment and trucks. While construction-related emissions would be generated, these measures would be anticipated to reduce long-term emissions by reducing the amount of fossil fuels combusted primarily from reduced vehicle use trips, reduced VMT, and increased alternative fuel use. These measures would improve air quality by reducing fossil fuel combustion and reducing PM_{10} and $PM_{2.5}$ emissions associated with dust and diesel exhaust. Implementation of these measures would align with the goals of the San Diego RAQS and SIP.

Implementation of these measures and actions would not result in population growth beyond SANDAG's projections for the county. Population growth associated with project development is tied to the generation of emissions of criteria air pollutants from VMT, vehicle trip rates, energy demand, and waste generation. Because population growth would not be affected by implementation of the project, emissions related to these factors

affected by population also would not change. Construction of these projects would result in short-term increases in emissions of criteria pollutants associated with construction activities, such as heavy equipment use, hauling trips, and worker commute trips. However, these activities would be temporary and would not likely result in prolonged emissions. Additionally, since the CAP Update does not propose changes in land use types, the emissions that would be generated during construction have been previously accounted for in the 2011 GPU PEIR.

Accordingly, implementation of these measures and actions would not conflict with or obstruct the implementation of the RAQS and/or the SIP. Further, as described above, adopted General Plan policies would ensure that new development would minimize emissions consistent with County policies and requirements to comply with federal and state standards. Implementation of the measures within the built environment and transportation group would result in a less-than-significant impact, consistent with the 2011 GPU PEIR.

Summary

Implementation of the CAP Update would not conflict with or obstruct implementation of the RAQS or SIP. This impact would remain less than significant, as identified in the 2011 GPU PEIR. Therefore, there is **no new or more severe significant impact** related to obstruction of the implementation of the San Diego RAQS and/or applicable portion of the SIP.

2.3.3.4 Issue 2: Violate Any Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation

This section describes potential project impacts related to conformance with federal and state ambient air quality standards because of implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines as well as the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Air Quality* (County of San Diego 2007), which remains the most recent guidance for San Diego County, the project would have a significant impact if it would result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation. County SLTs are established for both attainment-criteria pollutants (NO_2, SO_2, and CO), and nonattainment-criteria pollutants (O_3 precursors, PM_{10}, and $PM_{2.5}$). Specifically, the CAP Update would result in a significant impact if it would result in:

- emissions that exceed 250 pounds per day of NO_X, or 75 pounds per day of VOCs; and/or
- emissions of CO that, when totaled with the ambient concentrations, will exceed a 1-hour concentration of 20 parts per million (ppm) or an 8-hour average of 9 ppm, or exceed 550 pounds per day of CO, or 100 pounds per year of CO; and/or

- emissions that exceed 55 pounds per day of $PM_{2.5}$; and/or
- emissions of PM_{10} that exceed 100 pounds per day and increase the ambient PM_{10} concentration by 5 micrograms per cubic meter or greater at the maximum exposed individual; and/or
- expose sensitive receptors to a substantial incremental increase in TAC emissions that exceed 10 in one million for carcinogenic risk (i.e., the risk of contracting cancer) and/or a noncarcinogenic hazard index of 1.0 or greater.

Because the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Air Quality* remains the most recent guidance for San Diego County, the standards of significance described above remain consistent with those applied to the 2011 GPU PEIR analysis.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR included a discussion of emissions of criteria pollutants and precursors associated with future development consistent with the land use plan of the adopted General Plan. The 2011 GPU PEIR concluded that buildout of the General Plan would exceed the SLTs for PM_{10}, $PM_{2.5}$, NO_X, and VOCs, primarily due to emissions resulting from vehicle trips.

The 2011 GPU PEIR determined that the impacts related to conformance with federal and state air quality standards would be reduced through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; adopted General Plan policies; and mitigation measures identified in the 2011 GPU PEIR. However, even with these programs and identified mitigation measures (Air-2.1 through Air-2.13), the direct impacts would remain significant and unavoidable because the mitigation measures deemed feasible would not be sufficient to reduce impacts associated with air quality violations below a significant level. Other mitigation measures were proposed but ultimately deemed infeasible because they would restrict new development in areas identified for growth, would require the use of new technology and would be more restrictive than the existing air quality regulations, and would require all applicants to provide on-site renewable energy systems. The discussion of impacts related to air quality can be found in Section 2.3, “Air Quality,” of the 2011 GPU PEIR on pages 2.3-1 to 2.3-52 and is herein incorporated by reference. The 2011 GPU PEIR concluded that the General Plan would result in a significant and unavoidable impact associated with air quality violations.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures and actions to result in conflicts with the state and federal ambient air quality standards.

Solid Waste Measures and Actions

Implementation of measures and actions within the solid waste group would increase organic waste diversion (Actions SW-1.1, SW-1.1a, and SW-1.1b), increase recycling (Actions SW-2.1, SW-2.1a, SW-2.1b, and SW-4.1b), and increase gas capture (Actions SW-3.1 and SW-4.1). Implementation of the measures within this group and their associated actions include solid waste diversion/recycling programs/incentives, development of new composting/anaerobic digestion facilities and on-farm digesters, and biogas capture at existing landfills (Borrego and Otay). Specific locations for projects have not been identified. Air emissions from new waste handling and recycling facilities (Actions SW-4.1.a and SW-4.1.b) could occur from construction activities, including operation of heavy-duty equipment, vehicle travel by worker commute trips, material delivery, and haul trips. Construction activities associated with these actions could result in construction-related air quality emissions and would, therefore, lead to a short-term increase in air emissions.

Regarding the operation of new waste handling and recycling facilities, the anaerobic decomposition of waste would result in operational emissions of VOCs. These organics processing facilities could generate additional VOC emissions that would be analyzed during discretionary review of individual projects. These types of projects were accounted for in the 2011 GPU PEIR as light- and medium-impact industrial development. These projects would be subject to additional review to ensure that emissions resulting from the project would be below applicable thresholds before a stationary source permit would be issued. Stationary source emissions are reported to the SDAPCD and are not anticipated to change unless new stationary sources are constructed. However, if new stationary sources were constructed, they would be subject to the SDAPCD's requirements for permitting and must demonstrate that they will not cause or contribute to a violation of an air quality standard. Organics processing can be conducted outdoors or in partially or fully enclosed facilities, which could result in variations of air quality emissions depending on the type of facility. Operation of new or expanded organics processing facilities would result in increased haul truck trips to and from the facility; however, it is anticipated that the haul truck trips to the organics processing facility would displace the haul truck trips that would be diverted from the landfill and would not result in increased emissions from hauling trips. Therefore, a net increase in the number of haul truck trips within the county is not anticipated. Similarly, increased construction and demolition waste recycling and collection of commercial food scraps and household hazardous waste is expected to displace trips already occurring to transport this waste to landfills.

At the programmatic level, it is not possible to determine with certainty that impacts to air quality standards from construction activities would be reduced to a less-than-significant level. Additionally, emissions of VOCs resulting from operation of solid waste facilities could result in significant levels of VOC emissions. Because the scale of physical development necessary to implement the above measures and actions is unknown, it cannot be assured that adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the impacts related to construction emissions to a less-than-significant level. Adopted Mitigation Measures Air-2.1 through Air-2.13, as well as proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of criteria pollutants

from construction equipment by requiring Tier 3 engines, would reduce emissions associated with project construction and operation. Additionally, at the programmatic level, VOC emissions from operations related to the measures and associated actions of the solid waste group cannot be estimated and it cannot be assured that adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce operations related VOC emissions to a level that would not exceed the local air quality threshold for VOCs. Therefore, implementation of the measures and actions within the solid waste group would result in significant and unavoidable impacts, consistent with buildout of the General Plan.

Water and Wastewater Measures and Actions

Implementation of measures and actions within the water and wastewater group would increase water efficiency and conservation (Actions W-1.1, W-2.1, W-2.2, W-2.3, W-2.3a, W-2.3b, W-2.4, and W-3.1). Implementation of the measures within this group and their associated actions include new building requirements, building retrofits, expansion of recycled water/greywater infrastructure, the installation of water-efficient appliances and smart irrigation systems, and water efficiency programs. Specific locations for projects have not been identified. Implementation of the measures within this group would result in the installation of new greywater systems, smart irrigation, and stormwater capture systems, which could result in new sources of temporary emissions. Air emissions from the implementation of water and wastewater facilities and upgrades could occur from construction activities, including operation of heavy-duty equipment, vehicle travel by worker commute trips, and material delivery. Construction activities would primarily consist of the installation of small structures, such as stormwater capture systems, as well as the installation of new irrigation systems, which could involve some ground-disturbing activities. Operation of these facilities and structures would generate air quality emissions from maintenance trips, worker commute trips, and the use of electricity to power pumps. However, operation of these facilities does not typically require a substantial number of employees, and maintenance activities are typically infrequent and last for short periods of time. Regarding electricity demand, all projects would be required to comply with state building code requirements for energy efficiency.

At the programmatic level, it is not possible to determine with certainty that impacts to air quality standards from construction activities would be reduced to a less-than-significant level. Because the scale of physical development necessary to implement the above measures and actions is unknown, it cannot be assured that adopted General Plan, 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Air-2.1 through Air-2.13), and proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of criteria pollutants from construction equipment by requiring Tier 3 engines, would reduce the impacts related to construction emissions to a less-than-significant level.

Agriculture and Conservation Measures and Actions

Implementation of measures and actions within the agriculture and conservation group would acquire and preserve natural lands (Action A-1.1), as well as improve land management practices to protect habitat and increase carbon storage (Actions A-1.2, A-

1.2.a, and A-3.1). Additionally, actions in the group aim to reduce GHG emissions from agricultural operations (Actions A-5.1 and A-5.1.a). Projects that could result from implementation of these measures and actions could include creating agricultural programs, restoring natural/working lands, reducing on-farm anaerobic digesters, incentivizing manure composting, improving foraging/grazing lands, reducing agricultural water costs, implementing, carbon farming programs, developing open space/habitat restoration plans, planting trees, promoting low-carbon/zero emissions landscaping, and evaluating the potential for increasing farmworker housing. This list is not intended to be exhaustive but represents some of the types of projects that could be considered in the future.

Measures and actions within this group may involve some level of construction and physical disturbance of the land (e.g., Action A-4.1.b, which would create additional housing for farmers), as well as the combustion of fossil fuels for the delivery and planting of trees as stated in Actions A-2.1 and A-2.2. This analysis assumes that implementation of the measures and actions within this group would result in construction activities that could include the use of heavy equipment for earthmoving, materials processing, or compost spreading; vehicle trips during construction/equipment replacement/monitoring activities; possible changes in landform and views; and installation or upgrades of mechanical equipment or facilities. Construction activities associated with these measures could result in construction-related air quality emissions and would therefore lead to a short-term increase in air emissions to the extent that air quality thresholds may be exceeded.

It would be speculative to assume the precise impacts that could occur with implementation of the agriculture and conservation measures and actions in the CAP Update, or what new regulations or mitigation measures would be available to minimize potential environmental impacts. However, all projects would be required to comply with applicable existing federal, state, and local regulations, as described above. Specifically, projects would be evaluated for their consistency adopted General Plan policies, 2011 GPU PEIR mitigation measures, County Grading Ordinance regulations, and County Resources Protection Ordinance regulations.

At the programmatic level, it is not possible to determine with certainty that impacts to air quality standards from construction and operations activities would be reduced to a less-than-significant level. Projects would be subject to additional review as part of the County's discretionary review process and all applicable feasible mitigation (Air-2.2, Air-2.4, Air-2.5, Air-2.6, Air-2.7, Air-2.9, Air-2.10, Air-2.11, Air-2.13, and CAP Air-2.1) would be applied at the project level as part of this process. However, construction of projects associated with the agriculture and conservation measures and actions could still adversely affect the attainment of air quality standards because they would likely require the use of heavy construction equipment and involve earth moving activities and the duration and intensity of these activities is unknown at the programmatic level. It is also unknown if the mitigation measures listed above would be sufficient in reducing operational impacts to a less-than-significant level. While adopted General Plan policies and 2011 GPU PEIR mitigation measures would likely reduce construction and operational emissions, these measures may not be able to fully mitigate the impacts. Therefore,

implementation of the measures and actions within the agriculture and conservation group would result in significant and unavoidable impacts, consistent with buildout of the General Plan.

Energy Measures and Actions

Implementation of measures and actions within the energy group would increase building energy efficiency (Measures E-1 and E-2), and develop policies and programs to increase use of renewable (Measure E-3). These measures and actions would result in investments in local job training and incentive programs and amendments to County codes regarding energy, among other initiatives. Other measures and actions could result in large-scale renewable energy development, such as wind turbines and solar arrays. Additional actions include energy efficiency retrofits on existing residential and non-residential structures, including rooftop or ground-mounted solar photovoltaic arrays or small wind turbines, and incentivizing the use of renewable energy. Implementation of some of these measures and actions would involve some type of ground-disturbing construction activity.

Implementation of measures that result in the installation of new large- and small-scale rooftop wind turbines and solar panels (Actions E-1.1, E-2.2, E-3.2, and E-3.3) would produce emissions of criteria air pollutants related to construction. Air emissions from construction activities would result from use of heavy-duty equipment, fugitive dust from earth moving and grading activities, and worker commute trips, vendor truck trips, and haul trips.

Construction activities associated with small-scale renewables would likely be relatively small in scale, occur intermittently, and last for only short periods of time. Therefore, emissions from construction activities would not be concentrated in one area for an extended period of time. Solar photovoltaic energy panels and small-scale wind turbines typically do not result in substantial activities related to operating the equipment, and include only minor maintenance activities, such as regular inspections, repairs, and removing debris, as necessary.

Implementation of new mechanical equipment or new renewable energy equipment would be regulated by the County Zoning Ordinance Section 6952(b), which governs the use of solar energy systems, and would require approval of a building permit to ensure County codes and requirements are met. In the cases of small photovoltaic energy systems, (under 500 square feet) or small wind turbines (up to three turbines allowed as accessory use), the County would not require a discretionary permit and would not require mitigation for air quality impacts. In these cases, the scale of the projects would not require large construction equipment and would likely not violate air quality standards. In the case of larger renewable energy systems, the County would have the discretion to review the projects and could require mitigation if any air quality violations were identified.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating the renewable energy resource. Because the amount of demand generated by such a program and the mix of renewable

energy types that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level and assumes development of current, common renewable energy technologies.

Large-scale renewable energy systems, specifically wind and solar photovoltaic (PV) or concentrator solar, require large swaths of undeveloped land that are productive for generating renewable energy. Specific locations of potential facilities are unknown. Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would be required to minimize or eliminate impacts to air quality standards to the extent feasible in compliance with State CEQA Guidelines Section 15126.4, as necessary. The large-scale production of energy from solar energy generation systems generally includes a variety of infrastructure components such as arrays, substation sites, battery storage, collection system, and overhead and underground transmission facilities. Large-scale wind turbine infrastructure generally includes wind turbines (300-500 feet to the topmost blade tip), substations, meteorological towers, overhead and underground collector cable systems, and overhead transmission lines.

Air emissions resulting from construction activities include fugitive dust emissions from earth moving and grading activities; products of combustion from heavy-duty equipment, vendor vehicles, haul trips, and worker commute vehicles; and stationary sources such as generators. Earth moving and grading activities would be subject to the County Grading Ordinance, which requires the implementation of dust control measures, minimization of land disturbance to the extent feasible, application of water to active grading areas to decrease fugitive dust emissions, reduced speed limits on unpaved roads, and requirements for trucks hauling soil materials to be covered. Construction emissions associated with large-scale renewable energy facilities may lead to a short-term increase in air emissions to the extent that County SLTs may be exceeded.

The operation of large-scale renewable energy systems would not directly produce substantial air emissions because no large emission-generating equipment would be operated. Operation would result in a minimal increase in the number of full-time employees commuting to and from these facilities. Other operational emissions include minor VOC emissions during routine changes of lubricating and cooling fluids and greases; fugitive dust emissions from vehicle travel; and products of combustion from panel washing equipment operation, water trucks, and stationary sources such as generators. While the sizes, scale, and location of renewable infrastructure is unknown, typical emissions associated with these facilities are low and occur infrequently such that County SLTs are not anticipated to be violated. Implementation of the measures and actions in the energy group generally would reduce the combustion of fossil fuels by incentivizing and developing electricity use as well as the generation and utilization of renewable energy. This would result in improvements in air quality in the region and would likely offset emissions of criteria pollutants generated during construction. Applicable regulatory requirements, General Plan policies, 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Air-2.1 through Air-2.13), and proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of criteria pollutants from construction equipment by requiring Teir 3 engines, would be applied to implementation

of the proposed measures and actions within this group. The operation of these projects is not expected to result in the emission of significant levels of criteria pollutants because, as noted above, implementation of the measures and actions in the energy group would reduce the combustion of fossil fuels by incentivizing and developing electricity use as well as the generation and utilization of renewable energy. However, at the programmatic level, it cannot be assured that construction projects associated with these measures would not exceed a local significance threshold at a project-level. While adopted General Plan policies and 2011 GPU PEIR mitigation measures would likely reduce construction and operational emissions, these measures may not be able to fully mitigate the impacts. Therefore, implementation of the measures and actions within the energy group would result in significant and unavoidable impacts, consistent with buildout of the General Plan.

Built Environment and Transportation Measures and Actions

Implementation of the built environment and transportation group would encourage a shift towards alternative modes of transportation (Actions T-4.1, T-4.1.a, T-4.2, T-5.1, T-5.1.a, and T-5.1.b), encourage alternative fuel use (Action T-3.1.a), and reduce single-occupancy vehicle trips (Actions T-4.1, T-4.1.a, T-4.2, T-5.1, T-5.1.a, T-5.1.b, and T-5.2). These measures and actions would be implemented through activities such as constructing EV charging stations, implementing transit-supportive roadway treatments (e.g., transit signal priority, bus-only signal phases, queue jumps, curb extensions to speed passenger loading, and dedicated bus lanes), implementing TDM programs, improving roadways to encourage/expand multimodal transportation, incentivizing active transportation, and constructing new bicycle and pedestrian projects as well as improving existing infrastructure. While locations for such improvements have not been identified, it is assumed due to the nature and scale of these improvements that they would most likely occur near residential and commercial centers throughout the unincorporated areas.

Implementation of measures that would result in new hydrogen fueling and EV charging stations (Actions T-3.1 and T-3.1.a), as well as the implementation of transit-supportive roadway treatments and bicycle and pedestrian infrastructure (Actions T-5.1 and T-6.2), would generally involve some type of ground-disturbing construction activity and would therefore lead to a short-term increase in air emissions to the extent that air quality thresholds may be exceeded. Air emissions from construction activities would include fugitive dust from earth moving and grading activities, and emissions from heavy-duty equipment, worker commute trips, vendor truck trips, and haul trips. Construction activities may include grading, clearing, and paving, but would not include construction of new buildings or large structures (e.g., bridges, overpasses, parking structures), which could prolong the duration of construction activities and would potentially include more intense ground-disturbing activities such as excavation and would also increase haul truck and worker commute trips.

Operational emissions would be primarily from mobile sources. However, the proposed measures and their associated actions are anticipated to result in an overall decrease in long-term emissions by reducing the amount of fossil fuels combusted primarily from reduced vehicle use trips. It is reasonable to assume that implementation of the measures and actions which comprise the built environment and transportation group would result

in reductions in criteria air pollution because the improvements would involve activities to reduce vehicle use, reduce VMT, and increase alternative fuel use, resulting in an overall reduction in countywide air emissions. However, at the programmatic level, it cannot be assured that construction projects associated with these measures and actions would not exceed a local significance threshold at a project-level. While adopted General Plan policies, 2011 GPU PEIR mitigation measures (Air-2.1, Air-2.2, Air-2.3, Air-2.4, Air-2.5, Air-2.6, Air-2.7, Air-2.8, Air-2.9, Air-2.11, Air-2.12, and Air-2.13), and proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of criteria pollutants from construction equipment by requiring Tier 3 engines, would reduce construction emissions, depending on the size of the facilities, these measures may not be able to fully mitigate the impacts. Therefore, implementation of the measures and actions within the built environment and transportation group would result in significant and unavoidable impacts, consistent with buildout of the General Plan.

Summary

Construction related to implementation of the GHG reduction measures and their associated actions could result in exceedances of local criteria air pollutant thresholds. Because of the programmatic nature of the CAP Update, it is not possible to determine the size and location of projects that would be built, nor the details of their construction typically used to estimate emissions, such as duration, equipment use, and intensity. Despite the potential for reductions in operational emissions to offset those related to construction, project-level emissions from construction and operations activities are addressed separately by the SDAPCD and are therefore subject to different numerical emissions thresholds. It is possible that emissions from individual projects could exceed one or more construction or operations emissions thresholds. Therefore, it cannot be determined that reductions in operational emissions would offset construction emissions on a project level. Despite Adopted Mitigation Measures Air-2.1 through Air-2.13 and proposed CAP Update Mitigation Measure Air-2.1 being applied to all projects, it is not possible at this level of analysis to determine that these mitigation measures would reduce impacts below a significant level. Therefore, this impact would be significant.

Additionally, it is also uncertain at this level of analysis if VOC emissions related to operation of solid waste facilities would exceed the local air quality threshold for this pollutant. Due to this uncertainty, this impact would also be significant. Implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Air-2.1 through Air-2.13) would lessen impacts related to air quality violations that could result from implementation of the measure groups described above. However, the 2011 GPU PEIR determined that even with implementation of the adopted General Plan policies and mitigation measures, impacts associated with air quality violations would not be reduced to a less-than-significant level because some mitigation measures were determined to be infeasible while the feasible mitigation measures were determined to be insufficient in reducing impacts to a less-than-significant level.

The types of projects that would result from implementation of the CAP Update are consistent with the scope and type of development evaluated in the 2011 GPU PEIR. As indicated in the 2011 GPU PEIR, construction and operational emissions would generally

be addressed with the application of adopted regulations, General Plan policies, and 2011 GPU PEIR mitigation measures. However, due to the programmatic nature of the General Plan and CAP Update, the potential that subsequent projects may result in emissions that cannot be reduced below established thresholds remains. Implementation of the CAP Update would not result in a new significant impact, and the impact would not be substantially more severe than the impact identified in the 2011 GPU PEIR. This impact would remain significant and unavoidable following mitigation. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.3.3.5 Issue 3: Result in a Cumulatively Considerable Net Increase of any Nonattainment Criteria Pollutant

This section describes potential project impacts due to release of criteria pollutants from implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines as well as the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Air Quality* (County of San Diego 2007), which remains the most recent guidance for San Diego County, the project would have a significant impact if it would result in a cumulatively considerable net increase of any criteria pollutant for which the SDAB is in nonattainment under an applicable federal or state ambient air quality standard (including emissions that exceed the SLTs for O_3 precursors listed under Section 2.3.3.2). This is consistent with the guidelines for determination of significance applied in the 2011 GPU PEIR. The SDAB is currently classified as a nonattainment area for the NAAQS and CAAQS for O_3, which is caused by O_3 precursors NO_X and VOCs. The SDAB is also classified as a nonattainment area for the CAAQS for PM_{10} and $PM_{2.5}$.

Therefore, impacts would occur if implementation of the CAP Update would generate:

- emissions that exceed 250 pounds per day of NO_X, or 75 pounds per day of VOCs; and/or
- emissions that exceed 55 pounds per day of $PM_{2.5}$; and/or
- emissions of PM_{10} that exceed 100 pounds per day and increase the ambient PM_{10} concentration by 5 micrograms per cubic meter or greater at the maximally exposed individual (MEI).

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR included a discussion of emissions of criteria pollutants associated with future development consistent with the land use plan of the adopted General Plan. The 2011 GPU PEIR concluded that the General Plan would generate a cumulatively

significant impact regarding PM_{10}, $PM_{2.5}$, NO_X, and VOCs. These emissions would primarily come from vehicles trips associated with new development under the General Plan, and equipment and construction materials used during construction of future development and infrastructure.

The 2011 GPU PEIR determined that the impacts related to nonattainment criteria pollutants would be reduced through the implementation of the federal, state, and local regulations; existing County regulatory processes; the adopted General Plan policies and mitigation measures (Air-2.1 through Air-2.13) identified in the 2011 GPU PEIR. However, even with these programs and identified mitigation measures meant to reduce emissions of criteria pollutants that would result from project construction and operation (Adopted Mitigation Measures Air-2.1 through Air-2.13), the direct impacts would remain significant and unavoidable because the mitigation measures deemed feasible would not be sufficient in reducing impacts associated with nonattainment air pollutant violations below a significant level. Other mitigation measures were proposed but ultimately deemed infeasible because they would have restricted new development in areas identified for growth, would have required the use of new technology and would have been more restrictive than the existing air quality regulations, and would have required all applicants to provide on-site renewable energy systems. The discussion of impacts related to air quality can be found in Section 2.3, “Air Quality,” of the 2011 GPU PEIR on pages 2.3-1 to 2.3-52 and is herein incorporated by reference. The 2011 GPU PEIR concluded that the General Plan would result in a significant and unavoidable impact associated with air quality violations.

CAP Update Impact Analysis

The following sections describe the potentially significant impacts related to criteria air pollutants for which the SDAB is not in attainment that could result from the implementation of the measures.

Solid Waste Measures and Actions

Implementation of measures within the solid waste group would increase organic waste diversion (Actions SW-1.1,SW-1.1.a, and SW-1.1.b), increase recycling (Actions SW-2.1, SW-2.1.a, SW-2.1.b, and SW-4.1.b), and increase gas capture (Actions SW-3.1 and SW-4.1). Implementation of the measures within this group and their associated actions include solid waste diversion/recycling programs/incentives, development of new composting/anaerobic digestion facilities and on-farm digesters, and biogas capture at existing landfills (Borrego and Otay). Specific locations for projects have not been identified.

Air emissions from new waste handling and recycling facilities (Actions SW-2.1.b, SW-4.1.a, SW-4.1.b) could occur from construction activities including operation of heavy-duty equipment, vehicle travel by worker commute trips, material delivery, and haul trips. Construction activities associated with these actions could result in construction-related air quality emissions and would, therefore, lead to a short-term increase in air emissions. These activities could result in exceedances of local thresholds NO_x from the use of heavy

equipment, VOCs from architectural coating applications, and PM_{10} and $PM_{2.5}$ from diesel exhaust and dust. This could contribute to the exceedance of air quality thresholds for these pollutants and therefore contribute to the SDAB's nonattainment status for NO_x, VOCs, PM_{10} and $PM_{2.5}$.

Regarding the operation of new waste handling and recycling facilities, the anaerobic decomposition of the waste would result in operational emissions of VOCs. These organics processing facilities could generate additional VOC emissions that would be analyzed during discretionary review of individual projects. These types of projects were accounted for in the 2011 GPU PEIR as light- and medium-impact industrial development. These projects would be subject to additional review to ensure that emissions resulting from each project would be below applicable thresholds before a stationary source permit would be issued. Stationary source emissions are reported to the APCD and are not anticipated to change unless new stationary sources are constructed. However, if new stationary sources were constructed, they would be subject to the APCD's requirements for permitting and must demonstrate that they will not cause or contribute to a violation of an air quality standard. Organics processing can be conducted outdoors or in partially or fully enclosed facilities, which could result in variations of air quality emissions depending on the type of facility. It is possible that VOC emissions from operation of these facilities could contribute to the SDAB's nonattainment status for VOCs. Operation of new or expanded organics processing facilities would result in increased haul truck trips to and from the facility; however, it is anticipated that the haul truck trips to the organics processing facility would displace the haul truck trips that would be diverted from the landfill. Therefore, a net increase in the number of haul truck trips within the county is not anticipated. Similarly, increased construction and demolition waste recycling and collection of commercial food scraps and household hazardous waste is expected to displace trips already occurring to transport this waste to landfills.

General Plan policies, 2011 GPU PEIR Mitigation Measures Air-2.1 through Air-2.13, and proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of criteria pollutants from construction equipment by requiring Tier 3 engines, would be applied to future projects that result from implementation of measures and actions in the CAP Update. However, at the programmatic level, it is not possible to determine with certainty that impacts related to nonattainment pollutants from construction activities would be reduced below a level of significance. Additionally, emissions of VOCs resulting from operation of solid waste facilities could result in significant levels of VOC emissions and contribute to the SDAB's nonattainment status for VOCs. Because the scale of physical development necessary to implement the above measures and actions is unknown, it cannot be assured that adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the impacts related to construction emissions of nonattainment pollutants to a less-than-significant level. Additionally, at the programmatic level, VOC emissions from operations related to the measures and associated actions of the solid waste group cannot be estimated and it cannot be assured that adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce operations related VOC emissions to a level that would not exceed the local air quality threshold for VOCs and therefore contribute to the SDAB's nonattainment status for VOCs. Implementation

of the measures within the solid waste group would result in a significant and unavoidable impact, consistent with the 2011 GPU PEIR.

Water and Wastewater Measures and Actions

Implementation of measures within the water and wastewater group would increase water efficiency and conservation (Actions W-1.1, W-2.1, W-2.2, W-2.3, W-2.3.a, W-2.3.b, W-2.4, and W-3.1). Implementation of the measures within this group and their associated actions include new building requirements, building retrofits, expansion of recycled water/greywater infrastructure, the installation of water-efficient appliances and smart irrigation systems, and water efficiency programs. Specific locations for projects have not been identified.

Action W-1.1 would implement the County's Water Efficiency Plan, which could involve utilities upgrades such as greywater systems, smart irrigation, and stormwater capture systems. Air emissions from water and wastewater infrastructure installation and upgrades could occur from construction activities including operation of heavy-duty equipment, vehicle travel by worker commute trips, and material delivery. Construction activities would primarily consist of the installation of small structures, such as stormwater and greywater capture systems, as well as the installation of new irrigation systems, which could involve ground-disturbing activities. These activities could result in emissions of NO_x from the use of heavy equipment, VOCs from architectural coating applications, and PM_{10} and $PM_{2.5}$ from diesel exhaust and dust. This could contribute to the exceedance of air quality thresholds for these pollutants and therefore contribute to the SDAB's nonattainment status for NO_x, VOCs, PM_{10} and $PM_{2.5}$.

Operation of these facilities and structures would generate air quality emissions from maintenance trips, worker commute trips, and the use of electricity to power pumps and treatment facilities. However, operation of these facilities does not typically require a substantial number of employees, and maintenance activities are typically infrequent and last for short periods of time.

General Plan policies, 2011 GPU PEIR Mitigation Measures Air-2.1 through Air-2.13, and proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of criteria pollutants from construction equipment by requiring Tier 3 engines, would be applied to future projects implemented consistent with these measures and actions. However, at the programmatic level, it is not possible to determine with certainty that impacts related to nonattainment pollutants from construction activities would be reduced below a level of significance. Because the scale of physical development necessary to implement the above measures and actions is unknown, it cannot be assured that adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the impacts related to construction emissions of nonattainment pollutants to a less-than-significant level. Implementation of the measures within the water and wastewater group would result in a significant and unavoidable impact, consistent with the 2011 GPU PEIR.

Agriculture and Conservation Measures and Actions

Implementation of measures within the agriculture and conservation group would acquire and preserve natural lands (Action A-1.1), as well as improve land management practices to protect habitat and increase carbon storage (Actions A-1.2, A-1.2.a, and A-3.1). Additionally, measures in this group aim to reduce GHG emissions from agricultural operations (Actions A-5.1 and A-5.1.a).

Projects that could result from implementation of these measures and actions could include, but would not be limited to preservation of agricultural lands, carbon farming, natural/working lands restoration, on-farm anaerobic digesters, incentivizing manure composting, reducing agricultural water costs, carbon farming programs, open space/habitat restoration plans, tree planting, incentivizing transition to cleaner (e.g., renewable diesel and electric) agricultural equipment, and increasing farmworker housing.

Some measures within this group could involve some type of ground disturbing construction activity that would generate criteria pollutant emissions. For example, Action A-4.1.b would evaluate opportunities for increased farmworker housing, which could involve the subsequent construction of housing for farmworkers, while Actions A-2.1 and A-2.2 could result in the combustion of fossil fuels for the delivery and planting of trees. This analysis assumes that implementation of the measures within this group would result in construction activities that could include the use of heavy equipment for earthmoving, materials processing, or compost spreading; vehicle trips during construction/equipment replacement/monitoring activities; possible changes in landform and views; and installation or upgrades of mechanical equipment or facilities. These activities would result in criteria pollutant emissions and could result in exceedances of local thresholds NO_x from the use of heavy equipment and PM_{10} and $PM_{2.5}$ from diesel exhaust and dust from material movement. This could contribute to the exceedance of air quality thresholds for these pollutants and therefore contribute to the SDAB's nonattainment status for NO_x, PM_{10} and $PM_{2.5}$.

Regarding operations, all projects would be required to comply with applicable existing federal, state, and local regulations, as described above in Section 2.3.2, "Regulatory Framework." Specifically, projects would be evaluated for their consistency with General Plan policies, County Grading Ordinance regulations, and County Resources Protection Ordinance regulations. Additionally, 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Air-2.2, Air-2.4, Air-2.5, Air-2.6, Air-2.7, Air-2.9, Air-2.10, Air-2.11, and Air-2.13) and proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of criteria pollutants from construction equipment by requiring Tier 3 engines, would be applied to future activities in this category of measures and actions to reduce impacts to the extent feasible. Furthermore, future discretionary projects may also be required to undergo additional CEQA analysis to evaluate project-specific impacts. If a determination is made that potentially significant impacts would result from implementation of one or more projects, then additional feasible mitigation would be required to be implemented in accordance with State CEQA Guidelines Section 15126.4. However, because the specifics of projects that may be approved and ultimately

undertaken by the County is not known, it is not possible to speculate on the specific impacts that could occur and whether implementation of regulatory requirements or mitigation measures would fully avoid or minimize potential environmental impacts relating to criteria pollutants for which the SDAB is in nonattainment.

Therefore, at the programmatic level, it is not possible to determine with certainty that impacts related to nonattainment pollutants from construction and operations activities would be reduced below a level of significance. While all feasible mitigation would be applied at the project level as part of the County's discretionary review process, construction and operation of projects associated with the agriculture and conservation measures and their associated actions could still contribute to the nonattainment status of the SDAB because they would likely require the use of heavy construction equipment and involve earth moving activities. The duration and intensity of these activities is unknown at the programmatic level. It is also unknown if the mitigation measures listed above would be sufficient in reducing operational impacts to a less-than-significant level. While adopted General Plan policies and 2011 GPU PEIR mitigation measures (Air-2.2, Air-2.4, Air-2.5, Air-2.6, Air-2.7, Air-2.9, Air-2.10, Air-2.11, Air-2.13) would likely reduce construction and operational emissions, these measures may not be able to fully mitigate the impacts to a less-than-significant level. This impact would remain significant and unavoidable following mitigation, consistent with the 2011 GPU PEIR.

Energy Measures and Actions

Implementation of measures within the energy group would increase building energy efficiency (Measures E-1 and E-2) and develop policies and programs to increase use of renewable energy (Measure E-3). These measures and actions would result in investments in local job training and incentive programs and amendments to County codes regarding energy, among other initiatives. Other measures and actions could result in large-scale wind turbines and solar arrays. Additional actions include energy efficiency retrofits on existing residential and non-residential structures, including rooftop or ground-mounted solar photovoltaic arrays or small wind turbines, and incentivizing the use of renewable energy. Implementation of these measures and their associated actions would generally involve some type of ground-disturbing construction activity.

Implementation of measures that promote use of renewable energy could indirectly result in installation of new large- and small-scale rooftop wind turbines and solar panels (Actions E-1.1, E-2.2, E-3.2, and E-3.3), which would produce emissions of criteria air pollutants related to construction. Air emissions from construction activities would result from use of heavy-duty equipment, fugitive dust from earth moving and grading activities, and worker commute trips, vendor truck trips, and haul trips. Construction activities may include grading and clearing but would not include construction of new buildings or structures. These activities could result in exceedances of local thresholds for NO_x from the use of heavy equipment, VOCs from architectural coating applications, and PM_{10} and $PM_{2.5}$ from diesel exhaust and dust. This could contribute to the exceedance of air quality thresholds for these pollutants and therefore contribute to the SDAB's nonattainment status for NO_x, VOCs, PM_{10} and $PM_{2.5}$. Construction activities associated with small-scale renewables would likely be relatively small in scale, occur intermittently, and last for only short periods of time.

Therefore, emissions from construction activities would not be concentrated in one area for an extended period of time, but rather occur intermittently across a large area. Solar photovoltaic energy panels and small-scale wind turbines typically do not result in substantial activities related to operating the equipment, and include only minor maintenance activities, such as regular inspections, repairs, and removing debris, as necessary.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating renewable energy resources. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level and assumes development of common current technologies.

Large-scale renewable energy systems require large swaths of undeveloped land that are productive for generating renewable energy. Specific locations of potential facilities are unknown. Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to air quality standards to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. The large-scale production of energy from solar photovoltaic systems generally includes a variety of infrastructure components such as arrays, substation site, battery storage, collection system, and overhead and underground transmission facilities. Large-scale wind turbine infrastructure generally includes wind turbines (300-500 feet to the topmost blade tip), substations, meteorological towers, overhead and underground collector cable systems, and overhead transmission lines.

Air emissions resulting from construction activities include fugitive dust emissions from earth moving and grading activities; products of combustion from heavy-duty equipment, vendor vehicles, haul trips, and worker commute vehicles; and stationary sources such as generators. Earth moving and grading activities would be subject to the County Grading Ordinance, which requires the implementation of dust control measures, minimization of land disturbance to the extent feasible, application of water to active grading areas to decrease fugitive dust emissions, reduced speed limits on unpaved roads, and requirements for trucks hauling soil materials to be covered. Construction activities could contribute to the exceedance of air quality thresholds for these pollutants and therefore contribute to the SDAB's nonattainment status for NO_x, VOCs, PM_{10} and $PM_{2.5}$.

The operation of large-scale renewable energy systems including solar and wind would not directly produce substantial air emissions because no large emission-generating equipment would be operated. Operation could result in a minimal increase in the number of full-time employees commuting to and from these facilities. Other operational emissions include minor VOC emissions during routine changes of lubricating and cooling fluids and greases, fugitive dust emissions from vehicle travel, and products of combustion from panel washing, equipment operation, water trucks, and stationary sources such as generators. While the sizes, scale, and location of renewable

infrastructure is unknown, typical emissions associated with these facilities are low and occur infrequently such that County SLTs for nonattainment pollutants are not anticipated to be violated.

Implementation of new mechanical equipment or new renewable energy equipment would be regulated by the County Zoning Ordinance Section 6952(b), which governs the use of solar energy systems, and would require approval of a building permit to ensure County codes and requirements are met. In the cases of small photovoltaic energy systems, (under 500 square feet) or small wind turbines (up to three turbines allowed as accessory use), the County would not require a discretionary permit and would not require mitigation for air quality impacts. In these cases, the scale of the projects would not require large construction equipment and would likely not violate air quality standards for nonattainment pollutants. Overall, implementation of the measures and actions in the energy group would reduce the combustion of fossil fuels by incentivizing and developing electricity use as well as the generation and utilization of renewable energy. This would result in overall improvements in air quality in the region and would likely offset emissions of criteria pollutants generated during construction.

Applicable regulatory requirements, General Plan policies, 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Air-2.1 through Air-2.13), and proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of criteria pollutants from construction equipment by requiring Tier 3 engines, would be applied to implementation of the proposed measures and actions within this group. The operation of these projects is not expected to result in the emission of significant levels of nonattainment pollutants because implementation of the measures and actions in the energy group would reduce the combustion of fossil fuels by incentivizing and developing electricity use as well as the generation and utilization of renewable energy. However, at the programmatic level, it cannot be assured that construction projects associated with these measures would not exceed a local significance threshold for one or more nonattainment pollutants at a project-level. While adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce construction emissions, these measures may not be able to fully mitigate the impacts to a less-than-significant level. This impact would remain significant and unavoidable following mitigation, consistent with the 2011 GPU PEIR.

Built Environment and Transportation Measures and Actions

Implementation of the measures and actions within the built environment and transportation group would encourage a shift towards alternative modes of transportation (Actions T-4.1, T-4.1.a, T-4.2, T-5.1, T-5.1.a, and T-5.1.b), encourage alternative fuel use (Action T-3.1.a), and reduce single-occupancy vehicle trips (Actions T-4.1, T-4.1.a, T-4.2, T-5.1, T-5.1.a, T-5.1.b, and T-5.2). These measures and their associated actions would be implemented through activities such as constructing EV charging stations, implementing transit-supportive roadway treatments (e.g., transit signal priority, bus-only signal phases, queue jumps, curb extensions to speed passenger loading, and dedicated bus lanes), implementing TDM programs, improving roadways to encourage/expand multimodal transportation, incentivizing active transportation, and constructing

new bicycle and pedestrian projects as well as improving existing bicycle and pedestrian facilities.

Locations for such improvements have not been identified. Because of the nature of these improvements, they would most likely occur near residential and commercial centers throughout the unincorporated areas. The size, scale, and location of these improvements is unknown. As described above, the impacts of the proposed measures and actions are analyzed at a programmatic level.

Implementation of measures that would result in new hydrogen fueling and EV charging stations (Actions T-3.1 and T-3.1.a), as well as the implementation of transit-supportive roadway treatments and bicycle and pedestrian infrastructure (Actions T-5.1 and T-6.2) would generally involve some type of ground-disturbing construction activity and would, therefore, lead to short-term air emissions. Air emissions from construction activities would result from use of heavy-duty equipment, fugitive dust from earth moving and grading activities, and worker commute trips, vendor truck trips, and haul trips. Construction activities may include grading, clearing, and paving, but would not include construction of new buildings or structures. These activities could result in exceedances of the local thresholds for NO_x from the use of heavy equipment, VOCs from the application of paint to new or upgraded facilities (e.g., curbs, bike path striping, pavement markings), and PM_{10} and $PM_{2.5}$ from diesel exhaust and dust. This could contribute to the exceedance of air quality thresholds for these pollutants and therefore contribute to the SDAB's nonattainment status for NO_x, VOCs, $PM_{10,}$ and $PM_{2.5}$. Emissions of criteria air pollutants, especially those for which the SDAB is in nonattainment, would primarily occur from mobile sources.

The measures and actions within the built environment and transportation group are anticipated to reduce long-term emissions of criteria air pollutants by reducing the amount of fossil fuels combusted, primarily from reduced vehicle use trips. Therefore, it is reasonable to assume that implementation of the measures and actions that comprise the built environment and transportation group would result in reductions in emissions of criteria air pollutants, including nonattainment pollutants, because the improvements would involve activities to reduce vehicle use, reduce VMT, and increase alternative fuel use resulting in an overall reduction in countywide air emissions.

Applicable General Plan policies and 2011 GPU PEIR mitigation measures (Air-2.1, Air-2.2, Air-2.3, Air-2.4, Air-2.5, Air-2.6, Air-2.7, Air-2.8, Air-2.9, Air-2.11, Air-2.12, and Air-2.13) would be applied to individual future actions implemented as a result of these measures and actions.

At the programmatic level, it cannot be assured that construction projects associated with these measures and actions would not exceed a local significance threshold for a nonattainment pollutant at a project-level and thereby contribute to its nonattainment. Therefore, while adopted General Plan policies and 2011 GPU PEIR mitigation measures (Air-2.1 through Air-2.13) would reduce construction emissions, depending on the size of the facilities, these measures may not be able to fully mitigate the impacts to a less-than-significant level. Despite the potential for reductions in operational emissions to offset

those related to construction, project-level emissions from construction and operations activities are addressed separately by the SDAPCD and are therefore subject to different numerical emissions thresholds. It is possible that emissions from individual projects could exceed one or more construction or operations emissions thresholds. Therefore, it cannot be determined that reductions in operational emissions would offset construction emissions on a project level. Despite application of Mitigation Measures Air-2.1 through Air-2.13 and proposed CAP Update Mitigation Measure Air-2.1 to all projects, it is not possible at this level of analysis to determine that these mitigation measures would reduce impacts below a significant level. This impact would remain significant and unavoidable with implementation of mitigation, consistent with the 2011 GPU PEIR.

Summary

Construction related to implementation of the measures and their associated actions listed and described above could result in exceedances of local criteria air pollutant thresholds for nonattainment pollutants (i.e., NO_x, VOCs, PM_{10}, and $PM_{2.5}$). Because of the programmatic approach of this analysis, it is not possible to determine the size and location of projects that would be built, nor the details of their construction typically used to estimate emissions, such as duration, equipment use, and intensity. Despite the potential for reductions in operational emissions to offset those related to construction, this impact would be potentially significant. Additionally, it is also uncertain at this level of analysis if VOC emissions related to operation of solid waste facilities would exceed the SLT for VOC emissions, and therefore contribute to the SDAB's nonattainment status for O_3. Due to this uncertainty, this would also be potentially significant. Implementation of the General Plan policies and 2011 GPU PEIR mitigation measures would lessen impacts related to potential violations of thresholds for nonattainment pollutants that could result from implementation of the measure groups described above. However, the 2011 GPU PEIR determined that even with implementation of the adopted General Plan policies and mitigation measures, impacts associated with air quality violations for nonattainment pollutants would not be reduced to below a level of significance because the full suite of these and other mitigation measures considered and addressed in the 2011 GPU PEIR were found to be infeasible by the County for the reasons given in Section 2.3.6.2 of the 2011 GPU PEIR and described above. This impact would remain significant and unavoidable following mitigation, consistent with the 2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.3.3.6 Issue 4: Expose Sensitive Receptors to Substantial Pollutant Concentrations

This section describes potential project impacts related to the exposure of sensitive receptors to TACs and CO.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements:*

Air Quality (County of San Diego 2007), which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, the project would have a significant impact if it would:

- expose sensitive receptors to substantial pollutant concentrations.

The County of San Diego defines sensitive receptors as schools (preschool to 12th grade), hospitals, resident care facilities, day-care centers, or other facilities that may house individuals with health conditions that would be adversely affected by changes in air quality. For CEQA purposes, the County of San Diego also includes residents as sensitive receptors. Two primary emissions of concern regarding impacts to sensitive receptors are CO and TACs.

An air quality impact is considered significant if project emissions create a CO "hotspot" where either the 1-hour concentration of 20 ppm or 8-hour average of 9 ppm is exceeded. CO "hotspots" typically occur only at signalized intersections that operate at or below level of service E with peak-hour trips for intersections exceeding 3,000 trips. Therefore, the project would result in a significant impact if it would result in a CO "hotspot."

Air quality impacts relative to sensitive receptors are also considered significant if the project would result in exposure to TACs resulting in maximum incremental cancer risk greater than 10 in one million without application of Toxics-Best Available Control Technology, or a non-cancer acute or chronic health hazard index greater than 1. These TACs include acetaldehyde, benzene, 1,3-butadiene, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, perchloroethylene, and DPM. Some of these TACs are groups of compounds that contain many individual substances (e.g., copper compounds and polycyclic organic matter).

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR included a discussion of emissions that could contribute to impacts on sensitive receptors associated with future development consistent with the land use plan of the adopted General Plan. The 2011 GPU PEIR concluded that the General Plan under project and cumulative conditions would have significant impacts on sensitive receptors by exposing sensitive receptors to substantial concentrations of TACs, especially from diesel exhaust, from increased number of diesel truck trips, other vehicle trips, and other sources of DPM.

The 2011 GPU PEIR determined that the impacts to sensitive receptors would be reduced through the implementation of the federal, state, and local regulations; existing County regulatory processes; the adopted General Plan policies; and mitigation measures (Air-4.1) identified in the 2011 GPU PEIR. However, even with these programs, implementation measures, and identified mitigation measures, the direct and cumulative impacts would remain significant and unavoidable because the mitigation measures considered and addressed in the 2011 GPU PEIR were either found to be infeasible by the County for the reasons given in Section 2.3.6.4 of the 2011 GPU PEIR or would not

be sufficient in reducing impacts below a significant level. The mitigation measures were found infeasible because they would have required the prohibition of all off-road diesel engines or for those engines to be equipped with filters. This was determined to be costly and difficult to enforce, and remains infeasible currently. The discussion of impacts related to air quality can be found in Section 2.3, "Air Quality," of the 2011 GPU PEIR on pages 2.3-1 through 2.3-52 and is herein incorporated by reference.

CAP Update Impact Analysis

The following sections describe the potentially significant impacts to sensitive receptors that could result from implementation of the measure groups listed above and their associated actions.

Carbon Monoxide "Hotspots"

The project would not introduce or change land use designations that would increase traffic or have the potential to result in CO hotspots. The project does not propose any residential development that would result in regional population increases. The goal of the CAP Update is to reduce GHG emissions in the county and many of the measures would also have the co-benefit of reducing air emissions at the regional and local scale. The project would not lead to an increase in vehicular traffic or associated emissions that could cause CO hotspots because, while new trips may be generated as a result of the implementation of measures that would explore opportunities for the development of farmworker housing, such as Action A-4.1.b, the number of new vehicle trips would be minimal and distributed throughout the county. Therefore, the project would not contribute to a CO hotspot.

Toxic Air Contaminants

The 2011 GPU PEIR determined that the proposed land use designations and accompanying future development based on those designations would result in significant and unavoidable impacts related to the exposure of sensitive receptors to substantial amounts of TACs. The discussion of impacts related to exposure of sensitive receptors can be found in Section 2.3.3.4 of the 2011 GPU PEIR and is herein incorporated by reference.

The focus of the analysis of TACs for the CAP Update is DPM. Although other TACs exist (e.g., benzene, 1,3-butadiene, hexavalent, chromium, formaldehyde, and methylene chloride), they are primarily associated with industrial operations. The potential cancer risk from the inhalation of DPM outweighs the potential for all other health impacts (i.e., noncancer chronic risk and short-term acute risk) and health impacts from other TACs (CARB 2003). With regards to exposure of DPM, the dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher level of health risk for any exposed receptor. According to OEHHA's Air Toxics Hot Spots Program Risk Assessment Guidelines, exposure of

sensitive receptors to TAC emissions should be based on a 30-year exposure period for estimating cancer risk at the MEI, with 9- and 70-year exposure periods at the MEI as supplemental information. Furthermore, a 70-year exposure period is recommended for estimating cancer burden or providing an estimate of population-wide risk (OEHHA 2015).

Solid Waste Measures and Actions

Implementation of measures within the solid waste group would increase organic waste diversion (Actions SW-1.1, SW-1.1.a, and SW-1.1.b), increase recycling (Actions SW-2.1, SW-2.1.a, SW-2.1.b, and SW-4.1.b), and increase gas capture (Actions SW-3.1 and SW-4.1). Implementation of the measures within this group and their associated actions include new building requirements, building retrofits, solid waste diversion/recycling programs/incentives, and biogas at existing landfills. Specific locations for projects have not been identified.

Emissions of TACs from solid waste facilities and upgrades would occur from diesel exhaust during construction activities, including operation of heavy-duty equipment, vehicle travel by worker commute trips, material delivery, and haul trips. Operation of new or expanded organics processing facilities would result in increased haul truck trips to and from the facility; however, it is anticipated that the haul truck trips to the organics processing facility would displace the haul truck trips that would be diverted from the landfill. Therefore, a net increase in the number of haul truck trips within the county is not anticipated. Similarly, increased construction and demolition waste recycling and collection of commercial food scraps and household hazardous waste is expected to displace trips already occurring to transport this waste to landfills. As stated above, the location of projects associated with the measures and actions of the solid waste group have not been identified. However, it is possible that construction and operations activities, such as hauling trips, could occur near residential areas.

Buildout of the projects within the solid waste group would require the implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures (Adopted Mitigation Measure Air-4.1) to reduce emissions of TACs and minimize the exposure of sensitive receptors to TACs from project construction and operation. At a programmatic level, it is not possible to determine with certainty that impacts related to the exposure of sensitive receptors to TACs during construction activities would be reduced below a level of significance. Additionally, hauling trips related to operation of solid waste facilities could expose sensitive receptors to TAC emissions.

Because the scale of physical development necessary to implement the above measures and actions is unknown, it cannot be assured that adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the impacts related to construction-generated TACs to a less-than-significant level. Additionally, at the programmatic level, TAC emissions from operations related to the measures and associated actions of the solid waste group cannot be estimated and it cannot be assured that adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the exposure of sensitive receptors to TACs emitted during operation. Implementation of the measures

within the solid waste group would result in a significant and unavoidable impact, as identified in the 2011 GPU PEIR.

Water and Wastewater Measures and Actions

Implementation of measures within the water and wastewater group would increase water efficiency and conservation (Actions W-1.1, W-2.1, W-2.2, W-2.3, W-2.3.a, W-2.3.b, W-2.4, and W-3.1). Implementation of the measures within this group and their associated actions include new building requirements, building retrofits, expansion of recycled water/greywater infrastructure, the installation of water-efficient appliances and smart irrigation systems, and water efficiency programs. Specific locations for projects have not been Identified.

Emissions of TACs from measures pertaining to water and wastewater facilities and upgrades would occur from diesel exhaust during construction activities, including operation of heavy-duty equipment, vehicle travel by worker commute trips, and material delivery. Construction activities would primarily consist of the installation of small structures, such as stormwater and greywater capture systems and water-efficient appliances, as well as the installation of new irrigation systems, which could involve ground-disturbing activities. The operation of these facilities and structures do not generally require the use of diesel equipment; therefore, it is not likely that operations would result in substantial emissions of TACs.

Buildout of the projects within the water and wastewater group would require the implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures (Adopted Mitigation Measure Air-4.1), as well as proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of TACs from construction equipment by requiring Tier 3 engines, to reduce emissions of TACs and minimize the exposure of sensitive receptors to TACs from project construction and operation. At a programmatic level, it is not possible to determine with certainty that impacts related to the exposure of sensitive receptors to TACs during construction activities would be reduced below a level of significance.

Because the scale of physical development necessary to implement the above measures and actions is unknown, it cannot be assured that adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the impacts related to construction-generated TACs to a less-than-significant level. Implementation of the measures within the water and wastewater group would result in a significant and unavoidable impact, as identified in the 2011 GPU PEIR.

Agriculture and Conservation Measures and Actions

Measures A-1 and A-3 within the agriculture and conservation group would require the County to acquire and preserve natural lands, as well as develop programs to improve land management practices to protect habitat and increase carbon storage (Actions A-1.1, A-1.2, A-1.2.a, and A-3.1). Additionally, measures in the group aim to reduce GHG emissions from agricultural operations (Actions A-5.1 and A-5.1.a).

Projects that could result from implementation of these measures and actions could include, but would not be limited to: preservation of agricultural lands, carbon farming, natural/working lands restoration, on-farm anaerobic digesters, incentivizing manure composting, reducing agricultural water costs, carbon farming programs, open space/habitat restoration plans, tree planting, incentivizing transition to cleaner (e.g., renewable diesel and electric) agricultural equipment, and increasing farmworker housing.

Some measures within this group could involve some type of ground disturbing construction activity that could generate emissions of TACs. For example, Action A-4.1.b would evaluate opportunities for increased farmworker housing, which could involve the subsequent construction of housing for farmworkers, while Actions A-2.1 and A-2.2 could result in the combustion of diesel fuel for the delivery and planting of trees. This analysis assumes that implementation of the measures within this group would result in construction activities that could include the use of heavy equipment for earthmoving, materials processing, or compost spreading; vehicle trips during construction/equipment replacement/monitoring activities; possible changes in landform and views; and installation or upgrades of mechanical equipment or facilities. These activities could result in emissions of TACs. The greatest potential for TAC emissions during construction would be DPM emissions from construction equipment and heavy-duty truck trips. While activities related to the measures in the agriculture and conservation group, due to their nature, are not likely to occur near urban areas, it is not possible to determine at the programmatic level the exact scale and location of projects that would result from the implementation of these measures. Therefore, it is conservatively assumed that sensitive receptors could be exposed to emissions of TACs from construction activities associated with these measures.

Regarding operations, because the variety of projects that may be approved and ultimately undertaken by the County is not known, it is not possible to speculate on the specific impacts that could occur and whether regulations or mitigation measures would be available to minimize potential environmental impacts relating to TACs. However, all projects would be required to comply with applicable existing federal, state, and local regulations. Specifically, projects would be evaluated for their consistency with General Plan policies, 2011 GPU PEIR mitigation measures (Adopted Mitigation Measure Air-4.1), County Grading Ordinance regulations, and County Resources Protection Ordinance regulations.

Applicable General Plan policies, 2011 GPU PEIR mitigation measures, and proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of TACs from construction equipment by requiring Tier 3 engines, would be applied to future projects that result from implementation of the GHG reductions measures and actions to avoid or minimize their impacts.

However, at the programmatic level, it is not possible to determine with certainty that impacts related to TACs emitted from construction and operations activities would be reduced below the County of San Diego threshold for maximum incremental cancer risk of greater than 10 in one million. While all feasible mitigation would be applied at the

project level as part of the County's discretionary review process, construction of projects associated with the agriculture and conservation measures and their associated actions could still expose sensitive receptors to TACs because they could require the use of heavy construction equipment and involve earth moving activities and the duration and intensity of these activities is unknown at the programmatic level. While adopted General Plan policies and 2011 GPU PEIR mitigation measures would likely reduce construction emissions, these measures may not be able to fully mitigate the impacts to a less-than-significant level. This impact would remain significant and unavoidable following mitigation, consistent with the 2011 GPU PEIR.

Energy Measures and Actions

Implementation of measures within the energy group would increase building energy efficiency (Measures E-1 and E-2) and develop policies and programs to increase use of renewable energy that could result in renewable energy generation infrastructure, including energy storage (Measure E-3). These measures and actions would result in investments in local job training and incentive programs and amendments to County codes regarding energy, among other initiatives. Other measures and actions could result in large-scale wind turbines and solar arrays, as well as energy-storage systems (Action E-3.2.b). Additional actions include energy efficiency retrofits on existing residential and non-residential structures, including rooftop or ground-mounted solar photovoltaic arrays or small wind turbines, and incentivizing the use of renewable energy.

Implementation of measures that promote use of renewable energy could indirectly result in the installation of new large- and small-scale rooftop wind turbines and solar panels (Actions E-1.1, E-2.2, E-3.2, and E-3.3), the construction of which would produce emissions of TACs. Air emissions from construction activities would result from use of heavy-duty equipment, fugitive dust from earth moving and grading activities, and worker commute trips, vendor truck trips, and haul trips. Construction activities may include grading and clearing but would not include construction of new buildings or structures. These activities would result in emissions of TACs. The greatest potential for TAC emissions during construction would be DPM emissions from construction equipment and heavy-duty truck trips (such as those used to transport renewable systems components). Construction activities associated with small-scale renewables would likely be relatively small in scale, occur intermittently, and last for only short periods of time. Therefore, emissions from construction activities would not be concentrated in one area for an extended period of time, but rather would occur intermittently across a large area. However, it is likely that some construction would occur near residential areas and therefore has the potential to expose sensitive receptors to significant concentrations of TACs emitted from construction activities.

Solar photovoltaic energy panels and small-scale wind turbines typically do not result in substantial activities related to operating the equipment, and include only minor maintenance activities, such as regular inspections, repairs, and removing debris, as necessary. Implementation of new mechanical equipment or new renewable energy equipment would be regulated by the County Zoning Ordinance Section 6952(b), which governs the use of solar energy systems, and would require approval of a building permit

to ensure County codes and requirements are met. In the cases of small photovoltaic energy systems, (under 500 square feet) or small wind turbines (up to three turbines allowed as accessory use), the County would not require a discretionary permit and would not require mitigation for air quality impacts. In these cases, the scale of the projects would not require large construction equipment and would likely not violate air quality standards. In the case of larger renewable energy systems, the County would have the discretion to review the projects and could require mitigation if any air quality violations were identified. However, implementation of the measures and actions in the energy group would reduce the combustion of fossil fuels by incentivizing and developing electricity use as well as the generation and utilization of renewable energy.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating the renewable energy resource. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level and assumes development of common current renewable energy technologies.

Large-scale renewable energy systems, specifically wind and solar photovoltaic, require large swaths of undeveloped land that are productive for generating renewable energy. Specific locations of potential facilities are unknown. Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would be required to minimize or eliminate impacts to air quality standards to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. The large-scale production of energy from solar photovoltaic systems generally includes a variety of infrastructure components such as arrays, substation site, battery storage, collection system, and overhead and underground transmission facilities. Large-scale wind turbines infrastructure generally includes wind turbines (300-500 feet to the topmost blade tip), substations, meteorological towers, overhead and underground collector cable systems, and overhead transmission lines.

Air emissions from construction activities would result from use of heavy-duty equipment, fugitive dust from earth moving and grading activities, and worker commute trips, vendor truck trips, and haul trips. Construction activities may include grading and clearing, but would not include construction of new buildings or structures. These activities would result in emissions of TACs. The greatest potential for TAC emissions during construction would be DPM emissions from construction equipment and heavy-duty truck trips (such as those used to transport renewable systems components). It is likely that some construction would occur near residential areas and therefore has the potential to expose sensitive receptors to significant concentrations of TACs emitted from construction activities.

Operation of large-scale renewable energy systems would not directly produce substantial TAC emissions because no large emission-generating equipment would be operated. Operation could result in a minimal increase in the number of full-time employees commuting to and from these facilities as well as the operation of stationary sources, such as generators. While the sizes, scale, and location of renewable

infrastructure is unknown, typical emissions associated with these facilities are low and occur infrequently such that County SLTs are not anticipated to be violated.

Buildout of the projects within the energy group would require the implementation of applicable General Plan policies, 2011 GPU PEIR mitigation measures (Adopted Mitigation Measure Air-4.1), and proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of TACs from construction equipment by requiring Tier 3 engines, to reduce emissions of TACs and minimize the exposure of sensitive receptors to TACs from project construction and operation.

However, at the programmatic level, it cannot be assured that construction projects associated with these measures would not expose sensitive receptors to emissions of TACs, as it is likely that at least some construction would occur near residential areas. While adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce construction emissions, these measures may not be able to fully mitigate the impacts to a less-than-significant level. This impact would remain significant and unavoidable following mitigation, as consistent with the 2011 GPU PEIR.

Built Environment and Transportation Measures and Actions

Implementation of measures within the built environment and transportation group would encourage a shift toward alternative modes of transportation (Actions T-4.1, T-4.1.a, T-4.2, T-5.1, T-5.1.a, and T-5.1.b), encourage alternative fuel use (Action T-3.1.a), and reduce single-occupancy vehicle trips (Actions T-4.1, T-4.1.a, T-4.2, T-5.1, T-5.1.a, T-5.1.b, and T-5.2). These measures and their associated actions would be implemented through activities such as constructing EV charging stations, implementing transit-supportive roadway treatments (e.g., transit signal priority, bus-only signal phases, queue jumps, curb extensions to speed passenger loading, and dedicated bus lanes), implementing TDM programs, improving roadways to encourage/expand multimodal transportation, incentivizing active transportation, and constructing new bicycle and pedestrian projects as well as improving existing ones.

The greatest potential for TAC emissions during construction would be DPM emissions from construction equipment and heavy-duty truck trips. Implementation of measures that would result in new hydrogen fueling and EV charging stations (Actions T-3.1 and T-3.1.a) as well as the implementation of transit-supportive roadway treatments and bicycle and pedestrian infrastructure (Actions T-5.1 and T-6.2) would generally involve the use of off-road construction equipment and haul trucks which would result in the emission of TACs and possibly expose sensitive receptors to these emissions.

Operational emissions would be primarily from diesel-powered mobile sources, but the proposed measures and their associated actions are anticipated to reduce long-term emissions by reducing the amount of fossil fuels combusted primarily from reduced vehicle use, reduced VMT, and increased alternative fuel use. Therefore, it is reasonable to assume that implementation of the measures that comprise the built environment and transportation group would result in reductions in emissions of TACs because the

improvements would involve activities to reduce vehicle use, reduce VMT, and increase alternative fuel use resulting in an overall reduction in countywide air emissions.

Buildout of the projects within the built environment and transportation group would require the implementation of applicable General Plan policies, 2011 GPU PEIR mitigation measures (Adopted Mitigation Measure Air-4.1), and proposed CAP Update Mitigation Measure Air-2.1, which would reduce emissions of TACs from construction equipment by requiring Tier 3 engines, to reduce emissions of TACs and minimize the exposure of sensitive receptors to TACs from project construction and operation. Additionally, future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to sensitive receptors to the extent feasible in compliance with State CEQA Guidelines Section 15126.4.

The size, scale, and location of these improvements is unknown; however, given the nature of these improvements, they most likely would occur near residential and commercial centers throughout the unincorporated areas. Therefore, sensitive receptors including residences, schools, and childcare facilities could be located near the project locations. While adopted General Plan policies and 2011 GPU PEIR mitigation measures listed above would require the implementation of mitigation to reduce construction emissions, depending on the size of the facilities, these measures may not be able to fully mitigate the impacts to a less-than-significant level. Therefore, implementation of GHG reduction measures and their associated actions, described above, would have a significant and unavoidable impact following mitigation, consistent with the 2011 GPU PEIR.

Summary

Future projects related to implementation of the measures and their associated actions described above could result in the exposure of sensitive receptors to TACs. Because of the programmatic approach of this analysis, it is not possible to determine the location, size, and types of projects that would be built, nor the details of their construction typically used to estimate emissions of TACs and exposure to sensitive receptors, such as construction duration, equipment use, location and intensity. Additionally, it is also uncertain at this level of analysis if TAC emissions from hauling activities occurring during operation of solid waste facilities would occur at significant levels near sensitive receptors.

Implementation of the General Plan policies, 2011 GPU PEIR mitigation measures (Adopted Mitigation Measure Air-4.1), and proposed CAP Update Mitigation Measure Air-2.1 would lessen impacts related to the exposure of sensitive receptors to TACs that could result from implementation of the measure groups described above. However, the 2011 GPU PEIR determined that even with implementation of the adopted General Plan policies and mitigation measures, impacts associated with the exposure of sensitive receptors to TACs would not be reduced to a less-than-significant level because the mitigation measures considered and addressed in the 2011 GPU PEIR were found to either be infeasible by the County for the reasons given in the 2011 GPU PEIR or would not be sufficient in reducing impacts related to TACs to a less-than-significant level. This impact would remain significant and unavoidable following mitigation, consistent with the

2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.3.3.7 Issue 5: Result in Emissions of Odors Adversely Affecting a Substantial Number of People

This section describes potential project impacts related to odor resulting from the implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Air Quality* (County of San Diego 2007), which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, the project would result in a significant impact if it would either generate objectionable odors or place sensitive receptors next to existing objectionable odors, which would affect a considerable number of persons or the public.

SDAPCD Rule 51 (Public Nuisance) and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section 41700 prohibit the emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public. Projects required to obtain permits from SDAPCD, typically industrial and some commercial projects, are evaluated by SDAPCD staff for potential odor nuisance. Conditions may be applied (e.g., control equipment requirement), where necessary, to prevent the occurrence of public nuisance.

Odor issues are subjective by the nature of odors themselves and their measurements are difficult to quantify. As a result, odor impact assessments are qualitative and each project would be reviewed on an individual basis, focusing on the existing and potential surrounding uses and location of sensitive receptors.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR included a discussion of objectionable odors associated with the future development consistent with the land use plan of the adopted General Plan. The 2011 GPU PEIR concluded that the General Plan under project and cumulative conditions would result in less-than-significant impacts associated with objectionable odors.

The 2011 GPU PEIR also acknowledged that potential odor impacts would be reduced through the implementation of the federal, state, and local regulations; existing County regulatory processes; and the adopted General Plan policies and 2011 GPU PEIR mitigation measures listed above in Section 2.3.2. The discussion of impacts related to odors can be found in Section 2.3, “Air Quality,” on pages 2.3-1 to 2.3-52, and is herein incorporated by reference.

CAP Update Impact Analysis

The following sections describe the potentially significant impacts related odors that could result from the implementation of the measures.

Solid Waste Measures and Actions

Implementation of measures within the solid waste group would increase organic waste diversion (Actions SW-1.1, SW-1.1.a, and SW-1.1.b), increase recycling (Actions SW-2.1, SW-2.1.a, SW-2.1.b, and SW-4.1.b), and increase gas capture (Actions SW-3.1 and SW-4.1). Implementation of the measures within this group and their associated actions include new building requirements, building retrofits, solid waste diversion/recycling programs/incentives, and biogas at existing landfills.

Odors may result from construction of organics waste facilities and water/wastewater facilities. Potential odor sources may result from equipment exhaust during construction activities. These emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Because construction odors would be temporary and would disperse rapidly with distance from source, construction-generated odors would not result in the frequent exposure of nearby receptors to objectionable odor emissions and these impacts would not be expected to result in significant emissions.

CAP Update Action SW-4.1.a would incentivize the development of new composting/anaerobic digestion facilities and on-farm digesters (e.g., amend zoning ordinance to pre-zone or permit land for composting/anaerobic digestion and provide technical assistance) to divert compostable waste from landfills in the unincorporated area. This action is also included in the General Plan as Policy COS-17.5, which promotes efficient methods for methane recapture in landfills and the use of composting facilities and anaerobic digesters and other sustainable strategies to reduce the release of GHG emissions from waste disposal or management sites and to generate additional energy such as electricity. Organics processing techniques include open and enclosed configurations and have the potential to produce objectionable odors. As stated in the 2011 GPU PEIR, potential odor impacts from implementation of the General Plan would be reduced through the implementation of the federal, state, and local regulations; existing County regulatory processes; and the adopted General Plan policies. While the specific location of these types of facilities and activities is not known, solid waste projects would be subject to the County odor policies enforced by the SDAPCD, including Rule 51 and County Code Sections 63.401 and 63.402, which prohibit nuisance odors and identify enforcement measures to reduce odor impacts to nearby receptors. Therefore, implementation of measures and their associated actions within the solid waste group that would result in the development of new composting/anaerobic digestion facilities and on-farm digesters would result in a less-than-significant impact associated with objectionable odors consistent with buildout of the General Plan, as evaluated in the 2011 GPU PEIR.

Water and Wastewater Measures and Actions

Implementation of measures within the water and wastewater group would increase water efficiency and conservation (Actions W-1.1, W-2.1, W-2.2, W-2.3, W-2.3.a, W-2.3.b, W-2.4, and W-3.1). Implementation of the measures within this group and their associated actions include new building requirements, building retrofits, expansion of recycled water/greywater infrastructure, the installation of water-efficient appliances and smart irrigation systems, and water efficiency programs.

Odors may result from construction of water/wastewater facilities. Potential odor sources may result from equipment exhaust during construction activities. These emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Because construction odors would be temporary and would disperse rapidly with distance from source, construction-generated odors would not result in the frequent exposure of nearby receptors to objectionable odor emissions and these impacts would not be expected to result in significant emissions.

The operation of water/wastewater facilities that handle grey water and stormwater, as is proposed in the project, does not typically result in the generation of odors. Additionally, these facilities are not typically associated with increased odor complaints. Therefore, the operation of facilities related to water and wastewater would have a less-than-significant impact related to odors. Therefore, implementation of the water and wastewater measures and actions would result in impacts consistent with buildout of the General Plan, as evaluated in the 2011 GPU PEIR.

Agriculture and Conservation Measures and Actions

Measures A-1 and A-3 within the agriculture and conservation group would require the County to acquire and preserve natural lands, as well as improve land management practices to protect habitat and increase carbon storage (Actions A-1.1, A-1.2, A-1.2.a, and A-3.1). Additionally, measures in the group aim to reduce GHG emissions from agricultural operations (Actions A-5.1 and A-5.1.a). Projects that could result from implementation of these measures could include creating agricultural programs, restoring natural/working lands, reducing on-farm anaerobic digesters, incentivizing manure composting, improving foraging/grazing lands, reducing agricultural water costs, implementing carbon farming programs, developing open space/habitat restoration plans, planting trees, promoting low-carbon/zero emissions landscaping, and increasing farmworker housing. This list is not intended to be exhaustive but represents some of the types of projects that could be considered in the future.

Potential odors may be emitted from equipment exhaust during construction activities. These emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Because odors would be temporary and would disperse rapidly with distance from source, construction-generated odors would not result in the frequent exposure of nearby receptors to objectionable odor emissions. Additionally, it is likely that construction activities resulting from implementation of the measures and their associated actions within the agriculture and conservation group

would not occur near residential areas, due to their nature. Further, as described above, the 2011 GPU PEIR also acknowledged that potential odor impacts would be reduced through the implementation of the federal, state, and local regulations; existing County regulatory processes; and implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures. Agricultural projects would also be subject to the County odor policies enforced by the SDAPCD, including Rule 51 and County Code Sections 63.401 and 63.402, which prohibit nuisance odors and identify enforcement measures to reduce odor impacts to nearby receptors. Overall, odor impacts associated with these measures would be less than significant**,** as identified in the 2011 GPU PEIR. Therefore, implementation of the agriculture and conservation measures and actions would result in impacts consistent with buildout of the General Plan, as evaluated in the 2011 GPU PEIR.

Energy Measures and Actions

Implementation of measures within the energy group would increase building energy efficiency (Measures E-1 and E-2) and develop policies and programs to increase use of renewable energy (Measure E-3). These measures and actions would result in investments in local job training and incentive programs and amendments to County codes regarding energy, among other initiatives. Other measures and actions could result in large-scale wind turbines and solar arrays, as well as energy-storage systems. Additional actions include energy efficiency retrofits on existing residential and non-residential structures, including rooftop or ground-mounted solar photovoltaic arrays or small wind turbines, and incentivizing the use of renewable energy. Implementation of these measures and their associated actions could involve some level of ground-disturbing construction activity. Air emissions from construction activities would result from use of heavy-duty equipment, fugitive dust from earth moving and grading activities, and worker commute trips, vendor truck trips, and haul trips. Construction activities may include grading and clearing but would not include construction of new buildings or structures. Development of renewable energy infrastructure does not typically result in the emission of objectionable odors. Potential odor sources may result from equipment exhaust during construction activities. These emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Because odors would be temporary and would disperse rapidly with distance from source, construction-generated odors would not result in the frequent exposure of nearby receptors to objectionable odorous emissions. Small-scale renewable energy systems do not require substantial operational activities; only minor maintenance activities are required, such as regular inspections, repairs, and removing debris, as necessary. No significant odor sources would be developed under these measures. With implementation of the General Plan policies and 2011 GPU PEIR mitigation measures, overall impacts would be less than significant, as identified in the 2011 GPU PEIR.

Built Environment and Transportation Measures and Actions

Implementation of measures within the built environment and transportation group would encourage a shift toward alternative modes of transportation (Actions T-4.1, T-4.1.a, T-4.2, T-5.1, T-5.1.a, and T-5.1.b), encourage alternative fuel use (Action T-3.1.a), and reduce single-occupancy vehicle trips (Actions T-4.1, T-4.1.a, T-4.2, T-5.1, T-5.1.a, T-5.1.b, and

T-5.2). These measures and their associated actions would be implemented through activities, such as constructing EV charging stations, implementing transit-supportive roadway treatments (e.g., transit signal priority, bus-only signal phases, queue jumps, curb extensions to speed passenger loading, and dedicated bus lanes), implementing TDM programs, improving roadways to encourage/expand multimodal transportation, incentivizing active transportation, and constructing new bicycle and pedestrian projects as well as improving existing infrastructure. Locations for such improvements have not been identified. Because of the nature of these improvements, they would most likely occur near residential and commercial centers throughout the unincorporated areas. The size, scale, and location of these improvements is unknown.

Potential odors may be emitted from equipment exhaust during construction activities. These emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Because odors would be temporary and would disperse rapidly with distance from source, construction-generated odors would not result in the frequent exposure of nearby receptors to objectionable odor emissions. Further, as described above, the 2011 GPU PEIR also acknowledged that potential odor impacts would be reduced through the implementation of the federal, state, and local regulations; existing County regulatory processes; and implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures. Overall, odor impacts associated with these measures would be less than significant**,** as identified in the 2011 GP PEIR.

Summary

Implementation of the measure groups described above and their associated actions could result in impacts related to odors because measures within the solid waste measures and actions could result in the construction of new waste handling facilities that are typically associated with odor complaints. Implementation of the General Plan policies and 2011 GPU PEIR mitigation measures listed above in Section 2.3.2 would reduce impacts associated with odor management. Therefore, the solid waste measures group, which would include actions that could result in new or expanded solid waste facilities, would result in less-than-significant project impacts related to odors, consistent with the 2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.3.3.8 Cumulative Impacts

The cumulative impact analysis study area for air quality in the 2011 GPU PEIR was identified as the county and surrounding vicinity, including the San Diego region or the airshed for reactive air pollutants and surrounding vicinity for nonreactive or less reactive pollutants (as described on page 2.3-28 of the 2011 GPU PEIR). This analysis uses the same scope identified in the 2011 GPU PEIR. The scope and approach to the cumulative impact analysis are described in the “Cumulative Impact Assessment Overview” section in the introduction to this chapter.

Issue 1: Conflict with Air Quality Plans

The 2011 GPU PEIR concluded that the General Plan would not contribute to a significant cumulative impact because cumulative projects located in adjacent jurisdictions, including incorporated cities, adjacent counties, and state-managed lands, would be required to comply with the RAQS and SIP, while development in the county would be required to comply with the General Plan or would not be approved. Additionally, cumulative projects not included in the proposed General Plan would be required to show compliance with applicable air quality plans or would not be approved.

It remains true that, as discussed in the 2011 GPU PEIR, cumulative projects located in adjacent jurisdictions, including incorporated cities, adjacent counties, and state-managed lands, would still be required to comply with the RAQS and SIP. As discussed in Section 2.3.4.1, "Issue 1: Conflict with Air Quality Plans," CAP Update implementation could lead to projects such as solid waste, water, and wastewater facilities development, transportation infrastructure improvements, agricultural improvements and land conservation, and energy infrastructure improvements, all of which would not result in significant direct impacts. Future discretionary projects would be required to comply with existing federal, state, and local regulations to ensure that conflicts with applicable air quality plans would not occur.

No significant cumulative impact related to conflicts with applicable air quality plans was identified in the 2011 GPU PEIR, and the project would not result in a new significant impact. Therefore, the project would not result in a substantial incremental effect that would result in a new significant cumulative impact. The impact would be less than significant. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Issue 2: Violate Any Air Quality Standard or Contribute Substantially to an Existing or Projected Air Quality Violation

The 2011 GPU PEIR concluded that, despite projects within the General Plan and other cumulative projects located in the unincorporated county and adjacent jurisdictions being required to comply with NAAQS and CAAQS pursuant to CEQA prior to approval, air quality violations could potentially occur. In combination with other cumulative projects, the General Plan's contribution to a significant cumulative impact was determined to be cumulatively considerable.

It remains true that projects within the unincorporated county are required to comply with NAAQS and CAAQS pursuant to CEQA prior to approval and that feasible mitigation would be implemented to reduce impacts. As discussed in Section 2.3.4.2, "Issue 2: Conformance to Federal and State Air Quality Standards," CAP Update implementation could lead to projects such as solid waste, water, and wastewater facility development; transportation infrastructure improvements; agricultural improvements and land conservation; and energy infrastructure improvements. As identified in Section 2.3.4.2 of this analysis, the project would result in a significant and unavoidable impact related to violations of federal and state air quality standards, primarily due to emissions of PM_{10}, $PM_{2.5}$, VOCs, and NO_x associated with construction activities.

Therefore, emissions resulting from the project would have a considerable contribution to an existing cumulative effect. Because the CAP Update does not propose changes to the land use types identified in the General Plan, emissions of criteria pollutants are not expected to be greater than those accounted for in the 2011 GPU PEIR. Therefore, the cumulative impact would be significant, 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.

Issue 3: Result in a Cumulatively Considerable Net Increase of any Nonattainment Criteria Pollutant

The 2011 GPU PEIR concluded that, despite projects within the General Plan and other cumulative projects located in the unincorporated county and adjacent jurisdictions being required to comply with NAAQS and CAAQS pursuant to CEQA prior to approval, air quality violations pertaining to nonattainment pollutants (NO_X, VOCs, PM_{10}, and $PM_{2.5}$) could potentially occur. Emissions of these pollutants were identified to occur primarily from construction activities involving the use of heavy machinery and architectural coatings, as well as operational vehicle trips. In combination with other cumulative projects, the General Plan's contribution to a significant cumulative impact was determined to be cumulatively considerable.

It remains true that projects within the unincorporated county are required to comply with NAAQS and CAAQS pursuant to CEQA prior to approval and that feasible mitigation would be implemented to reduce impacts. The SDAB also remains in nonattainment for NO_X, VOCs, PM_{10}, and $PM_{2.5}$. As discussed in Section 2.3.4.3, "Issue 3: Nonattainment Criteria Pollutants," CAP Update implementation could lead to projects such as solid waste, water, and wastewater facilities development; transportation infrastructure improvements; agricultural improvements and land conservation; and energy infrastructure improvements. As identified in Section 2.3.4.3 of this analysis, the project would result in a significant and unavoidable impact related to violations of federal and state air quality standards for PM_{10}, $PM_{2.5}$, VOCs, and NO_x primarily associated with construction activities and operational vehicle trips. 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. Therefore, the project would result in a considerable contribution to an existing cumulative effect. The cumulative impact would be significant, 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.

Issue 4: Expose Sensitive Receptors to Substantial Pollutant Concentrations

The 2011 GPU PEIR stated that cumulative projects located in adjacent jurisdictions, including incorporated cities, adjacent counties, and state-managed lands would be required to comply with CARB's recommendations for siting new sensitive receptors, and stationary sources in the SDAB would be required to comply with emission thresholds for TACs or hazardous air pollutants. However, it was addressed that some cumulative projects are located outside of the SDAB and/or may not be subject to state and local

emissions regulations. It was determined that, because the General Plan would result in a potentially significant impact associated with sensitive receptors, its contribution to this significant cumulative impact would be cumulatively considerable.

As discussed in Section 2.3.4.4, "Issue 4: Toxic Air Contaminants and Carbon Monoxide Effects on Sensitive Receptors," CAP Update implementation could lead to projects such as solid waste, water, and wastewater facilities development; transportation infrastructure improvements; agricultural improvements and land conservation; and energy infrastructure improvements. Because changes have not been made to the land use designations outlined in the 2011 GPU PEIR, the CAP Update would not change the potential for sensitive receptors to be located near sources of substantial pollutant concentrations. Cumulative projects located in adjacent jurisdictions, including incorporated cities, adjacent counties, and state-managed lands, would be required to comply with CARB's recommendations for siting new sensitive receptors, and stationary sources in the SDAB would be required to comply with emission thresholds for TACs. However, as identified in the 2011 GPU PIER, some cumulative projects are located outside of the SDAB and/or may not be subject to state and local emissions regulations.

The CAP Update would result in a considerable contribution to an existing cumulative effect. The cumulative impact would be significant, consistent with the conclusion in the 2011 GPU PEIR. Because the CAP Update does not propose changes to the land use types identified in the General Plan, the exposure of sensitive receptors to TACs and CO is not expected to be more severe than what was accounted for in the 2011 GPU PEIR. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Issue 5: Result in Emissions of Odors Adversely Affecting a Substantial Number of People

The 2011 GPU PEIR stated that land use types within the General Plan that are typically associated with odor complaints, such as agricultural operations and landfills, would be subject to County odor policies enforced by SDAPCD, including Rule 51 and County Code Sections 63.401 and 63.402, which prohibit nuisance odors and identify enforcement measures to reduce odor impacts to nearby receptors. The 2011 GPU PEIR also cited the localized nature of odor impacts. For these reasons, it was determined that odors resulting from implementation of the General Plan would not combine to result in a cumulative odor impact and the General Plan would not contribute to a significant cumulative impact.

Land use types potentially affected by the CAP Update that are typically associated with odor complaints, such as agricultural operations and landfills, would similarly be subject to County odor policies enforced by SDAPCD, including Rule 51 and County Code Sections 63.401 and 63.402. As discussed in Section 2.3.4.5, "Issue 5: Objectionable Odors," CAP Update implementation could lead to projects such as solid waste, water, and wastewater facilities development; transportation infrastructure improvements; agricultural improvements and land conservation; and energy infrastructure improvements, all of which would not result in significant direct impacts. No significant cumulative impact related to objectionable odors was identified in the 2011 GPU PEIR,

and the project would not result in a substantial incremental effect that would result in a new significant cumulative impact. The impact would be less than significant. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.3.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would not result in new or more severe significant impacts related to air quality.

2.3.5 Mitigation Measures

This section lists the mitigation measures from the 2011 GPU PEIR that are applicable to the proposed project as well as new mitigation measures that have been proposed to avoid or minimize air quality impacts resulting from the proposed project. The mitigation measures addressing air quality that were adopted as part of the 2011 GPU PEIR and are applicable to the project include the following:

Issue 1: Conflict with Air Quality Plans

No mitigation required.

Issue 2: Conformance to Federal and State Air Quality Standards

2011 General Plan PEIR Mitigation Measures

> Adopted Mitigation Measure Air-2.1: Provide incentives such as preferential parking for hybrids or alternatively fueled vehicles such as compressed natural gas (CNG) vehicles or hydrogen- or electric-powered vehicles. The County shall also establish programs for priority or free parking on County streets or in County parking lots for hybrids or alternatively fueled vehicles.
>
> Adopted Mitigation Measure Air-2.2: Replace existing vehicles in the County fleet as needed with the cleanest vehicles commercially available that are cost-effective and meet vehicle use needs.
>
> Adopted Mitigation Measure Air-2.3: Implement transportation fleet fueling standards to improve the number of alternatively fueled vehicles in the County fleet.
>
> Adopted Mitigation Measure Air-2.4: Provide incentives to promote the siting or use of clean air technologies where feasible. These technologies shall include, but not be limited to, fuel cell technologies, renewable energy sources, and hydrogen fuel.
>
> Adopted Mitigation Measure Air-2.5: Require that the following measures be implemented on all construction projects where project emissions are above the SLTs:

- multiple applications of water during grading between dozer/scraper passes;
- paving, chip sealing, or chemical stabilization of internal roadways after completion of grading;
- use of sweepers or water trucks to remove "track-out" at any point of public street access;
- termination of grading if winds exceed 25 miles per hour;
- stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control;
- use of low-sulfur fuels in construction equipment;
- use of low VOC paints; and
- projects exceeding SLTs will require 10 percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NO_X), CO, and PM. Tier I standards are for engines over 50 horsepower (hp) (such as bulldozers) built between 1996 and 2000, and engines under 50 hp (such as lawn tractors) prop built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are for engines rated over 50 hp from 2006 to 2008. Tier IV standards apply to engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV.

Adopted Mitigation Measure Air-2.6: Use County Guidelines for Determining Significance for Air Quality to identify and mitigate adverse environmental effects on air quality.

Adopted Mitigation Measure Air-2.7: Implement County Air Pollution Control District regulations for air emissions from all sources under its jurisdiction.

Adopted Mitigation Measure Air-2.8: Require NSRs to prevent permitting projects that are "major sources."

Adopted Mitigation Measure Air-2.9: Implement the Grading, Clearing, and Watercourses Ordinance by requiring all clearing and grading to be conducted with dust control measures.

Adopted Mitigation Measure Air-2.10: Revise Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County-funded renovation and new building projects. This could be achieved by making the guidelines within the policy mandatory rather than voluntary.

Adopted Mitigation Measure Air-2.11: Implement County RAQS to attain state air quality standards for ozone.

Adopted Mitigation Measure Air-2.12: Revise Board Policy G-15 to require County facilities to comply with Silver Leadership in Energy and Environmental Design (LEED) standards or other equivalent Green Building rating systems.

Adopted Mitigation Measure Air-2.13: Revise Board Policy G-16 to require the County to:

- adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability, and
- require government contractors to use low-emission construction vehicles and equipment.

2011 General Plan PEIR Infeasible Mitigation Measures

As part of the preparation of the 2011 GPU PEIR, the County determined that the following measures were infeasible. These measures have been reviewed and a discussion is provided related to the feasibility with respect to the reduction measures in the CAP Update that would reduce emissions related to conformance to federal and state air quality standards.

Infeasible measures related to construction equipment in the 2011 GPU PEIR were as follows:

- Require all construction activities to use equipment that is CARB certified Tier 3 or better. This measure could not be accomplished because it would require all construction contractors working within the county to turn over their existing equipment which remains usable and would require a more stringent emissions standard than implemented by CARB. The CARB is currently implementing regulations that will require turnover of equipment to meet its regulatory standards for large vehicle fleets. The measure would limit which construction contractors would be allowed to work within the county and could result in undue costs to project applicants.

The CAP Update includes measures to reduce emissions from construction equipment. For example, Action T-2.2 requires the County to develop an ordinance that would require the use of alternative fuel and/or zero-emission equipment, which will reduce VOC, NOx, PM_{10}, and $PM_{2.5}$ emissions from construction equipment. The goal of this measure is to require that 100 percent of all construction equipment used in County projects be zero emission by 2045. Although the emission reductions would be potentially substantial, it is not possible to quantify these reductions at this time given that specific construction timing and fleet mix are unknown. Because the CAP Update includes measures related to the reduction of emissions from construction equipment, no additional mitigation is feasible.

Infeasible measures related to locally sourced construction materials in the 2011 GPU PEIR were as follows:

- Require the use of locally made building materials for construction projects. This measure would not be feasible because it would severely limit development projects, as some specialized building materials for projects may not be available locally. The measure would also require the County to monitor and enforce building material purchases at construction projects within its jurisdiction, which it does not have the funding or staffing available to accomplish.

The CAP Update includes Action SW-1.1.a, which would revise the County's Environmentally Preferred Purchasing policy (B-67) to include a requirement for departments to use evaluation criteria for purchasing Environmentally Preferrable Products to demonstrate compliance and increase the effectiveness and enforcement of the policy. This reduction measure included in the CAP Update would achieve the intent of the above infeasible mitigation measure by requiring that construction materials be acquired in a sustainable manner.

Infeasible measures related to on-road motor vehicles in the 2011 GPU PEIR were as follows:

- Prohibit new development that would result in emissions from new vehicle trips that would exceed the screening level thresholds. This measure would result in restrictions on future development in areas identified for increased growth in the General Plan because, with current vehicle emissions standards, it would severely limit development densities. This would conflict with the project's objective to support a reasonable share of projected regional population growth, because it would prohibit new development in the unincorporated county. In addition, if vehicle trips exceed screening level thresholds but a project is not proposing densities greater than what was expected by the General Plan, those trips are accounted for in the RAQS and does not automatically mean the actual ambient air quality standards will be exceeded.
- Encourage the construction of new development that would result in a reduction of vehicle trips because developers are able to demonstrate that they tie into an existing or planned alternative transportation network, such as transit (bus, train, trolley), bicycle network, walkways, and trails. This measure would result in restrictions on future development in areas identified for increased growth in the General Plan because not all areas of planned growth have an existing or planned alternative transportation network that new development could tie into. Implementation of this mitigation measure would conflict with the proposed project's objective to reinforce the vitality, local economy and individual character of existing communities by restricting future development to areas with existing alternative transportation networks, which excludes many rural areas.

The CAP Update includes measures to reduce emissions from on-road motor vehicles. For example, Action T-3.1 and Action T-3.1.a would collectively reduce emissions from the combustion of fossil fuels in on-road vehicles by increasing the use of alternative fuels

in on-road vehicles through the implementation of EV and hydrogen fueling infrastructure as well as the incentivization of EV purchases. Additionally, Action T-5.1 would implement the County's Active Transportation Plan pedestrian and bicycle network improvements to encourage alternative modes of transportation. This would reduce on-road vehicle emissions by replacing vehicle trips with alternative forms of transportation, such as walking and biking. These measures and actions would collectively reduce emissions resulting from on-road vehicle use and would therefore achieve the intent of the infeasible mitigation measures described above.

Infeasible measures related to renewable energy and energy efficiency were as follows:

- Require all applicants to provide on-site renewable energy systems, including solar, wind, geothermal, low-impact hydro power, biomass, and bio-gas. This measure would not be feasible because all applicants may not be able to provide renewable energy systems at all proposed locations. In addition, some energy systems may trigger additional regulatory requirements from the CPUC or CEC [California Energy Commission] that would make individual projects infeasible to construct. Implementation of this measure would potentially increase infrastructure costs, which would conflict with the proposed project's objective to minimize public costs of infrastructure and services. However, in circumstances where feasible, applicants will be encouraged to provide on-site renewable energy systems.

The CAP Update includes measures to incorporate renewable energy and energy efficiency in new development. For example, Action E-3.1 would amend the San Diego County Code of Regulatory Ordinances to require Tier 2 CALGreen renewable energy requirements for new residential and non-residential construction to increase renewable energy generation in new development. Additionally, Action 3.2.b would promote and support on-site renewable (wind and solar) energy generation and storage (microgrids, site-specific and/or community scale) to increase renewable energy generation and use in the unincorporated area, while Action E-3.2 would expand and implement the County's streamlined solar permitting process to install 5,002 kilowatts of renewable energy on existing development by 2030. Collectively, these measures and actions would achieve the intent of the infeasible mitigation measure described above by requiring and incentivizing the addition of renewable energy generation infrastructure to new and existing development.

Infeasible measures related to architectural coatings or other building materials that may in the 2011 GPU PEIR were as follows:

- Prohibit use of architectural coatings or other building materials that may result in emissions of VOCs. Only zero-VOC coatings and building materials would be allowed for use in the county. This measure would result in undue hardship on the entitlement process because most architectural coatings contain some VOCs and the measure would restrict the types of coatings that could be used to a limited type and number of formulations that may not be feasible for all applications. The VOC content in architectural coatings is regulated by the APCD, which has established a phase-in schedule for reduction of VOCs in accordance with the SIP

requirements. The measure would also require the county to monitor and enforce the use of architectural coatings at all construction projects within its jurisdiction, which it does not have the funding or staffing available to accomplish.

The CAP Update does not include any measures related to limiting the VOC content in architectural coatings. However, SDAPCD amended Rule 67.0 in 2021 which included changes to regulations regarding the VOC content of architectural coatings used in the county. With these recently updated regulations in place, VOC emissions from architectural coatings would be reduced to the extent feasible and would therefore require no additional mitigation.

New Mitigation Measures

CAP Update Mitigation Measure Air-2.1: Require construction contractors to reduce construction-related exhaust emissions by ensuring that all off-road equipment greater than 50 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall operate on at least an EPA-approved Tier 3 or newer engine. Exemptions can be made for specialized equipment where Tier 3 engines are not commercially available within 200 miles of the proposed project location. The construction contract must identify these pieces of equipment, document their unavailability, and ensure that they operate on no less than an EPA-approved Tier 2 engine.

Issue 3: Nonattainment Criteria Pollutants

The 2011 GPU PEIR mitigation measures and new mitigation measures identified above for Issue 2: Air Quality Violations would minimize impacts associated with non-attainment criteria pollutants.

Issue 4: Toxic Air Contaminants and Carbon Monoxide Effects on Sensitive Receptors

2011 General Plan PEIR Mitigation Measures

Adopted Mitigation Measure Air-4.1: Use the policies set forth in the CARB's Land Use and Air Quality Handbook as a guideline for siting sensitive land uses. Implementation of this measure will ensure that sensitive land uses such as residences, schools, day care centers, playgrounds, and medical facilities are sited appropriately to minimize exposure to emissions of TACs.

2011 General Plan PEIR Infeasible Mitigation Measures

As part of the preparation of the 2011 GPU PEIR, the County determined that the following measures were infeasible. These measures have been reviewed and a discussion is provided related to the feasibility with respect to the reduction measures in the CAP Update that would reduce TAC emissions resulting in effects on sensitive receptors.

Infeasible measures related to construction equipment in the 2011 GPU PEIR were as follows:

- Require that all off-road or non-road diesel engines, such as those associated with construction or extraction operations, be replaced by an alternative power source, such as electricity. This measure would limit which construction contractors would be allowed to work within the county because not all contractors have alternative power source equipment available and the measure could result in undue costs to the project applicant. Limiting the construction contractors allowed to work within the County would conflict with the proposed project's objective to reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment and recreational opportunities. In addition, the County cannot monitor and enforce all construction activities within its jurisdiction due to funding and staffing deficiencies and ultimately because CARB has the responsibility of regulating emissions from off-road construction equipment.

The CAP Update includes measures to reduce emissions from construction equipment. For example, Measure T-1.1.a requires the use of alternative fuel and/or zero-emission equipment, which will reduce TAC emissions from construction equipment. The goal of this measure is to require that 100 percent of all construction equipment used in county projects be zero emission by 2045. Although the emission reductions would be potentially substantial, it is not possible to quantify these reductions at this time given that specific construction timing and fleet mix are unknown. Because the CAP Update includes measures related to the reduction of TAC emissions from construction equipment, no additional mitigation is feasible.

Infeasible measures related to diesel trucks in the 2011 GPU PEIR were as follows:

- Require all diesel trucks that travel on county roads to be equipped with filters or other devices that would limit diesel emissions to below a significant level. This measure is considered to be infeasible [because] the county cannot monitor all diesel traffic within its jurisdiction due to funding and staffing deficiencies and ultimately because CARB has the responsibility of regulating emissions from vehicles. Implementing this measure would result in increased public costs, which would conflict with the proposed project's objective to minimize public costs of infrastructure and services.

The CAP Update includes measures to reduce emissions from diesel trucks. Measure T-4 supports the installation of EV charging stations and provides incentives for zero-emissions vehicles in the unincorporated county. Specific to trucks, Measure T-4.1 supports actions to install 2,040 publicly available EV charging stations by 2028 and require the electrification of loading docks and idling reduction in new commercial and industrial development, while Measure T-4.1a supports the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts.

Although the emission reductions would be potentially substantial, it is not possible to quantify these reductions at this time given that specific fleet mix and number of trucks are unknown. Because the CAP Update includes measures related to the reduction of TAC emissions from medium- and heavy-duty vehicles, no additional mitigation is feasible.

New Mitigation Measures

> CAP Update Mitigation Measure Air-2.1: Require construction contractors to reduce construction-related exhaust emissions by ensuring that all off-road equipment greater than 50 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall operate on at least an EPA-approved Tier 3 or newer engine. Exemptions can be made for specialized equipment where Tier 3 engines are not commercially available within 200 miles of the proposed project location. The construction contract must identify these pieces of equipment, document their unavailability, and ensure that they operate on no less than an EPA-approved Tier 2 engine.

Issue 5: Odor Impacts

No mitigation required.

2.3.6 Significance Conclusion

Issue 1: Conflict with Air Quality Plans

The proposed CAP Update would not conflict with or obstruct implementation of the San Diego RAQS and/or applicable portion of the SIP. Therefore, there is no new significant impact related to obstruction of the implementation of the San Diego RAQS and/or applicable portion of the SIP and the impact is not substantially more severe than the impact identified in the 2011 GPU PEIR. This impact would remain **less than significant** and the project **would not result in a considerable contribution** to a significant cumulative impact. This **would not be a new or more severe impact** than identified in the 2011 GPU PEIR.

Issue 2: Conformance to Federal and State Air Quality Standards

Construction and operation of subsequent future projects may result in emissions of criteria pollutants that would exceed the SLTs for PM_{10}, $PM_{2.5}$, NO_X, and VOCs. Implementation of the 2011 GPU PEIR Mitigation Measures Air-2.1 through Air-2.13, 2011 General Plan policies, along with various CAP measures would reduce construction and operational emissions. While these measures and policies would result in a decrease in criteria pollutants during construction and operation, the impact related to conformance to federal and state air quality standards would be **significant and unavoidable** and the project **would result in a considerable contribution** to a significant cumulative impact. This **would not be a new or more severe impact** than identified in the 2011 GPU PEIR.

Issue 3: Nonattainment Criteria Pollutants

Construction and operation of subsequent future projects may result in a cumulatively considerable increase in nonattainment pollutants (PM_{10}, $PM_{2.5}$, NO_X, and VOCs). Implementation of the 2011 GPU PEIR Mitigation Measures Air-2.1 through Air-2.13, 2011 General Plan policies, along with various CAP Update measures would reduce construction and operational emissions. While these measures and policies would result in a decrease in nonattainment pollutants during construction and operation, the impact related to emissions of nonattainment criteria pollutants would remain **significant and unavoidable** and the project **would result in a considerable contribution** to a significant cumulative impact. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Issue 4: Toxic Air Contaminants and Carbon Monoxide Effects on Sensitive Receptors

Future projects related to implementation of the measures and their associated actions described above could result in the exposure of sensitive receptors to TACs. Because of the programmatic approach of this analysis, it is not possible to determine the location or size of projects that would be built, nor the details of their construction typically used to estimate emissions of TACs and exposure to sensitive receptors such as construction duration, equipment use, location and intensity.

Implementation of the 2011 GPU PEIR Mitigation Measure Air-4.1, 2011 General Plan policies, along with various CAP Update measures would reduce sensitive receptor exposure to TAC emissions. While these measures and policies would reduce sensitive receptor exposure to TAC emissions, the impact related to sensitive receptor exposure to TAC emissions would remain **significant and unavoidable**, and the project **would result in a considerable contribution** to a significant cumulative impact. This **would not be a new or more severe impact** than identified in the 2011 GPU PEIR.

Issue 5: Objectionable Odors

Implementation of the proposed CAP Update could result in impacts related to odors because measures and actions related to solid waste could result in the construction of new waste handling facilities that are typically associated with odor complaints. Additionally, the operation of new composting/anaerobic digestion facilities and on-farm digesters could result in new sources of odors within existing agricultural lands, which are often near residences.

SDAPCD rules, including Rule 51, along with and County Code Sections 63.401 and 63.402, prohibit nuisance odors and identify enforcement measures to reduce odor impacts to nearby receptors. Development of any waste handling, composting, or digester facilities would be required to comply with these regulations. Compliance with existing rules would ensure objectionable odors are not a nuisance on nearby receptors. Therefore, impacts would be **less than significant** at both the project and cumulative scale, as identified in the 2011 GPU PEIR, and the project **would not result in a**

considerable contribution to a significant cumulative impact. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Table 2.3-2 Sources and Health Effects of Criteria Air Pollutants

Pollutant	Sources	Acute[1] Health Effects	Chronic[2] Health Effects
Ozone	Secondary pollutant resulting from reaction of ROG and NO_X in presence of sunlight. ROG emissions result from incomplete combustion and evaporation of chemical solvents and fuels; NO_X results from the combustion of fuels	Increased respiration and pulmonary resistance; cough, pain, shortness of breath, lung inflammation	Permeability of respiratory epithelia, possibility of permanent lung impairment
Carbon monoxide (CO)	Incomplete combustion of fuels; motor vehicle exhaust	Headache, dizziness, fatigue, nausea, vomiting, death	Permanent heart and brain damage
Nitrogen dioxide (NO_2)	Combustion devices; e.g., boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines	Coughing, difficulty breathing, vomiting, headache, eye irritation, chemical pneumonitis or pulmonary edema; breathing abnormalities, cough, cyanosis, chest pain, rapid heartbeat, death	Chronic bronchitis, decreased lung function
Sulfur dioxide (SO_2)	Coal and oil combustion, steel mills, refineries, and pulp and paper mills	Irritation of upper respiratory tract, increased asthma symptoms	Insufficient evidence linking SO_2 exposure to chronic health impacts
Respirable particulate matter (PM_{10}), Fine particulate matter ($PM_{2.5}$)	Fugitive dust, soot, smoke, mobile and stationary sources, construction, fires and natural windblown dust, and formation in the atmosphere by condensation and/or transformation of SO_2 and ROG	Breathing and respiratory symptoms, aggravation of existing respiratory and cardiovascular diseases, premature death	Alterations to the immune system, carcinogenesis
Lead	Metal processing	Reproductive/ developmental effects (fetuses and children)	Numerous effects including neurological, endocrine, and cardiovascular effects

1. **"Acute" refers to effects of short-term exposures to criteria air pollutants, usually at fairly high concentrations.**

2 **"Chronic" refers to effects of long-term exposures to criteria air pollutants, usually at lower, ambient concentrations.**

Notes: NO_X = oxides of nitrogen; ROG = reactive organic gases.

Source: EPA 2023a.

Table 2.3-3 Summary of Annual Ambient Air Quality Data in San Diego County (2019-2021)

Pollutant	2019	2020	2021
Ozone (2015 standard)[1]			
Maximum concentration (1-hr/8-hr avg, ppm)	0.110/0.085	0.105/0.090	0.099/0.080
Number of days state standard exceeded (1-hr/8-hr)	2/18	5/28	2/15
Number of days national standard exceeded (8-hr)	16	24	15
Fine Particulate Matter ($PM_{2.5}$)[2]			
Maximum concentration (24-hour µg/m^3)	25.7	41.6	31.5
Annual Average (µg/m^3)	8.5	11.6	10.4
Number of days national standard exceeded (measured)	0	2	0
Respirable Particulate Matter (PM_{10})[2]			
Maximum concentration (24-hour µg/m^3)	38.7	-	-
Number of days state standard exceeded	0	-	-
Number of days national standard exceeded (estimated days)	0.0	-	-

Notes: µg/m^3 = micrograms per cubic meter; ppm = parts per million; - = data not available

[1] Data from the Alpine – 2300 Victoria Drive station

[2] Data from the El Cajon – Lexington Elementary School station

Source: CARB 2023.

Table 2.3-4 Ambient Air Quality Standards and Attainment Status for the San Diego Air Basin

Pollutant	Averaging Time	California (CAAQS)		National (NAAQS)	
		Standards	Attainment Status	Standards – Primary	Attainment Status
Ozone (O_3)	1-hour	0.090 ppm (180 µg/m^3)	Nonattainment	—	—
	8-hour	0.070 ppm (137 µg/m^3)	Nonattainment	0.070 ppm (137 µg/m^3)	Nonattainment
Carbon monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment
	8-hour	9 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment
Nitrogen dioxide (NO_2)	Annual arithmetic mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Attainment
	1-hour	0.18 ppm (339 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Attainment
Sulfur dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m^3)	Attainment	—	—
	3-hour	—	Attainment	—	—
	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
Respirable particulate matter (PM_{10})	Annual arithmetic mean	20 µg/m^3	Attainment	—	—
	24-hour	50 µg/m^3	Nonattainment	150 µg/m^3	Unclassified/ Attainment
Fine particulate matter ($PM_{2.5}$)	Annual arithmetic mean	12 µg/m^3	Nonattainment	12 µg/m^3	Unclassified/ Attainment
	24-hour	—	—	35 µg/m^3	Unclassified/ Attainment
Lead	Calendar quarter	—	—	1.5 µg/m^3	Attainment
	30-Day average	1.5 µg/m^3	Attainment	—	—
	Rolling 3-Month Average	—	—	0.15 µg/m^3	Attainment
Hydrogen sulfide	1-hour	0.03 ppm (42 µg/m^3)	Unclassified	No national standards	
Sulfates	24-hour	25 µg/m^3	Attainment		
Vinyl chloride	24-hour	0.01 ppm (26 µg/m^3)	Unclassified		
Visibility-reducing particulate matter	8-hour	Extinction of 0.23 per km	Unclassified		

Notes: µg/m^3 = micrograms per cubic meter; km = kilometers; mg/m^3 = milligrams per cubic meter; ppb = parts per billion; ppm = parts per million (by volume).

Sources: EPA 2023b; SDAPCD n.d.

2.4 Biological Resources

This section summarizes the existing common and sensitive biological resources in the unincorporated county, including vegetation communities and special-status wildlife and plant species. Potential impacts of the project on special-status plant and wildlife species, riparian habitat and other sensitive natural communities, state and federally protected wetlands, wildlife movement corridors and nursery sites, local policies and ordinances, and habitat conservation plans (HCPs) and natural community conservation plans (NCCPs) are analyzed. Because this analysis is subsequent to the certified 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the General Plan. This section incorporates by reference the biological resources setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the 2011 GPU PEIR. The 2011 GPU PEIR mitigation measures that are applicable to the proposed project also are incorporated herein.

Table 2.4-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. As indicated below, implementation of the proposed project would not result in new or more severe significant impacts on biological resources (with implementation of mitigation).

Table 2.4-1 Summary of Biological Resources–Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Special-Status Plant and Wildlife Species	General Plan Only: Significant and Unavoidable Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
2	Riparian Habitat and Other Sensitive Natural Communities	General Plan Only: Significant and Unavoidable Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
3	State and Federally Protected Wetlands	General Plan Only: Less-Than-Significant Impact after Mitigation	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less than Significant	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
4	Wildlife Movement Corridors and Nursery Sites	General Plan Only: Significant and Unavoidable Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
5	Local Policies and Ordinances	General Plan Only: Less than Significant	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: No	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
6	Habitat Conservation Plans and Natural Community Conservation Plans	General Plan Only: Less than Significant Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

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

Source: Compiled by Ascent Environmental in 2023.

Comments received during the Notice of Preparation (NOP) scoping process included the following issues regarding the CAP Update that pertained to biological resources: species adaptation to climate change and native habitat preservation. These concerns are addressed and summarized in this section, as appropriate. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

2.4.1 Existing Conditions

The 2011 GPU PEIR included a description of existing conditions in Section 2.4, “Biological Resources.” No substantial changes have occurred to the existing conditions described in the 2011 GPU PEIR. Therefore, the existing conditions in the 2011 GPU PEIR remain applicable and are incorporated by reference. The following discussion summarizes the information in the 2011 GPU PEIR and provides supplemental discussion of recent wildfire events as they relate to change in land cover.

2.4.1.1 Terrestrial Communities and Habitats

Vegetation communities and habitats within the county, as described on pages 2.4-2 through 2.4-11 of the 2011 GPU PEIR include the following: chaparral, coastal sage scrub, coniferous forests, desert chaparral, desert dunes, desert scrub, dry wash woodlands, grasslands, marshes, meadows and seeps, oak forest, other woodlands, pinyon juniper woodland, playas/badlands/mudhill forbs, riparian forest, riparian scrub, riparian woodland, southern foredunes, beach, saltpan, mudflats, urban, disturbed habitat, agriculture, Eucalyptus, and water.

Special-Status Species

Special-status species are plants and animals that are legally protected or otherwise considered sensitive by federal, state, or local resource conservation agencies and organizations. In this document, special-status species are defined as plants and animals in the following categories:

- Species listed or proposed for listing as threatened, rare, or endangered under the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA).
- Species considered as candidates for listing under the ESA or CESA.
- Wildlife species identified by California Department of Fish and Wildlife (CDFW) as Species of Special Concern.
- Animals fully protected under the California Fish and Game Code.
- Plants considered by CDFW to be “rare, threatened, or endangered in California” (California Rare Plant Ranks of 1A, presumed extinct in California; 1B, considered rare or endangered in California and elsewhere; and 2, considered rare or endangered in California but more common elsewhere). The California Rare Plant Ranks correspond with and replace former California Native Plant Society (CNPS) listings. While these rankings do not afford the same type of legal protection as ESA or CESA, the uniqueness of these species requires special consideration under CEQA.
- Other species determined to be sensitive within the county.

Tables C-1 and C-2 of the 2011 GPU PEIR provide comprehensive lists of special-status plants and special-status animals that were listed at the time of adoption of the 2011 GPU PEIR. Since adoption of the 2011 GPU PEIR, several additional special-status species have been added to the California Natural Diversity Database (CNDDB) and the CNPS Inventory of Rare and Endangered Plants. A total of 139 special-status animal species and 301 special-status plants are now listed as potentially occurring within the boundaries of the county. Special-status plant and animal species are listed at the end of this section in Table 2.4-2 and Table 2.4-3, respectively. Some of these species are listed under the ESA and federally designated critical habitat for the species that occurs within the county (Table 2.4-4, presented at the end of this section).

2.4.2 Regulatory Framework

The 2011 GPU PEIR included a summary of the regulatory framework related to biological resources in Section 2.4 (pages 2.4-13 to 2.4-19), which is incorporated by reference. Specific regulations discussed in the 2011 GPU PEIR and applicable to the project include the following. Regulations that appear in a list format have not changed substantially and continue to apply to the unincorporated county. Regulations that have been adopted or updated since certification of the 2011 GPU PEIR are described in full.

2.4.2.1 Federal

- ESA
- Migratory Bird Treaty Act
- Bald and Golden Eagle Protection Act
- Clean Water Act (CWA)

2.4.2.2 State

- CESA
- California Fish and Game Code Sections 3503 and 3503.5
- California Fish and Game Code Section 1602 – Streambed Alteration
- Porter-Cologne Water Quality Control Act
- Natural Community Conservation Planning Act of 1991

2.4.2.3 Local

- San Diego County Zoning Ordinance (Zoning Ordinance)
- Multiple Species Conservation Program (MSCP)
- County of San Diego Code of Regulatory Ordinances Sections 86.501–86.509: Biological Mitigation Ordinance (BMO)
- County of San Diego Code of Regulatory Ordinances Sections 67.801–67.814: Watershed Protection, Stormwater Management, and Discharge Control Ordinance
- County of San Diego Code of Regulatory Ordinances Sections 86.601–86.608: Resource Protection Ordinance (RPO)
- San Diego County Board of Supervisors Policy I-123: Conservation Agreement for the MSCP

Habitat Loss Permit Ordinance

The Habitat Loss Permit (HLP) Ordinance was adopted in March of 1994 as a response to both the listing of the coastal California gnatcatcher as a federally threatened species and the adoption of the Natural Community Conservation Planning Act by the State of California. Pursuant to the Special 4(d) Rule under the federal ESA, the County is authorized to issue "take permits" for the California gnatcatcher (in the form of HLPs) in lieu of Section 7 or 10(a) Permits typically required from USFWS. Although issued by the County, the wildlife agencies must concur with the issuance of an HLP for it to become valid as a take authorization under the federal ESA. The HLP Ordinance states that projects must obtain an HLP prior to the issuance of a grading permit, clearing permit, or improvement plan if the project will directly or indirectly adversely affect any of several coastal sage scrub habitat types. The ordinance requires an HLP if coastal sage scrub or related habitat will be adversely affected, regardless of whether the site is currently occupied by gnatcatchers. HLPs are not required for projects within the boundaries of the MSCP because take authorization is conveyed to those projects through compliance with the MSCP. HLPs are also not required for projects that have separately obtained Section 7 or 10(a) permits for take of the gnatcatcher.

The "Planning Agreement by and among the County of San Diego, the California Department of Fish and Wildlife, and the United States Fish and Wildlife Service regarding the North and East County Multiple Species Conservation Program Plans: Natural Community Conservation Program Plans and Habitat Conservation Plans" was most recently restated and amended in March 2021 (County of San Diego et al. 2021).

2011 San Diego County General Plan

The General Plan policies addressing biological resources that are applicable to the CAP Update include the following:

> Policy COS-1.1: Coordinated Preserve System. Identify and develop a coordinated biological preserve system that includes Pre-Approved Mitigation Areas, Biological Resource Core Areas, wildlife corridors, and linkages to allow wildlife to travel throughout their habitat ranges.
>
> Policy COS-1.2: Minimize Impacts. Prohibit private development within established preserves. Minimize impacts within established preserves when the construction of public infrastructure is unavoidable.
>
> Policy COS-1.3: Management. Monitor, manage and maintain the regional preserve system facilitating the survival of native species and the preservation of healthy populations of rare, threatened, or endangered species.
>
> Policy COS-1.6: Assemblage of Preserve Systems. Support the proactive assemblage of a biological preserve system to protect biological resources and to facilitate development through mitigation banking opportunities.

Policy COS-1.7: Preserve System Funding. Provide adequate funding for assemblage, management, maintenance, and monitoring through coordination with other jurisdictions and agencies.

Policy COS-1.8: Multiple-Resource Preservation Areas. Support the acquisition of large tracts of land that have multiple resource preservation benefits, such as biology, hydrology, cultural, aesthetics, and community character. Establish funding mechanisms to serve as an alternative when mitigation requirements would not result in the acquisition of large tracts of land.

Policy COS-1.9: Invasive Species. Require new development adjacent to biological preserves to use non-invasive plants in landscaping. Encourage the removal of invasive plants within preserves.

Policy COS-2.1: Protection, Restoration and Enhancement. Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands where appropriate.

Policy COS-2.2: Habitat Protection through Site Design. Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.

Policy COS-3.1: Wetland Protection. Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.

Policy COS-3.2: Minimize Impacts of Development. Require development projects to:

- Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and
- Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species.

Policy LU-6.1: Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.

Policy LU-6.2: Reducing Development Pressures. Assign lowest-density or lowest intensity land use designations to areas with sensitive natural resources.

Policy LU-6.3: Conservation-Oriented Project Design. Support conservation-oriented project design. This can be achieved with mechanisms such as, but not limited to, Specific Plans, lot area averaging, and reductions in lot size with

corresponding requirements for preserved open space (Planned Residential Developments). Projects that rely on lot size reductions should incorporate specific design techniques, perimeter lot sizes, or buffers, to achieve compatibility with community character. [See applicable community plan for possible relevant policies.]

Policy LU-6.6: Integration of Natural Features into Project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.

Policy LU-6.7: Open Space Network. Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.

Policy LU-10.2: Development-Environmental Resource Relationship. Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Bio-1.5: Utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources. Also, utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special-status species populations on or near project sites. This information will be used to avoid or mitigate impacts as appropriate.

Adopted Mitigation Measure Bio-1.6: Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species.

Adopted Mitigation Measure Bio-1.7: Minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance.

Adopted Mitigation Measure Bio-2.1: Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and

regulations requiring planting of native or compatible non-native, non-invasive plant species in new development.

Adopted Mitigation Measure Bio-2.2: Require that development projects obtain CWA Section 401/404 permits issued by the California Regional Water Quality Control Board and U.S. Army Corps of Engineers for all project-related disturbances of waters of the U.S. and/or associated wetlands. Also, continue to require that projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Game for all project-related disturbances of streambeds.

Adopted Mitigation Measure Bio-2.3: Ensure that wetlands and wetland buffer areas are adequately preserved whenever feasible to maintain biological functions and values.

Adopted Mitigation Measure Bio-2.4: Implement the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands.

2.4.3 Analysis of Effects and Significance Determinations

2.4.3.1 Significance Criteria

Based on the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Biological Resources* (County of San Diego 2010) and Appendix G of the State CEQA Guidelines, the proposed project would result in a significant impact if it would:

- have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;
- have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS;
- have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan.

2.4.3.2 Approach to Analysis

Impacts related to biological resources were analyzed qualitatively based on a review of the CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. The following impact analysis is informed by databases that address biological resources in the unincorporated county, including the CNDDB and CNPS Inventory of Rare and Endangered Plants. Because this SEIR tiers from the 2011 GPU PEIR, all relevant 2011 GPU PEIR mitigation measures have been applied to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update.

Scope of SEIR Impact Analysis

The impact analysis contained within this draft SEIR focuses on whether approval and implementation of the CAP Update would result in new or more severe impacts than were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward the established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impact of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unincorporated county) and its role as a planning document designed to guide future decision-making related to the reduction of GHGs within the unincorporated county, the study area for the CAP Update is the unincorporated area of the county within the County's jurisdiction (i.e., excluding tribal lands, state and federally owned lands, and military installations).

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

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies and associated measures and actions proposed in the CAP Update (see Table 1-2) have been

grouped into subcategories for the purpose of analysis, based on the sector they target (e.g., solid waste, water/wastewater). CAP Update measures and actions with the potential to result effects related to biological resources are summarized below. CAP Update actions and measures that would involve development of policies and programs that would not result in direct physical effects or those that would result in limited physical improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to biological resources.

Solid Waste Measures and Actions. This category includes strategies, measures, implementing actions aimed at achieving zero solid waste in County operations and within the unincorporated county. Key measures and actions with potential to result in new or more severe impacts related to biological resources include those that would result in the development of new or expanded recycling and composting facilities (Action SW-4.1).

Water and Wastewater Measures and Actions. This category includes strategies to decrease water consumption and increase wastewater and stormwater treatments. Key measures and actions with potential to result in new or more severe impacts related to biological resources include those that would result in the construction of new recycled water and stormwater capture and reuse infrastructure (Actions W-2.2, W-2.3, and W-2.4).

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural land and agricultural land, improve land management practices, and support climate-friendly farming practices. Therefore, the measures and actions are not expected to result in new or more severe impacts related to biological resources. Rather, actions that would result in the acquisition and management of conservation lands (Actions A-1.1, A-1.2, A-3.1, and A-4.1) would have potential to benefit biological resources.

Energy Measures and Actions. This category includes strategies to develop policies and programs to increase energy efficiency and renewable energy use. Key measures and actions with potential to result in new or more severe impacts related to biological resources include those that would result in the construction of new infrastructure to promote renewable energy use and electrification (Actions E-1.1, E-3.2, and E-3.2.a). Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize vehicle fleet and to support transit and ridesharing. Key measures and actions with potential to result in new or more severe impacts related to biological resources include those that would result in the construction of new electric vehicle charging stations (Actions T-3.1.b, 3.1.c, and T-4.2) and hydrogen fueling infrastructure (Action T-3.1.a).

2.4.3.3 Issue 1: Special-Status Plant and Wildlife Species

This section describes potential project impacts on special-status species, based on effects that CAP Update implementation would have on vegetation communities that could support special-status species. These effects could also affect designed critical habitat for federally listed plant and animal species.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, the project could result in a significant adverse effect related to biological resources if it would:

- have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts on special-status species on a habitat-scale, because biological resources were analyzed at a regional level and the disturbance or loss of some habitats could substantially affect these species. Potential impacts identified in the 2011 GPU PEIR were related to the development of land uses, and construction of new infrastructure to support these land uses. Development, such as construction of new buildings and infrastructure, would result in the removal of several common and sensitive habitat types, which could affect special-status species associated with those habitats. The 2011 GPU PEIR determined that buildout of the General Plan would result in potentially significant direct (e.g., removal of habitat), indirect (e.g., impacts on water quality, introduction of nonnative plants, edge effects), and cumulative impacts on special-status species. The discussion of impacts and mitigation measures related to special-status species can be found in Section 2.4, “Biological Resources,” on pages 2.4-19 through 2.4-25 and 2.4-34 through 2.4-35; and 2.4-37 through 2.4-40 of the 2011 GPU PEIR and is hereby incorporated by reference.

The General Plan establishes 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 that would reduce impacts associated with special-status species (see Section 2.4.2.3, “Local,” for full text of GPU PEIR policies). In addition, adopted 2011 GPU PEIR mitigation measures establish uniform methods and data sources for identifying adverse effects on biological resources (Mitigation Measure Bio-1.5); implementing established County ordinances including the RPO, BMO, HLP, the Noise Ordinance, the Groundwater Ordinance, and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (Mitigation Measures Bio-1.6 and Bio-1.7); and revising the ordinance relating to water conservation for landscaping to encourage use of native plants (Mitigation Measure Bio-2.1).

Although these impacts would be reduced with implementation of the adopted General Plan policies, 2011 GPU PEIR mitigation measures, and compliance with applicable regulations, they remain significant and unavoidable because even with mitigation measures in place, implementation of the General Plan would allow land uses and development to occur in areas outside of an adopted regional conservation plan, thereby resulting in direct, indirect, and cumulative impacts on species identified as candidate, sensitive, or with special-status. Specific General Plan policies related to the protection of biological resources are listed above under Section 2.4.2, "Regulatory Framework," and adopted 2011 GUP PEIR mitigation measures that apply to CAP Update implementation are also listed in Section 2.4.2 above.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures and actions to result in impacts on special-status species. Impacts to designated critical habitat for listed species could also result if such habitat was modified or converted as a result of the proposed CAP Update measures and actions.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and more generally in the unincorporated county. Implementing CAP Update measures and actions could result in potential construction of new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 include development of zero waste policies which may result in new or expanded composting and recycling facilities to divert solid waste from landfills. Specific locations for new and expanded facilities have not been identified. Therefore, these improvements are analyzed at a programmatic level.

Construction of new facilities in rural or semi-rural areas may result in direct loss or loss of habitat for special-status plant and wildlife species when project activities involve vegetation removal, ground disturbance, or disruption of wildlife activity due to construction noise.

Although all feasible applicable 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 (Bio-1.1, Bio-1.5, and Bio-1.6) would be applied at the project level as part of the County's discretionary review process, potential construction of new or expanded solid waste facilities could still adversely affect special-status species because of the nature of the projects. Therefore, the impacts related to special-status plants and wildlife species would be significant, consistent with the conclusions in the 2011 GPU PEIR.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Measures W-1 and W-2 include implementing actions to develop

policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. Implementation of these measures would not result in substantial effects on special-status plant and wildlife species because any new or expanded physical structures associated with implementing water conservation measures and actions would be ancillary to existing or proposed development and consistent with the existing habitat function for special-status plant and wildlife species. Impacts would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of Measures A-1 and A-2 would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. Implementation of CAP Update Actions A-1.2 and A-2.1 could result in habitat restoration activities and tree planting and associated tree watering. Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified.

Construction of new farmworker housing in rural or semi-rural areas may result in direct loss or loss of habitat for special-status plant and wildlife species when project activities involve vegetation removal, ground disturbance, or disruption of wildlife activity due to construction noise. Development of farmworker housing would be required to comply with County policies and ordinances, including adopted General Plan Policies COS-1.3, COS-1.6, COS-1.7, COS-1.9, COS-1.9, COS-1.10, COS-2.2, LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, and LU-10.2. In addition, adopted 2011 GPU PEIR mitigation measures require that project proponents utilize the established *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Biological Resources* (Mitigation Measure Bio-1.5).

Mitigation Measure Bio-1.5 of the 2011 GPU PEIR would be applied to reduce this impact. This measure requires that County guidelines are utilized to determine the significance for biological resources, including utilization of the County's GIS records and matrix of sensitive species to locate sensitive populations.

While all feasible General Plan policies and 2011 GPU PEIR mitigation measures would be applied at the project level, potential construction of new or expanded farmworker housing could still adversely affect special-status species. Therefore, the impacts related to special-status species would be significant, consistent with the conclusions in the 2011 GPU PEIR.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects.

Implementation of CAP Update Measure E-3, Action E-3.2, and Action E-3.2.a could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. These retrofits could include rooftop or ground-mounted photovoltaic (PV) solar arrays or small wind turbines, energy storage systems, upgraded mechanical systems, and other similar improvements. Development of alternative energy infrastructure may be required to support implementation of some measures. Although removal of common and sensitive habitats that could support special-status plants or animals is not specifically proposed, implementation of the energy measures and actions listed above could result in removal of these habitats or other disturbances to special-status species. However, while the location of improvements associated with potential future projects is unknown it is likely that retrofits would occur in areas of existing development. Further, because of the small scale and nature of the energy measures, building retrofits generally would not be expected to result in substantial effects on special-status species.

Renewable energy projects, including on-site renewable energy generation supported through proposed CAP Update Action E-3.2.b, would be regulated by existing County ordinances and policies. The placement of small-scale PV solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance Section 6954(a). Rooftop PV solar energy panels generally do not involve construction that would result in substantial changes to habitats that support special-status species. Additionally, installation and operation of small-scale wind turbines would be regulated by the County's Wind Energy Ordinance Sections 6950 through 6952. A small wind turbine is defined as a wind turbine, with or without a tower, which has a rated capacity of not more than 50 kilowatts; is consistent with the requirements of existing Zoning Ordinance Sections 6156 and 6951; and generates electricity primarily for use on the same lot on which the wind turbine is located. These turbines would be allowed as an accessory use in all zones, provided the turbine complies with the Renewable Energy Regulations in Zoning Ordinance Section 6950 and the turbine proponent obtains a Zoning Verification Permit prior to issuance of a building permit. Small wind turbines are limited to a height of no more than 80 feet (but not more than the height designator of the Zoning District in which they are located) and have relatively small blades on a vertical or horizontal axis. Ground-mounted PV solar arrays could result in small-scale impacts on special-status habitat because small systems can be installed as an accessory use without obtaining a discretionary permit. Operation of solar systems and other building retrofits would not result in impacts on special-status species.

Operation of small wind turbines could result in significant direct impacts on special-status avian and bat species as described on pages 2.4-27 to 2.4-28 of the 2012 Wind Energy Ordinance EIR (County of San Diego 2012). Wind turbine projects would result in the loss of functional foraging habitat for raptors, avian species may be hit by spinning wind turbine blades, and wind turbines may result in direct injury to bats whose flight can be disrupted by the air pressure differential created around wind turbines, resulting in injury or death of individuals. Ground-mounted facilities may require ground disturbance and, therefore, could affect sensitive species if habitat is present. Small wind turbines are prohibited within 4,000 feet of a known golden eagle nest, per the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Biological Resources* (County of San Diego 2010). Additionally, pursuant to the County's Wind Energy Ordinance setbacks of 300 feet, or five times the turbine height, whichever is greater, are required from known significant roosts of sensitive bat species, blueline watercourses, or water bodies mapped on the US Geological Survey topographic maps and known locations of transmission towers or power lines.

Implementation of Action E-3.3 could result in the construction of new large-scale renewable energy systems, such as large-scale PV solar and concentrated solar systems, and/or wind turbines. Requirements for new development would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small-scale solar and small-scale wind turbines (roof- or ground-mounted systems) and energy storage systems. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level and assumes construction of commonly used existing solar and wind technology. Specific locations for projects have not been identified. While the potential for the construction of large-scale renewable energy infrastructure was not evaluated in the 2011 GPU PEIR, potential wind energy impacts were evaluated in the 2012 Wind Energy EIR, and a summary of that analysis is provided below and is hereby incorporated by reference.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating renewable energy source. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure which relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Solar array fields and wind turbines typically encompass large areas, and implementation of the projects could result in the conversion of sensitive habitat, resulting in habitat loss or fragmentation.

Large-scale solar and wind energy systems could result in impacts to special-status species due to f construction activities, implementation of access roads and transmission lines, and conversion of large areas of land to industrial uses, resulting in habitat loss. Wildlife could potentially be displaced within the construction areas and use of access

roads around the construction area has the potential to result in the direct mortality of less mobile wildlife and rare plants.

Additionally, as described on pages 2.4-27 through 2.4-31 of the 2012 Wind Energy EIR, both small- and large-scale wind turbines could result in direct impacts to avian and bat species because of collision risk. To reduce potential impacts, the Wind Energy Ordinance prohibits small wind turbines within 4,000 feet of a known golden eagle nest. Additionally, setbacks of 300 feet, or five times the turbine height, whichever is greater, are required from known significant roosts of sensitive bat species, blueline watercourses or water bodies mapped on the US Geological Survey topographic maps, and known locations of transmission towers or power lines. Small turbines cannot include guy wires for structural support or aboveground power lines because these features pose additional collision risk. The environmental design considerations included in the zoning verification process would minimize potential impacts to sensitive species from small wind turbines, but not to a level below significance (County of San Diego 2012).

All large-scale renewable energy projects are subject to discretionary review and are required to obtain a Major Use Permit (MUP). As part of the County's discretionary review process, all large-scale energy projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to candidate, sensitive, or special-status species, as necessary. However, permanent impacts to native vegetation communities could potentially result from the construction of infrastructure such as wind turbines, solar arrays, and solar fields, including support facilities, and access roads. Because of the potential for future large-scale projects to directly and indirectly affect sensitive wildlife, rare plants, and native habitat, large-scale renewable projects could result in potentially significant impacts related to candidate, sensitive, or special-status species.

As described in the 2012 Wind Energy EIR on pages 2.4-28 through 2.4-31, all large-scale wind energy projects would be required to obtain a MUP and be evaluated as part of the County's discretionary review process. Additionally, the 2012 Wind Energy EIR adopted Mitigation Measures M-Bio-1 and M-Bio-2, described below in Section 2.4.5, require significant impacts to special-status species to be mitigated and require updates to the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Biological Resources* to include mitigation which could reduce impacts related to avian and bat species. The 2012 Wind Energy EIR considered mitigation that would have required the County to prepare and adopt MSCP plans for North and East County. However, this mitigation was determined to be infeasible because approvals from other agencies would be required and the timing of these plans could not be guaranteed. The North County MSCP is currently being prepared, but the East County MSCP plan has not been initiated. No other feasible mitigation is available. The measure is still considered infeasible because the timing of completion of these plans is undetermined.

Future projects would be required to be evaluated for project-specific impacts under CEQA at the time of application. Project-specific mitigation would minimize or eliminate impacts to special-status species to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Implementation of the General Plan policies and 2011 GPU

PEIR mitigation measures listed above also would reduce potential impacts to biological resources as part of the County's discretionary review process. However, construction and operation of facilities associated with implementation of Action E-3.3 could still adversely affect special-status species because of the scale and nature of the projects. At the programmatic level, it is not possible to determine with certainty that impacts to special-status species from construction and operation of large-scale renewable energy projects would occur. With implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local regulations that protect sensitive resources; and completion of subsequent project-level planning and environmental review, potential impacts on special-status species because of implementation of measures would be reduced, however, the potential loss of special-status plant or animal species would be a significant impact.

Built Environment and Transportation Measures and Actions

The CAP Update built environment and transportation measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Action T-1.1) and Active Transportation Program (Action T-5.1). Other measures and actions would affect the design of existing and planned roadways. Action T-6.2 would implement transit-supportive roadway treatments such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Action T-3.1 would result in the installation of publicly available electric vehicle charging stations. Action T-3.1.a would support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts that could facilitate future infrastructure construction. Several measures and actions would further support alternative modes of transportation without resulting in physical changes that could affect biological resources.

Because of the nature of such improvements (i.e., limited size, along existing roadways, not accompanied by tall or expansive buildings), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. Specific locations for such improvements have not been identified. However, it is possible that the locations of such improvements would disturb existing vegetation communities. Although removal of common and sensitive habitats that could support special-status plants or animals is not specifically proposed, implementation of the measures listed above could result in removal of these habitats or other disturbances to special-status species. Construction activities and project operations associated with these measures and actions could result in direct and indirect disturbances or loss of special-status species through ground disturbance, tree removal, or habitat conversion in areas suitable for some special-status species.

As explained in the 2011 GPU PEIR, implementation of the General Plan and 2011 GPU PEIR mitigation measures identified in Section 2.4, "Biological Resources," on pages 2.4-19 through 2.4-25, 2.4-34, 2.4-35; and 2.4-37 through 2.4-40 of the 2011 GPU PEIR would reduce potential impacts on special-status species: Bio-1.1 requires that a

Conservation Subdivision Program is created which facilitates conservation-oriented project design; Bio-1.5 requires that County guidelines are utilized to determine the significance for biological resources, including utilization of the County's GIS records and matrix of sensitive species to locate sensitive populations; and Bio-1.6 requires that the RPO, BMO, and HLP Ordinance protects wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare or endangered plant or animal species.

Additionally, all future development projects would be required to follow County development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to protection of sensitive biological resources, which would minimize impacts on special-status species. Furthermore, as described in Section 2.4.2, "Regulatory Framework," above, several federal, state, and local regulations and policies (e.g., ESA, CESA) are in place to protect special-status species in the county. Furthermore, future projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts on special-status species to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. With implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local regulations that protect sensitive resources; and completion of subsequent project-level planning and environmental review, potential impacts on special-status species because of implementation of measures would be minimized. Nonetheless, the impacts related to special-status species would be significant, consistent with the conclusions in the 2011 GPU PEIR.

Summary

Implementation of CAP Update Actions SW-1.1, SW-1.2, SW-2.1b, SW-3.1, SW-4.1a, SW-4.1b, W-1.1, E-3.2.a, T-3.1, T-3.1.a, and E-3.3 would result in new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, small wind turbines, transportation infrastructure improvements, and large-scale renewable energy infrastructure that could result in new development, which would have construction and operational impacts. Subsequent projects associated with CAP Update implementation would be required to comply with applicable existing federal, state, and local regulations, as well as with the General Plan 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 that would reduce the potential for impacts to special-status species. Specifically, projects would be evaluated for their consistency with policies and regulations including County Grading Ordinance regulations, and the County RPO regulations, and the 2011 GPU PEIR Mitigation Measures Bio-1.1, Bio-1.5, and Bio-1.6. CAP Update Mitigation Measures Bio-1 and Bio-2 also would be applied to the project to further reduce impacts associated with large-scale renewable energy development. These measures would require implementation of measures to avoid sensitive biological resources; preserve habitat; requirement revegetation of disturbed areas; and restrict lighting, runoff, access and/or noise on future renewable energy development sites.

Additionally, standard measures as outlined in the *County Guidelines for Determining Significance for Biological Resources* would be required to be implemented.

While all feasible mitigation would be applied at the project level as part of the County's discretionary review process, construction of projects associated with CAP Update Actions SW-1.1, SW-1.2, SW-2.1b, SW-3.1, SW-4.1a, SW-4.1b, W-1.1, E-3.2.a, T-3.1, and T-3.1.a could still adversely affect special-status species because of the nature of the projects. At the programmatic level, it is not possible to determine with certainty that impacts resulting from construction activities to special-status species would be reduced to a level below significance. The 2011 GPU PEIR concluded that implementation of the General Plan would have the potential to adversely impact special-status species and their habitat. At a programmatic level, and thus the potential loss of special-status plant or animal species would remain a **significant impact**, consistent with the 2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** to special-status species beyond the scope of the 2011 GPU PEIR.

2.4.3.4 Issue 2: Riparian Habitat and Other Sensitive Natural Communities

This section describes potential project impacts on riparian habitat or other sensitive natural communities for the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, the project could result in a significant adverse effect related to biological resources if it would:

- have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS.

Impact Analysis

2011 GPU PEIR Determination

Impacts identified in the 2011 GPU PEIR were primarily related to new development which could affect up to 10,131 acres of riparian habitat within the county. Development under the 2011 GPU PEIR would also result in development of various vegetation communities, presented in Table 2.4-2 on pages 2.4-46 and 2.4-47 of the 2011 GPU PEIR; many of which may contain sensitive natural communities. The 2011 GPU PEIR determined that proposed development would result in potentially significant direct (e.g., removal of habitat), and indirect (e.g., impacts on water quality, introduction of nonnative plants) impacts on riparian habitat and other sensitive natural communities. This determination was developed by reviewing the potential for project-related clearing, grading, or construction activities which may remove sensitive natural habitat; potential work within jurisdictional wetlands or riparian habitats as defined by the US Army Corps of Engineers, CDFW, and the County of San Diego; potential of groundwater draw on

groundwater-dependent habitat; introduction of disturbance along edge habitat; and potential disruption to the habitat function of wetlands. The discussion of impacts on riparian habitat and other sensitive natural communities can be found in Section 2.4, "Biological Resources" (pages 2.4-25 through 2.4-27, 2.4-35, and 2.4-40 through 2.4-41), of the 2011 GPU PEIR and is incorporated by reference.

The 2011 GPU PEIR concluded that even with implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures listed above, and compliance with applicable state and federal regulations, potential impacts were determined to be significant and unavoidable because implementation of the General Plan would allow land uses and development to occur in areas outside of any adopted regional conservation plan, thereby resulting in direct and indirect impacts on riparian habitat and other sensitive natural communities. Specific General Plan policies related to the protection of riparian habitat and other sensitive resources include Policies COS-1.1, COS-1.2, COS-1.3, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-2.1, COS-2.2, COS-3.1, and COS-3.2. Adopted 2011 GPU PEIR mitigation measures related to the protection of riparian habitat and other sensitive resources include Bio-2.1, Bio-2.2, Bio-2.3, Bio-2.4. Applicable General Plan policies and 2011 GPU PEIR mitigation measures are listed above under Section 2.4.2, "Regulatory Framework."

CAP Update Impact Analysis

Riparian vegetation occurs along rivers, streams, and other drainages in the unincorporated county. Riparian areas connect terrestrial and aquatic habitats and provide linkages between water bodies and upstream vegetation communities. Sensitive natural communities in the unincorporated county can be associated with several vegetation communities, including grassland, chaparral, and coastal scrub. The following section describes the potentially significant impacts on riparian habitat and other sensitive natural communities that could result from the implementation of the CAP Update measures and actions.

Solid Waste Measures and Actions

Implementation of CAP Update Measures SW-1 through SW-4 and associated implementing actions have the potential to result in the construction of new or expanded solid waste facilities. These projects would involve some level of construction and physical disturbance to the land. This analysis assumes that implementation of these projects would result in construction activities that could include: the use of heavy equipment for earthmoving, materials processing, or compost spreading; and vehicle trips during construction/equipment replacement/monitoring activities. Construction activities and project operations associated with these measures could result in direct and indirect disturbances to riparian habitat or other sensitive natural communities through ground disturbance, or conversion of habitat. Depending on the location of these projects, construction could result in erosion, direct removal of habitat, or water quality issues.

However, all projects would be required to comply with applicable existing federal, state, and local regulations. Specifically, projects would be evaluated for their consistency with

General Plan policies, 2011 GPU PEIR mitigation measures, County Grading Ordinance regulations, and County RPO regulations. General Plan policies related to the protection of riparian habitat and other sensitive resources include Policies COS-1.1, COS-1.2, COS-1.3, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-2.1, COS-2.2, COS-3.1, and COS-3.2. Adopted 2011 GPU PEIR mitigation measures related to the protection of riparian habitat and other sensitive resources include Bio-2.1, Bio-2.2, Bio-2.3, and Bio-2.4. Applicable General Plan policies and 2011 GPU PEIR mitigation measures are listed above under Section 2.4.2, "Regulatory Framework."

Potential impacts associated with implementation of CAP Update Measures SW-1 through SW-4 would be related to disturbance of riparian and other sensitive natural communities as a result of construction of new or expanded solid waste facilities. As noted above, these impacts would be addressed through implementation of General Plan policies and 2011 GPU PEIR mitigation measures, as well as other regulatory requirements. Consistent with the 2011 GPU PEIR conclusion, implementation of these measures and actions could allow development to occur in areas outside of any adopted regional conservation plan, thereby resulting in direct and indirect impacts on riparian habitat and other sensitive natural communities. Accordingly, implementation of the CAP Update solid waste measures could result in impacts on riparian habitat or other natural communities but would not result in new or substantial increase in magnitude of impacts on any riparian habitat or other sensitive natural community compared to the General Plan. Impacts would remain significant.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Measures W-1 and W-2 include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. As discussed under Section 2.4.3.3, "Issue 1: Special-Status Plant and Wildlife Species," implementation of CAP Update water and wastewater measures and actions would result in new or replaced ancillary structures within existing development or developed areas and would not result in substantial effects on riparian habitat and other sensitive natural communities. Impacts would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of Measures A-1 and A-2 would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. Implementation of CAP Update Actions A-1.2 and A-2.1 could result in habitat restoration activities and tree planting, including associated watering of planted vegetation. Agriculture and

conservation projects associated with the CAP Update would contribute to preservation of natural and agricultural lands and habitat restoration. Therefore, it would result in beneficial effects to riparian habitats and other sensitive natural communities.

Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified. Development of farmworker housing would be required to comply with County policies and ordinances, including adopted General Plan Policies COS-1.1, COS-1.2, COS-1.3, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-2.1, COS-2.2, COS-3.1, and COS-3.2. These policies would reduce impacts to riparian resources by requiring management of riparian resources, maintenance of a preserve system, funding for the system, public involvement, protection and enhancement of riparian habitat through site design and land use, conservation-oriented project design, and wetland protection. In addition, 2011 GPU PEIR Mitigation Measures Bio-2.1, Bio-2.2, Bio-2.3, and Bio-2.4 would require that landscaping addresses water conservation and invasive plant species, require that development projects obtain CWA Section 401/404 permits and Fish and Game Code Section 1602 Streambed Alteration Agreements when appropriate, ensure that wetlands and wetland buffer areas are adequately preserved, and require that adequate watershed protection, storm water management, and discharge control ordinances are followed. With the implementation of these policies and mitigation measures, impacts to riparian habitats and other sensitive natural communities as a result of the agriculture and conservation measures and actions in the CAP Update would be less than significant.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects (including large- and small-scale PV solar arrays and small-scale wind turbines). While exact locations for these projects have not been determined, it is possible that the locations of such improvements would disturb some riparian habitat and other sensitive natural communities.

The placement of small-scale PV solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance Section 6954(a). Rooftop PV solar energy panels would not involve construction that would substantially alter riparian habitat or other sensitive natural communities; however, ground-mounted PV solar arrays could result in impacts on these habitats because of ground disturbance.

Wind turbines of all sizes are regulated by the County's Zoning Ordinance, Wind Energy Sections 6950–6952 and would be required to comply with regulations specific to the size and scale of the turbines. These turbines would be allowed as accessory use in all zones provided the turbine complies with the Zoning Ordinance Section 6950 and the proponent

obtains a Zoning Verification Permit prior to issuance of a building permit. However, small wind turbines could result in significant impacts on riparian habitat and other sensitive natural communities as described on pages 2.4-31 and 2.4-32 of the 2012 Wind Energy EIR due to removal or disturbance of riparian habitat and sensitive natural communities (County of San Diego 2012). Ground-mounted facilities may require ground disturbance that would not be subject to environmental review and, therefore, could affect riparian habitat or other sensitive natural communities if present. The Wind Energy Ordinance requires setbacks of 300 feet, or five times the turbine height, whichever is greater, from blueline watercourses or water bodies mapped on the US Geological Survey topographic maps.

The 2012 Wind Energy Ordinance EIR concluded that small turbines may result in a potentially significant adverse impact on riparian habitat or other sensitive natural communities because multiple small turbines are allowed on a single parcel as an accessory use without discretionary review (County of San Diego 2012). The 2012 Wind Energy Ordinance EIR considered mitigation that would have required the County to prepare and adopt MSCP plans for North and East County. However, this mitigation was determined to be infeasible because approvals from other agencies would be required and the timing of these plans could not be guaranteed. The North County MSCP is currently being prepared, but the East County MSCP plan has not been initiated. No other feasible mitigation is available.

Implementation of CAP Update Action E-3.3 could result in the construction of new large-scale renewable energy systems, such as large-scale PV solar or concentrated solar power systems, and/or wind turbines. Requirements for new development would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small-scale solar and small-scale wind turbines (roof- or ground-mounted systems) and energy storage systems. As described in detail above in Section 2.4.4.3 large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating renewable energy source. As a result, it is likely that the locations of such renewable energy projects would disturb some riparian communities. Specific locations for projects have not been identified. PV solar, concentrator solar, and/or wind turbines could result in impacts to riparian habitat and habitat loss because of construction activities, implementation of access roads and transmission lines, and conversion of large areas of land to infrastructure uses.

The 2012 Wind Energy EIR evaluated impacts to riparian habitat associated with the development of large-scale wind turbines on pages 2.4-32 and 2.4-33. Future projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to riparian habitat to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. All large-scale wind projects would be subject to discretionary review and required to obtain a MUP. As part of the County's discretionary review process all large wind projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to riparian habitat, as necessary. MUPs are also subject to several biological resources protection ordinances including the County's RPO, MSCP, Biological

Mitigation Ordinance, Natural Communities Conservation Planning program, and other local or regional plans, policies, or regulations. Additionally, the 2012 Wind Energy EIR adopted Mitigation Measures M-Bio-1 and M-Bio-2 as described below in Section 2.4.5 require mitigation of significant impacts to riparian species. While these mitigation programs are in place, there is no guarantee that project-level impacts would not occur. Therefore, the 2012 Wind Energy EIR concluded that impacts to riparian habitat would remain potentially significant because there is no guarantee that mitigation could resolve all impacts (see page 2.4-33).

All other large-scale renewable energy projects allowed under these measures would be required to follow County development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to protection of sensitive riparian habitat. Large-scale solar projects over 10 acres would be required to obtain a MUP and undergo discretionary review under CEQA. Furthermore, as described in Section 2.4.2, “Regulatory Framework,” several federal, state, and local regulations and policies are in place to protect sensitive biological resources in the county. Compliance with General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing local, state, and federal regulations that protect sensitive habitats; and completion of subsequent project-level planning and environmental review, would minimize and reduce potential impacts. However, the construction of renewable energy facilities could still adversely affect riparian habitat because of the scale and nature of the projects. The potential loss of riparian habitat would result in a significant impact.

Built Environment and Transportation Measures and Actions

CAP Update built environment and transportation measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Action T-1.1) and Active Transportation Program (Action T-5.1). Other measures and actions would affect the design of existing and planned roadways. Action T-6.2 would Implement transit-supportive roadway treatments such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Action T-3.1 would result in the installation of publicly available electric vehicle charging stations. Action T-3.1.a would support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts that could facilitate future infrastructure construction.

As discussed in Section 2.4.3.3, “Issue 1: Special-Status Plant and Wildlife Species,” it is likely that most improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved because of the nature of these improvements. Improvements occurring within developed and residential areas would not result in substantial impacts to riparian habitats and other sensitive natural communities given that these areas are already disturbed due to prior development. Furthermore, all future projects associated with the CAP Update would be required to comply with existing federal, state, and local regulations that protect sensitive resources.

In addition, future projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts on riparian habitat and other sensitive natural communities to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Although removal of riparian habitat and other sensitive natural communities is not specifically proposed, implementation of the measures listed above could result in removal of these habitat types during construction or development of improvements, if these resources are present in individual project areas. Construction activities and project operations associated with these measures could result in direct and indirect disturbances or loss of riparian habitat and other sensitive natural communities through ground disturbance, tree removal, or conversion of habitat. Depending on the location of these new facilities, construction could result in erosion, or water quality issues. However, as described above in Section 2.4.3.3, implementation of the relevant General Plan policies (Policies COS-1.1, COS-1.2, COS-1.3, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-2.1, COS-2.2, COS-3.1, and COS-3.2) would reduce impacts to riparian resources by requiring management of riparian resources, maintenance of a preserve system, funding for the system, public involvement, protection and enhancement of riparian habitat through site design and land use, conservation-oriented project design, and wetland protection. Additionally, implementation of the 2011 GPU PEIR Mitigation Measures Bio-2.1, Bio-2.2, Bio-2.3, and Bio-2.4 would require that landscaping addresses water conservation and invasive plant species; require that development projects obtain CWA Section 401/404 permits and Fish and Game Code Section 1602 Streambed Alteration Agreements when appropriate; ensure that wetlands and wetland buffer areas are adequately preserved; and require that adequate watershed protection, storm water management, and discharge control ordinances are followed. With the implementation of these policies and mitigation measures, impacts to riparian habitats and other sensitive natural communities as a result of the built environment and transportation measures and actions in the CAP Update would be less than significant.

Summary

All future projects that result from implementation of the CAP Update would be required to comply with applicable existing federal, state, and local regulations. Specifically, projects would be evaluated for their consistency with General Plan policies (Policies COS-1.1, COS-1.2, COS-1.3, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-2.1, COS-2.2, COS-3.1, and COS-3.2), 2011 GPU PEIR mitigation measures (Bio-2.1, Bio-2.2, Bio-2.3, Bio-2.4), County Grading Ordinance regulations, and County RPO regulations.

While all feasible mitigation would be applied at the project level as part of the County's discretionary review process, construction of projects associated with CAP Update Actions SW-1.1, SW-1.2, SW-2.1b, SW-3.1, SW-4.1a, SW-4.1b, W-1.1, E-3.2.a, T-3.1, T-3.1.a, and E-3.3 could still adversely affect riparian habitat and other sensitive natural communities because of the nature of the projects. The 2011 GPU PEIR concluded that it is not possible to determine with certainty that impacts on riparian habitat and other sensitive natural communities at the programmatic level, because a comprehensive NCCP is not in place for the long-term protection of the sensitive natural communities in San Diego and the surrounding landscape. Therefore, loss of riparian and other sensitive habitat may

occur even after mitigation has been implemented. The potential impact related to riparian habitat and other sensitive natural communities would remain significant, consistent with the conclusion identified in the 2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** on any riparian habitat or other sensitive natural community compared to the 2011 GPU PEIR

2.4.3.5 Issue 3: State and Federally Protected Wetlands

This section describes potential impacts on state and federally protected wetlands because of implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, implementation of the project could result in a significant adverse effect related to biological resources if it would:

- have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Impact Analysis

2011 GPU PEIR Determination

As described in the 2011 GPU PEIR, new development proposed under the General Plan could potentially affect approximately 1,841 acres of federally protected wetlands in the unincorporated county. The 2011 GPU PEIR determined that this development would result in potentially significant direct impacts on federally protected wetlands, including direct filling, removal, or hydrological interruption. The discussion of impacts on wetlands can be found in Section 2.4, “Biological Resources” (pages 2.4-27, 2.4-28, 2.4-35, 2.4-41, and 2.4-42), of the 2011 GPU PEIR and is hereby incorporated by reference. With implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures, and compliance with applicable state and federal regulations, these potential impacts were determined to be reduced to a less-than-significant level. Specific policies and mitigation measures related to the protection of biological resources are listed above under Section 2.4.2, “Regulatory Framework.”

In 2020, the US Environmental Protection Agency and the US Department of the Army’s Navigable Waters Protection Rule: Definition of “Waters of the United States” (NWPR) was updated. In 2023, the 2020 NWPR was vacated and replaced in the Code of Federal Regulations by the “Revised Definition of ‘Waters of the United States’” (2023 rule). The 2023 rule uses a pre-2015 definition of waters of the United States as the foundation, updated to reflect consideration of Supreme Court decisions, the science, and the agencies’ technical expertise. The agencies’ definition of “waters of the United States” provides jurisdiction over waterbodies that Congress intended to protect under the CWA, including traditional navigable waters (e.g., certain large rivers and lakes), territorial seas, and interstate waters. To determine jurisdiction for tributaries, adjacent wetlands, and

additional waters, the 2023 rule relies on the relatively permanent standard or significant nexus standard.

The state wetland delineation procedures will continue to follow the methods set forth in the USACE 1987 wetlands delineation manual (Environmental Laboratory 1987) and applicable regional supplement (i.e., the Mountains, Valleys, and Coasts supplement). However, if there is a conflict between these federal methods and the state procedures, the State Board directs that the state procedures will be used.

These wetland definitions and procedures do not affect the meaning of waters of the state as it pertains to the State and Regional Boards' jurisdiction and do not change the authority of the State and Regional Boards to protect water quality. The guidance specifies that it is the intent of the State Board to apply a broad interpretation of waters of the United States into the definition of waters of the state, including both historic and current definitions of waters of the United States. The state will continue to regulate wetlands and waters that may no longer be protected under new federal rules pertaining to the CWA. Waters of the state continue to be broadly defined to include any surface or groundwater, including saline waters, within the boundaries of the state.

In addition to the 2023 rule, since certification of the 2011 GPU PEIR, guidance in the State CEQA Guidelines regarding determining significance has been changed to include waters of the state. As a result, waters of the state and wetlands under the jurisdiction of the state were not directly addressed in the 2011 GPU PEIR. However, the 2011 GPU PEIR Mitigation Measure Bio-1.6 requires protection of wetlands through implementation of the County RPO, which defines wetlands more broadly and encompassing than the federal definition in that it only requires the presence of one of the following: hydrophytic vegetation, hydric soils, or an ephemeral or perennial stream whose substrate is predominately non-soil. The County RPO requires a standard of no net loss for impacts on wetlands and a 3:1 mitigation ratio for impacts on wetlands, which meets or exceeds requirements for impacts on state protected wetlands.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures and actions to affect state and federally protected wetlands.

Solid Waste Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update solid waste measures and actions could result in construction and operation of new or expanded solid waste facilities. Specific locations for the new or expanded solid waste facilities have not been identified. Although removal of wetlands is not specifically proposed, implementation of the measures and efforts listed above could result in degradation or removal of these wetlands. Depending on the locations of new facilities, construction activities and project operations, these measures could result in direct and indirect disturbances or loss of state or federally protected wetlands through ground disturbance or conversion of habitat.

There are many federal, state, and local regulations in place to limit impacts on state or federally protected wetlands in the county. At the federal level, there are prohibitions regarding the discharge of pollutants or fill materials in waters of the United States without obtaining a Section 404 permit and Section 401 Water Quality certification. At the state level, the Lake and Streambed Alteration Program requires written notification to CDFW prior to altering a riparian area supported by a lake, river, or stream, including state or federally protected wetlands. For water quality impacts on all wetlands, the California Porter-Cologne Water Quality Control Act directs the local water boards to develop regional Basin Plans, which, for the San Diego Region, is designed to preserve and enhance the quality of water resources in the region. At the local level, the County's RPO restricts impacts from certain project types to various wetlands, wetland buffers, floodways, and floodplain fringe areas, which would potentially contain state or federally protected wetlands. In addition, both the Watershed Protection Ordinance and the Zoning Ordinance include special protections for wetlands that would apply to state or federally protected wetlands and would be applied at the time of discretionary project review.

All future projects would be required to follow County development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to protection of sensitive biological resources. Therefore, with implementation of the General Plan policies (Policies COS-3.1 and COS-3.2) and 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); compliance with existing local, state, and federal regulations that protect sensitive habitats; and completion of subsequent project-level planning and environmental review, potential direct and indirect impacts on state or federally protected wetlands would be reduced to a less-than-significant level.

Water and Wastewater Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update water and wastewater Measures W-1 through W-3 and actions could result in installation of new or replaced ancillary structures (e.g., water efficient appliances, irrigation systems, and stormwater and wastewater treatment systems) within exiting development or developed areas. Given the nature of these improvements it is assumed that these potential ancillary structures would not be located on state or federally protected wetlands. With compliance of applicable general plan policies from the General Plan policies (Policies COS-3.1 and COS-3.2) and 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); compliance with existing local, state, and federal regulations that protect sensitive habitats; and completion of subsequent project-level planning and environmental review, potential direct and indirect impacts on state or federally protected wetlands would be reduced to a less-than-significant level.

Agriculture and Conservation Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update agriculture and conservation Measures A-1 through A-2 and actions would result in preservation of conservation, natural, and agricultural lands, protection of trees, and development of programs to incentivize carbon farming and transition to clean fuels. Implementation of

these measures and associated implementing actions would reduce development pressure on vacant and undeveloped lands and conserve natural lands including state or federally protected wetlands.

Implementation of Action A-4.1.b would result in evaluation of opportunities to increase affordable farmworker housing in the unincorporated county. If development of new farmworker housing results from opportunities identified through implementation of this action, such development would be required to comply with applicable federal, state and location regulations regarding protections of wetlands. As described above, there are prohibitions regarding the discharge of pollutants or fill materials in waters of the United States without obtaining a Section 404 permit and Section 401 Water Quality certification. A Lake and Streambed Alteration Agreement with CDFW would be required prior to altering a riparian area supported by a lake, river, or stream, including state or federally protected wetlands. For water quality impacts on all wetlands, the California Porter-Cologne Water Quality Control Act directs the local water boards to develop regional Basin Plans, which, for the San Diego Region, is designed to preserve and enhance the quality of water resources in the region. The County's RPO also restricts impacts from certain project types to various wetlands, wetland buffers, floodways, and floodplain fringe areas, which would potentially contain state or federally protected wetlands. In addition, both the Watershed Protection Ordinance and the Zoning Ordinance include special protections for wetlands that would apply to state or federally protected wetlands. With compliance of applicable general plan policies from the General Plan policies (Policies COS-3.1 and COS-3.2) and 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); compliance with existing local, state, and federal regulations that protect sensitive habitats; and completion of subsequent project-level planning and environmental review, potential direct and indirect impacts on state or federally protected wetlands would be reduced to a less-than-significant level.

Energy Measures and Actions

As discussed in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update Measure E-3, Action E-3.2, and Action E-3.3 could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. Potential retrofits could include rooftop or ground-mounted PV solar arrays or small wind turbines, energy storage systems, upgraded mechanical systems, and other similar improvements. Rooftop or ground-mounted PV solar arrays and upgraded mechanical systems would likely be located on disturbed areas with existing infrastructure and would not be located in state or federally protected wetlands. Requirements for new development would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small-scale solar and small-scale wind turbines (roof- or ground-mounted systems) and energy storage systems. Implementation of CAP Update Action E-3.3 also could result in the construction of new large-scale renewable energy systems, such as large-scale PV solar and concentrated solar and/or wind turbines.

Specific locations for renewable energy projects have not been identified. Although removal of wetlands is not specifically proposed, implementation of the measures and

efforts listed above could result in degradation or removal of these wetlands. Depending on the locations of new facilities, construction activities and project operations, these measures could result in direct and indirect disturbances or loss of federally protected wetlands through ground disturbance or conversion of habitat.

Future projects would be required to be evaluated for project-specific impacts under CEQA at the time of discretionary application. Project-specific mitigation would minimize or eliminate impacts to federally protected wetlands to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. As described above in Section 2.4.2, Regulatory Framework, there are many federal, state, and local regulations in place to limit impacts to federally protected wetlands in the county. At the federal level, there are prohibitions regarding the discharge of pollutants or fill materials in waters of the United States without obtaining a Section 404 permit and Section 401 Water Quality certification. At the state level, the Lake and Streambed Alteration Program requires written notification to CDFW prior to altering a riparian area (a type of wetland) supported by a lake, river, or stream, including federally protected wetlands. For water quality impacts to all wetlands, the California Porter-Cologne Water Quality Control Act directs the local water boards to develop regional Basin Plans, which, for the San Diego Region, is designed to preserve and enhance the quality of water resources in the region. At the local level, the County's RPO restricts impacts from certain project types to various wetlands, wetland buffers, floodways, and floodplain fringe areas, which would potentially contain federally protected wetlands. In addition, both the Watershed Protection Ordinance and the Zoning Ordinance include special protections for wetlands that would apply to federally protected wetlands and would be applied at the time of discretionary project review. All future development projects would be required to follow County development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to the protection of sensitive biological resources.

The County's Wind Energy Ordinance allows small wind turbines projects without discretionary review if they meet the zoning verification requirements. Small wind turbine projects could impact state or federally protected wetlands if they installed in or near state or federally protected wetlands. However, small wind turbine projects would be required to obtain necessary approval from federal, state, and local agencies regarding wetland protection prior to project activities, including but not limited to a Section 404 permit, a Section 401 Water Quality certification, and a Lake and Streambed Alteration Agreement. With compliance with applicable policies from the General Plan (Policies COS-3.1 and COS-3.2) and 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); compliance with existing local, state, and federal regulations that protect sensitive habitats; and completion of subsequent project-level planning and environmental review, potential direct and indirect impacts on state or federally protected wetlands would be reduced to a less-than-significant level.

Built Environment and Transportation Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update built environment and transportation measures and associated implementing actions could result in construction and operation of electrification improvements, electric vehicle

infrastructure, and infrastructure to support bikes and pedestrians. Specific locations for projects associated with implementation of the CAP Update have not been identified. Implementation of the built environment and transportation measures could result in degradation or removal of state or federally protected wetlands. Depending on the locations of construction activities and project operations, these measures could result in direct and indirect disturbances or loss of state or federally protected wetlands through ground disturbance or conversion of habitat.

Future projects that result from implementation of the CAP Update would be required to comply with federal, state, and local regulations pertaining to wetlands protections, including but not limited to, obtaining a Section 404 permit and Section 401 Water Quality certification prior to discharging pollutants or fill materials in waters of the United States, obtaining CDFW's approval via a Lake and Streambed Alteration Agreement prior to altering a riparian area supported by a lake, river, or stream, including state or federally protected wetlands, and complying with regional Basin Plans which regulate water quality impacts on all wetlands. With compliance with applicable policies from the General Plan (Policies COS-3.1 and COS-3.2) and 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); compliance with existing local, state, and federal regulations that protect sensitive habitats; and completion of subsequent project-level planning and environmental review, potential direct and indirect impacts on state or federally protected wetlands would be reduced to a less-than-significant level.

Summary

All future development projects would be required to comply with federal, state, and location regulations regarding the protection of state or federal wetlands and to follow County development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to the protection of sensitive biological resources.

The 2011 GPU PEIR concluded that implementation of relevant mitigation measures and plan policies would reduce impacts to federally protected wetlands to a less-than-significant level. Implementation of the CAP Update would not result in a new or substantial increase in magnitude of impacts on any riparian habitat or other sensitive natural community compared to the 2011 GPU PEIR. With implementation of applicable policies from the General Plan (Policies COS-3.1 and COS-3.2) and 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); with compliance with existing local, state, and federal regulations that protect sensitive habitats; and with completion of subsequent project-level planning and environmental review, direct and indirect impacts on state or federally protected wetlands resulting from implementation of the project would remain less than significant after mitigation, consistent with the conclusion of the 2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.4.3.6 Issue 4: Wildlife Movement Corridors and Nursery Sites

This section describes potential impacts on wildlife movement corridors and nursery sites because of implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, the project could result in a significant adverse effect related to biological resources if it would:

- interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts on wildlife movement corridors and nursery sites, including effects of new development proposed under the General Plan. The 2011 GPU PEIR determined that new development would result in potentially significant direct (e.g., development resulting in blockage of a corridor, removal of nursery habitat), indirect (e.g., noise, nighttime lighting), and cumulative impacts on wildlife movement corridors or nursery sites. The discussion of impacts can be found in Section 2.4, "Biological Resources" (pages 2.4-28 through 2.4-31, 2.4-36, and 2.4-42 through 2.4-43), of the 2011 GPU PEIR and is hereby incorporated by reference. Although these impacts would be reduced with implementation of the General Plan policies and 2011 GPU PEIR mitigation measures, and compliance with applicable regulations, they were determined to remain significant and unavoidable. Specific policies and mitigation measures related to the protection of biological resources are listed above under Section 2.4.2, "Regulatory Framework."

CAP Update Impact Analysis

Direct impacts on wildlife movement corridors generally occur from blockage or interference with the connectivity between blocks of habitat, a decrease in the width of a corridor or linkage that constrains movement, or the loss of visual continuity within a linkage or corridor. Depending on the locations of new facilities, construction activities and project operations associated with these measures could result in the conversion and fragmentation of habitat, and blockage of important movement corridors. The following section describes the potentially significant impacts on wildlife corridors and nursery sites that could result from the implementation of the proposed CAP Update measures and actions.

Solid Waste Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update solid waste measures and actions could result in construction and operation of new or expanded solid

waste facilities. New or expanded solid waste facilities in rural areas of the county may impact wildlife corridors, habitat linkages, and native wildlife nursery sites if these resources are present. Habitat corridors and linkages may be present in the northern and eastern portions of the unincorporated county, and these may be disrupted if construction results in increased encroachment or fragmentation of these areas, or if construction introduces noise levels or lighting which discourages wildlife use. Nursery sites are located throughout the unincorporated county, and direct impacts to nursery sites may include removal of habitat for development and infrastructure. Implementation of General Plan Policies COS-1.1 through COS-1.5 would protect wildlife movement corridors and nursery sites by establishing preserve systems (including wildlife corridor areas), prohibiting private development on established preserves, requiring monitoring and maintenance of preserves, and requiring cross-jurisdictional collaboration and funding for resource management goals. Additionally, Policies LU-6.1 and LU-6.7 would support the protection of critical and sensitive resources, including wildlife corridors, through land management policies. Implementation of 2011 GPU PEIR Mitigation Measures Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3 would also minimize the impacts to wildlife corridors and nursery sites as a result of infrastructure required to implement the CAP Update solid waste measures and actions. Impacts would be less than significant.

Water and Wastewater Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update water and wastewater Measures W-1 through W-3 and actions could result in installation of new or replaced ancillary structures (e.g., water efficient appliances, irrigation systems, and stormwater and wastewater treatment systems) within exiting development or developed areas. The potential ancillary structures would be installed indoors or within existing or proposed developments. Due to the nature of the proposed improvements (e.g., small size and within existing and proposed development), it is unlikely that these improvements would narrow or remove existing wildlife corridors or native wildlife nursery sites. With compliance with applicable policies from the General Plan (Policies COS-1.1 through COS-1.5) and 2011 GPU PEIR mitigation measures (Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3); compliance with existing local, state, and federal regulations that protect sensitive habitats; and completion of subsequent project-level planning and environmental review, potential direct and indirect impacts on wildlife movement corridors and nursery sites would be reduced to a less-than-significant level.

Agriculture and Conservation Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update agriculture and conservation Measures A-1 through A-2 and actions could result in preservation of conservation, natural, and agricultural lands, protection of trees, and development of programs to incentivize carbon farming and transition to clean fuels. Implementation of these measures and associated implementing actions would reduce development pressure on vacant and undeveloped lands and conserve natural lands including wildlife corridors, habitat linkages, and native wildlife nursery site.

Implementation of Action A-4.1.b would result in evaluation of opportunities to increase affordable farmworker housing in the unincorporated county. New or affordable farmworker housing in rural areas of the county would impact wildlife corridors, habitat linkages, and native wildlife nursery sites if farmworker housing construction results in the temporary or permanent disruption, disturbance, or removal of wildlife corridors, habitat linkages, and nursery sites. Habitat corridors and linkages may be present in the northern and eastern portions of the unincorporated county, and these may be disrupted if construction results in increased encroachment or fragmentation of these areas, or if construction introduces noise levels or lighting which discourages wildlife use. Nursery sites are located throughout the unincorporated county, and direct impacts to nursery sites may include removal of habitat for development and infrastructure.

If development of new farmworker housing results from opportunities identified through implementation of this action, such development would be required to comply with General Plan Policies COS-1.1 through COS-1.5. These would protect wildlife movement corridors and nursery sites by establishing preserve systems including wildlife corridor areas, prohibiting private development on established preserves, requiring monitoring and maintenance of preserves, and requiring cross-jurisdictional collaboration and funding for resource management goals. Additionally, Policies LU-6.1 and LU-6.7 would support the protection of critical and sensitive resources including wildlife corridors through land management policies. 2011 GPU PEIR Mitigation Measures Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3 would also reduce impacts to wildlife corridors and nursery sites as a result of infrastructure required to address the CAP Update solid waste measures and actions.

With compliance with applicable policies from the General Plan (Policies COS-1.1 through COS-1.5) and 2011 GPU PEIR mitigation measures (Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3); compliance with existing local, state, and federal regulations that protect sensitive habitats; and completion of subsequent project-level planning and environmental review, potential direct and indirect impacts on wildlife movement corridors and nursery sites would be reduced to a less-than-significant level.

Energy Measures and Actions

As discussed in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update Measure E-3, Action E-3.2, and Action E-3.3 could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. Potential retrofits could include rooftop or ground-mounted PV solar arrays, upgraded mechanical systems, and other similar improvements. Implementation of Action E-3.3 also could result in the construction of large-scale renewable energy generation projects including PV or concentrated solar power and/or wind turbines.

Requirements for new energy generation development would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small-scale solar and small-scale wind turbines (roof- or ground-mounted systems) and energy storage systems. Large-scale renewable energy infrastructure would generally be constructed in primarily undeveloped locations that are

productive for generating renewable energy source. As a result, it is likely that the locations of such renewable energy projects could disrupt some wildlife corridors and disturb some nursery sites. Large-scale energy generation systems could result in impacts to wildlife corridors and nursery sites because of the scale of the facilities which can require large swaths of land and the possible need for access roadways and transmission lines which result in long linear improvements that could result in a physical deterrent to wildlife corridors. Small-scale renewable energy systems would likely be constructed in developed residential areas of the county but could still result in ground disturbance or disruption of habitat because renewable systems can be installed without a discretionary permit if criteria within the Zoning Ordinance are met.

The 2012 Wind Energy EIR evaluated impacts to nursery corridors related to the development of small- and large-scale wind turbine facilities on pages 2.4-36 and 2.4-37 (County of San Diego 2012). Consistent with the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Biological Resources* (County of San Diego 2010), a Biological Resources Report would be required for discretionary projects and must analyze the potential effects of projects on wildlife movement, corridors, and nursery sites, including the application of maximum feasible mitigation. As described on page 2.4-37 of the 2012 Wind Energy EIR, discretionary projects constructed within the County's adopted South County MSCP are required to maintain corridors and linkages. However, the County's Zoning Ordinance allows for the development of small wind turbines without discretionary review if the project meets established criteria. Because these projects would be processed through a ministerial review process, it is possible for small wind turbines to have adverse impacts on wildlife corridors. The EIR concluded that Mitigation Measures M-Bio-1 and M-Bio-2 would minimize impacts related to large-scale wind turbine projects but found mitigation that would require the County to prepare MSCP plans for North and East County to be infeasible because of the uncertainty of their timing.

Therefore, even though all large-scale wind turbine projects would be subject to discretionary review and required to obtain a MUP, and implement measures to minimize impacts to wildlife corridors, there remains potential for large-scale wind turbine projects to result in direct impacts to wildlife movement and nurseries because of the introduction of new structures or vertical elements, and indirect effects may occur from increased noise levels or nighttime lighting that would discourage movement within corridors or linkages. Nursery sites are located throughout the county and include areas that provide the resources necessary for reproduction of a species, including foraging habitat, breeding habitat, and water sources. Determining whether a specific area is a nursery site requires field surveys, which would be evaluated at the project level during discretionary review. Therefore, direct impacts to nursery sites from implementation of the large wind turbine projects would occur if habitat were removed for development and infrastructure. Indirect impacts to nursery sites would have the potential to result from noise, lighting, changes in drainage patterns, and introduction of pests or domestic animals (pages 2.4-36 to 2.4-37 of the Wind Energy EIR).

Small-scale renewable energy systems would likely be constructed in developed residential areas of the county but could still result in ground disturbance or disruption of

habitat if they are installed in areas where wildlife movement corridors or nurseries are present. Future large-scale solar projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to nursery sites and wildlife movement corridors to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. All large-scale renewable energy development projects would be required to follow County development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to protection of wildlife corridors and sensitive habitat that may contain nursery sites. Furthermore, as described in Section 2.4.2, "Regulatory Framework," several federal, state, and local regulations and policies are in place to protect sensitive biological resources in the county.

The 2012 Wind Energy EIR evaluated impacts on nursery corridors related to the development of small- and large-scale wind turbine facilities on pages 2.4-36 to 2.4-37 (County of San Diego 2012), and states that potential habitat linkages and corridors will be formally designated and protected once the County completes preparation of the MSCP plans in the north and east portions of the unincorporated county. However, protections will not be implemented until the MSCP is finalized. With compliance with applicable policies from the General Plan (Policies COS-1.1 through COS-1.5) and 2011 GPU PEIR mitigation measures (Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3); compliance with existing local, state, and federal regulations that protect sensitive habitats; and completion of subsequent project-level planning and environmental review, potential direct and indirect impacts on wildlife movement corridors and nursery sites would be minimized. However, implementation of small-and large-scale renewable energy facilities could still adversely affect wildlife corridors and nursery sites because of the ability to install small systems without a discretionary permit, and because of the large swaths of land that would be required for large-scale wind and solar development. The potential disruption or loss of habitat would result in a potentially significant impact.

Built Environment and Transportation Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update built environment and transportation measures and associated implementing actions could result in construction and operation of electrification improvements, electric vehicle infrastructure, and infrastructure to support bikes and pedestrians. Specific locations for such improvements have not been identified. However, because of the nature and scale of the type of improvements that would result from implementation of these measures, it is anticipated that the improvements (e.g., pedestrian improvements, electric vehicle infrastructure) would occur in existing rights-of-way or other developed areas that support existing residents and would not result in disruption to corridors or nursery sites. With compliance with applicable policies from the General Plan (Policies COS-1.1 through COS-1.5) and 2011 GPU PEIR mitigation measures (Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3); compliance with existing local, state, and federal regulations that protect sensitive habitats; and completion of subsequent project-level planning and environmental review, potential direct and indirect impacts on wildlife movement corridors and nursery sites would be reduced to a less-than-significant level.

Summary

Most of the measures and action would result in some level of construction and physical disturbance of the land. This analysis assumes that implementation of these projects would result in construction activities that could include: the use of heavy equipment for earthmoving, materials processing, or compost spreading; vehicle trips during construction/equipment replacement/monitoring activities; possible changes in landform and views; and installation or upgrades of mechanical equipment or facilities. Construction activities and project operations associated with these measures could result in direct and indirect disturbances to wildlife corridors and nurseries through ground disturbance, or conversion of habitat. Depending on the location of these projects, construction could result in erosion, direct removal of habitat, or water quality issues. Implementation of the relevant General Plan policies (Policies COS-1.1 through COS-1.5) and 2011 GPU PEIR mitigation measures (Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3) listed above would reduce potential impacts on wildlife movement corridors and nursery sites because it would require the preservation of intact or sensitive natural resources and require projects to design contiguous open space area.

While all future development projects would be required to follow County development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to protection of sensitive biological resources, construction of projects associated with CAP Update Actions E-3.2, E-3.3,T-4.1, and T-5.1 could still result in potential direct and indirect impacts on wildlife movement corridors and nursery sites. Regional conservation plans do not cover all areas of the unincorporated county; therefore, development could occur outside areas where protections are in place. The 2011 GPU PEIR concluded that implementation of the General Plan would have the potential to adversely impact wildlife movement corridors and nursery sites. The potential impact to wildlife movement corridors and nursery sites would remain significant, consistent with the 2011 GPU PEIR**.** Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.4.3.7 Issue 5: Conflict with Local Policies or Ordinances

This section describes potential impacts related to inconsistency with local policies or ordinances because of implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, the project could result in a significant adverse effect related to biological resources if it would:

- conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated consistency of planned new development under the General Plan with local policies and ordinances. The discussion of impacts can be found in Section 2.4, "Biological Resources" (pages 2.4-31, 2.4-32, and 2.4-36), of the 2011 GPU PEIR and is hereby incorporated by reference.

Future projects that result from implementation of the General Plan would be required to comply with all applicable local policies and ordinances. There are regulatory processes in place to ensure compliance that would not be impacted by the General Plan. Implementation of the General Plan would result in less-than-significant impacts related to potential conflict with local policies and ordinances, because future projects proposed under the General Plan would be required to comply with applicable local policies and ordinances. Specific policies and mitigation measures related to the protection of biological resources are listed above under Section 2.4.2, "Regulatory Framework."

CAP Update Impact Analysis

Solid Waste Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update solid waste measures and actions could result in construction and operation of new or expanded solid waste facilities. Construction and operation of all new or expanded solid waste facilities would be required to comply with all applicable federal, state, and local regulations and policies pertaining to biological resources listed in Section 2.4.2, "Regulatory Framework," including tree preservation policy or ordinance if tree removal would be required. In addition, the General Plan Policy COS-1.2 would prohibit development in established habitat preserves; Policy COS-1.3 requires the monitoring, management, and maintenance of a regional preserve system; and Policy COS-1.9 serves to minimize invasive plants near preserves and promotes the removal of invasive species within biological preserves. Therefore, implementation of CAP Update solid waste measures and associated implementing actions would not result in conflict with any local policies or ordinances protecting biological resources. There would be a less-than-significant impact.

Water and Wastewater Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update water and wastewater Measures W-1 through W-3 and actions could result in installation of new or replaced ancillary structures (e.g., water efficient appliances, irrigation systems, and stormwater and wastewater treatment systems) within exiting development or developed areas. Similar to development of new or expanded solid waste facilities, installation of new or replaced ancillary structures would be required to comply with all applicable federal, state, and local regulations and policies pertaining to biological resources listed in Section 2.4.2, "Regulatory Framework," including tree preservation policies and ordinances. In addition, General Plan Policy COS-1.2 would prohibit development in established habitat preserves; Policy COS-1.3 requires the monitoring, management, and

maintenance of a regional preserve system; and Policy COS-1.9 serves to minimize invasive plants near preserves and promotes the removal of invasive species within biological preserves. Therefore, implementing CAP Update water and wastewater measures and actions would not result in conflict with any local policies or ordinances protecting biological resources. There would be a less-than-significant impact.

Agriculture and Conservation Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update agriculture and conservation Measures A-1 through A-2 and actions could result in preservation of conservation, natural, and agricultural lands, protection of trees, and development of programs to incentivize carbon farming and transition to clean fuels. Implementing these measures would reduce development pressure on vacant and undeveloped land, conserve natural lands, and protect trees, which would result in benefit impacts related to biological resources protection.

Implementation of Action A-4.1.b would result in evaluation of opportunities to increase affordable farmworker housing in the unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified. Development of farmworker housing would be required to comply with all applicable federal, state, and local regulations and policies pertaining to biological resources listed in Section 2.4.2, “Regulatory Framework,” including tree preservation policy or ordinance. In addition, General Plan Policy COS-1.2 would prohibit development in established habitat preserves; Policy COS-1.3 requires the monitoring, management, and maintenance of a regional preserve system; and Policy COS-1.9 serves to minimize invasive plants near preserves and promotes the removal of invasive species within biological preserves. Therefore, implementing CAP Update agriculture and conservation measures and actions would not result in conflict with any local policies or ordinances protecting biological resources. There would be a less-than-significant impact.

Energy Measures and Actions

As discussed in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update Measure E-3, Action E-3.2, and Action E-3.3 could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. Potential retrofits could include rooftop or ground-mounted PV solar arrays, large or small wind turbines, energy storage systems, upgraded mechanical systems, and other similar improvements. Similar to development of new or expanded solid waste facilities, future energy retrofits improvements would be required to comply with all applicable federal, state, and local regulations and policies pertaining to biological resources listed in Section 2.4.2, “Regulatory Framework,” including tree preservation policy or ordinance. In addition, General Plan Policy COS-1.2 would prohibit development in established habitat preserves; Policy COS-1.3 requires the monitoring, management, and maintenance of a regional preserve system; and Policy COS-1.9 serves to minimize invasive plants near preserves and promotes the removal of invasive species within biological preserves. Therefore, implementing CAP Update energy measures and actions would not result in conflict with

any local policies or ordinances protecting biological resources. There would be a less-than-significant impact.

Built Environment and Transportation Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update built environment and transportation measures and associated implementing actions could result in construction and operation of electrification improvements, electric vehicle infrastructure, and infrastructure to support bikes and pedestrians. Specific locations for projects associated with implementation of the CAP Update have not been identified. Similar to development of new or expanded solid waste facilities, future transportation infrastructure projects would be required to comply with all applicable federal, state, and local regulations and policies pertaining to biological resources listed in Section 2.4.2, "Regulatory Framework," including tree preservation policy or ordinance. In addition, General Plan Policy COS-1.2 would prohibit development in established habitat preserves; Policy COS-1.3 requires the monitoring, management, and maintenance of a regional preserve system; and Policy COS-1.9 serves to minimize invasive plants near preserves and promotes the removal of invasive species within biological preserves. Therefore, implementing CAP Update built environment and transportation measures and associated implementing actions would not result in conflict with any local policies or ordinances protecting biological resources. There would be a less-than-significant impact.

Summary

All CAP Update measures and associated implementing actions that would require construction and operation of new facilities/structure would be required to comply with local policies and ordinances established to protect biological resources. As described in Section 2.4.2, "Regulatory Framework," several federal, state, and local regulations and policies are in place to protect biological resources in the county. All future development projects 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.

The 2011 GPU PEIR concluded that implementation of the 2011 GPU PEIR would result in a less-than-significant impact to local policies and ordinances. Consistent with the 2011 GPU PEIR, implementation of the solid waste, water and wastewater, agriculture and conservation, energy and built environment and transportation measures and actions associated with the CAP Update would result in less-than-significant impacts related to conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.4.3.8 Issue 6: Conflict with Adopted Habitat Conservation Plans and Natural Community Conservation Plans

This section describes potential impacts related to inconsistencies with local HCPs or NCCPs because of implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, the project could result in a significant adverse effect related to biological resources if it would:

- conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated consistency of planned new development under the General Plan with the applicable HCPs and NCCPs for the County. The discussion of impacts can be found in Section 2.4, "Biological Resources" (pages 2.4-33, 2.4-34, and 2.4-37), of the 2011 GPU PEIR and is hereby incorporated by reference. Implementation of the General Plan would result in less-than-significant impact related to potential conflict with applicable HCPs and NCCPs, because future projects proposed under the General Plan would be required to comply with applicable HCPs and NCCPs.

CAP Update Impact Analysis

Solid Waste Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update solid waste measures and actions could result in construction and operation of new or expanded solid waste facilities. Construction and operation of all new or expanded solid waste facilities would be required to comply with all applicable federal, state, and local regulations and policies pertaining to biological resources listed in Section 2.4.2, "Regulatory Framework," including applicable HCP, NCCP, and other approved HCPs. In addition, General Plan Policy COS-1.2 would prohibit development in established habitat preserves; Policy COS-1.3 requires the monitoring, management, and maintenance of a regional preserve system; Policies COS-1.4 and COS-1.5 require collaboration with other jurisdictions to achieve resource preservation and management goals; Policies COS-1.6 through COS-1.8 facilitate preserve assembly and funding; Policy COS-1.9 serves to minimize invasive plants near preserves and promotes the removal of invasive species within biological preserves; and Policy COS-1.10 calls for public involvement in the preparation of HCPs and resource management plans. Therefore, implementation of CAP Update solid waste measures and associated implementing actions would not result in conflict with any adopted HCP, NCCP, or other approved local, regional, or state HCP. The impact would be less than significant.

Water and Wastewater Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update water and wastewater Measures W-1 through W-3 and actions could result in installation of new or replaced ancillary structures (e.g., water efficient appliances, irrigation systems, and stormwater and wastewater treatment systems) within exiting development or developed areas. Similar to development of new or expanded solid waste facilities, installation of any new or replaced ancillary structures would be required to comply with applicable HCP, NCCP, and other approved HCPs. In addition, General Plan Policy COS-1.2 would prohibit development in established habitat preserves; Policy COS-1.3 requires the monitoring, management, and maintenance of a regional preserve system; Policies COS-1.4 and COS-1.5 require collaboration with other jurisdictions to achieve resource preservation and management goals; Policies COS-1.6 through COS-1.8 facilitate preserve assembly and funding; Policy COS-1.9 serves to minimize invasive plants near preserves and promotes the removal of invasive species within biological preserves; and Policy COS-1.10 calls for public involvement in the preparation of HCPs and resource management plans. Therefore, implementation of CAP Update water and wastewater measures and associated implementing actions would not result in conflict with any adopted HCP, NCCP, or other approved local, regional, or state HCP. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update agriculture and conservation Measures A-1 through A-2 and actions could result in preservation of conservation, natural, and agricultural lands, protection of trees, and development of programs to incentivize carbon farming and transition to clean fuels. Implementation of these measures would reduce development pressure on vacant and undeveloped land and conserve natural lands, which would result in beneficial impacts to habitat preservation and conservation.

Implementation of Action A-4.1.b would result in evaluation of opportunities to increase affordable farmworker housing in the unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified. Development of farmworker housing would be required to comply with applicable HCP, NCCP, and other approved HCPs, which may require avoidance or mitigation of sensitive biological resources during design or construction activities. In addition, General Plan Policy COS-1.2 would prohibit development in established habitat preserves; Policy COS-1.3 requires the monitoring, management, and maintenance of a regional preserve system; Policies COS-1.4 and COS-1.5 require collaboration with other jurisdictions to achieve resource preservation and management goals; Policies COS-1.6 through COS-1.8 facilitate preserve assembly and funding; Policy COS-1.9 serves to minimize invasive plants near preserves and promotes the removal of invasive species within biological preserves; and Policy COS-1.10 calls for public involvement in the preparation of HCPs and resource management plans. Therefore, implementation of CAP Update agriculture and conservation measures and associated implementing actions would not result in conflict with any adopted HCP, NCCP, or other approved local, regional, or state HCP. The impact would be less than significant.

Energy Measures and Actions

As discussed in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update Measure E-3, Action E-3.2, and Action E-3.3 could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. Potential retrofits could include rooftop or ground-mounted PV solar arrays, large or small wind turbines, upgraded mechanical systems, and other similar improvements. Similar to development of new or expanded solid waste facilities, energy retrofit improvements would be required to comply with applicable HCP, NCCP, and other approved HCPs. In addition, General Plan Policy COS-1.2 would prohibit development in established habitat preserves; Policy COS-1.3 requires the monitoring, management, and maintenance of a regional preserve system; Policies COS-1.4 and COS-1.5 require collaboration with other jurisdictions to achieve resource preservation and management goals; Policies COS-1.6 through COS-1.8 facilitate preserve assembly and funding; Policy COS-1.9 serves to minimize invasive plants near preserves and promotes the removal of invasive species within biological preserves; and Policy COS-1.10 calls for public involvement in the preparation of HCPs and resource management plans. Therefore, implementation of CAP Update energy measures and associated implementing actions would not result in conflict with any adopted HCP, NCCP, or other approved local, regional, or state HCP. The impact would be less than significant.

Built Environment and Transportation Measures and Actions

As described in Sections 2.4.3.3 and 2.4.3.4, implementation of CAP Update built environment and transportation measures and associated implementing actions could result in construction and operation of electrification improvements, electric vehicle infrastructure, and infrastructure to support bikes and pedestrians. Specific locations for projects associated with implementation of the CAP Update have not been identified. However, similar to development of new or expanded solid waste facilities, future transportation infrastructure improvement projects would be required to comply with applicable HCP, NCCP, and other approved HCPs. In addition, General Plan Policy COS-1.2 would prohibit development in established habitat preserves; Policy COS-1.3 requires the monitoring, management, and maintenance of a regional preserve system; Policies COS-1.4 and COS-1.5 require collaboration with other jurisdictions to achieve resource preservation and management goals; Policies COS-1.6 through COS-1.8 facilitate preserve assembly and funding; Policy COS-1.9 serves to minimize invasive plants near preserves and promotes the removal of invasive species within biological preserves; and Policy COS-1.10 calls for public involvement in the preparation of HCPs and resource management plans. Therefore, implementation of CAP Update water and wastewater measures and associated implementing actions would not result in conflict with any adopted HCP, NCCP, or other approved local, regional, or state HCP. The impact would be less than significant.

Summary

All CAP Update measures and associated implementing actions that would require construction and operation of new facilities/structures would be required to comply with

adopted HCPs and NCCPs. As described in Section 2.4.2, "Regulatory Framework," future development projects located within the county would be required to comply with applicable HCP/NCCP requirements promulgated by local, state, and/or federal agencies to proceed with development. Implementation of General Plan Policies COS-1.2, COS-1.3, COS-1.4, COS-1.5, COS-1.6, COS-1.7, COS-1.8, COS-1.9, and COS-1.10 will further ensure that CAP Update projects do not conflict with any HCP or NCCP.

The 2011 GPU PEIR concluded that implementation of the 2011 GPU PEIR would result in a less-than-significant impact to HCPs and NCCPs. Consistent with the 2011 GPU PEIR, implementation of the solid waste, water and wastewater, agriculture and conservation, energy and built environment and transportation measures and actions associated with the CAP Update would result in less-than-significant impacts related to conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.4.3.9 Cumulative Impact Analysis

The geographic scope of the cumulative impact analysis for biological resources is the San Diego region, and includes the unincorporated and incorporated county, as well as surrounding counties. The analysis utilizes the same cumulative study area for biological resources as the 2011 GPU PEIR (see page 2.4-34 of the 2011 GPU PEIR). The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Special-Status Plant and Wildlife Species

Cumulative development in the San Diego region has the potential to result in impacts to special status plant and wildlife species, including loss of habitat. Adjacent jurisdictions, including incorporated cities, adjacent counties, tribal governments, and federal and State-managed lands would be required to comply with applicable federal and/or State regulations that provide protections for special status plant and wildlife species such as the Federal ESA, the CESA, and the California NCCP Act. In addition, some projects that affect special status species require approval from the USFWS and the CDFW. Conversion of undeveloped areas to other uses is anticipated in regional planning documents. This may result in loss of habitat or edge effects that would affect special status plant and wildlife species, resulting in a cumulative effect on the resources.

The 2011 GPU PEIR concluded that although cumulative impacts on special-status species resulting from the build-out associated with the General Plan would be reduced with implementation of the General Plan 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 Bio-1.1, Bio-1.5, and Bio-1.6; however, the impact would remain potentially significant. With implementation of these measures, and compliance with applicable state and federal regulations, the cumulative impact on special-status species would be significant and unavoidable.

Implementation of CAP Update measures and actions that result in new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, wind turbines, and transportation infrastructure improvements, that could result in new development and construction and operational impacts would result in potentially significant impacts, as described above in Section 2.4.3.3, "Issue 1: Special-Status Plant and Wildlife Species." Projects would be required to be consistent with the General Plan policies and 2011 GPU PEIR mitigation measures identified above, as well as comply with existing federal, state, and local regulations that protect sensitive resources. 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.

Therefore, implementation of the CAP Update would result in a considerable contribution to a significant cumulative effect. The cumulative impact would be significant, 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.

Issue 2: Riparian Habitat and Other Sensitive Natural Communities

Cumulative development in the San Diego region could result in impacts to riparian habitat and other sensitive natural communities through direct and indirect loss or degradation. Adjacent jurisdictions, including incorporated cities, adjacent counties, and federal and State-managed lands, would be required to comply with applicable federal and/or State regulations such as the California Lake and Streambed Alteration Program or the California NCCP Act. These programs provide protections for riparian and other sensitive habitats. In addition, many projects that affect riparian or other protected habitat types require approval from the USFWS and the CDFW. Nonetheless, a cumulative effect on sensitive natural communities is anticipated from growth projected to occur in the region.

The 2011 GPU PEIR concluded that although cumulative impacts on riparian habitat and other sensitive natural communities resulting from the build-out associated with the General Plan would be reduced with implementation of the General Plan policies (Policies COS-1.1, COS-1.2, COS-1.3, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-2.1, COS-2.2, COS-3.1, and COS-3.2), and 2011 GPU PEIR mitigation measures (Bio-2.1, Bio-2.2, Bio-2.3, Bio-2.4), and compliance with applicable state and federal regulations, cumulative impacts on riparian habitat and other sensitive natural communities would remain significant and unavoidable because the General Plan would allow for development outside of adopted regional conservation plan areas.

Implementation of CAP Update measures and actions that result in new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, wind turbines, and transportation infrastructure improvements, that could result in new development and construction and operational impacts would result in potentially significant impacts, as described above in Section 2.4.3.4, "Issue 2: Riparian Habitat and Other Sensitive Natural Communities." Projects would be required to be consistent with the General Plan policies and 2011 GPU PEIR mitigation measures identified above, as well as comply with existing

federal, state, and local regulations that protect sensitive resources. 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.

Therefore, implementation of the CAP Update 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. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Issue 3: State and Federally Protected Wetlands

Adjacent jurisdictions, including incorporated cities, adjacent counties, tribal lands, and federal and State-managed lands, would be required to comply with applicable federal regulations such as Section 401 and 404 of the CWA. Existing regulations would ensure that a significant cumulative impact associated with federally protected wetlands would not occur. As a result, development in the region would not generate a cumulative effect on the state and federally protected wetlands.

The 2011 GPU PEIR concluded that cumulative impacts on state or federally protected wetlands associated with buildout of the General Plan would be reduced with implementation of the applicable policies from the General Plan (Policies COS-3.1 and COS-3.2) and 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 compliance with applicable state and federal regulations. The General Plan policies, 2011 GPU PEIR mitigation measures, and state and federal regulations would collectively require each individual project to avoid wetland areas. In addition, the 2011 GPU PEIR Mitigation Measure Bio-1.6 requires protection of wetlands through implementation of the County RPO, which defines wetlands more broadly than the federal definition. The County RPO requires a standard of no net loss for impacts on wetlands and a 3:1 mitigation ratio for impacts on wetlands, which meets or exceeds requirements for impacts on state protected wetlands. Implementation of the CAP Update would not result in a new or substantial increase in magnitude of impacts on any wetland habitat, and each individual project implemented under the plan would meet these high standards.

The project's direct and indirect effects to state or federally protected wetlands would remain less than significant; therefore, the project would not result in a new significant cumulative impact on state or federally protected wetlands. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Issue 4: Wildlife Movement Corridors and Nursery Sites

Regional projects implemented to accommodate projected growth, including transportation improvements, could affect wildlife movement corridors and nursery sites. Adjacent jurisdictions, including incorporated cities, adjacent counties, and federal and State-managed lands would be required to comply with applicable federal and/or State regulations such as the California NCCP Act. Because there is still a potential for a

combined effect on wildlife movement corridors and nursery sites, cumulative development in the San Diego region is anticipated to result in a cumulative effect on these resources.

As described in the 2011 GPU PEIR, cumulative impacts on wildlife movement corridors and nursery sites were determined to be significant and unavoidable with implementation of relevant General Plan policies (Policies COS-1.1 through COS-1.5) and 2011 GPU PEIR mitigation measures (Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3), compliance with existing local, state, and federal regulations that protect sensitive habitats; and completion of subsequent project-level planning and environmental review. Impacts were identified because the General Plan would allow land uses and development to occur in areas outside of an adopted regional conservation plan, thereby resulting in direct, indirect, and cumulative impacts on corridors, linkages, and nursery sites.

Implementation of CAP Update measures and actions that result in new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, wind turbines, and transportation infrastructure improvements, that could result in new development and construction and operational impacts would result in potentially significant impacts, as described above. Projects would be required to be consistent with the General Plan policies and 2011 GPU PEIR mitigation measures identified above, as well as comply with existing federal, state, and local regulations that protect sensitive resources. However, because the exact location and nature of future projects associated with the CAP Update are unknown, the potential for a contribution to a cumulatively significant impact remains.

Therefore, implementation of the CAP Update would result in a considerable contribution to a significant cumulative effect. The cumulative impact would be significant, 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.

Issue 5: Conflict with Local Policies or Ordinances

Projects under the County's jurisdiction are required to comply with applicable local policies and ordinances, such as the MSCP Plan or the Southern California Coastal Sage Scrub NCCP Process Guidelines, in order for such projects to be approved. However, it cannot be determined with certainty that regional projects in other jurisdictions would conform to applicable local ordinances. Therefore, cumulative development in the San Diego region is anticipated to result in a cumulative effect.

The 2011 GPU PEIR concluded that the General Plan would have the potential to conflict with one or more local policies or ordinances and would therefore contribute to a significant cumulative impact. All future development projects under County oversight 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.

Most projects associated with implementation of the CAP Update (e.g., irrigation and stormwater systems upgrades and transportation infrastructure improvements) would be undertaken by the County. These projects would be required to comply with all local policies and ordinances. In limited cases, the CAP Update has potential to indirectly result in infrastructure upgrades that are outside the County's jurisdiction (e.g., powerline upgrades to support increased demand for renewable energy and transportation improvements initiated by the State). There is a limited potential for these projects to conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, in a manner that results in a cumulatively significant effect on biological resources. Further, as described in Section 2.11, "Land Use and Planning," implementation of the project would result in less-than-significant impacts related to the potential conflict with a plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental impact.

Therefore, the project would not have a considerable contribution to a significant cumulative impact related conflicts with local policies or ordinances protecting biological resources. The impact would be less than significant. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Issue 6: Conflict with Adopted Habitat Conservation Plans and Natural Community Conservation Plans

Cumulative development in the San Diego region is required to comply with applicable HCPs or NCCPs, such as the San Diego MSCP or the Southern California Coastal Sage Scrub NCCP. However, it cannot be determined with certainty that regional projects in other jurisdictions would take steps to prevent conflicts with federal and State HCP and NCCP agreements. Therefore, cumulative development in the San Diego region is anticipated to result in a cumulative effect.

Because of the lack of certainty that regional projects would prevent conflicts with existing HCP and NCCP agreements, implementation of the CAP Update measures and supporting efforts may potentially result in conflicts with applicable HCPs and NCCPs. As described in Section 2.4.2, "Regulatory Framework," future development projects located within the county would be required to comply with applicable HCP/NCCP requirements promulgated by local, state, and/or federal agencies to proceed with development.

Therefore, the project would not have a considerable contribution to a significant cumulative impact. The impact would remain less than significant. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.4.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would not result in new or more severe significant impacts on special-status plant and wildlife species; riparian habitat and other sensitive

natural communities, state and federally protected wetlands, wildlife movement corridors and nursery sites; potential for conflict with local policies and ordinances, or conflict with HCPs and NCCPs.

2.4.5 Mitigation Measures

2.4.5.1 Issue 1: Special-Status Plant and Wildlife Species

The mitigation measures applicable to biological resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Bio-1.5: Utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources. Also, utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special-status species populations on or near project sites. This information will be used to avoid or mitigate impacts as appropriate.
>
> Adopted Mitigation Measure Bio-1.6: Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species.
>
> Adopted Mitigation Measure Bio-1.7: Minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance.
>
> Adopted Mitigation Measure Bio-2.1: Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development.

The 2012 Wind Energy Ordinance EIR included the following mitigation measures to minimize the potentially significant impacts related to large wind turbine projects:

> Adopted Mitigation Measure M-Bio-1: During the environmental review process for future MUPs for wind turbines, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts on biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise.

> Adopted Mitigation Measure M-Bio-2: Update the County Guidelines for Determining Significance for Biological Resources to include, or incorporate by reference, recommendations from the California Department of Fish and Game, the Avian Power Line Interaction Committee, the USFWS Draft Guidance, and the California Energy Commission (e.g., California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development). Examples of recommended mitigation measures include: site screening; pre-permitting monitoring; acoustic monitoring; buffer zone inclusion; reduction of foraging resources near turbines; specific lighting to reduce bird collisions; post-construction monitoring; and avian protection plans.

As described in Section 2.4.3.3, additional wind turbine mitigation was considered but rejected as infeasible through the 2012 Wind Energy Ordinance EIR. Mitigation Measures M-Bio-1 and M-Bio-2 shall be incorporated into the Mitigation Monitoring and Reporting Program for the CAP Update SEIR and shall be applied to all large-scale renewable energy projects including but not limited to PV solar infrastructure and wind turbines during the discretionary review process which would occur as a condition of receiving a MUP. As described during the impact analysis, future large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts on special-status species to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. However, because of the uncertainty of the types, locations, and scale of future renewable energy projects, it is not possible to guarantee that all impacts on special-status species would be reduced to a level below significance. To reduce impacts to the greatest extent feasible, Mitigation Measures M-Bio-1 and M-Bio-2 from the 2012 Wind Energy Ordinance EIR have been revised and would be applied to the project as CAP Update Mitigation Measures Bio-1 and Bio-2 to include all large-scale renewable energy projects as follows:

> CAP Update Mitigation Measure Bio-1: During the environmental review process for future MUPs for large-scale renewable energy projects, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts on biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise.

> CAP Update Mitigation Measure Bio-2: Update the County Guidelines for Determining Significance for Biological Resources to include, or incorporate by reference, recommendations from the California Department of Fish and Wildlife, the Avian Power Line Interaction Committee, the USFWS Draft Guidance, and the California Energy Commission (e.g., California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development). Examples of recommended mitigation measures include: site screening; pre-permitting monitoring; acoustic monitoring; buffer zone inclusion; reduction of foraging resources near turbines

and transmission lines; specific lighting to reduce bird collisions; post-construction monitoring; and avian protection plans.

2.4.5.2 Issue 2: Riparian Habitat and Other Sensitive Natural Communities

The mitigation measures applicable to biological resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Bio-1.6: Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species.
>
> Adopted Mitigation Measure Bio-1.7: Minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance.
>
> Adopted Mitigation Measure Bio-2.1: Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development.
>
> Adopted Mitigation Measure Bio-2.2: Require that development projects obtain CWA Section 401/404 permits issued by the California Regional Water Quality Control Board and US Army Corps of Engineers for all project-related disturbances of waters of the US and/or associated wetlands. Also, continue to require that projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Game for all project-related disturbances of streambeds.

CAP Update Mitigation Measures Bio-1 and Bio-2 shall be incorporated into the Mitigation Monitoring and Reporting Program for the CAP Update SEIR and shall be applied to all large-scale renewable energy projects including but not limited to PV solar, solar concentrator, and wind turbine systems during the discretionary review process which would occur as a condition of receiving a MUP. As described during the impacts analysis, future, large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to riparian habitat to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. However, because of the uncertainty of the types, locations, and scale of future renewable energy projects, it is not possible to guarantee that all impacts to riparian habitat would be reduced to a level below significance. Additional mitigation that would implement a development cap upon large-scale renewable energy projects was considered but rejected as infeasible because it

may prohibit achievement of the County's GHG emissions reduction target. It is unknown how many numbers and types of renewable large-scale renewable energy facilities would be required to meet the GHG reduction goals of the CAP because the design, siting, and economic feasibility characteristics of the options under consideration vary widely.

No other feasible project-related mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted General Plan policies or mitigation measures is available and could be applied to individual projects under the CAP.

2.4.5.3 Issue 3: State and Federally Protected Wetlands

Project level impacts and contributions to cumulative impacts were determined to be less than significant; therefore, no mitigation measures in addition to the following mitigation measures identified in the 2011 GPU PEIR are required:

> Adopted Mitigation Measure Bio-1.6: Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species.
>
> Adopted Mitigation Measure Bio-1.7: Minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance.
>
> Adopted Mitigation Measure Bio-2.1: Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development.
>
> Adopted Mitigation Measure Bio-2.2: Require that development projects obtain CWA Section 401/404 permits issued by the California Regional Water Quality Control Board and US Army Corps of Engineers for all project-related disturbances of waters of the US and/or associated wetlands. Also, continue to require that projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Game for all project-related disturbances of streambeds.
>
> Adopted Mitigation Measure Bio-2.3: Ensure that wetlands and wetland buffer areas are adequately preserved whenever feasible to maintain biological functions and values.
>
> Adopted Mitigation Measure Bio-2.4: Implement the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands.

No other feasible project-related mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted General Plan policies or mitigation measures is available and could be applied to individual projects under the CAP.

2.4.5.1 Issue 4: Wildlife Movement Corridors and Nursery Sites

The mitigation measures applicable to biological resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Bio-1.6: Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species.
>
> Adopted Mitigation Measure Bio-1.7: Minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance.

Additional mitigation that would implement a development cap upon large-scale renewable energy projects was considered but rejected as infeasible because it may prohibit achievement of the County's GHG emissions reduction target. It is unknown how many numbers and types of renewable large-scale renewable energy facilities would be required to meet the GHG reduction goals of the CAP because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation is available.

Projects that would result in wildlife corridor and nursery site impacts would be required to comply with all local, state, and federal regulations. Additionally, projects that were developed within certain areas of the county would be required to comply with the mitigation requirements of adopted HCPs covering those areas. Where such plans do not exist, the federal and state permitting requirements would apply.

No other feasible project-related mitigation beyond compliance with existing federal and state permitting requirements, the County's adopted General Plan policies, and 2011 GPU PEIR mitigation measures, is available and could be applied to individual projects under the CAP.

2.4.5.2 Issue 5: Local Policies or Ordinances

Project level impacts and contributions to cumulative impacts were determined to be less than significant; therefore, no mitigation measures in addition those identified in the 2011 GPU PEIR are required.

2.4.5.3 Issue 6: Conflict with Adopted Habitat Conservation Plans and Natural Community Conservation Plans

Project level impacts and contributions to cumulative impacts were determined to be less than significant; therefore, no mitigation measures in addition those identified in the 2011 GPU PEIR are required.

2.4.6 Significance Conclusion

2.4.6.1 Issue 1: Special-Status Plant and Wildlife Species

Construction and operation of new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, small wind turbines, transportation infrastructure, and large-scale renewable energy facilities could result in significant direct impacts on special-status plant and wildlife species and sensitive habitat. These impacts would be more severe than those identified in the 2011 GPU PEIR and the 2012 Wind Energy EIR and would be significant. Additionally, when combined with the growth and development within the cumulative study area, the project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs and would be cumulatively considerable. Implementation of General Plan policies identified in Section 2.4.2.3 and 2011 GPU PEIR mitigation measures, in addition to compliance with applicable regulations, would reduce impacts on special-status plant and wildlife species and sensitive habitat, but not below a level of significance for the reasons described above. Therefore, the project would have a **significant and unavoidable impact** and a **considerable contribution** to a significant cumulative impact on special-status plant and wildlife species, consistent with the conclusion in the 2011 GUP PEIR. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.4.6.2 Issue 2: Riparian Habitat and Other Sensitive Natural Communities

Construction and operation of new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, small wind turbines, and transportation infrastructure could result in significant direct impacts on riparian habitat and other sensitive natural communities. These impacts would be more severe than those identified in the 2011 GPU PEIR and the 2012 Wind Energy EIR and would be significant. Where a project would comply with existing regulations and HCP requirements and would receive applicable permits from regulatory agencies, it would reduce its project-specific impacts to a less-than-significant level and would reduce its contribution to cumulative impacts such that it would not be considerable. When combined with the growth and development within the cumulative study area, the project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs and would be cumulatively considerable. Implementation of General Plan policies identified in Section 2.4.2.3 and 2011 GPU PEIR mitigation measures, in addition to compliance with applicable regulations, would reduce

impacts on riparian habitat and other sensitive natural communities but not below a level of significance for the reasons described above. Therefore, the project would have a **significant and unavoidable impact** and a **considerable contribution** to a significant cumulative impact on riparian habitat and other sensitive natural communities, consistent with the conclusion in the 2011 GUP PEIR. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.4.6.3 Issue 3: State and Federally Protected Wetlands

Implementation of the project could have the potential to result in the loss of state or federally protected wetlands. However, for the reasons described above, implementation of General Plan policies identified in Section 2.4.2.3 and 2011 GPU PEIR mitigation measures, in addition to compliance with federal, state, and local regulations, would reduce this project-level impact to **less than significant**. In addition, because cumulative growth and development would also be required to comply with federal, state, and local regulations and mitigate for any loss of wetlands, the project's contribution to cumulative impacts on state or federally protected wetlands and County RPO wetlands would be similar to the contribution identified in the 2011 GPU PEIR and **would not be cumulatively considerable**. There **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.4.6.4 Issue 4: Wildlife Movement Corridors and Nursery Sites

Construction and operation of new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, small wind turbines, transportation infrastructure, and large-scale renewable energy facilities could result in significant direct impacts on wildlife movement corridors and nursery sites. These impacts would be more severe than those identified in the 2011 GPU PEIR and the 2012 Wind Energy EIR and would be significant. Additionally, when combined with the growth and development within the cumulative study area, the project's contribution to this cumulative impact would be more severe than the contribution identified in the prior EIRs and would be cumulatively considerable. Implementation of General Plan policies identified in Section 2.4.2.3 and 2011 GPU PEIR mitigation measures, in addition to compliance with applicable regulations, would reduce impacts on wildlife movement corridors and nursery sites but not below a level of significance for the reasons described above. Therefore, the project would have a **significant and unavoidable impact** and a **considerable contribution** to a significant cumulative impact on wildlife corridors and nursery sites, consistent with the conclusion in the 2011 GUP PEIR. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.4.6.5 Issue 5: Conflict with Local Policies or Ordinances

Implementation of the project would not conflict with any local policies or ordinances that protect biological resources or result in project-level impacts. **Less-than-significant impacts** would occur. Additionally, the project would not contribute to a significant cumulative impact. As such, cumulative impacts **would not be cumulatively**

considerable. The proposed project impacts would be equivalent or less severe than those analyzed by the 2011 GPU PEIR. There **would not be new or more severe impacts**.

2.4.6.6 Issue 6: Conflict with Habitat Conservation Plans and Natural Community Conservation Plans

Implementation of the project would not conflict with any HCPs or NCCPs or result in project-level impacts. Impacts would be **less than significant**. Additionally, the project would not contribute to a significant cumulative impact. As such, cumulative impacts **would not be cumulatively considerable**. The proposed project impacts would be equivalent or less severe than those analyzed by the 2011 GPU PEIR. There **would not be new or more severe impacts**.

Table 2.4-2 Special-Status Plant Species Known to Occur in San Diego County

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Red sand-verbena *Abronia maritima*	–	–	4.2	Coastal dunes. 0–328 feet in elevation. Blooms February–November.
Chaparral sand-verbena *Abronia villosa* var. *aurita*	–	–	1B.1	Sandy areas. 246–5,249 feet in elevation. Blooms January–September.
Shrubby Indian mallow *Abutilon abutiloides*	–	–	2B.1	Rocky, granitic. 2,805–2,953 feet in elevation. Blooms August–November.
San Diego thorn-mint *Acanthomintha ilicifolia*	FT	SE	1B.1	Endemic to active vertisol clay soils of mesas and valleys. Usually on clay lenses within grassland or chaparral communities. 82–3,100 feet in elevation. Blooms April–June.
Pygmy lotus *Acmispon haydonii*	–	–	1B.3	Creosote bush scrub to pinyon-juniper woodland; rocky sites. 591–4,199 feet in elevation. Blooms January–June.
Nuttall's acmispon *Acmispon prostratus*	–	–	1B.1	Sand dunes. 0–59 feet in elevation. Blooms March–June.
California adolphia *Adolphia californica*	–	–	2B.1	Sandy/gravelly to clay soils within grassland, coastal sage scrub, or chaparral; various exposures. 148–2,428 feet in elevation. Blooms December–May.
Shaw's agave *Agave shawii* var. *shawii*	–	–	2B.1	Coastal bluffs and slopes within coastal sage scrub. 33–394 feet in elevation. Blooms September–May.
Yucaipa onion *Allium marvinii*	–	–	1B.2	In openings on clay soils. 2,789–3,510 feet in elevation. Blooms April–May.
Munz's onion *Allium munzii*	FE	ST	1B.1	Clay and mesic soils within chaparral, cismontane woodland, coastal scrub, pinyon and juniper woodland, and valley and foothill grassland. 975-3,510 feet in elevation. Blooms March -May.
Parish's onion *Allium parishii*	–	–	4.3	Rocky sites. 2,953–4,806 feet in elevation. Blooms April–May.
San Diego bur-sage *Ambrosia chenopodiifolia*	–	–	2B.1	Slopes of canyons in open succulent scrub usually with little herbaceous cover. 66–820 feet in elevation. Blooms April–June.
Singlewhorl burrobrush *Ambrosia monogyra*	–	–	2B.2	Sandy soils. 16–1,558 feet in elevation. Blooms August–November.
San Diego ambrosia *Ambrosia pumila*	FE	–	1B.1	Sandy loam or clay soil; sometimes alkaline. In valleys, persists where disturbance has been superficial. Sometimes on margins or near vernal pools. 10–1,903 feet in elevation. Blooms April–October.
California androsace *Androsace elongata* ssp. *acuta*	–	–	4.2	Highly localized and often overlooked little plant. 492–3,937 feet in elevation. Blooms March–June.
Aphanisma *Aphanisma blitoides*	–	–	1B.2	On bluffs and slopes near the ocean in sandy or clay soils. 10–1,001 feet in elevation. Blooms February–June.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Short-lobed broomrape *Aphyllon parishii* ssp. *brachylobum*	–	–	4.2	Sandy soil near beaches; reported to grow on *Isocoma menziesii* and other shrubs. 10–1,001 feet in elevation. Blooms April–October.
Del Mar manzanita *Arctostaphylos glandulosa* ssp. *crassifolia*	FE	–	1B.1	Sandy coastal mesas and ocean bluffs; in chaparral or Torrey pine forest. 98–1,198 feet in elevation. Blooms December–June.
Otay manzanita *Arctostaphylos otayensis*	–	–	1B.2	Metavolcanic soils with other chaparral associates. 394–5,003 feet in elevation. Blooms January–April.
Rainbow manzanita *Arctostaphylos rainbowensis*	–	–	1B.1	Usually found in gabbro chaparral. 328–2,854 feet in elevation. Blooms December–March.
San Diego sagewort *Artemisia palmeri*	–	–	4.2	In drainages and riparian areas in sandy soil within chaparral and other habitats. 49–3,002 feet in elevation. Blooms May–September.
Western spleenwort *Asplenium vespertinum*	–	–	4.2	Rocky sites. 591–3,281 feet in elevation. Blooms February–June.
Salton milk-vetch *Astragalus crotalariae*	–	–	4.3	Plains, valley floors, washes and fans in the foothills of desert mountains or on open desert, sandy or gravelly soil. 197–820 feet in elevation. Blooms January–April.
Dean's milk-vetch *Astragalus deanei*	–	–	1B.1	Open, brushy south-facing slopes in Diegan coastal sage, sometimes on recently burned-over hillsides. 230–2,608 feet in elevation. Blooms February–May.
Jacumba milk-vetch *Astragalus douglasii* var. *perstrictus*	–	–	1B.2	Stony hillsides and gravelly or sandy flats in open oak woodland. 1,640–4,511 feet in elevation. Blooms April–June.
Harwood's milk-vetch *Astragalus insularis* var. *harwoodii*	–	–	2B.2	Open sandy flats and sandy or stony desert washes; mostly in creosote bush scrub. 164–2,297 feet in elevation. Blooms January–May.
Borrego milk-vetch *Astragalus lentiginosus* var. *borreganus*	–	–	4.3	Sandy flats and semi-stabilized dunes, locally abundant after rains. 98–1,050 feet in elevation. Blooms February–May.
Peirson's milk-vetch *Astragalus magdalenae* var. *peirsonii*	FT	SE	1B.2	Slopes and hollows in mobile dunes, usually to the lee of the prevailing winds. 197–738 feet in elevation. Blooms December–April.
Providence Mountains milk-vetch *Astragalus nutans*	–	–	4.3	Sandy or gravelly flats and stony washes in the foothills of desert mountains. 1,476–6,398 feet in elevation. Blooms March–June.
San Diego milk-vetch *Astragalus oocarpus*	–	–	1B.2	Openings in chaparral or on gravelly flats and slopes in thin oak woodland. 394–5,889 feet in elevation. Blooms May–August.
Jaeger's milk-vetch *Astragalus pachypus* var. *jaegeri*	–	–	1B.1	Dry ridges and valleys and open sandy slopes; often in grassland and oak-chaparral. 1,198–3,002 feet in elevation. Blooms December–June.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Gravel milk-vetch *Astragalus sabulonum*	–	–	2B.2	Sandy or gravelly flats, washes, and roadsides. 197–2,904 feet in elevation. Blooms February–June.
Coastal dunes milk-vetch *Astragalus tener* var. *titi*	FE	SE	1B.1	Moist, sandy depressions of bluffs or dunes along and near the Pacific Ocean; one site on a clay terrace. 3–148 feet in elevation. Blooms March–May.
Coulter's saltbush *Atriplex coulteri*	–	–	1B.2	Ocean bluffs, ridgetops, as well as alkaline low places. Alkaline or clay soils. 7–1,509 feet in elevation. Blooms March–October.
South coast saltscale *Atriplex pacifica*	–	–	1B.2	Alkali soils. 3–1312 feet in elevation. Blooms March–October.
Parish's brittlescale *Atriplex parishii*	–	–	1B.1	Vernal pools, chenopod scrub, playas. Usually on drying alkali flats with fine soils. 16–4,659 feet in elevation. Blooms June–October.
California ayenia *Ayenia compacta*	–	–	2B.3	Sandy and gravelly washes in the desert; dry desert canyons. 197–6,004 feet in elevation. Blooms March–April.
Encinitas baccharis *Baccharis vanessae*	FT	SE	1B.1	On sandstone soils in steep, open, rocky areas with chaparral associates. 131–2,805 feet in elevation. Blooms August–November.
Higgin's barberry *Berberis higginsiae*	–	–	3.2	Rocky, sometimes granitic. 2,625–3,494 feet in elevation. Blooms March–April.
Nevin's barberry *Berberis nevinii*	FE	SE	1B.1	On steep, north-facing slopes or in low grade sandy washes. 951–5,167 feet in elevation. Blooms March–June.
Golden-spined cereus *Bergerocactus emoryi*	–	–	2B.2	Limited to the coastal belt. 10–1,296 feet in elevation. Blooms May–June.
San Diego goldenstar *Bloomeria clevelandii*	–	–	1B.1	Mesa grasslands, scrub edges; clay soils. Often on mounds between vernal pools in fine, sandy loam. 164–1,526 feet in elevation. Blooms April–May.
Hirshberg's rockcress *Boechera hirshbergiae*	–	–	1B.2	Pebble (or pavement) plains. 4,593–4,642 feet in elevation. Blooms March–May.
Thread-leaved brodiaea *Brodiaea filifolia*	FT	SE	1B.1	Usually associated with annual grassland and vernal pools; often surrounded by shrubland habitats. Occurs in openings on clay soils. 49–3,346 feet in elevation. Blooms March–June.
Orcutt's brodiaea *Brodiaea orcuttii*	–	–	1B.1	Mesic, clay habitats; sometimes serpentine; usually in vernal pools and small drainages. 98–5,299 feet in elevation. Blooms May–July.
Santa Rosa Basalt brodiaea *Brodiaea santarosae*	–	–	1B.2	Santa Rosa Basalt. 1,919–3,428 feet in elevation. Blooms May–June.
Little-leaf elephant tree *Bursera microphylla*	–	–	2B.3	Hillsides and washes and on canyon sides in California; rocky sites. 640–2,001 feet in elevation. Blooms June–July.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Brewer's calandrinia *Calandrinia breweri*	–	–	4.2	Sandy or loamy soils. Disturbed sites, burns. 33–3,937 feet in elevation. Blooms March–June.
Pink fairy-duster *Calliandra eriophylla*	–	–	2B.3	Sandy or rocky sites in the desert. 394–4,921 feet in elevation. Blooms January–March.
Dunn's mariposa-lily *Calochortus dunnii*	–	SR	1B.2	On gabbro or metavolcanic soils; also known from sandstone; often associated with chaparral. 837–5,299 feet in elevation. Blooms April–June.
San Jacinto mariposa-lily *Calochortus palmeri* var. *munzii*	–	–	1B.2	In open Jeffrey pine forest as well as in chaparral. 3,084–5,955 feet in elevation. Blooms April–July.
Plummer's mariposa-lily *Calochortus plummerae*	–	–	4.2	Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, valley and foothill grassland in granitic, rocky soils. 330–5,580 feet in elevation. Blooms May–July.
Arizona pussypaws *Calyptridium arizonicum*	–	–	2B.1	In washes. 1,985–2,608 feet in elevation. Blooms March–April.
Lewis' evening-primrose *Camissoniopsis lewisii*	–	–	3	Sandy or clay soil. 0–984 feet in elevation. Blooms March–May.
San Luis Obispo sedge *Carex obispoensis*	–	–	1B.2	Usually in transition zone on sand, clay, serpentine, or gabbro. In seeps. 16–2,772 feet in elevation. Blooms April–June.
Arizona carlowrightia *Carlowrightia arizonica*	–	–	2B.2	Sandy, granitic alluvium; associated with palm oases in California. 886–3,412 feet in elevation. Blooms March–May.
Payson's jewelflower *Caulanthus simulans*	–	–	4.2	Frequently in burned areas, or in disturbed sites such as streambeds and rocky, steep slopes. Sandy, granitic soils. 295–7,218 feet in elevation. Blooms March–May.
Lakeside ceanothus *Ceanothus cyaneus*	–	–	1B.2	Closed-cone coniferous forest, chaparral. 656–3,412 feet in elevation. Blooms April–June.
Viejas Mountain ceanothus *Ceanothus foliosus* var. *viejasensis*	–	–	1B.2	Gabbro. 2,575–4,495 feet in elevation. Blooms March–June.
Vine Hill ceanothus *Ceanothus foliosus* var. *vineatus*	–	–	1B.1	Chaparral. 150-1,000 feet in elevation. Blooms March-May.
Vail Lake Ceanothus Ceanothus ophiochilus	FT	SE	1B.1	Chaparral (gabbroic, pyroxenite-rich outcrops. 1,905-3,495 feet in elevation. Blooms February-March.
Otay Mountain ceanothus *Ceanothus otayensis*	–	–	1B.2	Metavolcanic or gabbroic soils. 246–3,806 feet in elevation. Blooms January–April.
Pendleton ceanothus *Ceanothus pendletonensis*	–	–	1B.2	Chaparral, cismontane woodland. Granitic. 360–2,854 feet in elevation. Blooms March–June.
Wart-stemmed ceanothus *Ceanothus verrucosus*	–	–	2B.2	Chaparral. 3–1,247 feet in elevation. Blooms December–May.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Southern tarplant *Centromadia parryi* ssp. *australis*	–	–	1B.1	Often in disturbed sites near the coast at marsh edges, in alkaline soils, sometimes with saltgrass. Sometimes on vernal pool margins. 0–3,199 feet in elevation. Blooms May–November.
Smooth tarplant *Centromadia pungens* ssp. *laevis*	–	–	1B.1	Alkali meadow, alkali scrub, and disturbed places. 16–3,839 feet in elevation. Blooms April–September.
Peirson's pincushion *Chaenactis carphoclinia* var. *peirsonii*	–	–	1B.3	Open rocky or sandy sites. 10–607 feet in elevation. Blooms March–April.
Orcutt's pincushion *Chaenactis glabriuscula* var. *orcuttiana*	–	–	1B.1	Sandy sites. 10–262 feet in elevation. Blooms January–August.
Parish's chaenactis *Chaenactis parishii*	–	–	1B.3	Chaparral. Rocky sites. 4,265–8,202 feet in elevation. Blooms May–July.
Southern mountain misery *Chamaebatia australis*	–	–	4.2	Gabbro or metavolcanic soils. 984–3,346 feet in elevation. Blooms November–May.
Salt marsh bird's-beak *Chloropyron maritimum* ssp. *maritimum* (formerly *Cordylanthus maritimus* ssp. *maritimus)*	FE	SE	1B.2	Limited to the higher zones of salt marsh habitat. 0–33 feet in elevation. Blooms May–October.
Peninsular spineflower *Chorizanthe leptotheca*	–	–	4.2	On granitic soils, in alluvial fans. 984–6,234 feet in elevation. Blooms May–August.
Orcutt's spineflower *Chorizanthe orcuttiana*	FE	SE	1B.1	Sandy sites and openings; sometimes in transition zones. 10–410 feet in elevation. Blooms March–May.
Long-spined spineflower *Chorizanthe polygonoides* var. l*ongispina*	–	–	1B.2	Gabbroic clay. 98–5,052 feet in elevation. Blooms April–July.
White-bracted spineflower *Chorizanthe xanti* var. *leucotheca*	–	–	1B.2	Sandy or gravelly places. 984–3,937 feet in elevation. Blooms April–June.
Seaside cistanthe *Cistanthe maritima*	–	–	4.2	Sea bluffs; sandy sites. 16–984 feet in elevation. Blooms March–June.
Delicate clarkia *Clarkia delicata*	–	–	1B.2	Often on gabbro soils. 164–4,462 feet in elevation. Blooms April–June.
San Miguel savory *Clinopodium chandleri*	–	–	1B.2	Rocky, gabbroic or metavolcanic substrate. 394–3,527 feet in elevation. Blooms March–July.
Summer holly *Comarostaphylis diversifolia* ssp. *diversifolia*	–	–	1B.2	Often in mixed chaparral in California, sometimes post-burn. 98–3,100 feet in elevation. Blooms April–June.
Small-flowered morning-glory *Convolvulus simulans*	–	–	4.2	Wet clay, serpentine ridges. 98–2,297 feet in elevation. Blooms March–July.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Small-flowered bird's-beak *Cordylanthus parviflorus*	–	–	2B.3	Joshua tree woodland, pinyon-juniper woodland, Mojavean desert scrub. 2,297–7,218 feet in elevation. Blooms August–October.
Short-bracted bird's-beak *Cordylanthus rigidus* ssp. *brevibracteatus*	–	–	4.3	Chaparral, Lower montane coniferous forest, Pinyon and juniper woodland, Upper montane coniferous forest in granitic areas and openings. 2,000-8,500 feet. Blooms July-August (Sep-Oct)
San Diego sand aster *Corethrogyne filaginifolia* var. *incana*	–	–	1B.1	Most sites are disturbed, so hard to tell. Possibly in disturbed sites and ecotones. 10–377 feet in elevation. Blooms June–September.
Del Mar Mesa sand aster *Corethrogyne filaginifolia* var. *linifolia*	–	–	1B.1	In coastal, shrubby communities on maritime sediments and conglomerates; in openings. 49–492 feet in elevation. Blooms May–September.
Gander's cryptantha *Cryptantha ganderi*	–	–	1B.1	On dunes and in washes. 509–1,017 feet in elevation. Blooms February–May.
Wiggins' cryptantha *Cryptantha wigginsii*	–	–	1B.2	Coastal scrub. Often on clay soils. 148–361 feet in elevation. Blooms February–June.
Pointed dodder *Cuscuta californica* var. *apiculata*	–	–	3	Sandy areas in Mojavean desert scrub and Sonoran desert scrub. 0-1,640 feet in elevation. Blooms February-August.
Snake cholla *Cylindropuntia californica* var. *californica*	–	–	1B.1	Chaparral, coastal scrub. 49–951 feet in elevation. Blooms April–May.
Pink teddy-bear cholla *Cylindropuntia fosbergii*	–	–	1B.3	Sonoran desert scrub. 279–2,789 feet in elevation. Blooms March–May.
Wolf's cholla *Cylindropuntia wolfii*	–	–	4.3	Dry places above the valley floors. 328–3,937 feet in elevation. Blooms March–May.
Otay tarplant *Deinandra conjugens*	FT	SE	1B.1	Coastal plains, mesas, and river bottoms; often in open, disturbed areas; clay soils. 197–902 feet in elevation. Blooms May–June.
Tecate tarplant *Deinandra floribunda*	–	–	1B.2	Chaparral, coastal scrub. Often in little drainages or disturbed areas. 230–4,003 feet in elevation. Blooms August–October.
Mojave tarplant *Deinandra mohavensis*	–	SE	1B.3	Low sand bars in riverbed; mostly in riparian areas or in ephemeral grassy areas. 2,100–5,249 feet in elevation. Blooms June–October.
Paniculate tarplant *Deinandra paniculata*	–	–	4.2	Usually in vernally mesic sites. Sometimes in vernal pools or on mima mounds near them. 82–3,084 feet in elevation. Blooms April–November.
Cuyamaca larkspur *Delphinium hesperium* ssp. *cuyamacae*	–	SR	1B.2	Usually found in low, moist areas within meadows. 3,986–6,086 feet in elevation. Blooms May–July.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Colorado Desert larkspur *Delphinium parishii* ssp. *subglobosum*	–	–	4.3	On dry stony fans and slopes. 1,969–5,906 feet in elevation. Blooms March–June.
North island bush-poppy *Dendromecon harfordii* var. *harfordii*	–	–	3.2	Rocky areas in chaparral, and closed-cone coniferous forest. 50-1,380 feet in elevation. Blooms March-November.
Western dichondra *Dichondra occidentalis*	–	–	4.2	On sandy loam, clay, and rocky soils. 164–1,640 feet in elevation. Blooms March–July.
Orcutt's bird's-beak *Dicranostegia orcuttiana*	–	–	2B.1	Found in coastal scrub associations on slopes; also reported from intermittently moist swales, and in washes. 0–656 feet in elevation. Blooms April–July.
Mt. Laguna aster *Dieteria asteroides* var. *lagunensis*	–	SR	2B.1	Openings in woodland or forest. 2,986–6,004 feet in elevation. Blooms July–August.
Arizona cottontop *Digitaria californica* var. *californica*	–	–	2B.3	Rocky schist hillsides in California; open plains out of state. 131–4,888 feet in elevation. Blooms July–November.
Low bush monkeyflower *Diplacus aridus*	–	–	4.3	Dry, open rocky places. 2,461–3,937 feet in elevation. Blooms April–July.
Cleveland's bush monkeyflower *Diplacus clevelandii*	–	–	4.2	Disturbed gravelly roadsides and slopes. 1,476–6,562 feet in elevation. Blooms April–July.
California ditaxis *Ditaxis serrata* var. *californica*	–	–	3.2	On sandy washes and alluvial fans of the foothills and lower desert slopes. 98–3,281 feet in elevation. Blooms March–December.
Slender-horned Spineflower *Dodecahema leptoceras*	FE	SE	1B.1	Sandy areas in chaparral, cismontane woodland, and coastal scrub (alluvial fans). 655-2,495 feet in elevation. Blooms April-June.
Cuyamaca Lake downingia *Downingia concolor* var. *brevior*	–	SE	1B.1	In vernal seeps, lakes, and pools, and on mudflats, with *Orthocarpus*, *Limnanthes*, *Collinsia*. 4,593–4,921 feet in elevation. Blooms May–July.
Banner dudleya *Dudleya alainae*	–	–	3.2	Rocky sites. 2,428–3,937 feet in elevation. Blooms April–July.
Orcutt's dudleya *Dudleya attenuata* ssp. *attenuata*	–	–	2B.1	Rocky mesas, canyons, and ridges. 10–164 feet in elevation. Blooms May–July.
Blochman's dudleya *Dudleya blochmaniae* ssp. *blochmaniae*	–	–	1B.1	Open, rocky slopes; often in shallow clays over serpentine or in rocky areas with little soil. 16–1,476 feet in elevation. Blooms April–June.
Short-leaved dudleya *Dudleya brevifolia*	–	SE	1B.1	On Torrey sandstone soils; in pebbly openings. 98–410 feet in elevation. Blooms April–May.
Many-stemmed dudleya *Dudleya multicaulis*	–	–	1B.2	In heavy, often clay soils or grassy slopes. 49–2,592 feet in elevation. Blooms April–July.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Variegated dudleya *Dudleya variegata*	–	–	1B.2	In rocky or clay soils, sometimes associated with vernal pool margins. 10–1,903 feet in elevation. Blooms April–June.
Sticky dudleya *Dudleya viscida*	–	–	1B.2	On north and south-facing cliffs and banks. 33–1,804 feet in elevation. Blooms May–June.
California bottle-brush grass *Elymus californicus*	–	–	4.3	Broadleafed upland forest, cismontane woodland, north coast coniferous forest, riparian woodland. 50-1,540 feet in elevation. Blooms May-August (Nov).
Harwood's eriastrum *Eriastrum harwoodii*	–	–	1B.2	Desert dunes. 246–2,362 feet in elevation. Blooms March–June.
Laguna Mountains goldenbush *Ericameria cuneata* var. *macrocephala*	–	–	1B.3	Endemic to the Laguna Mountains. Among boulders; in crevices in granitic outcrops and in rocky soil. 3,921–6,070 feet in elevation. Blooms September–December.
Palmer's goldenbush *Ericameria palmeri* var. *palmeri*	–	–	1B.1	On granitic soils, on steep hillsides. Mesic sites. 16–2,051 feet in elevation. Blooms September–November.
Sessile-leaved yerba santa *Eriodictyon sessilifolium*	–	–	2B.1	Coastal scrub. Volcanic. 558–557 feet in elevation. Blooms July.
Vanishing wild buckwheat *Eriogonum evanidum*	–	–	1B.1	Chaparral, cismontane woodland, lower montane coniferous forest, pinyon and juniper woodland. Sandy sites. 3,199–7,349 feet in elevation. Blooms July–October.
San Diego button-celery *Eryngium aristulatum* var. *parishii*	FE	SE	1B.1	San Diego mesa hardpan and claypan vernal pools and southern interior basalt flow vernal pools; usually surrounded by scrub. 49–2,887 feet in elevation. Blooms April–June.
Pendleton button-celery *Eryngium pendletonense*	–	–	1B.1	Clay. Vernally mesic sites. 66–98 feet in elevation. Blooms April–June.
Sand-loving wallflower *Erysimum ammophilum*	–	–	1B.2	Sandy openings. 0–197 feet in elevation. Blooms February–June.
Palomar monkeyflower *Erythranthe diffusa*	–	–	4.3	Sandy or gravelly soils. 4,003–6,004 feet in elevation. Blooms April–June.
Annual rock-nettle *Eucnide rupestris*	–	–	2B.2	Sonoran desert scrub. 869–1,001 feet in elevation. Blooms December–April.
Abrams' spurge *Euphorbia abramsiana*	–	–	2B.2	Sandy sites. -148–4,741 feet in elevation. Blooms September–November.
Arizona spurge *Euphorbia arizonica*	–	–	2B.3	Sandy soils. 492–2,953 feet in elevation. Blooms March–April.
Cliff spurge *Euphorbia misera*	–	–	2B.2	Coastal bluff scrub, coastal scrub, Mojavean desert scrub. Rocky sites. 10–1,411 feet in elevation. Blooms December–August.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Revolute spurge *Euphorbia revoluta*	–	–	4.3	Rocky sites. 3,593–10,171 feet in elevation. Blooms August–September.
San Diego barrel cactus *Ferocactus viridescens*	–	–	2B.1	On exposed, level or south-sloping areas; often in coastal scrub near crest of slopes. 10–1,608 feet in elevation. Blooms May–June.
Palmer's frankenia *Frankenia palmeri*	–	–	2B.1	Coastal dunes, coastal salt marsh, playas. 0–33 feet in elevation. Blooms May–July.
Chaparral ash *Fraxinus parryi*	–	–	2B.2	Open mixed chaparral and in the chaparral-sage scrub interface in California. 699–2,034 feet in elevation. Blooms March–May.
Mexican flannelbush *Fremontodendron mexicanum*	FE	SR	1B.1	Usually scattered along the borders of creeks or in dry canyons; found on gabbro, serpentine, or metavolcanics. 984–1,608 feet in elevation. Blooms March–June.
Utah vine milkweed *Funastrum utahense*	–	–	4.2	Sandy or gravelly sites in the desert. 328–4,708 feet in elevation. Blooms April–June.
Borrego bedstraw *Galium angustifolium* ssp. *borregoense*	–	SR	1B.3	Steep walls and (usually north) slopes in rocky watersheds or canyons. 1,148–4,101 feet in elevation. Blooms March.
Slender bedstraw *Galium angustifolium* ssp. *gracillimum*	–	–	4.2	Joshua tree "woodland" and Sonoran desert scrub on granitic and rocky soils. 425-5,085 feet in elevation. Blooms April-June (July).
San Jacinto Mountains bedstraw *Galium angustifolium* ssp. *jacinticum*	–	–	1B.3	Lower montane coniferous forest. Open mixed forest. 3,904–8,005 feet in elevation. Blooms June–August.
Desert bedstraw *Galium proliferum*	–	–	2B.2	Rocky, limestone substrate. 3,904–5,348 feet in elevation. Blooms March–June.
Campbell's liverwort *Geothallus tuberosus*	–	–	1B.1	Coastal scrub, vernal pools. Liverwort known from mesic soil. 33–1,969 feet in elevation.
Sticky geraea *Geraea viscida*	–	–	2B.3	Loamy coarse sand to gravelly sand soils; often in post burned areas and in bulldozed areas. 1,476–5,577 feet in elevation. Blooms May–June.
El Paso gilia *Gilia mexicana*	–	–	2B.3	Alluvial soil in washes, on bajadas, hillsides, arroyos, and plains. 3,445–4,839 feet in elevation. Blooms May.
Mission Canyon bluecup *Githopsis diffusa* ssp. *filicaulis*	–	–	3.1	Probably in open, grassy places and mesic, disturbed areas; much overlooked. 1,476–2,297 feet in elevation. Blooms April–June.
San Diego gumplant *Grindelia hallii*	–	–	1B.2	Frequently occurs in low moist areas in meadows; associated species commonly include *Wyethia*, *Ranunculus*, *Sidalcea*. 607–5,725 feet in elevation. Blooms May–October.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Palmer's grapplinghook *Harpagonella palmeri*	–	–	4.2	Clay soils; open grassy areas within shrubland. 66–3,133 feet in elevation. Blooms March–May.
Orcutt's hazardia *Hazardia orcuttii*	–	ST	1B.1	Often on clay; in grassy edges of chaparral and coastal scrub. 16–279 feet in elevation. Blooms August–October.
Algodones Dunes sunflower *Helianthus niveus* ssp. *tephrodes*	–	SE	1B.2	Desert dunes. On partially stabilized desert dunes. 164–328 feet in elevation. Blooms September–May.
Curly herissantia *Herissantia crispa*	–	–	2B.3	Sonoran desert scrub. 2,297–2,379 feet in elevation. Blooms August–September.
Hogwallow starfish *Hesperevax caulescens*	–	–	4.2	Valley and foothill grassland, vernal pools. Clay soils; mesic sites. 0–1,657 feet in elevation. Blooms March–June.
Tecate cypress *Hesperocyparis forbesii*	–	–	1B.1	Primarily on north-facing slopes; groves often associated with chaparral. On clay or gabbro. 197–5,397 feet in elevation.
Cuyamaca cypress *Hesperocyparis stephensonii*	–	–	1B.1	Restricted to the southwest slopes of Cuyamaca Peak, on gabbroic rock. 3,396–4,692 feet in elevation.
Beach goldenaster *Heterotheca sessiliflora* ssp. *sessiliflora*	–	–	1B.1	Sandy sites. 0–16 feet in elevation. Blooms March–December.
Laguna Mountains alumroot *Heuchera brevistaminea*	–	–	1B.3	Steep, rocky slopes. 4,462–6,562 feet in elevation. Blooms April–July.
Parish's alumroot *Heuchera parishii*	–	–	1B.3	Alpine boulder and rock fields, lower montane coniferous forest, subalpine coniferous forest, upper montane coniferous forest, 4,920-12,470 feet in elevation. Blooms June-August.
San Diego County alumroot *Heuchera rubescens* var. *versicolor*	–	–	3.3	Rocky outcrops. 3,789–6,398 feet in elevation. Blooms May–June.
Graceful tarplant *Holocarpha virgata* ssp. *elongata*	–	–	4.2	Coastal sage scrub, foothill woodland, chaparral, valley grassland. 200–3,600 feet in elevation. Blooms May–November.
Vernal barley *Hordeum intercedens*	–	–	3.2	Vernal pools, dry, saline streambeds, alkaline flats. 16–3,281 feet in elevation. Blooms March–June.
Mesa horkelia *Horkelia cuneata* var. *puberula*	–	–	1B.1	Sandy or gravelly sites. 49–5,397 feet in elevation. Blooms February–July.
Ramona horkelia *Horkelia truncata*	–	–	1B.3	Habitats in California include mixed chaparral, vernal streams, and disturbed areas near roads. Clay soil; at least sometimes on gabbro. 1,312–4,265 feet in elevation. Blooms May–June.
pink velvet-mallow *Horsfordia alata*	-	-	4.3	Rocky areas in Sonoran desert scrub. 330-1,640 feet in elevation. Blooms February-December.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Newberry's velvet-mallow *Horsfordia newberryi*	–	–	4.3	Rocky sites. 10–2,625 feet in elevation. Blooms February–December.
Otay Mountain lotus *Hosackia crassifolia* var. *otayensis*	–	–	1B.1	Metavolcanic, often in disturbed areas. 1,247–3,297 feet in elevation. Blooms May–August.
San Diego sunflower *Hulsea californica*	–	–	1B.3	Burns, clearings, or openings in chaparral and pine-oak woodland. 1,198–6,102 feet in elevation. Blooms April–June.
Mexican hulsea *Hulsea mexicana*	–	–	2B.3	Volcanic soils or burns and disturbed sites. 3,593–4,265 feet in elevation. Blooms April–June.
Beautiful hulsea *Hulsea vestita* ssp. *callicarpha*	–	–	4.2	Rocky or gravelly, granitic sites. 3,002–10,007 feet in elevation. Blooms May–October.
Wright's hymenothrix *Hymenothrix wrightii*	–	–	4.3	Cismontane woodland, lower montane coniferous forest, valley and foothill grassland. 4,593–5,085 feet in elevation. Blooms June–October.
California satintail *Imperata brevifolia*	–	–	2B.1	Mesic areas in chaparral, coastal scrub, meadows and seeps (often alkali), Mojavean desert scrub, riparian scrub. 0-3,985 feet in elevation. Blooms September-May .
Slender-leaved ipomopsis *Ipomopsis tenuifolia*	–	–	2B.3	Dry rocky or gravelly slopes. 2,789–4,199 feet in elevation. Blooms March–May.
Decumbent goldenbush *Isocoma menziesii* var. *decumbens*	–	–	1B.2	Sandy soils; often in disturbed sites. 3–3,002 feet in elevation. Blooms April–November.
San Diego marsh-elder *Iva hayesiana*	–	–	2B.2	Alkali playa, wetland. Marshes and swamps, playas. River washes. 3–1,411 feet in elevation. Blooms April–October.
Ribbed cryptantha *Johnstonella costata*	–	–	4.3	Sandy and gravelly places. -197–1,640 feet in elevation. Blooms February–May.
Winged cryptantha *Johnstonella holoptera*	–	–	4.3	Mojavean desert scrub, Sonoran desert scrub. 328–5,545 feet in elevation. Blooms March–April.
Southern California black walnut *Juglans californica*	–	–	4.2	Chaparral, coastal scrub, cismontane woodland. Slopes, canyons, alluvial habitats. 164–2,953 feet in elevation. Blooms March–August.,
Southwestern spiny rush *Juncus acutus* ssp. *leopoldii*	–	–	4.2	Moist saline places. 10–2,953 feet in elevation. Blooms May–June.
Cooper's rush *Juncus cooperi*	–	–	4.3	Mesic sites; alkaline or saline soils. -853–5,807 feet in elevation. Blooms April–May.
Santa Lucia dwarf rush *Juncus luciensis*	–	–	1B.2	Vernal pools, ephemeral drainages, wet meadow habitats, and stream sides. 984–6,693 feet in elevation. Blooms April–July.
Warty caltrop *Kallstroemia parviflora*	–	–	4.2	Sometimes disturbed areas. 2,805–5,594 feet in elevation. Blooms August–November.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Coulter's goldfields *Lasthenia glabrata* ssp. *coulteri*	–	–	1B.1	Usually found on alkaline soils in playas, sinks, and grasslands. 3–4,511 feet in elevation. Blooms February–June.
Pride-of-california *Lathyrus splendens*	–	–	4.3	Chaparral. Sandy to gravelly soils. 656–5,003 feet in elevation. Blooms March–June.
Heart-leaved pitcher sage *Lepechinia cardiophylla*	–	–	1B.2	Closed-cone coniferous forest, chaparral, cismontane woodland. 1,706–4,495 feet in elevation. Blooms April–July.
Gander's pitcher sage *Lepechinia ganderi*	–	–	1B.3	Usually found in chaparral or coastal scrub; sometimes in tecate cypress woodland. Gabbro or metavolcanic substrate. 1,001–3,297 feet in elevation. Blooms June–July.
Blair Valley pepper-grass *Lepidium flavum* var. *felipense*	–	–	1B.2	Sonoran desert scrub, pinyon and juniper woodland. Sandy, clay, or silty soils. 1,099–2,756 feet in elevation. Blooms March–May.
Robinson's pepper-grass *Lepidium virginicum* var. *robinsonii*	–	–	4.3	Chaparral, coastal scrub. Dry soils, shrubland. 3–2,904 feet in elevation. Blooms January–July.
Santa Rosa Mountains leptosiphon *Leptosiphon floribundus* ssp. *hallii*	–	–	1B.3	Sonoran desert scrub, pinyon and juniper woodland. Desert canyons. 3,281–6,562 feet in elevation. Blooms May–July.
Large-flowered leptosiphon Leptosiphon grandiflorus	–	–	4.2	Sandy areas in cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub, or valley and foothill grassland
Sea dahlia *Leptosyne maritima*	–	–	2B.2	Occurs on a variety of soil types, including sandstone. 16–607 feet in elevation. Blooms March–May.
Warner Springs lessingia *Lessingia glandulifera* var. *tomentosa*	–	–	1B.1	Along roadsides, sandy soil, in high desert chaparral. 2,854–4,003 feet in elevation. Blooms August–October.
Woolly-headed lessingia *Lessingia hololeuca*	–	–	3	Broadleafed upland forest, coastal scrub, lower montane coniferous forest, valley and foothill grassland. Clay and serpentinite soils. 50-1,000 feet in elevation. Blooms June-October.
Short-sepaled lewisia *Lewisia brachycalyx*	–	–	2B.2	Dry to moist meadows in rich loam. 4,495–8,038 feet in elevation. Blooms February–June.
Humboldt lily *Lilium humboldtii* ssp. *humboldtii*	–	–	4.2	Openings in chaparral, cismontane woodland, and lower montane coniferous forest
Ocellated humboldt lily *Lilium humboldtii* ssp. *ocellatum*	–	–	4.2	Yellow-pine forest or openings, oak canyons. 98–5,906 feet in elevation. Blooms March–July.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Lemon lily *Lilium parryi*	–	–	1B.2	Wet, mountainous terrain in forested areas, on shady edges of streams, and in open boggy meadows and seeps. 4,003–9,006 feet in elevation. Blooms July–August.
Parish's meadowfoam *Limnanthes alba* ssp. *parishii*	–	SE	1B.2	Vernally moist areas and temporary seeps of highland meadows and plateaus; often bordering lakes and streams. 1,985–5,922 feet in elevation. Blooms April–June.
Desert beauty *Linanthus bellus*	–	–	2B.1	Dry slopes and flats; open sandy spots in chaparral, mostly in loamy coarse sandy dg soil types. 3,281–4,593 feet in elevation. Blooms April–May.
Jacumba Mountains linanthus *Linanthus maculatus* ssp. *emaculatus*	–	–	1B.1	Sandy or course, opaque-white, decomposed granite soils of washes and on flats near wash margins and on the edges of desert dunes. 1,115–1,919 feet in elevation. Blooms Apr.
Orcutt's linanthus *Linanthus orcuttii*	–	–	1B.3	Sometimes in disturbed areas; often in gravelly clearings. 3,002–7,037 feet in elevation. Blooms May–June.
Mountain Springs bush lupine *Lupinus albifrons* var. *medius*	–	–	1B.3	Dry, sandy, gently sloping canyon washes, sandy soil pockets, and flats in steeper slopes and drainages. 1,394–4,495 feet in elevation. Blooms March–May.
California box-thorn *Lycium californicum*	–	–	4.2	Coastal bluff scrub, coastal scrub. 16–492 feet in elevation. Blooms March–August.
Parish's desert-thorn *Lycium parishii*	–	–	2B.3	Coastal scrub, Sonoran desert scrub. 443–3,281 feet in elevation. Blooms March–April.
Torrey's box-thorn *Lycium torreyi*	–	–	4.2	Sandy, rocky, washes, streambanks, desert valleys. -164–4,003 feet in elevation. Blooms March–June.
Palmer's lyrepod *Lyrocarpa coulteri*	–	–	4.3	Rocky, dry hillsides and washes. 394–2,608 feet in elevation. Blooms December–April.
Brown turbans *Malperia tenuis*	–	–	2B.3	Sandy places and rocky slopes. 0–1,804 feet in elevation. Blooms March–April.
Spear-leaf matelea *Matelea parvifolia*	–	–	2B.3	Dry rocky ledges and slopes. 1,444–3,593 feet in elevation. Blooms March–May.
Hairy stickleaf *Mentzelia hirsutissima*	–	–	2B.3	Washes, fans, slopes; coarse rubble and talus slopes; rocky sites. 0–2,297 feet in elevation. Blooms March–May.
Spiny-hair blazing star *Mentzelia tricuspis*	–	–	2B.1	Sandy or gravelly slopes and washes. 492–4,199 feet in elevation. Blooms March–May.
Small-flowered microseris *Microseris douglasii* ssp. *platycarpha*	–	–	4.2	Alkaline clay in river bottoms. 49–,3510 feet in elevation. Blooms March–May.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Shevock's copper moss *Mielichhoferia shevockii*	–	–	1B.2	Moss on metamorphic rocks containing heavy metals; mesic sites. On rocks along roads. 2,461–4,600 feet in elevation.
Slender-lobed four o'clock *Mirabilis tenuiloba*	–	–	4.3	Sonoran desert scrub. 984–3,600 feet in elevation. Blooms March–May.
Light gray lichen *Mobergia calculiformis*	–	–	3	Abundant on cobbles in right habitat; only known from one site in Baja and one in San Diego area. 33 feet in elevation.
Small-headed monardella *Monardella breweri* ssp. *microcephala*	–	–	2B.2	Chaparral, cismontane woodland, lower montane coniferous forest. Associated with disturbed areas (sometimes), granitic soils, and openings. 755-3,935 feet in elevation. Blooms May-August.
Intermediate monardella *Monardella hypoleuca* ssp. *intermedia*	–	–	1B.3	Often in steep, brushy areas. 640–5,500 feet in elevation. Blooms April–September.
Felt-leaved monardella *Monardella hypoleuca* ssp. *lanata*	–	–	1B.2	Occurs in understory in mixed chaparral, chamise chaparral, and southern oak woodland. Sandy soil. 984–5,167 feet in elevation. Blooms June–August.
Hall's monardella *Monardella macrantha* ssp. *hallii*	–	–	1B.3	Dry slopes and ridges in openings within the above communities. 2,395–7,201 feet in elevation. Blooms June–October.
San Felipe monardella *Monardella nana* ssp. *leptosiphon*	–	–	1B.2	Sometimes in openings and fuel breaks or in the understory of forest or chaparral. 2,789–7,956 feet in elevation. Blooms June–July.
Jennifer's monardella *Monardella stoneana*	–	–	1B.2	Usually found in rocky, intermittent streambeds. 33–2,592 feet in elevation. Blooms June–September.
Willowy monardella *Monardella viminea*	FE	SE	1B.1	In canyons, in rocky and sandy places, sometimes in washes or floodplains. Alluvial, ephemeral washes with adjacent coastal scrub. 148–755 feet in elevation. Blooms June–August.
California spineflower *Mucronea californica*	–	–	4.2	Sandy soil. 0–4,593 feet in elevation. Blooms March–July.
Appressed muhly *Muhlenbergia appressa*	–	–	2B.2	Rocky slopes, canyon bottoms. 66–5,249 feet in elevation. Blooms April–May.
Little mousetail *Myosurus minimus* ssp. *apus*	–	–	3.1	Vernal pools, valley and foothill grassland. Alkaline soils. 66–2,100 feet in elevation. Blooms March–June.
Mud nama *Nama stenocarpa*	–	–	2B.2	Lake shores, riverbanks, intermittently wet areas. 16–1,640 feet in elevation. Blooms January–July.
Spreading navarretia *Navarretia fossalis*	FT	–	1B.1	San Diego hardpan and San Diego claypan vernal pools; in swales and vernal pools, often surrounded by other habitat types. 49–2,789 feet in elevation. Blooms April–June.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Baja navarretia *Navarretia peninsularis*	–	–	1B.2	Wet areas in open forest. 3,773–7,759 feet in elevation. Blooms June–August.
Prostrate vernal pool navarretia *Navarretia prostrata*	–	–	1B.1	Alkaline soils in grassland, or in vernal pools. Mesic, alkaline sites. 10–4,052 feet in elevation. Blooms April–July.
Coast woolly-heads *Nemacaulis denudata* var. *denudata*	–	–	1B.2	Coastal dunes. 0–328 feet in elevation. Blooms April–September.
Slender cottonheads *Nemacaulis denudata* var. *gracilis*	–	–	2B.2	In dunes or sand. -164–1,312 feet in elevation. Blooms April–May.
Twisselmann's nemacladus *Nemacladus twisselmannii* var. *twisselmannii*	–	SR	1B.2	Sandy or rocky granitic soils, open ridgetops, and gentle slopes in Jeffrey pine forest. 3,986–7,808 feet in elevation. Blooms July.
Chaparral nolina *Nolina cismontana*	–	–	1B.2	Primarily on sandstone and shale substrates; also known from gabbro. 459–4,183 feet in elevation. Blooms May–July.
Dehesa nolina *Nolina interrata*	–	SE	1B.1	Typically on rocky hillsides or ravines on ultramafic soils. 837–2,411 feet in elevation. Blooms June–July.
California adder's-tongue *Ophioglossum californicum*	–	–	4.2	Grassy pastures, vernal pool margins, chaparral. Mesic sites. 197–1,722 feet in elevation. Blooms January–June.
Wiggins' cholla *Opuntia wigginsii*	–	–	3.3	Sandy soils. 98–2,904 feet in elevation. Blooms March.
California Orcutt grass *Orcuttia californica*	FE	SE	1B.1	Vernal pools, wetland. 33–2,165 feet in elevation. Blooms April–August.
Baja California birdbush *Ornithostaphylos oppositifolia*	–	SE	2B.1	Chaparral. Associated with *Ceanothus verrucosus* and *Salvia mellifera* in California. 180–2,625 feet in elevation. Blooms January–April.
Gander's ragwort *Packera ganderi*	–	SR	1B.2	Ultramafic. Chaparral. Recently burned sites and gabbro outcrops. 1,591–3,510 feet in elevation. Blooms April–June.
San Jacinto beardtongue *Penstemon clevelandii* var. *connatus*	–	–	4.3	Dry rocky hillsides in coarse sandy loam and in cracks in rock outcrops. 1,312–4,921 feet in elevation. Blooms March–May.
Thurber's beardtongue *Penstemon thurberi*	–	–	4.2	Dry sandy washes. 1,640–4,003 feet in elevation. Blooms May–July.
Golden-rayed pentachaeta *Pentachaeta aurea* ssp. *aurea*	–	–	4.2	Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, valley and foothill grassland, riparian woodland. 262–6,070 feet in elevation. Blooms March–July.
Narrow-leaf sandpaper-plant *Petalonyx linearis*	–	–	2B.3	Sandy or rocky canyons. -82–3,658 feet in elevation. Blooms March–May.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Santiago Peak phacelia *Phacelia keckii*	–	–	1B.3	Open areas, sometimes along creeks. 1,788–5,249 feet in elevation. Blooms May–June.
South coast branching phacelia *Phacelia ramosissima* var. *austrolitoralis*	–	–	3.2	Sandy, sometimes rocky sites. 16–984 feet in elevation. Blooms March–August.
Brand's star phacelia *Phacelia stellaris*	–	–	1B.1	Open areas. 3–1,312 feet in elevation. Blooms March–June.
Arizona pholistoma *Pholistoma auritum* var. *arizonicum*	–	–	2B.3	Mojavean desert scrub. 902–2,740 feet in elevation. Blooms March.
Woolly chaparral-pea *Pickeringia montana* var. *tomentosa*	–	–	4.3	Chaparral. Gabbroic or granitic substrates; usually clay. 0–5,577 feet in elevation. Blooms May–August.
Thurber's pilostyles *Pilostyles thurberi*	–	–	4.3	Sandy alluvial plains, sandstone talus. Parasite on *Psorothamnus emoryi*. -164–1,198 feet in elevation. Blooms December–April.
Torrey pine *Pinus torreyana* ssp. *torreyana*	–	–	1B.2	On dry, sandstone slopes. 230–525 feet in elevation.
Coleman's rein orchid *Piperia colemanii*	–	–	4.3	Sandy areas in chaparral and lower montane coniferous forest
Chaparral rein orchid *Piperia cooperi*	–	–	4.2	Chaparral, cismontane woodland, valley and foothill grassland. 49–607 feet in elevation. Blooms March–June.
Narrow-petaled rein orchid *Piperia leptopetala*	–	–	4.3	Cismontane woodland, lower montane coniferous forest, upper montane coniferous forest. 1,247–7,300 feet in elevation. Blooms May–July.
Wine-colored tufa moss *Plagiobryoides vinosula*	–	–	4.2	Granitic rock or granitic soil along seeps and streams, sometimes clay. 98–5,692 feet in elevation.
San Bernardino blue grass *Poa atropurpurea*	FE	–	1B.2	Mesic meadows of open pine forests and grassy slopes, loamy alluvial to sandy loam soil. 4,117–8,711 feet in elevation. Blooms May–July.
San Diego mesa mint *Pogogyne abramsii*	FE	SE	1B.1	Vernal pools within grasslands, chamise chaparral, or coastal sage scrub communities. 230–640 feet in elevation. Blooms March–July.
Otay Mesa mint *Pogogyne nudiuscula*	FE	SE	1B.1	Dry beds of vernal pools and moist swales with *Eryngium aristulatum* var. *parishii* and *Orcuttia californica*. 443–541 feet in elevation. Blooms May–July.
Fish's milkwort *Polygala cornuta* var. *fishiae*	–	–	4.3	Scree slopes, brushy ridges, and along creeks; often with oaks. 328–3,281 feet in elevation. Blooms May–August.
Desert unicorn-plant *Proboscidea althaeifolia*	–	–	4.3	Gently sloping sandy flats and washes. 279–3,281 feet in elevation. Blooms May–September.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
White rabbit-tobacco *Pseudognaphalium leucocephalum*	–	–	2B.2	Sandy, gravelly sites. 115–1,690 feet in elevation. Blooms August–November.
Deep Canyon snapdragon *Pseudorontium cyathiferum*	–	–	2B.3	Rocky sites. 0–2,625 feet in elevation. Blooms February–April.
Delta woolly-marbles *Psilocarphus brevissimus* var. *multiflorus*	–	–	4.2	Vernal pools, wetlands, and flats. 33–1,640 feet in elevation. Blooms May–June.
Cedros Island oak *Quercus cedrosensis*	–	–	2B.2	Closed-cone coniferous forest, chaparral, coastal scrub. 427–3,199 feet in elevation. Blooms April–May.
Nuttall's scrub oak *Quercus dumosa*	–	–	1B.1	Generally, on sandy soils near the coast; sometimes on clay loam. 49–1,312 feet in elevation. Blooms February–April.
Engelmann oak *Quercus engelmannii*	–	–	4.2	Cismontane woodland, chaparral, riparian woodland, valley and foothill grassland. 164–4,265 feet in elevation. Blooms March–June.
Single-leaved skunkbrush *Rhus aromatica* var. *simplicifolia*	–	–	2B.3	Pinyon and juniper woodland, usually on granitic soils. 2,395–4,364 feet in elevation. Blooms March–April.
Hoffmann's bitter gooseberry *Ribes amarum* var. *hoffmannii*	–	–	3	Chaparral and riparian woodland. 15-3,905 feet in elevation. Blooms March-April.
Moreno currant *Ribes canthariforme*	–	–	1B.3	Among boulders in oak-manzanita thickets; shaded or partially shaded sites. 1,115–3,937 feet in elevation. Blooms February–April.
Santa Catalina Island currant *Ribes viburnifolium*	–	–	1B.2	Among shrubs in canyons. 98–1,001 feet in elevation. Blooms February–April.
Coulter's matilija poppy *Romneya coulteri*	–	–	4.2	In washes and on slopes. Often seen after burns. 66–3,937 feet in elevation. Blooms March–July.
Gambel's water cress *Rorippa gambelii*	FE	ST	1B.1	Freshwater and brackish marshes at the margins of lakes and along streams, in or just above the water level. 16–1,083 feet in elevation. Blooms April–October.
Small-leaved rose *Rosa minutifolia*	–	SE	2B.1	On cobbly soil at the head of a small, dry canyon on Otay Mesa. 492–525 feet in elevation. Blooms January–June.
Cuyamaca raspberry *Rubus glaucifolius* var. *ganderi*	–	–	3.1	Open, moist forest; gabbro soils. 3,937–5,495 feet in elevation. Blooms May–June.
Parish's rupertia *Rupertia rigida*	–	–	4.3	Chaparral, lower montane coniferous forest, cismontane woodland, meadows and seeps, pebble plain, valley and foothill grassland. 2,297–8,202 feet in elevation. Blooms June–August.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Caraway-leaved woodland-gilia *Saltugilia caruifolia*	–	–	4.3	In disturbed areas near roads and on fuel breaks, in sandy washes, on old burns; and in rocky outcrops. 2,756–7,546 feet in elevation. Blooms May–August.
Munz's sage *Salvia munzii*	–	–	2B.2	Rolling hills and slopes, in rocky soil. 115–1,886 feet in elevation. Blooms February–April.
Tracy's sanicle *Sanicula tracyi*	–	–	4.2	Cismontane woodland, lower montane coniferous forest, upper montane coniferous forest. 330-5,200 feet in elevation. Blooms April-July.
Southern mountains skullcap *Scutellaria bolanderi* ssp. *austromontana*	–	–	1B.2	In gravelly soils on streambanks or in mesic sites in oak or pine woodland. 1,394–6,562 feet in elevation. Blooms June–August.
Bluish spike-moss *Selaginella asprella*	–	–	4.3	Dry, rocky soils, crevices; granitic substrate. 5,249–8,858 feet in elevation. Blooms July.
Ashy spike-moss *Selaginella cinerascens*	–	–	4.1	Chaparral, coastal scrub. 66–2,100 feet in elevation.
Desert spike-moss *Selaginella eremophila*	–	–	2B.2	Shaded sites, gravelly soils; crevices or among rocks. 656–2,953 feet in elevation. Blooms June.
Chaparral ragwort *Senecio aphanactis*	–	–	2B.2	Drying alkaline flats. 66–2,805 feet in elevation. Blooms January–April.
San Gabriel ragwort *Senecio astephanus*	–	–	4.3	Rocky slopes. 1,312–4,921 feet in elevation. Blooms May–July.
Cove's cassia *Senna covesii*	–	–	2B.2	Dry, sandy desert washes, slopes. 837–4,249 feet in elevation. Blooms March–June.
Hammitt's clay-cress *Sibaropsis hammittii*	–	–	1B.2	Mesic microsites in open areas on clay soils in *Stipa* grassland. Often surrounded by *Adenostoma* chaparral. 2,362–3,494 feet in elevation. Blooms March–April.
Salt Spring checkerbloom *Sidalcea neomexicana*	–	–	2B.2	Alkali springs and marshes. 0–5,020 feet in elevation. Blooms March–June.
Hellhole scaleseed *Spermolepis infernensis*	–	–	1B.2	Rocky or sandy soils. 755–2,198 feet in elevation. Blooms March–April.
Western bristly scaleseed *Spermolepis lateriflora*	–	–	2A	Rocky or sandy soils. 1,198–2,198 feet in elevation. Blooms March–April.
Bottle liverwort *Sphaerocarpos drewiae*	–	–	1B.1	Liverwort in openings; on soil. 295–1,969 feet in elevation.
Prairie false oat *Sphenopholis interrupta* ssp. *californica*	–	–	1B.1	Friable clay lenses. 285 feet in elevation.
Prairie wedge grass *Sphenopholis obtusata*	–	–	2B.2	Open moist sites, along rivers and springs, alkaline desert seeps. 984–6,562 feet in elevation. Blooms April–July.
Purple stemodia *Stemodia durantifolia*	–	–	2B.1	Sandy soils; mesic sites. 115–1,263 feet in elevation. Blooms January–December.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
San Diego County needle grass *Stipa diegoensis*	–	–	4.2	Rocky slopes, sea cliffs and stream banks; often in mesic sites. 33–2,625 feet in elevation. Blooms February–June.
Laguna Mountains jewelflower *Streptanthus bernardinus*	–	–	4.3	Clay or decomposed granite soils; sometimes in disturbed areas such as stream sides or roadcuts. 4,724–8,202 feet in elevation. Blooms May–August.
Southern jewelflower *Streptanthus campestris*	–	–	1B.3	Open, rocky areas. 2,953–7,546 feet in elevation. Blooms May–July.
Oil neststraw *Stylocline citroleum*	–	–	1B.1	Flats, clay soils in oil-producing areas. 164–1,312 feet in elevation. Blooms March–April.
Estuary seablite *Suaeda esteroa*	–	–	1B.2	Coastal salt marshes in clay, silt, and sand substrates. 0–16 feet in elevation. Blooms May–October.
Woolly seablite *Suaeda taxifolia*	–	–	4.2	Margins of salt marshes. 0–164 feet in elevation. Blooms January–December.
San Bernardino aster *Symphyotrichum defoliatum*	–	–	1B.2	Vernally mesic grassland or near ditches, streams, and springs; disturbed areas. 7–6,693 feet in elevation. Blooms July–November.
Parry's tetracoccus *Tetracoccus dioicus*	–	–	1B.2	Stony, decomposed gabbro soil. 541–3,281 feet in elevation. Blooms April–May.
Woven-spored lichen *Texosporium sancti-jacobi*	–	–	3	Chaparral (openings), often on soil, small mammal pellets, dead twigs, and on S*elaginella.* 195-2,165 feet in elevation.
Velvety false lupine *Thermopsis californica* var. *semota*	–	–	1B.2	Pine forests and meadow edges, on rocky slopes and outcrops, and along roadsides. 3,281–6,135 feet in elevation. Blooms March–June.
Rigid fringepod *Thysanocarpus rigidus*	–	–	1B.2	Dry, rocky slopes and ridges of oak and pine woodland in arid mountain ranges. 1,394–7,103 feet in elevation. Blooms February–May.
California screw moss *Tortula californica*	–	–	1B.2	Moss growing on sandy soil. 33–4,790 feet in elevation.
Coastal triquetrella *Triquetrella californica*	–	–	1B.2	Grows within 100 feet from the coast in coastal scrub, grasslands and in open gravels on roadsides, hillsides, rocky slopes, and fields. On gravel or thin soil over outcrops. 33–328 feet in elevation.
San Diego County viguiera *Viguiera laciniata*	–	–	4.3	Slopes and ridges. 197–2,461 feet in elevation. Blooms February–June.
La Purisima viguiera *Viguiera purisimae*	–	–	2B.3	Dry, rocky places in open shrubland. 1,198–1,394 feet in elevation. Blooms April–September.
Palmer's jackass clover *Wislizenia refracta* ssp. *palmeri*	–	–	2B.2	Known from desert basins, dunes, washes, and benches of sand field ecotones where upland desert scrubs, typically creosote bush scrub or palo verde, transition to halophytic scrub or mesquite. 410–574 feet in elevation. Blooms January–December.

Species	Federal Listing Status[1]	State Listing Status[1]	CRPR	Habitat
Rush-like bristleweed *Xanthisma junceum*	–	–	4.3	Dry hillsides. 787–3,281 feet in elevation. Blooms May–January.
Orcutt's woody-aster *Xylorhiza orcuttii*	–	–	1B.2	Arid canyons; often in washes. 0–1,198 feet in elevation. Blooms March–April.

Notes: CRPR = California Rare Plant Rank; CESA = California Endangered Species Act; CEQA = California Environmental Quality Act; ESA = Endangered Species Act; NPPA = Native Plant Protection Act

1 Legal Status Definitions

Federal:

FE Federally Listed as Endangered (legally protected by ESA)
FT Federally Listed as Threatened (legally protected by ESA)

State:

SE State Listed as Endangered (legally protected by CESA)
SR State Listed as Rare (legally protected by NPPA)

California Rare Plant Ranks:

1A Plant species that are presumed extirpated or extinct because they have not been seen or collected in the wild in California for many years. A plant is extinct if it no longer occurs anywhere. A plant that is extirpated from California has been eliminated from California but may still occur elsewhere in its range.
1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA).
2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA).
3 Plant species for which there is not enough information to assign the species to one of the other ranks or reject them.
4 Plant species with limited distribution or infrequent occurrence throughout California.

Threat Ranks:

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)
0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)
0.3 Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

Sources: CNDDB 2023; CNPS 2023; USFWS 2023.

Table 2.4-3 Special-Status Wildlife Species Known to Occur in San Diego County

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
Amphibians & Reptiles			
Arroyo toad *Anaxyrus californicus*	FE	SSC	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, and desert wash. Rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.
Baja California coachwhip *Coluber fuliginosus*	–	SSC	In California restricted to southern San Diego County, where it is known from grassland and coastal sage scrub. Open areas in grassland and coastal sage scrub
Barefoot gecko (Barefoot banded gecko) *Coleonyx switaki*	–	ST	Found only in areas of massive rock and rock outcrops at the heads of canyons. Occurs in rock cracks and crevices
California glossy snake *Arizona elegans occidentalis*	–	SSC	Patchily distributed from the eastern portion of San Francisco bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular Ranges south to Baja California. Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.
California red-legged frog *Rana draytonii*	FT	SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.
Coast horned lizard *Phrynosoma blainvillii*	–	SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.
Coast patch-nosed snake *Salvadora hexalepis virgultea*	–	SSC	Brushy or shrubby vegetation in coastal Southern California. Require small mammal burrows for refuge and overwintering sites.
Coast Range newt *Taricha torosa*	–	SSC	Coastal drainages from Mendocino County to San Diego County. Lives in terrestrial habitats and will migrate over 0.6 mile to breed in ponds, reservoirs, and slow-moving streams.
Coastal whiptail *Aspidoscelis tigris stejnegeri*	–	SSC	Found in deserts and semiarid areas with sparse vegetation and open areas. Also found in woodland and riparian areas. Ground may be firm soil, sandy, or rocky.
Colorado Desert fringe-toed lizard *Uma notata*	–	SSC	Colorado Desert region; in sand dunes, dry lakebeds, sandy beaches or riverbanks, desert washes, or sparse desert scrub. Requires fine, loose, windblown sand (for burrowing); shrubs or annuals for arthropod production.
Cope's leopard lizard *Gambelia copeii*	–	SSC	Restricted in California to Southeastern San Diego County. Occurs in desert scrub, coastal sage scrub, oak woodland, and chaparral. Open flat areas within vegetation.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
Coronado skink *Plestiodon skiltonianus interparietalis*	–	–	Grassland, chaparral, pinyon-juniper and juniper sage woodland, pine-oak, and pine forests in Coast Ranges of Southern California. Prefers early successional stages or open areas. Found in rocky areas close to streams and on dry hillsides.
Desert tortoise *Gopherus agassizii*	FT	ST	Most common in desert scrub, desert wash, and Joshua tree habitats; occurs in almost every desert habitat. Require friable soil for burrow and nest construction. Creosote bush habitat with large annual wildflower blooms preferred.
Flat-tailed horned lizard *Phrynosoma mcallii*	–	SSC	Restricted to desert washes and desert flats in central Riverside, eastern San Diego, and Imperial counties. Critical habitat element is fine sand, into which lizards burrow to avoid temp extremes; requires vegetative cover and ants.
Green sea turtle *Chelonia mydas*	FT	–	Marine. Completely herbivorous; needs adequate supply of seagrasses and algae.
Large-blotched salamander *Ensatina klauberi*	–	–	Found in conifer and woodland associations. Found in leaf litter, decaying logs, and shrubs in heavily forested areas.
Orange-throated whiptail *Aspidoscelis hyperythra*	–	–	Inhabits low-elevation coastal scrub, chaparral, and valley-foothill hardwood habitats. Prefers washes and other sandy areas with patches of brush and rocks. Perennial plants necessary for its major food-termites.
Red-diamond rattlesnake *Crotalus ruber*	–	SSC	Chaparral, woodland, grassland, and desert areas from coastal San Diego County to the eastern slopes of the mountains. Occurs in rocky areas and dense vegetation. Needs rodent burrows, cracks in rocks or surface cover objects.
San Diego banded gecko *Coleonyx variegatus abbotti*	–	SSC	Coastal and cismontane Southern California. Found in granite or rocky outcrops in coastal scrub and chaparral habitats.
San Diego ringneck snake *Diadophis punctatus similis*	–	–	Open, rocky areas. Use boards, flat rocks, woodpiles, stable talus, rotting logs and small ground holes for cover. Prefer areas with surface litter or herbaceous vegetation. Often in somewhat moist areas near intermittent streams.
Sandstone night lizard *Xantusia gracilis*	–	SSC	Known only from the Truckhaven Rocks in the eastern part of Anza-Borrego State Park. Found in fissures or under slabs of exfoliating sandstone and rodent burrows in compacted sandstone and mudstone
South coast gartersnake *Thamnophis sirtalis* ssp.	–	SSC	Southern California coastal plain from Ventura County to San Diego County, and from sea level to about 2,800 feet in elevation. Marsh and upland habitats near permanent water with good strips of riparian vegetation.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
Southern California legless lizard *Anniella stebbinsi*	–	SSC	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally, in moist, loose soil. Prefers soils with a high moisture content.
Southern mountain yellow-legged frog *Rana muscosa*	FE	SE	Federal listing refers to populations in the San Gabriel, San Jacinto, and San Bernardino Mountains (southern DPS). Northern DPS was determined to warrant listing as endangered, April 2014, effective June 30, 2014. Always encountered within a few feet of water. Tadpoles may require 2 - 4 years to complete their aquatic development.
Two-striped gartersnake *Thamnophis hammondii*	–	SSC	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 feet elevation. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.
Western pond turtle *Actinemys marmorata*	–	SSC	An aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches, usually with aquatic vegetation, below 6,000 feet elevation. Need basking sites and upland habitat suitable for the species (i.e., sandy banks, grassy open fields) up to approximately 1,650 feet from water for egg-laying.
Western spadefoot *Spea hammondii*	–	SSC	Occurs primarily in grassland habitats but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.
Birds			
American peregrine falcon *Falco peregrinus anatum*	FD	SD FP	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.
Bank swallow *Riparia riparia*	–	ST	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.
Belding's savannah sparrow *Passerculus sandwichensis beldingi*	–	SE	Inhabits coastal salt marshes, from Santa Barbara south through San Diego County. Nests in Salicornia on and about margins of tidal flats.
Bell's sage sparrow *Artemisiospiza belli belli*	–	–	Nests in chaparral dominated by dense stands of chamise. Found in coastal sage scrub in south of range. Nest located on the ground beneath a shrub or in a shrub 6–18 inches above ground. Territories about 150 feet apart.
Burrowing owl *Athene cunicularia*	–	SSC	Open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
California black rail *Laterallus jamaicensis coturniculus*	–	ST FP	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.
California brown pelican *Pelecanus occidentalis californicus*	FD	SD FP	Colonial nester on coastal islands just outside the surf line. Nests on coastal islands of small to moderate size which afford immunity from attack by ground-dwelling predators. Roosts communally.
California condor *Gymnogyps californianus*	FE	SE FP	Require vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Deep canyons containing clefts in the rocky walls provide nesting sites. Forages up to 100 miles from roost or nest.
California horned lark *Eremophila alpestris actia*	–	–	Coastal regions, chiefly from Sonoma County to San Diego County. Also, main part of San Joaquin Valley and east to foothills. Short-grass prairie, "bald" hills, mountain meadows, open coastal plains, fallow grain fields, alkali flats.
California least tern *Sternula antillarum browni*	FE	SE FP	Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, landfills, or paved areas.
California spotted owl *Strix occidentalis occidentalis*	P	SSC	Multi-layered forest habitat with high canopy closure and a mixture of tree sizes and densities, as well as large diameter old-growth trees for nesting and roosting
Coastal cactus wren *Campylorhynchus brunneicapillus sandiegensis*	–	SSC	Southern California coastal sage scrub. Wrens require tall *Opuntia* cactus for nesting and roosting.
Coastal California gnatcatcher *Polioptila californica californica*	FT	SSC	Obligate, permanent resident of coastal sage scrub below 2,500 feet in Southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.
Cooper's hawk *Accipiter cooperii*	–	–	Woodland, chiefly of open, interrupted, or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river floodplains; also, live oaks.
Double-crested cormorant *Phalacrocorax auritus*	–	–	Colonial nester on coastal cliffs, offshore islands, and along lake margins in the interior of the state. Nests along coast on sequestered islets, usually on ground with sloping surface, or in tall trees along lake margins.
Ferruginous hawk *Buteo regalis*	–	–	Open grasslands, sagebrush flats, desert scrub, low foothills and fringes of pinyon and juniper habitats. Eats mostly lagomorphs, ground squirrels, and mice. Population trends may follow lagomorph population cycles.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
Golden eagle *Aquila chrysaetos*	–	FP	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.
Grasshopper sparrow *Ammodramus savannarum*	–	SSC	Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs, and scattered shrubs. Loosely colonial when nesting.
Least Bell's vireo *Vireo bellii pusillus*	FE	SE	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2,000 feet. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, *Baccharis*, mesquite.
Least bittern *Ixobrychus exilis*	–	SSC	Colonial nester in marshlands and borders of ponds and reservoirs which provide ample cover. Nests usually placed low in tules, over water.
Light-footed Ridgway's rail *Rallus longirostris levipes*	FE	SE FP	Found in salt marshes traversed by tidal sloughs, where cordgrass and pickleweed are the dominant vegetation. Requires dense growth of either pickleweed or cordgrass for nesting or escape cover; feeds on mollusks and crustaceans.
Loggerhead shrike *Lanius ludovicianus*	–	SSC	Broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub, and washes. Prefers open country for hunting, with perches for scanning, and dense shrubs and brush for nesting.
Long-eared owl *Asio otus*	–	SSC	Riparian bottomlands grown to tall willows and cottonwoods; also, belts of live oak paralleling stream courses. Require adjacent open land productive of mice and the presence of old nests of crows, hawks, or magpies for breeding.
Northern harrier *Circus hudsonius*	–	SSC	Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.
Osprey *Pandion haliaetus*	–	–	Ocean shore, bays, fresh-water lakes, and larger streams. Large nests built in treetops within 15 miles of a good fish-producing body of water.
Prairie falcon *Falco mexicanus*	–	–	Inhabits dry, open terrain, either level or hilly. Breeding sites located on cliffs. Forages far afield, even to marshlands and ocean shores.
Purple martin *Progne subis*	–	SSC	Inhabits woodlands, low elevation coniferous forest of Douglas fir, ponderosa pine, and Monterey pine. Nests in old woodpecker cavities mostly, also in human-made structures. Nest often located in tall, isolated tree/snag.
Short-tailed albatross *Phoebastria albatrus*	FE	SSC	Forages at sea, but specific geographic and seasonal distribution patterns within the marine range are not well understood.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
Southern California rufous-crowned sparrow *Aimophila ruficeps canescens*	–	–	Resident in Southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.
Southwestern willow flycatcher *Empidonax traillii extimus*	FE	SE	Riparian woodlands in Southern California.
Swainson's hawk *Buteo swainsoni*	–	ST	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.
Tricolored blackbird *Agelaius tricolor*	–	ST SSC	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few miles of the colony.
Vermilion flycatcher *Pyrocephalus rubinus*	–	SSC	During nesting, inhabits desert riparian adjacent to irrigated fields, irrigation ditches, pastures, and other open, mesic areas. Nest in cottonwood, willow, mesquite, and other large desert riparian trees.
Western snowy plover *Charadrius alexandrinus nivosus*	FT	SSC	Sandy beaches, salt pond levees and shores of large alkali lakes. Needs sandy, gravelly, or friable soils for nesting.
Western yellow-billed cuckoo *Coccyzus americanus occidentalis*	FT	SE	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.
White-faced ibis *Plegadis chihi*	–	–	Shallow fresh-water marsh. Dense tule thickets for nesting interspersed with areas of shallow water for foraging.
White-tailed kite *Elanus leucurus*	–	FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.
Yellow rail *Coturnicops noveboracensis*	–	SSC	Summer resident in eastern Sierra Nevada in Mono County. Fresh-water marshlands.
Yellow warbler *Setophaga petechia*	–	SSC	Riparian plant associations near water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.
Yellow-breasted chat *Icteria virens*	–	SSC	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 feet of ground.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
Yuma Ridgway's rail *Rallus obsoletus yumanensis*	FE	ST FP	Nests in freshwater marshes along the Colorado River and along the south and east ends of the Salton Sea. Prefers stands of cattails and tules dissected by narrow channels of flowing water.
Fish			
Arroyo chub *Gila orcuttii*	–	SSC	Native to streams from Malibu Creek to San Luis Rey River basin. Introduced into streams in Santa Clara, Ventura, Santa Ynez, Mohave, and San Diego river basins. Slow water stream sections with mud or sand bottoms. Feeds heavily on aquatic vegetation and associated invertebrates.
Desert pupfish *Cyprinodon macularius*	FE	SE	Desert ponds, springs, marshes, and streams in Southern California. Can live in salinities from fresh water to 68 ppt, can withstand temperatures from 9–45 degrees Celsius and dissolved oxygen levels down to 0.1 ppm.
Mohave tui chub *Siphateles bicolor mohavensis*	FE	SE FP	Endemic to the Mojave River basin, adapted to alkaline, mineralized waters. Needs deep pools, ponds, or slough-like areas. Needs vegetation for spawning.
Razorback sucker *Xyrauchen texanus*	FE	SE FP	Found in the Colorado River bordering California. Adapted for swimming in swift currents but also need quiet waters. Spawn in areas of sand/gravel/rocks in shallow water.
Steelhead - southern California DPS *Oncorhynchus mykiss irideus* pop. 10	FE	–	Federal listing refers to populations from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego County). Southern steelhead likely have greater physiological tolerances to warmer water and more variable conditions.
Tidewater goby *Eucyclogobius newberryi*	FE	SSC	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches, they need still but not stagnant water and high oxygen levels.
Unarmored threespine stickleback *Gasterosteus aculeatus williamsoni*	FE	SE FP	Weedy pools, backwaters, and among emergent vegetation at the stream edge in small Southern California streams. Cool (i.e., less than 24 degrees Celsius), clear water with abundant vegetation.
Invertebrates			
American bumble bee *Bombus pensylvanicus*	–	–	Coastal prairie, valley and foothill grassland, and Great Basin grassland. Forages on a variety of flowers and nests above ground under long grass or underground.
A miner bee *Perdita stephanomeriae*	–	–	Desert dunes.
Borrego parnopes cuckoo wasp *Parnopes borregoensis*	–	–	Southern California, including Inyo, San Bernardino, and San Diego counties, and south to Mexico (Baja California), at least historically.
Busck's gallmoth *Eugnosta busckana*	–	–	Coastal dunes and coastal scrub. Requires host plant California brittlebush (*Encelia californica)* for breeding.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
California mellitid bee *Melitta californica*	–	–	Desert regions of southwest Arizona, southeast California, and Baja California, Mexico. Also collected from Torrey Pines, San Diego County.
Carlson's dune beetle *Anomala carlsoni*	–	–	Known primarily from creosote scrub in vicinity of Algodones Dunes, Imperial County. Also taken from Borrego, San Diego County. Host preferences unknown.
Cheeseweed owlfly (cheeseweed moth lacewing) *Oliarces clara*	–	–	Inhabits the lower Colorado River drainage. Found under rocks or in flight over streams. *Larrea tridentata* is the suspected larval host.
Crotch bumble bee *Bombus crotchii*	–	SC	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include *Antirrhinum*, *Phacelia*, *Clarkia*, *Dendromecon*, *Eschscholzia*, and *Eriogonum*.
Globose dune beetle *Coelus globosus*	–	–	Inhabitant of coastal sand dune habitat; erratically distributed from Ten Mile Creek in Mendocino County south to Ensenada, Mexico. Inhabits foredunes and sand hummocks; it burrows beneath the sand surface and is most common beneath dune vegetation.
Haromonius halictid bee *Halictus harmonius*	–	–	Known only from the foothills of the San Bernardino Mts., possibly also the San Jacinto Mts.
Hermes copper butterfly *Lycaena hermes*	FT	–	Found in southern mixed chaparral and coastal sage scrub at western edge of Laguna Mountains. Host plant is *Rhamnus crocea*.
Knull's metallic wood-boring beetle *Trichinorhipis knulli*	–	–	Endemic to California, where it has been collected from Riverside and Imperial Counties.
Laguna Mountains skipper *Pyrgus ruralis lagunae*	FE	–	Only in a few open meadows in yellow pine forest between 5,000 and 6,000 feet in the vicinity of Mt Laguna and Palomar Mountain. Eggs laid on leaves of *Horkelia bolanderi clevelandi*. Larvae feed on leaves and overwinter on the host plant.
Marsh-elder long-horned beetle *Deltaspis ivae*	–	–	Found in a few scattered locations in San Diego and Riverside counties; larva breeds in *Iva hayesiana* root collars.
Mesa shoulderband *Helminthoglypta coelata*	–	–	Known only from a few locations in western San Diego County. Found in rockslides, beneath bark and rotten logs, and among coastal vegetation.
Mimic tryonia (California brackishwater snail) *Tryonia imitator*	–	–	Inhabits coastal lagoons, estuaries, and salt marshes, from Sonoma County south to San Diego County. Found only in permanently submerged areas in a variety of sediment types; able to withstand a wide range of salinities.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
Monarch - California overwintering population *Danaus plexippus* pop. 1	FC	–	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.
Obscure bumble bee *Bombus caliginosus*	–	–	Coastal areas from Santa Barbara County to north to Washington state. Food plant genera include *Baccharis, Cirsium*, *Lupinus*, *Lotus*, *Grindelia*, and *Phacelia*.
Peak shoulderband *Helminthoglypta milleri*	–	–	Known only from the type locality at Cuyamaca Peak in San Diego County. Found in rock piles.
Quino checkerspot butterfly *Euphydryas editha quino*	FE	–	Sunny openings within chaparral and coastal sage shrublands in parts of Riverside and San Diego counties. Hills and mesas near the coast. need high densities of food plants *Plantago erecta*, *Plantago insularis*, and *Orthocarpus purpurescens*.
Riverside fairy shrimp *Streptocephalus woottoni*	FE	–	Endemic to western Riverside, Orange, and San Diego counties in areas of tectonic swales/earth slump basins in grassland and coastal sage scrub. Inhabit seasonally astatic pools filled by winter/spring rains. Hatch in warm water later in the season.
San Diego fairy shrimp *Branchinecta sandiegonensis*	FE	–	Endemic to San Diego and Orange County mesas. Vernal pools.
Sandy beach tiger beetle *Cicindela hirticollis gravida*	–	–	Inhabits areas adjacent to non-brackish water along the coast of California from San Francisco Bay to northern Mexico. Clean, dry, light-colored sand in the upper zone. Subterranean larvae prefer moist sand not affected by wave action.
Senile tiger beetle *Cicindela senilis frosti*	–	–	Inhabits marine shoreline, from Central California coast south to salt marshes of San Diego. Also found at Lake Elsinore Inhabits dark-colored mud in the lower zone and dried salt pans in the upper zone.
Thorne's hairstreak *Callophrys thornei*	–	–	Associated with the endemic tecate cypress (*Cupressus forbesii*). Only known from vicinity of Otay Mountain.
Vernal pool fairy shrimp *Branchinecta lynchi*	FT	–	Endemic to the grasslands of the Central Valley, Central Coast mountains, and South Coast mountains, in astatic rain-filled pools. Inhabit small, clear-water sandstone-depression pools and grassed swale, earth slump, or basalt-flow depression pools.
Wandering (=saltmarsh) skipper *Panoquina errans*	–	–	Southern California coastal salt marshes. Requires moist saltgrass for larval development.
Warner Springs shoulderband *Rothelix warnerfontis*	–	–	Known only from two localities near Warner Springs, San Diego County. Found in wood rat nests; as development eliminates rat nests, snail has become scarce.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
Wawona riffle beetle *Atractelmis wawona*	–	–	Aquatic; found in riffles of rapid, small to medium clear mountain streams; 2,000-5,000 feet in elevation. Strong preference for inhabiting submerged aquatic mosses
Western beach tiger beetle *Cicindela latesignata latesignata*	–	–	Mudflats and beaches in coastal Southern California.
Western tidal-flat tiger beetle *Cicindela gabbii*	–	–	Inhabits estuaries and mudflats along the coast of Southern California. Generally found on dark-colored mud in the lower zone; occasionally found on dry saline flats of estuaries.
Mammals			
American badger *Taxidea taxus*	–	SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils, and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.
Big free-tailed bat *Nyctinomops macrotis*	–	SSC	Low-lying arid areas in Southern California. Need high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.
California leaf-nosed bat *Macrotus californicus*	–	SSC	Desert riparian, desert wash, desert scrub, desert succulent scrub, alkali scrub and palm oasis habitats. Needs rocky, rugged terrain with mines or caves for roosting.
Colorado Valley woodrat *Neotoma albigula venusta*	–	–	Low-lying desert areas in southeastern California. Closely associated with beaver-tail cactus and mesquite. Intolerant of cold temperatures. Eats mainly succulent plants. Distribution influenced by abundance of nest building material
Dulzura pocket mouse *Chaetodipus californicus femoralis*	–	SSC	Variety of habitats including coastal scrub, chaparral, and grassland in San Diego County. Attracted to grass-chaparral edges.
Earthquake Merriam's kangaroo rat *Dipodomys merriami collinus*	–	–	Known only from San Diego and Riverside County. Associated with sage scrub, chaparral, and nonnative grassland. Need sandy loam substrates for digging of burrows.
Fringed myotis *Myotis thysanodes*	–	–	In a wide variety of habitats, optimal habitats are pinyon-juniper, valley foothill hardwood and hardwood-conifer. Uses caves, mines, buildings or crevices for maternity colonies and roosts.
Hoary bat *Lasiurus cinereus*	–	–	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths. Requires water.
Jacumba pocket mouse *Perognathus longimembris internationalis*	–	SSC	Desert riparian, desert scrub, desert wash, coastal scrub, and sagebrush. Rarely found on rocky sites, uses all canopy coverages.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
Lesser long-nosed bat *Leptonycteris yerbabuenae*	FE	–	Suitable day roosts (caves and mines) and suitable concentrations of food plants (columnar cacti and agaves) are critical resources. No maternity roosts known from California; may only be vagrant. Caves and mines are used as day roosts. Caves, mines, rock crevices, trees and shrubs, and abandoned buildings are used as night roosts for digesting meals. Nectar, pollen, and fruit eating bat; primarily feeding on agaves, saguaro, and organ pipe cactus.
Long-eared myotis *Myotis evotis*	–	–	Found in all brush, woodland, and forest habitats from sea level to about 9,000 feet prefers coniferous woodlands and forests. Nursery colonies in buildings, crevices, spaces under bark, and snags. Caves used primarily as night roosts.
Long-legged myotis *Myotis volans*	–	–	Most common in woodland and forest habitats above 4,000 feet. Trees are important day roosts; caves and mines are night roosts. Nursery colonies usually under bark or in hollow trees, but occasionally in crevices or buildings.
Los Angeles pocket mouse *Perognathus longimembris brevinasus*	–	SSC	Lower elevation grasslands and coastal sage communities in and around the Los Angeles Basin. Open ground with fine sandy soils. May not dig extensive burrows, hiding under weeds and dead leaves instead.
Mexican long-tongued bat *Choeronycteris mexicana*	–	SSC	Occasionally found in San Diego County, which is on the periphery of their range. Feeds on nectar and pollen of night-blooming succulents. Roosts in relatively well-lit caves, and in and around buildings.
Mountain lion Puma concolor	–	SC	Mountain lions inhabit a wide range of ecosystems, including mountainous regions, forests, deserts, and wetlands. Mountain lions establish and defend large territories and can travel large distances in search of prey or mates. In April of 2020, the California Fish and Game Commission found that listing of the Central Coast and Southern California Evolutionarily Significant Units may be warranted, and designated mountain lion within these ESUs as a candidate species.
Northwestern San Diego pocket mouse *Chaetodipus fallax fallax*	–	SSC	Coastal scrub, chaparral, grasslands, and sagebrush in western San Diego County. Sandy, herbaceous areas, usually in association with rocks or coarse gravel.
Pacific pocket mouse *Perognathus longimembris pacificus*	FE	SSC	Inhabits the narrow coastal plains from the Mexican border north to El Segundo, Los Angeles County. Seems to prefer soils of fine alluvial sands near the ocean, but much remains to be learned.
Pallid bat *Antrozous pallidus*	–	SSC	Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
Pallid San Diego pocket mouse *Chaetodipus fallax pallidus*	–	SSC	Desert border areas in eastern San Diego County in desert wash, desert scrub, desert succulent scrub, and pinyon-juniper. Sandy herbaceous areas, usually in association with rocks or coarse gravel.
Palm Springs pocket mouse *Perognathus longimembris bangsi*	–	SSC	Most common in creosote-dominated desert scrub. Rarely found on rocky sites. Occurs in all canopy coverage classes.
Peninsular bighorn sheep DPS *Ovis canadensis nelsoni* pop. 2	FE	ST FP	Eastern slopes of the Peninsular Ranges below 4,600 feet elevation. This DPS of the subspecies inhabits the Peninsular Ranges in southern California from the San Jacinto Mountains south to the US-Mexico International Border. Optimal habitat includes steep walled canyons and ridges bisected by rocky or sandy washes, with available water.
Pocketed free-tailed bat *Nyctinomops femorosaccus*	–	SSC	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, and desert riparian. Rocky areas with high cliffs.
San Bernardino kangaroo rat *Dipodomys merriami parvus*	FE	SC SSC	Alluvial scrub vegetation on sandy loam substrates characteristic of alluvial fans and flood plains. Needs early to intermediate seral stages.
San Diego black-tailed jackrabbit *Lepus californicus bennettii*	–	SSC	Intermediate canopy stages of shrub habitats and open shrub and tree edges. Coastal sage scrub habitats in Southern California.
San Diego desert woodrat *Neotoma lepida intermedia*	–	SSC	Coastal scrub of Southern California from San Diego County to San Luis Obispo County. Moderate to dense canopies preferred. They are particularly abundant in rock outcrops and rocky cliffs and slopes.
Silver-haired bat *Lasionycteris noctivagans*	–	–	Primarily a coastal and montane forest dweller feeding over streams, ponds and open brushy areas. Roosts in hollow trees, beneath exfoliating bark, abandoned woodpecker holes and rarely under rocks. Needs drinking water.
Southern grasshopper mouse *Onychomys torridus ramona*	–	SSC	Desert areas, especially scrub habitats with friable soils for digging. Prefers low to moderate shrub cover. Feeds almost exclusively on arthropods, especially scorpions and orthopteran insects.
Spotted bat *Euderma maculatum*	–	SSC	Occupies a wide variety of habitats from arid deserts and grasslands through mixed conifer forests. Feeds over water and along washes. Feeds almost entirely on moths. Needs rock crevices in cliffs or caves for roosting.
Stephens' kangaroo rat *Dipodomys stephensi*	FE	ST	Primarily annual and perennial grasslands, but also occurs in coastal scrub and sagebrush with sparse canopy cover. Prefers buckwheat, chamise, brome grass and filaree. Will burrow into firm soil.

Species	Federal Listing Status[1]	State Listing Status[1]	Habitat
Townsend's big-eared bat *Corynorhinus townsendii*	–	SSC	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.
Western mastiff bat *Eumops perotis californicus*	–	SSC	Many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosts in crevices in cliff faces, high buildings, trees, and tunnels.
Western red bat *Lasiurus blossevillii*	–	SSC	Roosts primarily in trees, 2-40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.
Western small-footed myotis *Myotis ciliolabrum*	–	–	Wide range of habitats mostly arid wooded and brushy uplands near water. Seeks cover in caves, buildings, mines, and crevices Prefers open stands in forests and woodlands. Requires drinking water. Feeds on a wide variety of small flying insects.
Western yellow bat *Lasiurus xanthinus*	–	SSC	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts in trees, particularly palms. Forages over water and among trees.
Yuma myotis *Myotis yumanensis*	–	–	Optimal habitats are open forests and woodlands with sources of water over which to feed. Distribution is closely tied to bodies of water. Maternity colonies in caves, mines, buildings, or crevices.

Notes: CNDDB = California Natural Diversity Database; CEQA = California Environmental Quality Act.

[1] Legal Status Definitions

Federal:

FE Federally Listed as Endangered (legally protected)
FT Federally Listed as Threatened (legally protected)
FC Federal Candidate for listing (legally protected)
FD Federally Delisted (not currently protected)
P Proposed for listing (not currently protected)

State:

FP Fully protected (legally protected)
SSC Species of special concern (no formal protection other than CEQA consideration)
SE State Listed as Endangered (legally protected)
ST State Listed as Threatened (legally protected)
SD State Delisted
SC State Candidate for Listing (legally protected)

Sources: CNDDB 2023; USFWS 2023.

Table 2.4-4 Federally Designated Critical Habitat for Species Listed Under the Endangered Species Act

Species
Plants
San Diego Thornmint *Acanthomintha ilicifolia*
San Diego Ambrosia *Ambrosia pumila*
Thread-leaved Brodiaea *Brodiaea filifolia*
Otay Tarplant *Deinandra (=Hemizonia) conjugens*
Mexican Flannelbush *Fremontodendron mexicanum*
Willowy Monardella *Monardella viminea*
Spreading Navarretia *Navarretia fossalis*
Cushenbury Oxytheca *Oxytheca parishii var. goodmaniana*
San Bernardino Bluegrass *Poa atropurpurea*
Invertebrates
San Diego Fairy Shrimp *Branchinecta sandiegonensis*
Quino Checkerspot Butterfly *Euphydryas editha quino (=E. e.wrighti)*
Hermes Copper Butterfly *Lycaena hermes*
Laguna Mountains Skipper *Pyrgus ruralis lagunae*
Riverside Fairy Shrimp *Streptocephalus woottoni*
Fish
Tidewater Goby *Eucyclogobius newberryi*
Amphibians and Reptiles
Arroyo (=arroyo Southwestern) Toad *Anaxyrus californicus*
Birds
Western Snowy Plover *Charadrius nivosus nivosus*
Southwestern Willow Flycatcher *Empidonax traillii extimus*

Species
Coastal California Gnatcatcher *Polioptila californica californica*
Least Bell's Vireo *Vireo bellii pusillus*
Mammals
Peninsular Bighorn Sheep *Ovis canadensis nelsoni*

Source: Compiled by Ascent Environmental in 2023.

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2.5 Cultural and Paleontological Resources

This section summarizes the existing conditions for cultural and paleontological resources, including historical resources, archaeological resources, human remains, and paleontological resources within the unincorporated county, and evaluates the potential effects that implementation of the project may have on these resources. Because this analysis is subsequent to the certified 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the cultural and paleontological resources setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the 2011 GPU PEIR. However, the existing conditions outlined in this section are generally consistent with those described in the 2011 GPU PEIR because the type and location of cultural and paleontological resources have not changed significantly since those documents were prepared.

Table 2.5-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. As indicated below, implementation of the proposed project would result in new or more severe significant impacts on cultural and paleontological resources.

Table 2.5-1 Summary of Cultural and Paleontological Resources–Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			Potential New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Historical Resources	General Plan Only: Less than Significant Impact after Mitigation	CAP Update Only: Yes	CAP Update Only: Yes
		General Plan Cumulative Contribution: Less-Than-Significant Impact after Mitigation	CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: Yes
2	Archaeological Resources	General Plan Only: Less than Significant Impact after Mitigation	CAP Update Only: Yes	CAP Update Only: Yes
		General Plan Cumulative Contribution: Less-Than-Significant Impact after Mitigation	CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: Yes

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			Potential New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
3	Paleontological Resources	General Plan Only: Less than Significant Impact after Mitigation	CAP Update Only: Yes	CAP Update Only: Yes
		General Plan Cumulative Contribution: Less-Than-Significant Impact after Mitigation	CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: Yes
4	Human Remains	General Plan Only: Less than Significant Impact after Mitigation	CAP Update Only: Yes	CAP Update Only: Yes
		General Plan Cumulative Contribution: Less-Than-Significant Impact after Mitigation	CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: Yes

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

Compiled by Ascent Environmental in 2023.

The County did not receive any comments regarding historical, archeological, or paleontological resources, or human remains during the Notice of Preparation (NOP) scoping process. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

2.5.1 Existing Conditions

The 2011 GPU PEIR included a discussion of existing conditions related to cultural and paleontological resources in Section 2.5.1 (page 2.5-1) which includes all lands within the county. As described in full detail in Section 2.5.1 of the 2011 GPU PEIR, the county contained more than 27,000 recorded sites (19,400 archaeological recorded sites and approximately 8,000 other cultural resources sites) in 2011 with a continuously growing number of sites being discovered. The cultural and paleontological resources conditions described in the 2011 GPU PEIR are the same as the existing conditions evaluated for this draft SEIR, except for the new issue of tribal cultural resources (see Section 2.14, "Tribal Cultural Resources," of this draft SEIR). No other changes to the existing conditions have been identified that would alter the conclusions in the 2011 GPU PEIR. As described on pages 2.5-1 through 2.5-16 of the 2011 GPU PEIR, cultural and paleontological resources are found throughout the county. All references used from the 2011 GPU PEIR were reviewed to ensure they are still valid today and are hereby incorporated by reference.

2.5.2 Regulatory Framework

The 2011 GPU PEIR described the regulatory framework related to cultural resources in Section 2.5 (pages 2.5-16 through 2.5-22) and is hereby incorporated by reference. Specific regulations discussed in the 2011 GPU PEIR and applicable to the project include the following:

2.5.2.1 Federal

- Executive Order 12072
- Historic Sites, Buildings, Objects, and Antiquities Act
- National Historic Landmarks Program
- National Historic Preservation Act
- National Register of Historic Places
- Secretary of the Interior's Standards

2.5.2.2 State

- State Historical Landmarks Program
- State Points of Historical Interest Program
- California Register of Historic Places
- Public Resources Code (PRC) Sections 5079–5079.65
- PRC Sections 5097–5097.6
- PRC Sections 5097.9–5097.991
- Government Code Section 25373
- Government Code Section 27288.2
- Government Code Sections 50280–50290
- Health and Safety Code (HSC) Sections 18950–18961
- HSC Section 7050.5

2.5.2.3 Local

- County of San Diego Code of Regulatory Ordinances Sections 87.101–87.804 Grading, Clearing, and Watercourses Ordinance
- County of San Diego Code of Regulatory Ordinances Sections 86.601–86.608 Resource Protection Ordinance (RPO)
- County of San Diego Zoning Ordinance
- County of San Diego Resource Conservation Areas

- San Diego County Local Register of Historical Resources
- San Diego County Historic Site Board

2011 San Diego County General Plan

The General Plan policies related to cultural and paleontological resources that are applicable to the CAP Update include the following:

> Policy COS-7.1: Archaeological Protection. Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.
>
> Policy COS-7.2: Open Space Easements. Require development to avoid archaeological resources whenever possible. If complete avoidance is not possible, require development to fully mitigate impacts to archaeological resources.
>
> Policy COS-7.3: Archaeological Collections. Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner.
>
> Policy COS-7.4: Consultation with Affected Communities. Require consultation with affected communities, including local tribes to determine the appropriate treatment of cultural resources.
>
> Policy COS-7.5: Treatment of Human Remains. Require human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the Most Likely Descendant (MLD) and under the requirements of Federal, State and County Regulations.
>
> Policy COS-7.6: Cultural Resource Data Management. Coordinate with public agencies, tribes, and institutions in order to build and maintain a central database that includes a notation whether collections from each site are being curated, and if so, where, along with the nature and location of cultural resources throughout the County of San Diego.
>
> Policy COS-8.1: Preservation and Adaptive Reuse. Encourage the preservation and/or adaptive reuse of historic sites, structures, and landscapes as a means of protecting important historical resources as part of the discretionary application process, and encourage the preservation of historic structures identified during the ministerial application process.
>
> Policy COS-8.2: Education and Interpretation. Encourage and promote the development of educational and interpretive programs that focus on the rich multicultural heritage of the County of San Diego.
>
> Policy COS-9.1: Preservation. Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes.

Policy COS-9.2: Impacts of Development. Require development to minimize impacts to unique geological features from human related destruction, damage, or loss.

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Cul-1.1: Utilize the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant.

Adopted Mitigation Measure Cul-1.6: Implement, and update as necessary, the "County's Guidelines for Determining Significance for Cultural Resources" to identify and minimize adverse impacts to historic and archaeological resources.

Adopted Mitigation Measure Cul-2.1: Develop management and restoration plans for identified and acquired properties with cultural resources.

Adopted Mitigation Measure Cul-2.2: Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information.

Adopted Mitigation Measure Cul-2.3: Support the dedication of easements that protect important cultural resources by using a variety of funding methods, such as grants or matching funds, or funds from private organizations.

Adopted Mitigation Measure Cul-2.5: Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys.

Adopted Mitigation Measure Cul-2.6: Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the South Coast Information Center (SCIC) and consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review, while maintaining the confidentiality of sensitive cultural information.

Adopted Mitigation Measure Cul-3.1: Implement the Grading Ordinance and CEQA to avoid or minimize impacts to paleontological resources, require a paleontological monitor during grading when appropriate, and apply appropriate mitigation when impacts are significant.

Adopted Mitigation Measure Cul-3.2: Implement, and update as necessary, the County's Guidelines for Determining Significance for Paleontological Resources to identify and minimize adverse impacts to paleontological resources.

Adopted Mitigation Measure Cul-4.1: Include regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant.

2.5.3 Analysis of Effects and Significance Determinations

2.5.3.1 Significance Criteria

Based on Appendix G of the State CEQA Guidelines, the project would result in a significant impact on cultural or paleontological resources if it would:

- cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the State CEQA Guidelines;
- cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines;
- directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;
- disturb any human remains, including those interred outside of formal cemeteries.

2.5.3.2 Approach to Analysis

Impacts related to cultural and paleontological resources were analyzed qualitatively based on a review of the CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant 2011 GPU PEIR mitigation measures are applicable to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update.

The analysis is informed by the provisions and requirements of federal, state, and local laws and regulations that apply to cultural resources. PRC Section 21083.2(g) defines a "unique archaeological resource" as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following California Register of Historical Resources-related criteria: (1) that it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) that it has a special and particular quality, such as being

the oldest of its type or the best available example of its type; or (3) that it is directly associated with a scientifically recognized important prehistoric or historic event or person. An impact on a resource that is not unique is not a significant environmental impact under CEQA (State CEQA Guidelines Section 15064.5[c][4]). If an archaeological resource qualifies as a resource under the California Register of Historical Resources criteria, then the resource is treated as a unique archaeological resource for the purposes of CEQA.

For the purposes of the impact discussion, "historical resource" is used to describe built-environment historic-period resources. Archaeological resources (both prehistoric and historic-period), which may qualify as "historical resources" pursuant to CEQA, are analyzed separately from built-environment historical resources.

Scope of SEIR Impact Analysis

The impact analysis contained within this draft SEIR focuses on whether implementation of the CAP Update would result in new or more severe impacts than were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward the established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impacts of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unicorporated county) and its role as a programmatic planning document designed to guide future decision-making related to the reduction of GHGs within the unincorporated county, the study area for cultural and paleontological resources is the unincorporated area of the county within the County's jurisdiction (i.e., excluding tribal lands, state and federally owned lands, and military installations), consistent with the 2011 GPU PEIR.

The analysis in this draft SEIR is programmatic. Implementation of all CAP Update measures and actions were considered during preparation of this draft SEIR, to the degree specific information about their implementation is known. This draft SEIR does not speculate about the potential site-specific physical impacts that could occur if and when a specific improvements are proposed in the future at locations still to be determined. Rather, this SEIR considers the types of impacts that could occur with implementation of future projects required to implement the proposed CAP Update measures and actions. Consistent with the requirements of State CEQA Guidelines Section 15168, future activities associated with the CAP Update are examined on a project-specific basis in the light of the 2011 GPU PEIR to determine whether an additional environmental document must be prepared (State CEQA Guidelines Section 15168[c]).

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies and associated measures and actions, proposed in the CAP Update (see Table 1-2) have

been grouped into categories for the purpose of analysis, based on the sector they target (e.g., solid waste, water/wastewater). CAP Update actions and measures that would have the potential to affect cultural or paleontological resources are provided below. CAP Update actions and measures that would involve development of policies and programs that would not result in direct physical effects or those that would result in limited physical improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to cultural and paleontological resources.

Solid Waste Measures and Actions. This category includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to cultural and paleontological resources include those that would result in the development of new or expanded recycling and composting facilities (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

Water and Wastewater Measures and Actions. This category includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Key actions with potential to result in new or more severe impacts related to cultural and paleontological resources include those that would result in the construction of new recycled water and stormwater capture and reuse infrastructure (Actions W-1.1, W-2.2, W-2.3, and W-2.4).

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. Therefore, the measures and actions are not expected to result in new or more severe impacts related to cultural and paleontological resources. Rather, actions that would result in the acquisition and management of conservation lands (Actions A-1.1, A-1.2, A-1.2.a, A-3.1, and A-4.1) would have potential to benefit cultural and paleontological resources. This category also includes an action that would evaluate opportunities for the construction of farmworker housing (Action A-4.1.b).

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

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more

severe impacts related to cultural and paleontological resources include those that would result in the construction of new electric vehicle charging stations (Action T-3.1 through T-4.3) and increase access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts in the unincorporated area (Action T-3.1.a).

2.5.3.3 Issue 1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines the project would result in a significant impact on cultural resources if it would:

- cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the State CEQA Guidelines.

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated historical resources impacts from the adoption of the goals and policies of the General Plan countywide, which is inclusive of the project area. In addition, the 2011 GPU PEIR evaluated buildout of the land use designations applied throughout the area. The 2011 GPU PEIR determined that buildout under the General Plan would result in potentially significant direct (e.g., demolition, alteration, or relocation), indirect (e.g., human activity, increased access to and/or use of a historical resource), and cumulative impacts on historical resources. The discussion of impacts can be found in Section 2.5, “Cultural and Paleontological Resources” (pages 2.5-22 through 2.5-27,2.5-34, and 2.5-35), of the 2011 GPU PEIR and is hereby incorporated by reference. These impacts would be reduced to below a level of significance through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; the adopted General Plan goals and policies; and specific mitigation measures/implementation programs identified in the 2011 GPU PEIR. Specific General Plan policies related to the protection of historical resources (Policy COS-8.1) are listed above in Section 2.5.2, “Regulatory Framework”; 2011 GPU PEIR mitigation measures (Cul-1.1 and Cul-1.6) are listed below in Section 2.5.5, “Mitigation Measures.”

CAP Update Impact Analysis

The following sections describe the effects on historical resources that could result from the implementation of the measures and actions proposed in the CAP Update.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and more generally in the unincorporated county. Implementing CAP Update measures and actions could result in potential construction of new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 include development of zero waste policies which may result in new or expanded composting and recycling facilities

to divert solid waste from landfills. Specific locations for new and expanded facilities have not been identified. Therefore, these improvements are analyzed at a programmatic level.

Historical (or architectural) resources include standing buildings (e.g., houses, barns, schools) and intact structures (e.g., dams, bridges). Implementation of the CAP Update solid waste measures and actions would occur in rural or semi-rural areas which are less likely than urban areas to have these resources. Nevertheless, construction of new facilities would have the potential to affect historical resources through alteration or demolition of structures. However, because the construction would occur in undeveloped areas, which are less likely to have architectural features, implementation of the CAP Update solid waste measures and actions would result in fewer impacts related to historical resources than identified in the 2011 GPU PEIR through future development.

The following 2011 GPU PEIR mitigation measures would be applied to reduce this impact: Cul-1.1 requires the identification and protection of historic resources by requiring appropriate reviews and applying mitigation when impacts are significant; and Cul-1.6 requires implementation of the *County of San Diego Guidelines for Determining Significance—Cultural Resources: Archaeological and Historical Resources* (County of San Diego 2007) to identify and minimize adverse impacts to historic resources. Additionally, General Plan Policy COS-8.1 encourages the preservation and/or adaptive reuse of historic structures as part of the discretionary application process and encourages the preservation of historic structures identified during the ministerial application process.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Measures W-1 and W-2 include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Measure W-3 would increase wastewater treatment efficiency through the East County Advanced Water Purification Program (Action W-3.1) and evaluate opportunities to reduce wastewater emissions in the unincorporated area (Action W3.1.a). Implementation of these measures would not result in impacts to historical resources because any new or expanded physical structures associated with implementing water conservation measures and actions would be ancillary to existing or proposed development, which would have previously undergone historic review, if required. This impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of Measures A-1 through A-4 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. Implementation of Action A-4.1.b would have the potential to result in new farmworker

housing in the unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified. Historical resources, including barns and other agricultural structures, could be located on these lands. Damage to or destruction of a building or structure that is a designated historic resource, or is eligible for listing as a historic resource, could result in a change in its historical significance.

Implementation of the CAP Update agricultural measures and actions would result in similar impacts related to historical resources as identified in the 2011 GPU PEIR through future development. For example, direct impacts related to demolition, alteration, or relocation of resources, or indirect impacts related to human activity, increased access to and/or use of a historical resource could occur through implementation of future development. Acquisition of lands and development of farmworker housing would be required to implement adopted General Plan Policy COS-8.1 which encourages the preservation and/or adaptive reuse of historic structures as part of the discretionary application process and encourages the preservation of historic structures identified during the ministerial application process. In addition, 2011 GPU PEIR Mitigation Measure Cul-1.1 requires the identification and protection of historic resources by requiring appropriate reviews and applying mitigation when impacts are significant; and Mitigation Measure Cul-1.6 requires implementation of the *County of San Diego Guidelines for Determining Significance—Cultural Resources: Archaeological and Historical Resources* (County of San Diego 2007) to identify and minimize adverse impacts to historic resources. Implementation of Mitigation Measures Cul-1.1 and Cul-1.6 would substantially reduce the potential for adverse effects to historical resources. This impact would be less than significant with mitigation.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects. Implementation of CAP Update Measure E-2 and Measure E-3 could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. These retrofits could include rooftop or ground-mounted photovoltaic (PV) solar arrays or small wind turbines, upgraded mechanical systems and energy storage, and other similar improvements. The addition of energy infrastructure may be required to support implementation of some measures; these projects have the potential to alter historical resources.

It is possible that implementation of some projects could result in development and construction of facilities that would result in direct and/or indirect impacts to historical resources. Types of impacts that could occur include retrofits to existing designated historic buildings, disturbance of the ground or setting, or demolition or construction of buildings and infrastructure that could affect the historic setting. Projects that include the alteration of historic buildings or structures would have a direct impact on historical resources. Projects that would introduce new visual elements, such as new small or large-

scale renewable energy systems, have the potential to indirectly affect historical resources by changing the visual setting within which the historical resource is located.

Large-scale renewable energy systems, such as solar PV and concentrator solar, and large-scale wind turbines, would generally be constructed in primarily undeveloped locations that are productive for generating renewable energy source. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Historical resources, including farm structures or railroads, could be located on these lands. Damage to or destruction of a building or structure that is a designated historic resource, or is eligible for listing as a historic resource, could result in a change in its historical significance.

Under the County's Renewable Energy Zoning Ordinance Sections 6950 and 6952, homeowners would be allowed to install roof-mounted solar PV arrays and small wind turbines without discretionary review if they meet the zoning verification requirements of the applicable section. In the case of solar PV panels, they are generally flat, low-lying elements that would not distract the viewer's attention when placed on a roof line as they are limited to maximum of 5 feet beyond the roof. When placed along an easement or within the subject property's yard, the visual impact is not anticipated to distract from the historic setting.

If a parcel meets the criteria of the zoning ordinance, up to three small wind turbines could be installed on a parcel as an accessory use. If the property is eligible for historic listing or is located within an historic zoning district but is not registered as such, then installation of the wind turbines would not be subject to discretionary review and changes to the property or visual setting could occur unmitigated. Therefore, impacts to historical resources could occur because it could result in the physical demolition, destruction, or alteration of the historical resource, or it could alter the setting of the resource when the setting contributes to the resource's significance through introducing new vertical elements.

In cases where improvements would be required to undergo the County's discretionary review process, impacts would be minimized through implementation of adopted General Plan Policy COS-8.1 and 2011 GPU PEIR Mitigation Measures Cul-1.1 and Cul-1.6, which would conserve, protect, and preserve historical resources consistent with federal and state requirements, as well as all applicable project-specific mitigation measures that would minimize impacts. However, it is possible for some properties that are not listed or zoned as historical resources to install wind turbines or solar PV energy systems without a discretionary permit. This impact would be significant.

Built Environment and Transportation Measures and Actions

These measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Measure T-

1.1) and Active Transportation Plan (Measure T-5.1). Other measures and actions would affect the design of existing and planned roadways. Measure T-6.2 would implement transit-supportive roadway treatments such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Measure T-3.1 would result in the installation of publicly available electric vehicle charging stations. Action T-3.1.a would support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts that could facilitate future infrastructure construction. Several measures and actions would further support alternative modes of transportation without resulting in physical changes that could affect visual character or quality.

Because of the nature of such improvements (i.e., limited size, along existing roadways, not accompanied by tall or expansive buildings), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. Implementation of these measures would not result in impacts to historical resources because any new or expanded physical structures associated with implementing built environment and transportation measures and actions would be ancillary to existing or proposed development, which would have previously undergone historic review, if required. All future development projects would be required to follow County development requirements, including implementing adopted General Plan Policy COS-8.1, which encourages the preservation and/or adaptive reuse of historic structures as part of the discretionary application process and encourages the preservation of historic structures identified during the ministerial application process; 2011 GPU PEIR Mitigation Measure Cul-1.1, which requires the identification and protection of historic resources by requiring appropriate reviews and applying mitigation when impacts are significant; and Mitigation Measure Cul-1.6, which requires implementation of the *County of San Diego Guidelines for Determining Significance— Cultural Resources: Archaeological and Historical Resources* (County of San Diego 2007) to identify and minimize adverse impacts to historic resources. This impact would be less than significant with mitigation.

Summary

As explained in the 2011 GPU PEIR, implementation of adopted General Plan Policy COS-8.1 and adopted 2011 GPU PEIR mitigation measures would ensure that new development would conserve and protect unique and sensitive visual features and the scenic quality of the environment. Adopted General Plan policies require preservation and/or adaptive reuse of historic structures as part of the discretionary application process and encourage the preservation of historic structures identified during the ministerial application process. Applicable 2011 GPU PEIR Mitigation Measure Cul-1.1 requires the identification and protection of historic resources by requiring appropriate reviews and applying mitigation when impacts are significant; and Mitigation Measure Cul-1.6 requires implementation of the *County of San Diego Guidelines for Determining Significance— Cultural Resources: Archaeological and Historical Resources* (County of San Diego 2007) to identify and minimize adverse impacts to historic resources.

Generally, improvements and projects that would result from implementation of the CAP Update would undergo a discretionary review process in which the County would be able to utilize project conditions and mitigation to minimize impacts related to historical resources, and may deny certain improvements if the object, building, structure, site, area or place is listed as a historical resource or zoned with the "H" Special Area Designator (Historic/Archaeological Landmark or District). Multi-modal improvements, solid waste facilities, and large-scale renewable energy projects would all be required to undergo the County's discretionary review process during which relevant General Plan policies and 2011 GPU PEIR mitigation measures located in Section 2.5, "Cultural and Paleontological Resources" (pages 2.5-22 through 2.5-27, 2.5-34, and 2.5-35), of the 2011 GPU PEIR would be implemented. In addition, federal, state, and local policies, ordinances, and applicable permitting procedures which protect historical resources would also be implemented.

Implementation of the General Plan policies and 2011 GPU PEIR mitigation measures (Mitigation Measures Cul-1.1 and Cul-1.6) and compliance with existing federal, state, and local regulations related to historical resources would generally minimize or eliminate impacts related to historical resources because of implementation of the project. However, in some cases, it is possible that wind and solar renewable energy improvements could result in significant impacts to historical resources because of changes to the historic building or setting **(Impact CULT-1)**. These projects may not be required to undergo a discretionary review process. Implementation of the CAP Update **would result in new or more severe impacts** not disclosed in the 2011 GPU PEIR.

2.5.3.4 Issue 2: Cause a Substantial Adverse Change in the Significance of an Archaeological Resource

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines the project would result in a significant impact on cultural resources if it would:

- cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the State CEQA Guidelines.

2011 GPU PEIR Determination

The 2011 GPU PEIR determined that buildout under the General Plan would result in potentially significant direct (e.g., alteration, or relocation), indirect (i.e., vandalism, looting, graffiti, and destruction because of increased access to and/or use of a resource because of additional human presence and activity), and cumulative impacts on known and unknown archaeological resources. The discussion of impacts can be found in Section 2.5, "Cultural and Paleontological Resources" (pages 2.5-27 through 2.5-30), of the 2011 GPU PEIR and is hereby incorporated by reference. These impacts would be reduced to a less-than-significant level through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; the adopted General Plan goals and policies; and specific mitigation measures/implementation programs identified in the 2011 GPU PEIR. Specific General Plan policies related to the

protection of archaeological resources (Policies COS-7.1, COS-7.2, and COS-7.3) are listed above in Section 2.5.2, “Regulatory Framework”; 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) are listed below in Section 2.5.5, “Mitigation Measures.”

CAP Impact Analysis

The following sections describe the potentially significant impacts related to archaeological resources that could result from the implementation of the proposed CAP Update measures and actions.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and more generally in the unincorporated county. Implementing CAP Update measures and actions could result in potential construction of new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 include development of zero waste policies which may result in new or expanded composting and recycling facilities to divert solid waste from landfills.

Specific locations for new and expanded facilities have not been identified. However, it is possible that the locations of such improvements could disturb archaeological resources because the location of all resources within the county is unknown. Development of new or expanded solid waste facilities would result in similar archaeological resource impacts as those discussed in the 2011 GPU PEIR.

The following 2011 GPU PEIR mitigation measures would be applied to reduce this impact: Cul-1.1 requires the identification and protection of archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant; Cul-1.6 requires implementation of the *County of San Diego Guidelines for Determining Significance—Cultural Resources: Archaeological and Historical Resources* (County of San Diego 2007) to identify and minimize adverse impacts to archaeological resources; Cul-2.1 requires a management plans properties with archaeological resources; Cul-2.2 and Cul-2.6 require identification of known archaeological resources through the South Coast Information Center; Cul-2.3 supports the dedication of easements that protect important archaeological resources; and Cul-2.5 requires grading monitoring by a qualified archaeologist. Implementation of these mitigation measures, along with General Plan Policies COS-7.1 (Archaeological Protection), COS-7.2 (Open Space Easements), and COS-7.3 (Archaeological Collections) would minimize impact to archeological resources resulting from projects that implement the CAP Update. Impacts would be less than significant with mitigation.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Measures W-1 and W-2

include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Measure W-3 would increase wastewater treatment efficiency through the East County Advanced Water Purification Program (Action W-3.1) and evaluate opportunities to reduce wastewater emissions in the unincorporated area (Action W3.1.a). Implementation of these measures would not result in impacts to archaeological resources because any new or expanded physical structures associated with implementing water conservation measures and actions would be ancillary to existing or proposed development, which would have previously undergone archaeological surveys, if required. Impacts would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of Measures A-1 through A-4 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified. Known and unknown archaeological resources could be located on these lands; earth-disturbing activities could result in damage to these resources.

Implementation of the CAP Update agricultural measures and actions would result in similar impacts related to archaeological resources as identified in the 2011 GPU PEIR. Acquisition of lands and development of farmworker housing would be required to implement adopted General Plan Policies COS-7.1 (Archaeological Protection), COS-7.2 (Open Space Easements), and COS-7.3 (Archaeological Collections). The following 2011 GPU PEIR mitigation measures would be applied to reduce this impact: Cul-1.1 requires the identification and protection of archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant; Cul-1.6 requires implementation of the *County of San Diego Guidelines for Determining Significance—Cultural Resources: Archaeological and Historical Resources* (County of San Diego 2007) to identify and minimize adverse impacts to archaeological resources; Cul-2.1 requires management and restoration plans for identified and acquired properties with archaeological resources; Cul-2.2 and Cul-2.6 require identification of known archaeological resources through the South Coast Information Center; Cul-2.3 supports the dedication of easements that protect important archaeological resources; and Cul-2.5 requires grading monitoring by a qualified archaeologist. Impacts would be less than significant with mitigation. In addition, future discretionary projects would be required to be evaluated to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy

efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects. Implementation of CAP Update Measure E-2 and Measure E-3 could result in construction of large-scale renewable energy systems and energy efficiency retrofits on existing residential and non-residential structures and County facilities. These retrofits could include rooftop or ground-mounted PV solar arrays or small wind turbines, upgraded mechanical systems and energy storage, and other similar improvements. The addition of energy infrastructure may be required to support implementation of some measures; these projects have the potential to alter archaeological resources.

Large-scale renewable energy systems, such as PV, concentrator solar and wind turbine systems, would generally be constructed in areas that are not highly developed because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Ground disturbance, including excavation and grading have the potential to alter archaeological resources.

Small-scale renewable energy systems and other energy efficiency retrofits would occur in areas of existing development, and new development would install energy-efficient mechanical equipment at the time of construction. Implementation of new mechanical equipment or new renewable energy equipment would generally occur in developed areas of the county and would be regulated by existing County codes and policies that regulate the protection of archaeological resources. The placement of small-scale PV solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance Section 6954(a) that regulates the height and scale of these facilities. Rooftop and ground-mounted PV solar energy panels and roof-top wind turbines would not result in significant ground disturbance, although impacts to archaeological impacts could still occur at any level of ground disturbance.

However, small-scale ground-mounted wind turbines or solar energy panels would have the potential to result in impacts to archaeological resources because they are allowed on a parcel as an accessory use without discretionary review. Small-scale wind turbines could result in ground disturbance through excavation and grading to create a secure foundation. Accordingly, even with implementation of General Plan Policies COS-7.1 (Archaeological Protection), COS-7.2 (Open Space Easements), and COS-7.3 (Archaeological Collections); 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, and local, state, and federal regulations, the potential exists for archaeological resource impacts related to small-scale wind turbines because of the lack of discretionary oversight for some facilities. Impacts would be significant.

Built Environment and Transportation Measures and Actions

This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more severe impacts related to archaeological resources include those

that would result in the construction of new electric vehicle charging stations (Action T-3.1) and increase access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts in the unincorporated area (Action T-3.1.a). Some of these measures and actions would result in the construction of new facilities and infrastructure, the placement of structures, and the excavation of earthen materials.

Specific locations for new facilities and infrastructure have not been identified. However, it is possible that the locations of such improvements could disturb archaeological resources because the location of all resources within the county is unknown. Development of new or expanded solid waste facilities would result in similar archaeological resource impacts as those discussed in the 2011 GPU PEIR.

The following 2011 GPU PEIR mitigation measures would be applied to reduce this impact: Cul-1.1 requires the identification and protection of archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant; Cul-1.6 requires implementation of the *County of San Diego Guidelines for Determining Significance—Cultural Resources: Archaeological and Historical Resources* (County of San Diego 2007) to identify and minimize adverse impacts to archaeological resources; Cul-2.1 requires a management plans properties with archaeological resources; Cul-2.2 and Cul-2.6 require identification of known archaeological resources through the South Coast Information Center; Cul-2.3 supports the dedication of easements that protect important archaeological resources; and Cul-2.5 requirs grading monitoring by a qualified archaeologist. Implementation of these mitigation measures, along with General Plan Policies COS-7.1 (Archaeological Protection), COS-7.2 (Open Space Easements), and COS-7.3 (Archaeological Collections) would minimize impacts to archeological resources resulting from projects that implement the CAP Update. Impacts would be less than significant with mitigation.

Summary

As explained in the 2011 GPU PEIR, implementation of adopted General Plan Policies COS-7.1, COS-7.2, and COS-7.3 and adopted 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 would ensure that new development would conserve and protect archaeological resources. Adopted General Plan policies require future development to include appropriate mitigation to protect the quality and integrity of these resources. Applicable 2011 GPU PEIR mitigation measures requires the identification and protection of archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant, preparing management plans for properties with archaeological resources, identifying known archaeological resources through the South Coast Information Center, dedicating easements that protect important archaeological resources, and requiring grading monitoring by a qualified archaeologist.

However, because it is possible to install small-scale wind turbines as an accessory use without discretionary review, significant impacts to archaeological resources could occur due to ground-disturbing activities. Therefore, impacts to archaeological resources would

be significant **(Impact CULT-2)**. Implementation of the CAP Update **would result in new or more severe impacts** not disclosed in the 2011 GPU PEIR.

2.5.3.5 Issue 3: Directly or Indirectly Destroy a Unique Paleontological Resource

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines the project would result in a significant impact on cultural resources if it would:

- directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts to paleontological resources from the adoption of the goals and policies contained within the plan and the development anticipated through the planning horizon. The discussion of impacts can be found in Section 2.5, "Cultural and Paleontological Resources" (pages 2.5-30 through 2.5-32), of the 2011 GPU PEIR and is hereby incorporated by reference. The 2011 GPU PEIR determined that buildout under the General Plan would result in potentially significant project and cumulative impacts on known and unknown paleontological resources in the unincorporated county.

The 2011 GPU PEIR determined activities resulting from implementation of the proposed General Plan, especially construction-related and ground-disturbing activities, could damage or destroy fossils in the underlying rock units. Loss or alteration of paleontological resources may result in an irreversible loss of significant information that could be obtained from these non-renewable resources. These impacts would be reduced to below a level of significance through the implementation of a combination of local, state, and federal regulations; existing County regulatory processes; the adopted General Plan goals and policies; and specific mitigation measures identified in the 2011 GPU PEIR. Specific General Plan policies related to the protection of paleontological resources (Policies COS-9.1 and COS-9.2) are listed above in Section 2.5.2, "Regulatory Framework"; 2011 GPU PEIR mitigation measures (Cul-3.1 and Cul-3.2) are listed below in Section 2.5.5, "Mitigation Measures."

CAP Update Impact Analysis

The following sections describe the potentially significant impacts related to paleontological resources that could result from the implementation of the proposed CAP Update measures and actions.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and more generally in the unincorporated county. Implementing CAP Update

measures and actions could result in potential construction of new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 include development of zero waste policies which may result in new or expanded composting and recycling facilities to divert solid waste from landfills.

Specific locations for new and expanded facilities have not been identified. However, it is possible that the locations of such improvements could disturb paleontological resources because the location of all resources within the county is unknown. Impacts to paleontological resources generally occur because of the physical destruction of fossil remains by excavation or trenching activities that require cutting into the underlying geologic formations. Ground-disturbing activities in high or moderate sensitivity fossil-bearing geologic formations have the potential to damage or destroy paleontological resources that may be present below the ground surface. Such alterations of known or unknown paleontological resources may result in an irreversible loss of significant information that could be obtained from these non-renewable resources. Development of new or expanded solid waste facilities would result in similar paleontological resource impacts as those discussed in the 2011 GPU PEIR.

The following 2011 GPU PEIR mitigation measures would be applied to reduce this impact: Cul-3.1: requires implementation of the Grading Ordinance to avoid or minimize impacts to paleontological resources and requires a paleontological monitor during grading when appropriate; Cul-3.2: requires implementation of the *County of San Diego Guidelines for Determining Significance: Paleontological Resources* (County of San Diego 2009) to identify and minimize adverse impacts to paleontological resources. General Plan policies that require the salvage and preservation of unique paleontological resources during excavation or grading activities or other development processes (COS-9.1) and require development to minimize impacts to unique geological features from human related destruction, damage, or loss (COS-9.2) would further limit project impacts to paleontological resources. Impacts would be less than significant with mitigation. In addition, future discretionary projects would be required to be evaluated to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If additional impacts would result, subsequent CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether impacts would be mitigated to a less-than-significant level.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Measures W-1 and W-2 include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Action W-3.2.a would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. Implementation of these measures would not result in impacts to paleontological resources because any

new or expanded physical structures associated with implementing water conservation measures and actions would be ancillary to existing or proposed development, which would have previously undergone paleontological review, if required. Impacts would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of Measures A-1 through A-4 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified. Excavation or trenching activities that require cutting into the underlying geologic formations in high or moderate sensitivity fossil-bearing geologic formations have the potential to damage or destroy paleontological resources that may be present below the ground surface.

Implementation of the CAP Update agriculture and conservation measures and actions would result in similar impacts related to paleontological resources as identified in the 2011 GPU PEIR through future development. Acquisition of lands and development of farmworker housing would be required to implement adopted General Plan policies that require the salvage and preservation of unique paleontological resources during excavation or grading activities or other development processes (COS-9.1) and require development to minimize impacts to unique geological features from human related destruction, damage, or loss (COS-9.2). The following 2011 GPU PEIR mitigation measures would be applied to reduce this impact: Cul-3.1: requires implementation of the Grading Ordinance to avoid or minimize impacts to paleontological resources and requires a paleontological monitor during grading when appropriate; Cul-3.2: requires implementation of the *County of San Diego Guidelines for Determining Significance: Paleontological Resources* (County of San Diego 2009) to identify and minimize adverse impacts to paleontological resources. Impacts would be less than significant with mitigation. In addition, future discretionary projects would be required to be evaluated to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If additional impacts would result, subsequent CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether impacts would be mitigated to a less-than-significant level.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects. Implementation of CAP Update Measure E-3, Action E-3.2, and Action E-3.3 could result in construction of large-scale renewable energy systems and energy efficiency retrofits on

existing residential and non-residential structures and County facilities. These retrofits could include rooftop or ground-mounted PV solar arrays or small wind turbines, upgraded mechanical systems and energy storage, and other similar improvements. The addition of energy infrastructure may be required to support implementation of some measures; these projects have the potential to alter paleontological resources.

Large-scale renewable energy systems, such as PV and concentrator solar, and wind turbines, would generally be constructed in areas that are not highly developed because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Ground disturbance, including excavation and grading have the potential to alter paleontological resources.

The placement of small-scale PV solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance Section 6954(a) that regulates the height and scale of these facilities. Rooftop mounted PV solar energy panels and roof-top wind turbines would not result in ground disturbance and ground mounted PV solar panels do not require deep or wide concrete footings such that disturbance of soils at a depth where resources could be present would not occur. Therefore, these systems would result in less-than-significant impacts to paleontological resources. However, ground-mounted wind turbines would have the potential to result in impacts to paleontological resources because of deep concrete footings and substantial grading at depth would be required. Small-scale wind turbines may be located on a parcel as an accessory use that would not require a discretionary review. Accordingly, even with implementation of General Plan Policies COS-9.1 and COS-9.2, 2011 GPU PEIR mitigation measures listed above, and federal, state, and local regulations that protect paleontological resources, the potential exists for significant impacts related to installation of small-scale wind turbines because of the lack of discretionary oversight and inability to mitigate impacts.

Built Environment and Transportation Measures and Actions

This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more severe impacts related to archaeological resources include those that would result in the construction of new electric vehicle charging stations (Action T-3.1) and increase access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts in the unincorporated area (Action T-3.1.a). Some of these measures and actions would result in the construction of new facilities and infrastructure, the placement of structures, and the excavation of earthen materials.

Specific locations for new facilities and infrastructure have not been identified. However, it is possible that the locations of such improvements could disturb paleontological resources because the location of all resources within the county is unknown. Excavation or trenching activities that require cutting into the underlying geologic formations in high or moderate sensitivity fossil-bearing geologic formations have the potential to damage or destroy paleontological resources that may be present below the ground surface.

Implementation of the CAP Update built environment and transportation measures and actions would result in similar impacts related to paleontological resources as identified in the 2011 GPU PEIR through future development. Projects would be required to implement adopted General Plan policies that require the salvage and preservation of unique paleontological resources during excavation or grading activities or other development processes (COS-9.1) and require the development to minimize impacts to unique geological features from human related destruction, damage, or loss (COS-9.2). The following 2011 GPU PEIR mitigation measures would be applied to reduce this impact: Cul-3.1: requires implementation of the Grading Ordinance to avoid or minimize impacts to paleontological resources and requires a paleontological monitor during grading when appropriate; Cul-3.2: requires implementation of the *County of San Diego Guidelines for Determining Significance: Paleontological Resources* (County of San Diego 2009) to identify and minimize adverse impacts to paleontological resources. Impacts would be less than significant with mitigation. In addition, future discretionary projects would be required to be evaluated to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If additional impacts would result, subsequent CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether impacts would be mitigated to a less-than-significant level.

Summary

As explained in the 2011 GPU PEIR, implementation of adopted General Plan Policies COS-9.1 and COS-9.2 and adopted 2011 GPU PEIR Mitigation Measures Cul-3.1 and Cul-3.2 would ensure that new development would conserve and protect paleontological resources. Adopted General Plan policies require future development to include appropriate mitigation to protect the quality and integrity of these resources. Applicable 2011 GPU PEIR mitigation measures require the identification and protection of paleontological resources by requiring appropriate reviews and applying mitigation when impacts are significant and requiring grading monitoring by a qualified paleontologist.

However, because it is possible to install small-scale wind turbines as an accessory use without discretionary review, significant impacts to paleontological resources could occur due to ground-disturbing activities. Therefore, project impacts to paleontological resources would be significant **(Impact CULT-3)**. Implementation of the CAP Update **would result in new or more severe impacts** not disclosed in the 2011 GPU PEIR.

2.5.3.6 Issue 4: Disturb Any Human Remains

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines the project would result in a significant impact on cultural resources if it would:

- disturb any human remains, including those interred outside of formal cemeteries.

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts to human remains from the adoption of the goals and policies contained within the plan and the development anticipated through the planning horizon. The discussion of impacts can be found in Section 2.5, "Cultural and Paleontological Resources" (pages 2.5-33 through 2.5-34), of the 2011 GPU PEIR and is hereby incorporated by reference. The 2011 GPU PEIR determined that buildout under the General Plan could result in potentially significant project and cumulative impacts to human remains because of the potential for human burial sites (known or unknown) within the unincorporated county.

Human burials have occurred outside of dedicated cemeteries historically, and the disturbance of any human remains is considered a significant impact, regardless of archaeological significance or association. While some burials have been uncovered, the potential exists for unknown burials to be present, including Native American burials. As evident from human remains that were previously discovered throughout the unincorporated county, there is the potential for impacts to human remains to occur as the result of development allowable under the General Plan. These impacts would be reduced to below a level of significance through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; the General Plan goals and policies; and specific mitigation measures implementation programs identified in the 2011 GPU PEIR. The specific General Plan policy related to the protection of human remains (Policy COS-7.5) is listed above in Section 2.5.2, "Regulatory Framework"; 2011 GPU PEIR Mitigation Measure Cul-4.1 is listed below in Section 2.5.5, "Mitigation Measures."

CAP Update Impact Analysis

The following sections describe the potentially significant impacts related to human remains that could result from the implementation of the proposed CAP Update measures and actions.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and more generally in the unincorporated county. Implementing CAP Update measures and actions could result in potential construction of new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 include development of zero waste policies which may result in new or expanded composting and recycling facilities to divert solid waste from landfills.

Specific locations for new and expanded facilities have not been identified. However, it is possible that the locations of such improvements could disturb human remains because the location of all resources within the county is unknown. Impacts to human remains generally occur because of ground-disturbing activities, including grading, excavation, and utilities installation during construction. The potential for disturbance may be reduced

through surveying a site to determine the likelihood that human remains are present, review of archaeological records to determine if human remains are known to occur in the area, and then designing future development to avoid areas where burials may be present. However, if surface evidence and archaeological records do not exist for a site, construction activities associated with the future development, including grading and excavation, would have the potential to disturb human remains. Any disturbance could result in a significant impact. Development of new or expanded solid waste facilities would result in similar impacts to human remains as those discussed in the 2011 GPU PEIR.

Adopted 2011 GPU PEIR Mitigation Measure Cul-4.1 includes regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs and ensures that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. General Plan Policy COS-7.5 additionally requires that human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the MLD and under the requirements of federal, state, and County regulations. Impacts would be less than significant with mitigation. In addition, future discretionary projects would be required to be evaluated to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If additional impacts would result, subsequent CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether impacts would be mitigated to a less-than-significant level.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Measures W-1 and W-2 include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Action W-3.2.a would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. Implementation of these measures would not result in impacts to human remains because any new or expanded physical structures associated with implementing water conservation measures and actions would be ancillary to existing or proposed development, which would have previously undergone archaeological review, including human remains, if required. Impacts would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of Measures A-1 through A-4 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county, if opportunities to increase farmworker housing in

the unincorporated area are identified. Ground-disturbing activities, including grading, excavation, and utilities installation during construction, have the potential to damage or destroy human remains that may be present.

Implementation of the CAP Update agriculture and conservation measures and actions would result in similar impacts related to human remains as identified in the 2011 GPU PEIR through future development. Acquisition of lands and development of farmworker housing would be required to implement adopted General Plan goals and policies related to preservation of paleontological resources. 2011 GPU PEIR Mitigation Measure Cul-4.1 would be applied to reduce this impact: Cul-4.1 includes regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs and ensures that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. General Plan Policy COS-7.5 additionally requires that human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the MLD and under the requirements of federal, state, and County regulations. Impacts would be less than significant. In addition, future discretionary projects would be required to be evaluated to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If additional impacts would result, subsequent CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether impacts would be mitigated to a less-than-significant level.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects. Implementation of CAP Update Measure E-3, Action E-3.2, and Action E-3.3 could result in construction of large-scale renewable energy systems and energy efficiency retrofits on existing residential and non-residential structures and County facilities. These retrofits could include rooftop or ground-mounted PV solar arrays or small wind turbines, upgraded mechanical systems, and other similar improvements. The addition of energy infrastructure may be required to support implementation of some measures; these projects have the potential to disturb human remains.

Large-scale renewable energy systems, such as PV solar, concentrator solar, and wind turbines, would generally be constructed in areas that are not highly developed because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Ground disturbance, including excavation and grading have the potential to disturb human remains.

The placement of small-scale PV solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance

Section 6954(a) that regulates the height and scale of these facilities. Rooftop PV solar energy panels and roof-top wind turbines would not result in ground disturbance. Ground-mounted PV solar panels do not require deep or wide concrete footings, which minimizes the amount of ground disturbance. As such, these energy systems would not result in significant impacts to human remains.

Ground-mounted wind turbines would have the potential to result in impacts to human remains because of the need to secure the turbines with deep concrete footings and the resultant ground disturbance and grading at depth that may be required. Small-scale wind turbines may be located on a parcel as an accessory use that would not require a discretionary review. Accordingly, even with implementation of General Plan policies, 2011 GPU PEIR mitigation measures listed above, and federal, state, and local regulations, the potential exists for direct impacts related to the disturbance of unknown human remains because of installation of small-scale wind turbines that lack discretionary oversight. Impacts would be significant.

Built Environment and Transportation Measures and Actions

This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more severe impacts related to archaeological resources include those that would result in the construction of new electric vehicle charging stations (Actions T-3.1) and increase access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts in the unincorporated area (Action T-3.1.a). Some of these measures and actions would result in construction of new facilities and infrastructure, placement of structures, and excavation of earthen materials.

Specific locations for new facilities and infrastructure have not been identified. However, it is possible that the locations of such improvements would have the potential to disturb human remains through ground-moving activities. Implementation of the CAP Update built environment and transportation measures and actions would result in similar impacts related to human remains as identified in the 2011 GPU PEIR through future development. Future projects would be required to implement the adopted General Plan goals and policies related to preservation of paleontological resources. 2011 GPU PEIR Mitigation Measure Cul-4.1 would be applied to reduce this impact: Cul-4.1 includes regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs and ensures that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. General Plan Policy COS-7.5 additionally requires that human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the MLD and under the requirements of federal, state, and County regulations. Impacts would be less than significant with mitigation. In addition, future discretionary projects would be required to be evaluated to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If additional impacts would result, subsequent CEQA documentation would be required to evaluate

impacts, determine mitigation, and conclude whether impacts would be mitigated to a less-than-significant level.

Summary

As explained in the 2011 GPU PEIR, implementation of adopted General Plan Policy COS-7.5 and adopted 2011 GPU PEIR Mitigation Measure Cul-4.1 would ensure that new development would protect human remains. Adopted General Plan policies require that human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the MLD and under the requirements of federal, state, and County regulations. The applicable 2011 GPU PEIR mitigation measure includes regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs.

However, because it is possible to install small-scale wind turbines as an accessory use without discretionary review, significant impacts to human remains could occur due to ground-disturbing activities and the lack of mitigation requirements. Therefore, impacts to human remains would be significant **(Impact CULT-4)**. Implementation of the CAP Update **would result in new or more severe impacts** not disclosed in the 2011 GPU PEIR.

2.5.3.7 Cumulative Impact Analysis

The cumulative impact analysis study area 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. This analysis uses the same scope identified in the 2011 GPU PEIR. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

Cumulative development in the southern California region would result in a cumulative impact associated with the loss of historical resources through changes to resources or their immediate surroundings that could combine to magnify the effect on historical resources. Potential development activities may be associated with the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy (SCAG RTP/SCS), San Diego Association of Governments Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan (SANDAG 2021 Regional Plan), private projects, and the development of land uses as designated under surrounding jurisdictions' general plans. Projects in California would be regulated by federal, state, and local regulations, including PRC Section 5097, California Penal Code 622, the Mills Act, HSC Sections 18950–18961, and the Secretary of the Interior's Standards for Rehabilitation and Standards for

the Treatment of Historic Properties. However, cumulative projects located in Mexico would not be subject to compliance with such regulations. Additionally, even with regulations in place, individual historical resources would still have the potential to be impacted or degraded from demolition, destruction, alteration, or structural relocation because of new private or public development or redevelopment. Therefore, the cumulative destruction of significant historical resources from construction and development planned within the region would result in a cumulatively significant impact. Additionally, past projects involving development and construction have already impacted historical resources within the region.

The 2011 GPU PEIR evaluation of cumulative impacts to historical resources assumed implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures listed in Section 2.5.2, "Regulatory Framework," and Section 2.5.5, "Mitigation Measures." Nonetheless, allowable development would have the potential to result in substantial adverse changes to the significance of historical resources due to demolition, destruction, alteration, or structural relocation because of new private or public development or redevelopment. Therefore, the General Plan, in combination with the cumulative development, has the potential to result in a significant cumulative impact associated with historical resources.

Implementation of the CAP Update measures and actions would have the potential to result in construction of new or expanded solid waste, renewable energy, and transportation facilities in the unincorporated county. As discussed in Section 2.5.3.3, "Issue 1: Cause a Substantial Adverse Change in the Significance of a Historical Resource," new facilities would be required to implement applicable General Plan policies and 2011 GPU PEIR Mitigation Measures Cul-1.1 and Cul-1.6, which would ensure that most measures and actions would have a less-than-significant impact to historical resources. However, because it is possible for some properties that are not listed or zoned as historical resources to install wind turbines or solar PV energy systems without a discretionary permit, impacts related to historical resources would be potentially significant.

Therefore, the cumulative destruction of significant historical resources from construction and development planned within the region would result in a cumulatively significant impact. As described above, the project would have potentially significant historical resources impacts from wind and solar PV projects. Therefore, the project would result in a considerable contribution to a significant cumulative effect. The cumulative impact would be significant **(Impact C-CULT-1)**. This **would be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Issue 2: Cause a Substantial Adverse Change in the Significance of an Archaeological Resource

Cumulative development in the southern California region would result in a cumulative impact associated with the loss of archaeological resources. Cumulative projects that may result in significant impacts include any projects that involve ground disturbing activities, such as tribal projects, energy and utility projects, private projects, or the development of

land uses as designated under surrounding jurisdictions' general plans. These projects are regulated by applicable federal, state, and local regulations, including the Native American Graves Protection and Repatriation Act (NAGPRA), the California Native American Graves Protection and Repatriation Act (CalNAGPRA), Section 106 of the National Historic Preservation Act, PRC Section 5079, CEQA Section 21083.2, and the County RPO. However, cumulative projects located in Mexico would not be subject to compliance with such regulations. Additionally, the loss of archaeological resources on a regional level may not be adequately mitigable through the data recovery and collection methods specified in these regulations, as their value may also lie in cultural mores and religious beliefs of applicable groups. Therefore, the cumulative destruction of archaeological resources from development projects within the region would be cumulatively significant. Additionally, past projects involving development and construction have already impacted archaeological resources within the region.

The 2011 GPU PEIR evaluation of cumulative impacts to archaeological resources assumed implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures listed in Section 2.5.2, "Regulatory Framework," and Section 2.5.5, "Mitigation Measures." Nonetheless, the evaluation concludes that development would have the potential to result in a substantial adverse change in the significance of an archaeological resource. Therefore, the General Plan, in combination with cumulative development, has the potential to result in a significant cumulative impact associated with archaeological resources.

Implementation of the CAP Update measures and actions would have the potential to result in construction of new or expanded solid waste, renewable energy, and transportation facilities in the unincorporated county. As discussed in Section 2.5.3.4, "Issue 2: Cause a Substantial Adverse Change in the Significance of an Archaeological Resource," new facilities 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, because it is possible to install small-scale wind turbines without a discretionary permit, impacts related to archaeological resources would be potentially significant.

Archaeological resources would still have the potential to be damaged or destroyed because of new private or public development or redevelopment allowed under cumulative projects. Therefore, the cumulative destruction of archaeological resources from construction and development planned within the region would result in a cumulatively significant impact.

Therefore, implementation of the CAP Update could result in a considerable contribution to an existing cumulative effect. The cumulative impact would be significant **(Impact C-CULT-2)**. This **would be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Issue 3: Directly or Indirectly Destroy a Unique Paleontological Resource

Cumulative projects located in the southern California region would result in a cumulative impact to paleontological resources from grading, excavation, and other ground-disturbing activities. Cumulative development that requires excavation, such as regional energy and utility projects or the construction of new roadways under the SCAG RTP/SCS or SANDAG 2021 Regional Plan would result in adverse impacts to paleontological resources. Cumulative projects on state or public lands would be required to comply with PRC Section 5097–5097.6 pertaining to impacts to paleontological resources. Most other cumulative projects would be regulated by state and local regulations, including CEQA and the County Grading Ordinance. However, cumulative projects located in Mexico would not be subject to compliance with such regulations. Additionally, the loss of paleontological resources on a regional level may not be adequately mitigable through methods specified in these regulations. Therefore, the cumulative destruction of significant paleontological resources from planned construction and development within the region would result in a cumulatively significant impact. Additionally, past projects involving development and construction have already impacted paleontological resources within the region.

The 2011 GPU PEIR evaluated cumulative impacts to paleontological resources assuming implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures listed in Section 2.5.2, “Regulatory Framework,” and Section 2.5.5, “Mitigation Measures.” As discussed in the 2011 GPU PEIR, areas of the county designated for high-density land uses under the General Plan, such as village residential, commercial, or industrial, that also have a high or moderate paleontological sensitivity, would have the potential to significantly impact paleontological resources from construction activities associated with development. Therefore, the General Plan, in combination with the identified cumulative projects, would have the potential to result in a significant cumulative impact associated with paleontological resources.

Implementation of the CAP Update measures and actions would have the potential to result in construction of new or expanded solid waste, renewable energy, and transportation facilities in the unincorporated county. As discussed in Section 2.5.3.5, “Issue 3: Directly or Indirectly Destroy a Unique Paleontological Resource,” new facilities would be required to implement applicable General Plan policies and 2011 GPU PEIR Mitigation Measures Cul-3.1 and Cul-3.2, which would ensure that most measures and actions would have a less-than-significant impact to paleontological resources.

Even with federal, state, and local regulations in place, resources would still have the potential to be destroyed because of new private or public development or redevelopment allowed under cumulative projects. Therefore, the cumulative destruction of paleontological resources from construction and development planned within the region would result in a cumulatively significant impact. Therefore, implementation of the CAP Update could result in a considerable contribution to an existing cumulative effect. The cumulative impact would be **significant (Impact C-CULT-3)**. This **would be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Issue 4: Disturb Any Human Remains

Cumulative projects located in the southern California region would result in impacts associated with grading, excavation or other ground-disturbing activities. Projects anticipated in the SCAG RTP/SCS, SANDAG 2021 Regional Plan, or the development of land uses as designated under surrounding jurisdictions' general plans may result in adverse impacts to human remains from development activities if they occur in proximity to the unincorporated county. Cumulative projects would be required to comply with NAGPRA, PRC Section 5097.9–5097.991, CalNAGPRA, and HSC Section 7050.5. On a regional level, the disturbance of human remains that are also considered archaeological resources may not be adequately mitigable through methods specified in these regulations, as their value may also lie in cultural mores and religion beliefs of applicable groups. Therefore, the cumulative disturbance of human remains by construction and development within the region would be considered a cumulatively significant impact. Additionally, past projects involving development and construction have already impacted human remains within the region.

The 2011 GPU PEIR concluded that implementation of the General Plan would have the potential to disturb human remains, including those located outside of formal cemeteries, from ground-disturbing activities development that could occur under the General Plan. Therefore, the General Plan, in combination with cumulative projects, would have the potential to result in a significant cumulative impact associated with human remains resources.

Implementation of the CAP Update measures and actions would have the potential to result in construction of new or expanded solid waste, renewable energy, and transportation facilities in the unincorporated county. As discussed in Section 2.5.3.6, "Issue 4: Disturb Any Human Remains," new facilities would be required to implement applicable General Plan policies and 2011 GPU PEIR Mitigation Measure Cul-4.1, which would ensure that most measures and actions would have a less than significant impact to human remains.

Based on cumulative conditions, even with federal, state, and local regulations in place, human remains would still have the potential to be damaged or destroyed because of new private or public development or redevelopment allowed under cumulative projects. Therefore, the cumulative destruction of human remains from construction and development planned within the region would result in a cumulatively significant impact. It is possible that implementation of the CAP Update, particularly construction of small-scale wind turbines, could result in a considerable contribution to an existing cumulative effect. The cumulative impact would be **significant (Impact C-CULT-4)**. This **would be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.5.4 Summary of New or More Severe Significant Impacts

The proposed project would result in potentially significant direct and cumulative impacts to historical resources, archaeological resources, paleontological resources, and human remains, as summarized below.

Impact-CULT-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource. Small-scale wind and solar renewable energy improvements may not be required to undergo a discretionary review process; this could result in impacts to historical resources because of changes to the historic building or setting.

Impact-CULT-2: Cause a Substantial Adverse Change in the Significance of an Archaeological Resource. Installation of small-scale wind turbines as an accessory use could occur without discretionary review; impacts to archaeological resources could occur because of ground disturbance.

Impact-CULT-3: Result in the Direct or Indirect Destruction of a Unique Paleontological Resource. Installation of small-scale wind turbines as an accessory use could occur without discretionary review; impacts to paleontological resources could occur because of ground disturbance.

Impact-CULT-4: Disturb Human Remains. Installation of small-scale wind turbines as an accessory use could occur without discretionary review; impacts related to human remains could occur because of ground disturbance.

Impact-C-CULT-1: Result in a Cumulatively Considerable Contribution to a Substantial Adverse Change in the Significance of a Historical Resource. Implementation of the proposed project would result in a potentially significant cumulative impact related to historical resources.

Impact-C-CULT-2: Result in a Cumulatively Considerable Contribution to a Substantial Adverse Change in the Significance of an Archaeological Resource. Implementation of the proposed project would result in a potentially significant cumulative impact related to archaeological resources.

Impact-C-CULT-3: Result in a Cumulatively Considerable Contribution to the Direct or Indirect Destruction of a Unique Paleontological Resource. Implementation of the proposed project would result in a potentially significant cumulative impact related to paleontological resources.

Impact-C-CULT-4: Result in a Cumulatively Considerable Contribution to the Disturbance of Human Remains. Implementation of the proposed project would result in a potentially significant cumulative impact related to human remains.

2.5.5 Mitigation Measures

Adopted 2011 GPU PEIR Mitigation Measures

The following section lists the mitigation measures from the 2011 GPU PEIR that are applicable to the proposed project. No new mitigation measures have been proposed to avoid or minimize cultural and paleontological impacts resulting from the proposed project.

2.5.5.1 Issue 1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

The mitigation measures applicable to historical resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Cul-1.1: Utilize the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant.
>
> Adopted Mitigation Measure Cul-1.6: Implement, and update as necessary, the "County's Guidelines for Determining Significance for Cultural Resources" to identify and minimize adverse impacts to historic and archaeological resources.

2.5.5.2 Issue 2: Cause a Substantial Adverse Change in the Significance of an Archaeological Resource

The mitigation measures applicable to archaeological resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Cul-1.1: Utilize the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant.
>
> Adopted Mitigation Measure Cul-1.6: Implement, and update as necessary, the "County's Guidelines for Determining Significance for Cultural Resources" to identify and minimize adverse impacts to historic and archaeological resources.
>
> Adopted Mitigation Measure Cul-2.1: Develop management and restoration plans for identified and acquired properties with cultural resources.
>
> Adopted Mitigation Measure Cul-2.2: Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information.
>
> Adopted Mitigation Measure Cul-2.3: Support the dedication of easements that protect important cultural resources by using a variety of funding methods, such as grants or matching funds, or funds from private organizations.
>
> Adopted Mitigation Measure Cul-2.5: Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys.

Adopted Mitigation Measure Cul-2.6: Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the South Coast Information Center (SCIC) and consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review, while maintaining the confidentiality of sensitive cultural information.

2.5.5.3 Issue 3: Directly or Indirectly Destroy a Unique Paleontological Resource

The mitigation measures applicable to paleontological resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

Adopted Mitigation Measure Cul-3.1: Implement the Grading Ordinance and CEQA to avoid or minimize impacts to paleontological resources, require a paleontological monitor during grading when appropriate, and apply appropriate mitigation when impacts are significant.

Adopted Mitigation Measure Cul-3.2: Implement, and update as necessary, the County's Guidelines for Determining Significance for Paleontological Resources to identify and minimize adverse impacts to paleontological resources.

2.5.5.4 Issue 4: Disturb Any Human Remains

The mitigation measures applicable to human remains that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

Adopted Mitigation Measure Cul-4.1: Include regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant.

2.5.6 Significance Conclusions

2.5.6.1 Issue 1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

As described above in Section 2.5.5.1, "Issue 1: Cause a Substantial Adverse Change in the Significance of a Historical Resource," even with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures that prevent significant impacts to historical resources and compliance with federal, state, and local regulations intended to protect historical resources, impacts could remain significant and unavoidable. No other feasible project-related mitigation is available and could be applied to small-scale wind and solar energy projects because of the lack of discretionary review and ability to mitigate as a condition of a permit. The project's impacts related to historical resources from GHG reduction measures that would result in the installation of small wind

turbines or solar PV facilities would remain **significant and unavoidable**, and the project **would result in a considerable contribution** such that a new significant cumulative impact to historical resources would occur. This **would be a new or more severe impact** not disclosed in the 2011 GPU PEIR.

2.5.6.2 Issue 2: Cause a Substantial Adverse Change in the Significance of an Archaeological Resource

As described above in Section 2.5.5.2, "Issue 2: Cause a Substantial Adverse Change in the Significance of an Archaeological Resource," 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 that prevent significant impacts to archaeological resources, impacts could remain significant and unavoidable. No other feasible project-related mitigation is available and could be applied to small-scale renewable energy projects because of the lack of discretionary review and ability to mitigate as a condition of a permit. The project's impacts related to archaeological resources related to the installation of small wind turbines would remain **significant and unavoidable**, and the project **would result in a considerable contribution** such that a new significant cumulative impact to archaeological resources would occur. This **would be a new or more severe impact** not disclosed in the 2011 GPU PEIR.

2.5.6.3 Issue 3: Directly or Indirectly Destroy a Unique Paleontological Resource

As described above in Section 2.5.5.3, "Issue 3: Directly or Indirectly Destroy a Unique Paleontological Resource," 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 paleontological resources, impacts could remain significant and unavoidable. No other feasible project-related mitigation is available and could be applied to small-scale renewable energy projects because of the lack of discretionary review and ability to mitigate as a condition of a permit. The project's impacts related to paleontological resources from GHG reduction measures that would result in the installation of small wind turbines would remain **significant and unavoidable**, and the project **would result in a considerable contribution** such that a new significant cumulative impact to paleontological resources would occur. This **would be a new or more severe impact** not disclosed in the 2011 GPU PEIR.

2.5.6.4 Issue 4: Disturb Any Human Remains

As described above in Section 2.5.5.4, "Issue 4: Disturb Any Human Remains," 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 human remains, impacts could remain significant and unavoidable. No other feasible project-related mitigation is available and could be applied to small-scale renewable energy projects because of the lack of discretionary review and ability to mitigate as a

condition of a permit. The project's impacts related to disturbance of human remains from GHG reduction measures that would result in the installation of small wind turbines would remain **significant and unavoidable**, and the project **would result in a considerable contribution** such that a new significant cumulative impact to human remains would occur. This **would be a new or more severe impact** not disclosed in the 2011 GPU PEIR.

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2.6 Energy

This section evaluates existing energy production/consumption within the county, as well as potential energy use and related impacts from the project. This section describes the existing conditions for energy in the unincorporated county and evaluates the potential effects that implementation of the project may have on energy. Specifically, this section evaluates the potential for the CAP Update to result in impacts related to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation and impacts related to conflicts with state or local plan for renewable energy or energy efficiency. Because this analysis is subsequent to the adopted 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the energy related setting and impacts discussion included in Section 2.16, “Utilities and Service Systems,” of the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the 2011 GPU PEIR. In 2018, Appendix G of the State CEQA Guidelines was updated to include a separate section with new questions associated with evaluating a project’s potential impacts related to energy. Because the 2011 GPU PEIR was certified prior to the 2018 update, the PEIR does not include a separate section for energy. Rather, impacts related to the construction of new energy production and/or transmission facilities or the expansion of existing facilities are discussed in Section 2.16, “Utilities and Service Systems,” of the 2011 GPU PEIR. Topics that were added to the State CEQA Guidelines in 2018 and, therefore, not addressed in the 2011 GPU PEIR include the project’s potential to result in impacts due to the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Table 2.6-1 summarizes the energy impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the proposed project. As indicated, implementation of the proposed project would not result in new or more severe significant impacts on energy.

Table 2.6-1 Summary of Energy-Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	General Plan Only: Not Evaluated[1]	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Not Evaluated[1]	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
2	State and Local Plans for Renewable Energy or Energy Efficiency	General Plan Only: Not Evaluated[1]	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Not Evaluated[1]	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

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

[1] Issues reflect updated sample questions in Appendix G of the State CEQA Guidelines.

Source: Compiled by Ascent Environmental in 2023.

2.6.1 Existing Conditions

This section describes the existing state and regional energy use, including direct and indirect consumption of energy, including electricity and natural gas, and fuel associated with transportation-related energy. Section 2.16.1.4, “Energy,” in the 2011 GPU PEIR (pages 2.16-27 through 2.16-31) presents a description of energy resources in San Diego County, which include electricity, natural gas, nuclear energy, and alternative energy sources. The environmental setting described in the 2011 GPU PEIR related to energy facilities remains applicable and is incorporated by reference. As appropriate, updated energy resource data is provided below.

2.6.1.1 Energy Types and Sources

California relies on a regional power system comprised of a diverse mix of natural gas, renewable, hydroelectric, and nuclear generation resources. One-third of energy commodities consumed in California is natural gas. In 2022, approximately 55 percent of utility-scale electricity generation was fueled by natural gas. Residential land uses represented approximately 22 percent of California’s natural gas consumption in 2021. Nonhydroelectric renewable energy sources provided 34 percent of the state's utility-scale net generation in 2021. With small-scale solar photovoltaic (PV) included, they supplied 40 percent of California's total in-state electricity generation. For the same year, coal accounted for less than 0.2 percent of the state's utility-scale net generation (EIA 2022a).

In September 2019, the cities of San Diego, Chula Vista, Encinitas, La Mesa, and Imperial Beach adopted an ordinance and resolution to form San Diego Community Power (SDCP), a California joint powers agency. In 2021, the San Diego County and National City voted to join SDCP. SDCP is a Community Choice Aggregation that allows customers to enroll on a voluntary basis. SDCP purchases electricity from renewable resources that is then delivered to consumers through a grid infrastructure owned and maintained by San Diego Gas & Electric Company (SDGE). SDGE is the primary energy supplier in San Diego County and provides energy service to over 3.6 million customers (i.e., 1.4 million accounts) in San Diego County and portions of southern Orange County. The utility has a diverse power production portfolio, composed of a variety of renewable and non-renewable sources. Energy production typically varies by season and by year. Regional electricity loads also tend to be higher in the summer because higher summer temperatures drive increased demand for air-conditioning. In contrast, natural gas loads are higher in the winter because colder temperatures drive increased demand for natural gas heating. See Tables 2.6-2 and 2.6-3, presented at the end of this section, for further details regarding SDGE, state, and SDCP power mixes. As shown in Table 2.6-2, SDGE derived 45 percent of its electricity from eligible renewable sources in 2021 (CEC 2021a). As shown in Table 2.6-3, SDCP derived 55 percent of its electricity from eligible renewable sources in 2021 (CEC 2021b).

2.6.1.2 Transportation Fuels

In 2021, petroleum products accounted for about 90 percent of the total U.S. transportation sector energy use (EIA 2022b). The California Department of Transportation projected that 1,804 million gallons of gasoline and diesel were consumed in San Diego County in 2015, an increase of approximately 183 million gallons of fuel from 2010 levels. It is estimated that approximately 2.82 billion gallons of gasoline and 294 million gallons of diesel will be consumed in San Diego County in 2030 (Caltrans 2008).

2.6.2 Regulatory Framework

Section 2.16.2, “Regulatory Framework,” of the 2011 GPU PEIR includes a brief discussion of the regulatory framework related to energy resources in the unincorporated county, namely a description of Part 6 of the Title 24 California Building Code (California Energy Code). Additional regulations related to energy use and conservation are summarized below.

2.6.2.1 Federal

Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 established nationwide fuel economy standards to conserve oil. Pursuant to this Act, the National Highway Traffic and Safety Administration, part of the US Department of Transportation, is responsible for revising existing fuel economy standards and establishing new vehicle economy standards.

Energy Policy Act of 1992 and 2005

The Energy Policy Act of 1992 (EPAct) was passed to reduce the country's dependence on foreign petroleum and improve air quality. The EPAct includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally fueled fleets in metropolitan areas. It requires certain federal, state, and local government and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in the EPAct. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the act to consider a variety of incentive programs to help promote AFVs. The EPAct of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 is designed to improve vehicle fuel economy and help reduce US dependence on oil. It represents a major step forward in expanding the production of renewable fuels, reducing dependence on oil, and confronting global climate change. The Energy Independence and Security Act of 2007 increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly fivefold increase over current levels, and reduces US demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020—an increase in fuel economy standards of 40 percent.

The Corporate Average Fuel Economy (CAFE) program was established to determine vehicle manufacturer compliance with the government's fuel economy standards. Compliance with the CAFE standards is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the country. The US Environmental Protection Agency calculates a CAFE value for each manufacturer based on the city and highway fuel economy test results and vehicle sales. Based on information generated under the CAFE program, the US Department of Transportation is authorized to assess penalties for noncompliance. As of 2022, the CAFE standards require an industry-wide fleet average of approximately 49 miles per gallon for passenger cars and light trucks in model year 2026. As of July 2023, the National Highway Transportation Safety Administration (NHTSA) proposes new CAFE standards for passenger cars and light trucks built in model years 2027-2032, and new fuel efficiency standards for heavy-duty pickup trucks and vans built in model years 2030-2035. If finalized, the proposal would require an industry fleet-wide average of approximately 58 miles per gallon for passenger cars and light trucks in 2032, by increasing fuel economy by 2% year over year for passenger cars and by 4% year over year for light trucks. For heavy-duty pickup trucks and vans, the proposal would increase fuel efficiency by 10% year over year (NHTSA 2023). By addressing renewable fuels and the CAFE standards, the Energy Independence and Security Act of 2007 builds upon progress made by the

EPAct of 2005 in setting out a comprehensive national energy strategy for the 21st century.

2.6.2.2 State

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the California Energy Commission (CEC). The act established state policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. The California Public Utilities Commission regulates privately owned utilities in the energy, rail, telecommunications, and water sectors.

State of California Energy Action Plan

CEC is responsible for preparing the state energy plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The current plan is the California Energy Action Plan (2008 update). The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles (ZEVs) and addressing their infrastructure needs and encouragement of urban design that reduces vehicle miles traveled (VMT) and accommodates pedestrian and bicycle access.

Assembly Bill 2076: Reducing Dependence on Petroleum

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000), CEC and the California Air Resources Board (CARB) prepared and adopted a joint agency report in 2003, *Reducing California's Petroleum Dependence.* The report includes recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT (CEC and CARB 2003). A performance-based goal of AB 2076 was to reduce petroleum demand to 15 percent below 2003 demand by 2030.

Integrated Energy Policy Report

Senate Bill (SB) 1389 (Chapter 568, Statutes of 2002) required CEC to "conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The Energy Commission shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety" (Public Resources Code Section 25301[a]). This work culminated in the Integrated Energy Policy Report (IEPR).

CEC adopts an IEPR every 2 years and an update every other year. The 2021 IEPR is the most recent IEPR. The 2021 IEPR provides a summary of priority energy issues currently facing the state and outlines strategies and recommendations to further the state's goal of ensuring reliable, affordable, and environmentally responsible energy sources. The report contains an assessment of major energy trends and issues within California's electricity, natural gas, and transportation fuel sectors. The report provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety. Topics covered in the 2021 IEPR include building decarbonization, coordination between state energy agencies, decarbonizing the state's natural gas system, increasing transportation efficiencies, improving energy reliability, and an assessment of the California Energy Demand Forecast (CEC 2022a).

Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars program, which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of ZEVs, into a single package of regulatory standards for vehicle model years 2017–2025. The new regulations strengthened the GHG standards for 2017 models and beyond. In addition, the program's ZEV regulation requires battery, fuel cell, and plug-in hybrid electric vehicles (EVs) to account for up to 15 percent of California's new vehicle sales by 2025. In August 2022, CARB adopted the Advanced Clean Cars II program, which sets sales requirements for ZEVs to ultimately reach the goal of 100 percent ZEV sales in the state by 2035.

Renewables Portfolio Standard

SB X1-2 of 2011 requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB 100 of 2018 sets a three-stage compliance period requiring all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, to generate 52 percent of their electricity from renewables by December 31, 2027; 60 percent by December 31, 2030; and 100 percent carbon-free electricity by December 31, 2045. On September 16, 2022, the state passed SB 1020, the Clean Energy, Jobs, and Affordability Act of 2022. The Act revises state policy to provide eligible renewable energy resources and zero-carbon resources to supply 100 percent of all retail sales of electricity to California and 100 percent of electricity procured to serve all state agencies by December 31, 2045.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by December 31, 2030. It also establishes energy efficiency targets that achieve statewide, cumulative doubling of the energy efficiency savings in electricity and natural gas end uses by the end of 2030.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statutes of 2005) required CEC to prepare a state plan to increase the use of alternative fuels in California. CEC prepared the State Alternative Fuels Plan in partnership with CARB and in consultation with other state, federal, and local agencies. The plan presents strategies and actions California must take to increase the use of alternative nonpetroleum fuels in a manner that minimizes the costs to California and maximizes the economic benefits of in-state production. The plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

California Building Energy Efficiency Standards (Title 24, Part 6 and Part 11)

The energy consumption of new residential and nonresidential buildings in California is regulated by the state's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The California Energy Code was established by CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and to provide energy efficiency standards for residential and nonresidential buildings.

CEC updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions. The current California Energy Code will require builders to use more energy-efficient building technologies for compliance with increased restrictions on allowable energy use. The core focus of the building standards has been efficiency, but the 2019 Energy Code ventured into onsite generation by requiring solar PV on new homes, providing significant GHG savings. The most recent is the 2022 California Energy Code, which advances the onsite energy generation progress started in the 2019 California Energy Code by encouraging electric heat pump technology and use, establishing electric-ready requirements when natural gas is installed, expanding solar PV system and battery storage standards, and strengthening ventilation standards to improve indoor air quality. The CEC estimates that the 2022 California Energy Code will save consumers $1.5 billion and reduce GHG emissions by 10 million metric tons of carbon dioxide-equivalent ($MMTCO_2e$) emissions over the next 30 years (CEC 2022b).

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code; it became mandatory January 1, 2011 (as part of the 2010 California Building Standards Code). The current version is the 2022 CALGreen Code, which took effect on January 1, 2023. As compared to the 2019 CALGreen Code, the 2022 CALGreen Code strengthened sections pertaining to EV and bicycle parking, water efficiency and conservation, and material conservation and resource efficiency, among other sections of the CALGreen Code. The CALGreen Code sets design requirements equivalent to or more stringent than those of the California Energy Code for energy efficiency, water efficiency, waste diversion, and indoor air quality. These codes are adopted by local agencies that enforce building codes and used

as guidelines by state agencies for meeting the requirements of Executive Order (EO) B-18-12.

Assembly Bill 32, Senate Bill 32, and Climate Change Scoping Plan and Update

In December 2008, CARB adopted its Climate Change Scoping Plan, which contains the main strategies California will implement to achieve reduction of approximately 118 $MMTCO_2e$ emissions, or approximately 21.7 percent from the state's projected 2020 emission level of 545 $MMTCO_2e$ under a business-as-usual scenario (this is a reduction of 47 $MMTCO_2e$, or almost 10 percent, from 2008 emissions). In May 2014, CARB released and has since adopted the *First Update to the Climate Change Scoping Plan* to identify the next steps in reaching AB 32 goals and evaluate progress that has been made between 2000 and 2012 (CARB 2014). According to the update, California is on track to meet the near-term 2020 GHG limit and is well positioned to maintain and continue reductions beyond 2020 (CARB 2014). The update also reports the trends in GHG emissions from various emission sectors (e.g., transportation, building energy, agriculture).

In August 2016, SB 32 and AB 197, which serve to extend California's GHG reduction programs beyond 2020, were signed into law. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction to at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the state's continued efforts to pursue the long-term target expressed in EOs S-3-05 and B-30-15 of 80 percent below 1990 emission levels by 2050. Achievement of these goals will have the co-benefit of reducing California's dependency on fossil fuels and making land use development and transportation systems more energy efficient.

California's 2017 Climate Change Scoping Plan (2017 Scoping Plan), prepared by CARB, outlines the main strategies California will implement to achieve the legislated GHG emission target for 2030 and "substantially advance toward our 2050 climate goals" (CARB 2017). It identifies the reductions needed by each GHG emission sector (e.g., transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste).

On September 16, 2022, the state legislature passed AB 1279, which codified stringent emissions targets for the state of achieving carbon neutrality and an 85 percent reduction in 1990 emissions level by 2045. CARB adopted the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) on November 16, 2022, as directed by AB 1279 (CARB 2022). The 2022 Scoping Plan traces the pathway for the state to achieve its carbon neutrality and an 85 percent reduction in 1990 emissions goal by 2045 using a combined top down, bottoms up approach using various scenarios. CARB adopted the 2022 Scoping Plan on December 16, 2022.

Senate Bill 375 of 2008

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. It requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy or Alternative Planning Strategy, showing prescribed land use allocation in each MPO's Regional Transportation Plan. CARB, in consultation with the MPOs, is to provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks for 2020 and 2035. Implementation of SB 375 will have the co-benefit of reducing California's dependency on fossil fuels and making land use development and transportation systems more energy efficient.

2.6.2.3 Local

San Diego Association of Governments Regional Plans and Programs

The San Diego Association of Governments' (SANDAG's) San Diego Forward: The Regional Plan (2021 Regional Plan) is a Regional Transportation Plan/Sustainable Communities Strategy that combines and updates two previous plans, the Regional Comprehensive Plan and the Regional Transportation Plan/Sustainable Communities Strategy, into one document that looks toward 2050. The 2021 Regional Plan covers a broad range of topics including air quality, borders and tribal nations, climate change, economic prosperity, emerging technologies, transit and automobile energy efficiency, fuels, habitat preservation, community health, public facilities, shoreline preservation, transportation, and water quality. The Regional Plan emphasizes the importance of multimodal transportation and places special emphasis on active transportation, such as walking and biking, and reducing car use to minimize GHG emissions, diminish air pollution, and maximize public health. The 2021 Regional Plan also includes a Sustainable Communities Strategy, which identifies five main strategies to complement the goal of sustainability. These strategies focus on job growth and housing in urbanized areas with existing public transportation options; housing needs for all economic segments of the population; the preservation of open space; investment in an accessible transit network; and reduced GHG emissions through the implementation of actions such as increasing public transportation infrastructure and access, encouraging active transportation through upgrades to pedestrian and bike facilities, and incentivizing EV use and providing additional EV infrastructure. The 2021 Regional Plan is designed to be updated every 4 years in accordance with federal law in collaboration with the 18 cities and San Diego County along with regional, state, and federal partners. The 2021 Regional Plan focuses on regional targets through 2050. The 2021 Regional Plan reduces per capita GHG emissions from cars and light-duty trucks to 20 percent below 2005 levels by 2035, exceeding the region's state-mandated target of 19 percent. The 2021 Regional Plan also meets federal air quality conformity requirements. The goals outlined in the 2021 Regional Plan are as follows:

- the efficient movement of people and goods;
- access to affordable, reliable, and safe mobility; and
- healthier air and reduced GHG emissions.

2011 San Diego County General Plan

The General Plan policies related to GHGs that are applicable to the CAP Update include the following:

> Policy COS-14.1: Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.
>
> Policy COS-14.2: Villages and Rural Villages. Incorporate a mixture of uses within Villages and Rural Villages that encourage people to walk, bicycle, or use public transit to reduce air pollution and greenhouse gas (GHG) emissions.
>
> Policy COS-14.3: Sustainable Development. Require design of residential subdivisions and nonresidential development through "green" and sustainable land development practices to conserve energy, water, open space, and natural resources.
>
> Policy COS-14.4: Sustainable Technology and Projects. Require technologies and projects that contribute to the conservation of resources in a sustainable manner, that are compatible with community character, and that increase the self-sufficiency of individual communities, residents, and businesses.
>
> Policy COS-14.5: Building Siting and Orientation in Subdivisions. Require that buildings be located and oriented in new subdivisions and multi-structure non-residential projects to maximize passive solar heating during cool seasons, minimize heat gains during hot periods, enhance natural ventilation, and promote the effective use of daylight.
>
> Policy COS-14.6: Solar Access for Infill Development. Require that property setbacks and building massing of new construction located within existing developed areas maintain an envelope that maximizes solar access to the extent feasible.
>
> Policy COS-14.7: Alternative Energy Sources for Development Projects. Encourage development projects that use energy recovery, photovoltaic, and wind energy.
>
> Policy COS-14.9: Significant Producers of Air Pollutants. Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design.
>
> Policy COS-14.10: Low-Emission Construction Vehicles and Equipment. Require County contractors and encourage other developers to use low-emission

construction vehicles and equipment to improve air quality and reduce GHG emissions.

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

Policy COS-15.1: Design and Construction of New Buildings. Require that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants.

Policy COS-15.2: Upgrade of Existing Buildings. Promote and, as appropriate, develop standards for the retrofit of existing buildings to incorporate design elements, heating and cooling, water, energy, and other elements that improve their environmental sustainability and reduce GHG.

Policy COS-15.3: Green Building Programs. Require all new County facilities and the renovation and expansion of existing County buildings to meet identified "green building" programs that demonstrate energy efficiency, energy conservation, and renewable technologies.

Policy COS-15.4: Title 24 Energy Standards. Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.

Policy COS-15.5: Energy Efficiency Audits**.** Encourage energy conservation and efficiency in existing development through energy efficiency audits and adoption of energy saving measures resulting from the audits.

Policy COS-15.6: Design and Construction Methods. Require development design and construction methods to minimize impacts to air quality.

Policy COS-16.1: Alternative Transportation Modes. Work with SANDAG and local transportation agencies to expand opportunities for transit use. Support the development of alternative transportation modes, as provided by Mobility Element policies.

Policy COS-16.2: Single-Occupancy Vehicles. Support transportation management programs that reduce the use of single-occupancy vehicles.

Policy COS-16.3: Low-Emissions Vehicles and Equipment. Require County operations and encourage private development to provide incentives (such as priority parking) for the use of low- and zero-emission vehicles and equipment to improve air quality and reduce GHG emissions. [Refer also to Policy M-9.3 (Preferred Parking) in the Mobility Element.]

Policy COS-16.4: Alternative Fuel Sources. Explore the potential of developing alternative fuel stations at maintenance yards and other County facilities for the municipal fleet and general public.

Policy COS-16.5: Transit-Center Development. Encourage compact development patterns along major transit routes.

Policy COS-17.3: Landfill Waste Management. Require landfills to use waste management and disposal techniques and practices to meet all applicable environmental standards.

Policy COS-17.4: Composting. Encourage composting throughout the County and minimize the amount of organic materials disposed at landfills.

Policy COS-17.5: Methane Recapture. Promote efficient methods for methane recapture in landfills and the use of composting facilities and anaerobic digesters and other sustainable strategies to reduce the release of GHG emissions from waste disposal or management sites and to generate additional energy such as electricity.

Policy COS-17.6: Recycling Containers. Require that all new land development projects include space for recycling containers.

Policy COS-17.7: Material Recovery Program. Improve the County's rate of recycling by expanding solid waste recycling programs for residential and non-residential uses.

Policy COS-17.8: Education. Continue programs to educate industry and the public regarding the need and methods for waste reduction, recycling, and reuse.

Policy COS-18.1: Alternate Energy Systems Design. Work with San Diego Gas and Electric and non-utility developers to facilitate the development of alternative energy systems that are located and designed to maintain the character of their setting.

Policy COS-18.2: Energy Generation from Waste. Encourage use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites.

Policy COS-18.3: Alternate Energy Systems Impacts. Require alternative energy system operators to properly design and maintain these systems to minimize adverse impacts to the environment.

Policy COS-20.1: Climate Change Action Plan. Prepare, maintain, and implement a climate change action plan with a baseline inventory of GHG emissions from all sources; GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures.

Policy COS-20.2: GHG Monitoring and Implementation. Establish and maintain a program to monitor GHG emissions attributable to development, transportation, infrastructure, and municipal operations and periodically review the effectiveness of and revise existing programs as necessary to achieve GHG emission reduction objectives.

Policy COS-20.3: Regional Collaboration. Coordinate air quality planning efforts with federal and state agencies, San Diego Association of Governments (SANDAG), and other jurisdictions.

Policy COS-20.4: Public Education. Continue to provide materials and programs that educate and provide technical assistance to the public, development professionals, schools, and other parties regarding the importance and approaches for sustainable development and reduction of GHG emissions.

Policy LU-2.8: Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.

Policy CC-1.1: Update the County Green Building Program to increase effectiveness of encouraging incentives for development that is energy efficient and conserves resources through incentives and education.

Policy CC-1.2: Prepare a County Climate Change Action Plan with an update baseline inventory of greenhouse gas emissions from all sources, more detailed greenhouse gas emissions reduction targets and deadlines; and a comprehensive and enforceable GHG emissions reduction measures that will achieve a 17 percent reduction in emissions from County operations from 2006 by 2020 and a 9 percent reduction in community emissions between 2006 and 2020. Once prepared, implementation of the plan will be monitored and progress reported on a regular basis.

Policy CC-1.3: Work with SANDAG to achieve regional goals in reducing GHG emissions associated with land use and transportation.

Policy CC-1.4: Review traffic operations to implement measures that improve flow and reduce idling such as improving traffic signal synchronization and decreasing stop rate and time.

Policy CC-1.5: Coordinate with the San Diego County Water Authority and other water agencies to better link land use planning with water supply planning with specific regard to potential impacts from climate change and continued implementation and enhancement of water conservation programs to reduce demand. Also support water conservation pricing (e.g., tiered rate structures) to encourage efficient water use.

Policy CC-1.6: Implement and expand County-wide recycling and composting programs for residents and businesses. Require commercial and industrial recycling.

Policy CC-1.8: Revise County Guidelines for Determining Significance based on the Climate Change Action Plan. The revisions will include guidance for proposed discretionary projects to achieve greater energy, water, waste, and transportation efficiency.

Policy CC-1.9: Coordinate with APCD, SDG&E, and the California Center for Sustainable Energy to research and possibly develop a mitigation credit program. Under this program, mitigation funds will be used to retrofit existing buildings for energy efficiency to reduce GHG emissions.

Policy CC-1.10: Continue to implement the County Groundwater Ordinance, Watershed Protection Ordinance (WPO), Resource Protection Ordinance (RPO), MSCP and prepare MSCP Plans for North and East County in order to further preserve wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits and to restrict the use of water for cleaning outdoor surfaces and vehicles. The WPO also implements low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on-site can drastically reduce the need for energy-intensive imported water at the site.)

Green Building Incentive Program

The San Diego County Green Building Incentive Program is designed to promote the use of resource efficient construction materials, water conservation, and energy efficiency in new and remodeled residential and commercial buildings. The program offers incentives of reduced plan check turnaround time and a 7.5 percent reduction in plan check and building permit fees for projects meeting program requirements (San Diego County 2019).

Landscape Ordinance

The San Diego County's Landscaping Ordinance was adopted in accordance with the state's Model Water Efficient Landscape Ordinance, which establishes water efficiency standards for new and existing landscapes to reduce water related energy use. The County's ordinance applies to new construction for which the County issues a building permit or a discretionary review where the aggregate landscaped area is 500 square feet or more to obtain outdoor water use authorization. For those projects between 500 and 2,500 square feet, the County has a more streamlined process called the Prescriptive Compliance Option. All landscape areas are subject to a Maximum Applied Water Allowance, which sets an upper limit of allowable water use per landscape area.

County Operations Strategic Sustainability Plan

The County's 2020–2030 County Operations Strategic Sustainability Plan (2020 Strategic Plan) supersedes the previously implemented 2015 Strategic Energy Plan. The 2020 Strategic Plan sets goals to promote sustainability in four key sectors of County operations: energy, water, waste, and transportation. The goals outlined in the Strategic Plan relating to energy are as follows:

- reduce energy use and GHG emissions,
- promote clean energy production,
- provide sound facility energy management,
- achieve cost savings,
- reduce fleet VMT,
- eliminate underutilized vehicles to decrease size of the fleet,
- electrify the fleet where possible, and
- expand EV charging infrastructure on County sites for both public and fleet.

The Strategic Plan is intended to consolidate the sustainability planning efforts of other County planning documents under a single County operations purpose (i.e., mission statement).

2011 San Diego County GPU PEIR

As discussed above, Appendix G of the State CEQA Guidelines was updated in 2018 to include a separate section for energy with criteria meant to evaluate a project's potential impacts related the wasteful, inefficient, or unnecessary consumption of energy and the conflict/obstruction of an applicable energy plan. Because the 2011 GPU PEIR was certified prior to the 2018 update, the PEIR does not include a separate section for energy with the aforementioned criteria. Rather, impacts related to the construction of new energy production and/or transmission facilities or the expansion of existing facilities are discussed in Section 2.16, "Utilities and Service Systems," and mitigation measures were proposed as part of that impact analysis. While impacts were found to be significant and mitigation measures were proposed, this mitigation was developed in response to the conclusion that the project would "result in significant environmental effects" (the now outdated Appendix G criteria used in the 2011 GPU PEIR analysis), rather than the criteria developed for evaluating energy impacts in the 2018 update to Appendix G of the State CEQA Guidelines. Therefore, the mitigation proposed in Section 2.16 of the 2011 GPU PEIR would not apply to this project regarding energy.

2.6.3 Analysis of Effects and Significance Determination

2.6.3.1 Significance Criteria

Based on Appendix G of the State CEQA Guidelines, the CAP would result in a significant impact related to energy if it would:

- result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation
- conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

San Diego County has not established thresholds for determining the significance of energy impacts, and therefore does not provide guidance regarding potential physical effects of the implementation of energy infrastructure, such as production and/or transmission facilities or the expansion of existing facilities. Potential environmental effects of the construction of the energy production projects (i.e., small-scale renewable energy generation systems) included in the CAP Update are considered and addressed throughout this draft SEIR, specifically in Section 2.3, “Air Quality”; Section 2.8, “Greenhouse Gas Emissions”; Section 2.9, “Hazards and Hazardous Materials”; and Section 2.10, “Hydrology and Water Quality.”

2.6.3.2 Approach to Analysis

Impacts related to energy were analyzed qualitatively based on a review of the CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. As noted above, the 2011 GPU PEIR did not analyze energy impacts, but for the analysis of impacts related to the construction of new energy production and/or transmission facilities or expansion of existing facilities. This threshold is not addressed in this section, as potential impacts related to the construction of new renewable energy infrastructure, as proposed by the CAP Update, are analyzed in other sections of this SEIR. The energy-related Appendix G checklist questions were added in 2018, subsequent to the certification of the 2011 GPU PEIR, and are addressed herein.

Scope of SEIR Impact Analysis

The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward the established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impact of their implementation. Given the broad

scope of the CAP Update (i.e., covering the entire unincorporated county) and its role as a programmatic planning document designed to guide future decision-making related to the reduction of GHGs within the unincorporated county, the study area for energy is the unincorporated area of the county within the County's jurisdiction (i.e., all unincorporated lands excluding tribal lands, state and federally owned lands, and military installations).

The analysis in this draft SEIR is programmatic. Implementation of all CAP Update measures and actions were considered during preparation of this draft SEIR, to the degree specific information about their implementation is known. Because future projects that would be implemented under the CAP Update have yet to be specifically defined, this SEIR considers the types of impacts that could occur with implementation of future projects. Future discretionary projects would be required to be evaluated to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If additional impacts would result, additional CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether impacts are reduced to below a significant impact.

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the measures and actions in Table 1-2 have been grouped into subcategories for the purpose of analysis, based on similarities in implementation and their potential for physical environmental effects. CAP Update measures and actions that would have the potential to result in new or more severe impacts related to energy are provided below.

Solid Waste Measures and Actions. This category includes measures intended to increase organic waste diversion, increase recycling, and increase gas capture. These measures and actions would involve adopting a policy to achieve zero waste (90 percent diversion) from County operations by 2030 (Action SW-1.1) and incentivizing the development of new composting/anaerobic digestion facilities and on-farm digesters (Action SW-4.1.a).

Water and Wastewater Programs Measures and Actions. This category includes measures intended to increase water efficiency and conservation through the installation and upgrade of greywater and stormwater capture systems, irrigation systems, and efficient water appliances (i.e., shower heads, faucets). Associated actions that would achieve the goals of these measures include updating the County's Water Efficiency Plan to require water-efficiency measures in new and existing County buildings/operations to reduce potable water use by 19 percent (Action W-1.1) and amending the County's Code of Regulatory Ordinances to require Tier 2 CALGreen water efficiency requirements (which could include installation of stormwater and greywater capture systems for irrigation) for existing development projects with qualifying improvements (Action W-2.2).

Agriculture and Conservation Measures and Actions. This category includes the acquisition and preservation of natural lands, improvements to land management practices to protect habitat and increase carbon storage, and the reduction of GHG emissions from agricultural operations. Within these measures are associated actions

that would result in acquiring 11,000 acres of conservation lands by 2030 to preserve land in perpetuity (Action A-1.1), implementing the County's Landscaping Ordinance to require planting 87,539 trees in single family residential development by 2030 (Action A-2.1), developing a Carbon Farming Program to increase carbon sequestration on 480 acres by 2030 (Action A-1.2), and developing a program to incentivize a transition to cleaner fuels (e.g., renewable diesel and electric equipment) and the efficient use of energy and water (e.g., LED grow lights and water re-use) to reduce emissions from agricultural operations in the unincorporated area (Action A-5.1). This category also includes an action that would evaluate opportunities for the construction of farmworker housing (Action A-4.1.b).

Energy Measures and Actions. This category includes measures and actions that would increase building energy efficiency, result in the development of renewable energy generation infrastructure, and increase electrification in the unincorporated county Specifically, Action E-1.1 would implement the County Facilities Zero Carbon Portfolio Plan to achieve 90 percent reduction in operational carbon emissions by 2030. Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes a shift towards alternative modes of transportation, the encouragement of alternative fuel use, and reduced single-occupancy vehicle trips. Within these measures are associated actions that would result in use of alternative fuel and/or zero-emission construction equipment in County projects (Action T-1.1.a), development of a program to provide residents and businesses incentives for alternative fuel and/or zero-emission construction and landscaping equipment (Action T-2.1), development of a program to fund and/or construct 2,040 publicly available EV charging stations at County facilities and in the unincorporated county by 2028 (Action T-3.1), and an amendment to the San Diego County Code of Regulatory Ordinances to require installation of Tier 2 CALGreen EV charging infrastructure for new multi-family residential and non-residential construction (Action T-3.1).

2.6.3.3 Issue 1: Result in a Potentially Significant Environmental Impact Due to Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

Guidelines for Determination of Significance

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

- result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR did not analyze energy impacts related to the consumption of energy resources; therefore, no prior determinations are reported here.

CAP Update Impact Analysis

The following section describes the potential for implementation of the proposed CAP Update measures and actions to result in wasteful, inefficient, or unnecessary consumption of energy resources.

Solid Waste Measures and Actions

Implementation of measures and actions within the solid waste group would increase organic waste diversion and recycling (Action SW-2.1.a) and increase gas capture (Action SW-3.1). Implementation of the measures within this group and their associated actions include solid waste diversion/recycling programs and incentives, development of new composting/anaerobic digestion facilities and on-farm digesters, and biogas capture at existing landfills (Borrego and Otay). Implementation of the measures and actions within the solid waste group would result in the consumption of energy resources during construction. CAP Update measures and actions that would result in new waste handling and recycling facilities (Actions SW-4.1.a and SW-4.1.b) would increase electricity demand, consumption of fuels, and use of non-renewable resources during construction. These types of projects would not involve large amounts of labor or extensive use of construction equipment. Some worker trips may be required during installation of these facilities and features, resulting in the short-term consumption of diesel fuel and gasoline. However, workers would likely be located within the region and would not require extended commutes to reach construction sites. Some construction equipment (e.g., backhoes, front loaders, pavers, bulldozers, and skid steers) may also be used during installation of these facilities and features, but it is likely that this equipment would be used intermittently and for relatively short periods of time. Additionally, Action T-1.1.a would promote the use of alternative fuel in construction equipment and would therefore reduce fossil fuel consumption. Demand for energy resources during construction would vary throughout the construction period and would generally cease upon completion of construction.

Implementation of the CAP Update would improve operational energy efficiency and reduce the use of fossil fuels through measures that reduce VMT and encourage alternative fuel use. Actions SW-2.1.b, SW-4.1.a, and SW-4.1.b could lead to increased haul truck trips to and from new waste management and recycling facilities; however, it is anticipated that these trips would displace the haul truck trips that would be diverted from the landfill. The operation of new facilities would require additional electricity use. These facilities would be required to comply with the California Energy Code and CALGreen requirements. These facilities do not typically require a substantial number of employees to operate and would therefore not result in a substantial increase in worker

commute trips. Maintenance trips along pipelines are typically infrequent and last for short periods of time and would therefore not result in large amounts of fuel being consumed during operations. Regarding electricity demand, all projects would be required to comply with state building code requirements for energy efficiency. Additionally, the CAP Update would further the requirements of General Plan policies related to the solid waste sector. For example, General Plan Policy COS-14.9 requires projects that generate potentially significant levels of air pollutants and/or GHGs, such as landfill operations, to incorporate renewable energy. Policy COS-18.2 encourages the use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites.

Collectively, these measures and actions are intended to increase reuse of materials to reduce the consumption of nonrenewable resources. Therefore, these projects would be considered necessary and beneficial uses of energy resources. Implementation of the GHG reduction measures within the solid waste group would not involve short- or long-term physical changes that could result in wasteful, inefficient, or unnecessary energy consumption. Impacts would be less than significant.

Water and Wastewater Measures and Actions

Implementation of measures and actions within the water and wastewater group would increase water efficiency and conservation (Actions W-1.1, W-2.1, W-2.2, W-2.3, W-2.3.a, W-2.3.b, W-2.4, and W-3.1). Measures and actions within this group include programs that would result in new building requirements, building retrofits, expansion of recycled water/greywater infrastructure, installation of smart irrigation systems, and water efficiency programs. Actions W-2.1 and W-2.2 would amend the County's Code of Regulatory Ordinances for new and existing development to require Tier 2 CALGreen water efficiency requirements, including the installation of stormwater and greywater capture systems. Construction of these systems would generate electricity demand, consumption of fuels, and use of non-renewable resources. Additionally, Action W-1.1 may result in the installation of smart irrigation, which could also require the consumption of fuels and use of non-renewable resources during installation. These types of projects would not involve large amounts of labor or extensive use of construction equipment. Some worker trips may be required during installation of these facilities and features, resulting in the short-term consumption of diesel fuel and gasoline. However, workers would likely be located within the region and would not require extended commutes to reach construction sites. Construction equipment (e.g., backhoes, front loaders, pavers bulldozers, and skid steers) may also be used during installation of these systems and features, but it is likely that this equipment would be used intermittently and for relatively short periods of time. Additionally, Action T-1.1.a would promote the use of alternative fuel in construction equipment and, therefore, would reduce fossil fuel consumption. Demand for energy resources during construction would vary and would generally cease upon completion of construction.

Occasional operational maintenance activities may be required with implementation of the measures and actions within the water and wastewater group. Actions W-1.1, W-2.1, and W-2.2 would require the use of fuel for maintenance trips and worker commute trips,

as well as the use of electricity to power pumps and treatment systems. However, these systems do not typically require a substantial number of employees to operate and worker trips would be infrequent; thus, associated operational fuel consumption would also be minimal.

Additionally, the CAP Update would further policies established in the General Plan related to water and wastewater. For example, General Plan Policy CC-1.5 requires coordination with the San Diego County Water Authority and other water agencies to better link land use planning with water supply planning with specific regard to potential impacts from climate change and continued implementation and enhancement of water conservation programs to reduce demand. This would help to lessen the energy demand of transporting and treating water by increasing water efficiency; thus, decreasing its demand. Implementation of the measures and actions within the water and wastewater group would not involve short- or long-term physical changes that could result in wasteful, inefficient, or unnecessary energy consumption. Impacts would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of agriculture and conservation measures and actions would result in the acquisition and preservation of natural lands (Actions A-1.1 A-1.2, and A-3.1), evaluation of opportunities to increase farmworker housing (Action A-4.1.b), as well as improvements to land management practices to protect habitat and increase carbon storage (Actions A-1.2, and A-1.2.a). Additionally, measures and actions in the group aim to reduce GHG emissions from agricultural operations (Measure A-5 and Actions A-5.1 and A-5.1.a). Implementation of the measures and actions described above would result in the consumption of energy resources during construction. These types of projects would not involve large amounts of labor or extensive use of construction equipment; however, limited expenditure of energy could occur during the construction of farmer housing (if opportunities are identified to increase farmworker housing pursuant to Action A-4.1.b) and Actions A-2.1 and A-2.2 would require the use of energy during tree planting and watering. Some worker trips may be required during construction of housing and tree installation, resulting in the short-term consumption of diesel fuel and gasoline. However, workers would likely be located within the region and would not require extended commutes to reach construction sites. Construction equipment such as dozers, graders, hauling trucks, backhoes, and truck-mounted cranes may also be used during construction of farmworker housing and the installation of the trees, but it is likely that this equipment would be used intermittently and for relatively short periods of time. Some fuel would also be consumed during the delivery of trees and building materials. While some construction equipment may be used, Action T-1.1.a would promote the use of alternative fuel in construction equipment and, therefore, would reduce fossil fuel consumption. Demand for energy resources during construction would vary and would generally cease upon completion of construction.

Actions A-2.1 and A-2.2 would increase tree planting within the county and would therefore indirectly involve minor electricity consumption associated with conveyance and treatment of water used for irrigation. However, these measures are intended to reduce the urban heat island effect and provide additional shade for buildings to reduce the

consumption of electricity needed for building cooling. Action A-5.1 would develop a program to incentivize a transition to cleaner fuels (e.g., renewable diesel, electric equipment) and the efficient use of energy and water (e.g., LED grow lights and water re-use), while Action A-5.1.a would create a partnership with SDGE to advocate for agricultural pump rates that would incentivize electrification. These measures would reduce reliance on fossil fuels by transitioning agricultural equipment to alternative fuels as well as conserve energy through the use of water-recycling methods and energy efficient grow lights. Farmworker housing that could result from the evaluation of opportunities conducted pursuant to Action A-4.1b would result in the consumption of energy for lighting, space heating, water heating, and other electrical uses. New development would be subject to the residential design requirements of Title 24 Part 6, which requires the use of energy-efficient building technologies in new development. All farmworker housing opportunity sites would be identified where there is a potential to decrease existing employee VMT in a manner that would limit unnecessary energy consumption.

Collectively, these measures are intended to reduce the consumption of gasoline and diesel fuels, and reduce the heat island effect; thus, these measures would reduce the consumption of electricity used for cooling buildings and increase the efficiency of energy consumed within the county. Therefore, these projects would be considered necessary and beneficial uses of energy resources. Implementation of the other GHG reduction measures and adaptation strategies within the agriculture and conservation group would not involve short- or long-term physical changes that could result in wasteful, inefficient, or unnecessary energy consumption. Impacts would be less than significant.

Energy Measures and Actions

Implementation of measures and actions within the energy group would increase building energy efficiency, develop renewable energy generation infrastructure, and increase electrification in the unincorporated county. These measures and actions could result in installing large-scale PV solar arrays and wind turbines; implementing energy efficiency retrofits on existing residential and non-residential structures, including rooftop or ground-mounted solar PV arrays or small wind turbines; and incentivizing the use of renewable energy. Implementation of the measures and actions within the energy group would result in the consumption of energy resources during construction. Construction of small-scale renewable system projects would not involve large amounts of labor or extensive use of construction equipment. Some worker trips may be required during installation of these facilities and features, resulting in the short-term consumption of diesel fuel and gasoline. However, workers would likely be located within the region and would not require extended commutes to reach construction sites. It is not likely that heavy duty construction equipment would be used during the installation of the small-scale renewable energy generation systems, but fuel would be consumed during the delivery of parts. Demand for energy resources during construction would vary throughout and would generally cease upon completion of construction.

Construction of large-scale renewable energy systems would likely require more intense construction and would therefore consume more energy for a longer period of time due

to the use of heavy construction equipment throughout a longer construction phase (relative to that of small-scale renewable construction).

Occasional operational maintenance activities for the renewable energy systems above may be required with implementation of the CAP Update. However, these trips would be infrequent. Because operational vehicle trips would be minimal, associated operational fuel consumption would also be minimal. Implementation of the CAP Update would improve operational energy efficiency through measures that facilitate the increased generation and utilization of renewable energy. For example, Action E-2.2 would reduce operational energy consumption by amending the County's Code of Regulatory Ordinances to require Tier 2 CALGreen energy efficiency requirements for existing development projects for newly permitted systems/equipment. Actions E-3.1 through E-3.3 would collectively increase renewable energy use, generation, and storage in the unincorporated county through the development of policies and programs that incentivize and provide education for the use of renewable energy. For example, Action E-3.2.b would develop a partnership to promote and support on-site renewable energy generation and storage (site-specific and/or community scale microgrids) to increase renewable energy generation and use in the unincorporated area.

Additionally, the CAP Update would be consistent with the General Plan, which includes policies that would also reduce impacts related to energy. For example, General Plan Policy COS-14.7 encourages development projects that use energy recovery, PV, and wind energy, while Policy COS-18.3 requires alternative energy system operators to properly design and maintain these systems to minimize adverse impacts to the environment. These policies would aid in reducing impacts related to energy by encouraging and incentivizing renewable energy use and generation, thus decreasing reliance on fossil fuels for energy generation. Implementation of the GHG reduction measures within the energy group would not involve short- or long-term physical changes that could result in wasteful, inefficient, or unnecessary energy consumption. Impacts would be less than significant.

Built Environmental and Transportation Measures and Actions

Implementation of the measures and actions within the built environment and transportation group would encourage a shift towards alternative modes of transportation, encourage alternative fuel use, and reduce single-occupancy vehicle trips. These measures and their associated actions would be implemented through activities such as constructing EV charging stations, implementing transit-supportive roadway treatments (e.g., transit signal priority, bus-only signal phases, queue jumps, curb extensions to speed passenger loading, and dedicated bus lanes), implementing TDM programs, improving roadways to encourage/expand multimodal transportation, incentivizing active transportation, and constructing new bicycle and pedestrian projects and improving existing bicycle and pedestrian facilities.

Implementation of the measures and actions described above would result in the consumption of energy resources during construction. GHG reduction measures that would increase access to hydrogen fueling infrastructure through streamlined permitting

processes and install EV charging stations (Action T-3.1) and implement transit-supportive roadway treatments and bicycle and pedestrian infrastructure (Actions T-5.1 and T-6.2) would increase electricity demand, consumption of fuels, and use of non-renewable resources during construction. These types of projects would not involve large amounts of labor or extensive use of construction equipment. Some worker trips may be required during installation of these facilities and features, resulting in the short-term consumption of diesel fuel and gasoline. However, workers would likely be located within the region and would not require extended commutes to reach construction sites. Construction equipment (e.g., backhoes, front loaders, pavers bulldozers, and skid steers) may also be used during installation of these facilities and features, but it is likely that this equipment would be used intermittently and for relatively short periods of time. Additionally, Action T-1.1.a would promote the use of alternative fuel in construction equipment and would therefore reduce fossil fuel consumption. Demand for energy resources during construction would vary throughout the construction period and would generally cease upon completion of construction.

Occasional operational maintenance activities for the facilities and features described above may be required with implementation of the energy group of measures. However, these trips would be infrequent. Because operational vehicle trips would be minimal, associated operational fuel consumption would also be minimal.

Implementation of the CAP Update would improve operational energy efficiency and reduce the use of fossil fuels through measures that reduce VMT and encourage alternative fuel use, as well as measures that facilitate the increased generation and utilization of renewable energy. For example, Action T-3.1 would involve the installation of publicly accessible EV chargers, while other transportation-related measures (Actions T-65.1 and T-7.16.2) would implement roadway improvements that would encourage alternative transportation, such as biking and walking, and improve traffic efficiency in the county. Measures pertaining to EV charging would increase the use of electricity. However, these measures would reduce the consumption of fossil fuels by encouraging EV use. The General Plan includes policies that would also reduce impacts related to the built environment and transportation. For example, General Plan Policy CC-1.4 includes review of traffic operations to implement measures that improve flow and reduce idling, such as improving traffic signal synchronization and decreasing stop rate. The reduction of idling time would result in more efficient fuel consumption. Implementation of the measures and actions within the built environment and transportation group would not involve short- or long-term physical changes that could result in wasteful, inefficient, or unnecessary energy consumption. Impacts would be less than significant.

Summary

The goal of the CAP Update is to reduce GHG emissions generated within the county by increasing the use of alternatively fueled vehicles, reducing VMT, generating and utilizing renewable energy, reducing waste generation, and increasing carbon sequestration. Although implementation of the CAP Update would result in temporary construction activities that would consume energy resources, Action T-1.1.a would promote the use of

alternative fuel in construction equipment and reduce the consumption of gasoline and diesel fuel.

Moreover, while the GHG reduction measures were formulated to reduce GHGs, many would also improve energy efficiency (e.g., Action E-2.2) and decrease reliance on fossil fuels (e.g., Action T-3.1). Thus, implementation of the CAP Update would not result in wasteful, inefficient, or unnecessary consumption of energy during project construction. Further, actions that encourage improvements to alternative transportation infrastructure, require energy efficiency and water conservation, and enhance waste processing would result in long-term reduction in energy consumption and a reduction in the use of nonrenewable energy sources.

As discussed previously, impacts relating to energy were not analyzed in the 2011 GPU PEIR. Because of this, it is not possible to directly compare these analyses. However, it can be concluded, based on the analysis above, that because the GHG reduction measures proposed within the CAP Update would result in the use of more efficient technology that would generally reduce energy demand, the impacts would be less than those that would occur due to implementation of the General Plan without the proposed CAP Update. This impact would be less than significant. Implementation of the CAP Update **would not result in a new impact**.

2.6.3.4 Issue 2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency

Guidelines for Determination of Significance

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

- conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR did not analyze energy impacts related to conflicts with state or local plans for renewable energy or energy efficiency; therefore, no prior determinations are reported here.

CAP Update Impact Analysis

The measures and actions included in the CAP Update were developed in consideration of the long-term GHG reduction goals of the 2022 Scoping Plan, especially those pertaining to energy utilization and generation. Appendix D of the 2022 Scoping Plan identifies three key sectors that may be targeted during CAP development to ensure that local governments are doing their “fair share” in assisting the state in meeting its long-term GHG reduction goal of achieving carbon neutrality and reducing statewide emissions

by 85 percent from a 1990 baseline level by 2045. These sectors are building decarbonization (i.e., the full electrification of development and prohibition of on-site natural gas usage), VMT reduction, and the electrification of the mobile source sector. The CAP Update has been prepared in consideration of reducing natural gas usage, reducing VMT within the county, and the transition to EVs from internal combustion engine vehicles.

Solid Waste Measures and Actions

Actions SW-1.1 and SW-2.1 would result in the diversion of waste from landfills. This could result in increased haul truck trips to and from waste facilities; however, it is anticipated that the haul truck trips to the organics processing facility would displace the haul truck trips that would be diverted from the landfill and would not result in increased emissions from hauling trips. Therefore, a net increase in the number of haul truck trips within the county is not anticipated. Similarly, increased construction and demolition waste recycling and collection of commercial food scraps and household hazardous waste is expected to displace trips already occurring to transport this waste to landfills. Because a net increase in the number of haul trucks would not occur, measures and actions within the solid waste group would not impair the implementation of the 2022 Scoping Plan. In fact, these measures and actions would align with the 2022 Scoping Plan's goal of reducing fossil fuel consumption by utilizing landfill emissions for energy generation. This impact would be less than significant.

Water and Wastewater Measures and Actions

Implementation of measures and actions within the water and wastewater group would include new building requirements, building retrofits, expansion of recycled water/greywater infrastructure, the installation of water-efficient appliances and smart irrigation systems, and water efficiency programs. Actions W-2.1 and W-2.2 would amend the County's Code of Regulatory Ordinances for new and existing development to require Tier 2 CALGreen water efficiency requirements, including the installation of stormwater and greywater capture systems. The measures within the water and wastewater group would improve water efficiency and therefore decrease water demand. This would result in less energy being used for the transportation and treatment of water. This decrease in energy demand would result in less electricity being used and, therefore, less fossil fuel being consumed for the generation of this electricity. Operation of water recycling facilities would require maintenance trips and worker commute trips; however, these systems do not typically require a substantial number of employees to operate and would, therefore, not result in a substantial increase in worker commute trips. Decreases in energy demand and fossil fuel consumption would be in line with the goals of the 2022 Scoping Plan. This impact would be less than significant.

Agriculture and Conservation Measures and Actions

Measures and actions within the agriculture and conservation group would involve the creation of agricultural programs, carbon farming, natural/working lands restoration, reducing on-farm anaerobic digesters, incentivizing manure composting, improving

foraging/grazing lands, reducing agricultural water costs, carbon farming programs, open space/habitat restoration plans, tree planting, promoting low-carbon/zero emissions landscaping, and evaluating the potential for increasing farmworker housing. Implementation of the GHG reduction measures and their associated actions in the agriculture and conservation group would collectively reduce energy consumption and demand within the county by incentivizing the transition to cleaner fuels, promoting the efficient use of energy and water, reducing the need for cooling through the planting of trees in residential areas, and reducing VMT associated with food delivery and farmer commutes. In addition, Measure A-5, which supports energy and water efficiency, would reduce GHG emissions from agricultural equipment (including pumps) and at power plants. Measure A-2 could result in projects that involve tree planting, which would aid in the removal of GHG emissions from the atmosphere through carbon sequestration. Additionally, these measures could reduce electricity demand associated with the use of air conditioning by providing shade. These measures would collectively improve energy efficiency, reduce electricity demand, reduce VMT, and aid in removal of carbon from the atmosphere. This would align with the goals of the 2022 Scoping Plan by aiding the state in achieving its emissions reduction goals. This impact would be less than significant.

Energy Measures and Actions

Measures and actions included in the energy group would collectively reduce the demand and usage of fossil fuels in both residential and nonresidential applications by retrofitting existing buildings to improve energy efficiency; requiring that new residential, commercial, and industrial development be all-electric; and increasing renewable energy use and generation. These measures would assist the state in meeting its carbon neutrality goals by decarbonizing existing and future development, a goal of the 2022 Scoping Plan. These measures and actions would also be consistent with the General Plan, which also includes policies that would reduce impacts related to energy. For example, General Plan Policy COS-14.7 encourages development projects that use energy recovery, PV, and wind energy. Policy COS-18.3 requires alternative energy system operators to properly design and maintain alternative systems to minimize adverse impacts to the environment. This policy would apply to energy systems developed through implementation of the CAP Update. The measures and actions in the CAP Update would aid in improving energy efficiency in the county and reducing emissions associated with the generation of electricity. This would further align with the goals of the 2022 Scoping Plan. This impact would be less than significant.

Built Environment and Transportation Measures and Actions

The measures and actions within the built environment and transportation group would encourage the use of alternatively fueled vehicles through the installation of EV chargers, thus facilitating the statewide goal of transitioning the on-road vehicle fleet to be fully electric (Action T-3.1). Other transportation-related measures (e.g., Action T-5.1) would encourage alternative transportation, such as biking and walking. These improvements would reduce the combustion of fossil fuel by reducing gasoline and diesel fuel consumption, as well as reducing VMT, which aligns with the goals of Appendix D of the 2022 Scoping Plan to lower statewide VMT. While the construction required to implement

these measures may require some energy consumption, ultimately the measures would improve energy efficiency and reduce fossil fuel consumption. Action T-1.1.a would promote the use of alternative fuel in construction equipment and reduce the consumption of gasoline and diesel fuel. Therefore, construction associated with implementation of the CAP Update would not obstruct achievement of the energy efficiency and GHG reduction goals outlined in the 2022 Scoping Plan.

The 2021 Regional Plan, which focuses on transportation efficiency, energy efficiency, air quality improvement, vehicle electrification, improving multimodal transportation options and viability, and achieving GHG reduction targets, would also be relevant to the implementation of the CAP Update. As discussed above, although implementation of the CAP Update would consume energy resources during construction and operation, GHG reduction measures (e.g., Action T-3.1) would involve the installation of EV chargers, thus facilitating the statewide goal of transitioning the on-road vehicle fleet to be fully electric. Other transportation-related measures (e.g., T-6.1) would encourage alternative transportation such as biking and walking and would therefore reduce VMT in the county. Measures and actions that support the conversion from gasoline or diesel to electricity or alternative fuels and reduce VMT in the county would directly support 2021 Regional Plan goals and strategies. This impact would be less than significant.

Summary

All GHG-related measures within the CAP Update would support the 2021 Regional Plan's goal of achieving GHG reduction targets because the CAP Update is intended to reduce GHG emissions generated within the unincorporated county. As discussed previously, impacts relating to energy were not directly analyzed in the 2011 GPU PEIR. However, it can be concluded, based on the analysis above, that because the GHG reduction measures proposed within the CAP Update would require newer and more efficient technology to reduce GHG emissions, the impacts related to energy resources would be less than those that would occur due to implementation of the General Plan without the CAP Update. Therefore, the CAP Update would not result in a new impact related to conflict with or obstruction of a state or local plan for renewable energy or energy efficiency. This impact would be less than significant. Implementation of the CAP Update **would not result in a new impact**.

2.6.3.5 Cumulative Impacts

The cumulative impact analysis study area for energy in this analysis is the SANDAG region, which encompasses the unincorporated areas and 18 incorporated cities that make up the entire County of San Diego. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Result in a Potentially Significant Environmental Impact Due to Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

While other cumulative development within the SANDAG region could result in the consumption of energy resources, all development would be required to comply with the current building code, including requirements for achieving appropriate energy efficiency standards (e.g., Title 24 standards or better). Development that results from implementation of the CAP Update in the unincorporated county would also be required to comply with General Plan policies related to energy. Further, the project would not result in any significant cumulative energy impacts because the project would decrease the region's reliance on fossil fuels and would reduce energy consumption in the unincorporated area. Additionally, implementation of the CAP Update would include the installation of renewable energy generation systems, such as wind and solar, which would increase electricity generation to offset increases in electricity demand during the ongoing transition from fossil fuel utility infrastructure to all-electric utility infrastructure. Finally, many of the measures proposed in the CAP Update would apply new standards and requirements to all development projects to reduce GHG emissions related to community and County operations and overall energy demand.

By decreasing reliance on fossil fuels, decreasing overall energy demand, improving energy efficiency, decreasing VMT and vehicle trips in the county, and increasing the use of renewable energy systems, the measures and actions within the CAP Update would reduce the potential for wasteful, inefficient, or unnecessary consumption of resources. Therefore, the CAP Update would not result in a considerable contribution to cumulative impacts associated with wasteful, inefficient, or unnecessary consumption of resources. This impact would be less than significant. Implementation of the CAP Update **would not result in a new cumulative impact**.

Issue 2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency

Development anticipated in the region and projected in the 2021 Regional Plan would not generate a cumulative conflict with state or local plans for renewable energy or energy efficiency because of regulatory mechanisms in place to address each project's incremental contribution. For example, projects are required to demonstrate consistency with Title 22 building requirements and regulations established by CARB. The 2021 Regional Plan EIR determined that cumulative impacts relating to energy would be less than significant because the 2021 Regional Plan would not result in an increase in overall per capita energy consumption or otherwise use energy in an inefficient, wasteful, or unnecessary manner in 2025, 2035, or 2050.

As stated under Issue 1, above, the CAP Update includes measures and actions identified to improve energy efficiency and reduce energy use. The CAP Update would align with the goals of the 2022 Scoping Plan, as well as the 2021 Regional Plan. If adopted, future projects that are consistent with the CAP Update would also be consistent with state and local plans for energy efficiency. Therefore, implementation of the project would not result in a considerable contribution such that a new significant energy impact would occur. The

project would result in less-than-significant energy impacts. Implementation of the CAP Update **would not result in a new cumulative impact**.

2.6.4 Summary of New or More Severe Significant Impacts

Implementation of the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, nor would it conflict with or obstruct the implementation of the applicable GHG reduction plans. Therefore, impacts in these areas would be less than significant.

2.6.5 Mitigation Measures

Implementation of the project would not result in significant impacts related to energy. Therefore, no mitigation is required.

2.6.6 Significance Conclusions

Issue 1: Result in a Potentially Significant Impact Due to Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

The goal of the CAP Update is to reduce GHG emissions generated within the county by increasing the use of alternatively fueled vehicles, reducing VMT, generating and utilizing renewable energy, reducing waste generation, and increasing carbon sequestration. While construction related to CAP Update implementation would consume some energy, the measures and actions would result in overall net improvements in energy efficiency. Thus, implementation of the CAP Update would not result in wasteful, inefficient, or unnecessary consumption of energy during project construction. This impact would be **less than significant** and **would not result in a considerable contribution** such that a new significant cumulative impact would occur. Implementation of the CAP Update **would not result in a new significant impact** not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Issue 2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency

As stated previously, all GHG-related measures within the CAP Update would support the 2022 Scoping Plan's and the 2021 Regional Plan's goal of achieving GHG reduction targets because the CAP Update is intended to reduce GHG emissions generated within the Plan Area. The proposed CAP Update would not conflict with or obstruct implementation of 2022 Scoping Plan or the 2021 Regional Plan as the measures themselves have been developed in consideration of these plans and their GHG reduction goals. Therefore, implementation of the measures and actions described above would not conflict with these plans and the impact would be **less than significant** and **would not result in a considerable contribution** such that a new significant cumulative impact would occur. Implementation of the CAP Update **would not result in a new significant impact** not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Table 2.6-2 SDGE and the State of California Power Mix in 2021

Energy Resources	SDGE Power Mix (%)	California-Wide Power Mix (%)
Eligible Renewables	45	34
Biomass and Waste	*<1*	*2*
Geothermal	*0*	*5*
Eligible hydroelectric	*0*	*1*
Solar	*29*	*14*
Wind	*15*	*11*
Coal	0	3
Large Hydroelectric	2	9
Natural Gas	30	38
Nuclear	0	9
Other	0	<1
Unspecified sources of power[1]	24	7
Total	100	100

Notes: SDGE = San Diego Gas & Electric Company.

[1] Electricity from transactions that are not traceable to specific generation sources.

Source: CEC 2021a.

Table 2.6-3 SDCP and the State of California Power Mix in 2021

Energy Resources	SDCP Power Mix (%)	California-Wide Power Mix (%)
Eligible Renewables	55	34
Biomass and Waste	7	2
Geothermal	4	5
Eligible hydroelectric	<1	1
Solar	29	14
Wind	15	11
Coal	0	3
Large Hydroelectric	12	9
Natural Gas	0	38
Nuclear	0	9
Other	0	<1
Unspecified sources of power[1]	33	7
Total	**100**	**100**

Notes: SDCP = San Diego Community Power.

[1] Electricity from transactions that are not traceable to specific generation sources.

Source: CEC 2021b.

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2.7 Environmental Justice

"Environmental justice" (EJ), which seeks to minimize the effects of environmental hazards, is defined by the California Government Code (Section 65040.12) as the "fair treatment and meaningful participation of people of all races, culture, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." The term "fair treatment" can be defined as a condition under which "no group of people, including racial, ethnic, or socioeconomic group, shall bear a disproportionate share of negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies" (EPA 2020).

At present, there is no requirement for a separate evaluation of EJ impacts in CEQA or the State CEQA Guidelines. However, in response to the trial court's determination that the 2018 CAP SEIR inadequately analyzed impacts related to EJ, San Diego County, as the lead agency, is preparing this section to evaluate potential EJ implications that could result from project implementation.

This section identifies EJ populations within the unincorporated county, summarizes existing regulatory requirements, and evaluates the potential for CAP Update implementation to result in adverse environmental impacts that might be disproportionally borne by minority and low-income communities within the unincorporated county. Table 2.7-1 summarizes the EJ impact that would occur with implementation of the project. Because the 2011 GPU PEIR did not evaluate EJ impacts, no comparison is made related to whether a new or more severe significant EJ impact would occur with implementation of the CAP Update.

Table 2.7-1 Summary of Environmental Justice–Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Disproportionately high and adverse human health or environmental impact on an EJ community	Not evaluated	CAP Update Only: No	CAP Update Only: No
		Not evaluated	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

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

Source: Compiled by Ascent Environmental in 2023.

The County received a comment concerning project impacts on economically disadvantaged communities (DACs) during the Notice of Preparation (NOP) scoping process. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

2.7.1 Existing Conditions

This section summarizes existing conditions related to DACs consistent with the information included in the County of San Diego General Plan Environmental Justice Element (EJ Element). To broaden the reach of the EJ Element and to align with current County programs directed at high-need areas, the County refers to DACs as Environmental Justice Communities (EJ communities) to differentiate them from the state's designated DACs (County of San Diego 2021).

2.7.1.1 Environmental Justice Communities

This section incorporates by reference the EJ community's definition and characteristics from the EJ Element. The County utilized the state recommended (at the time of preparing the EJ Element) California Communities Environmental Health Screening Tool 3.0 (CalEnviroScreen 3.0)[1] in combination with localized data available through the County's *Live Well San Diego* vision program, to identify EJ communities within their jurisdiction. CalEnviroScreen identifies California communities by census tract that are disproportionately burdened by, and vulnerable to, multiple sources of pollution. The customized methodology identified 17 census tracts with varying population sizes, demographics, socioeconomic characteristics, and environmental conditions that meet the intent for addressing EJ issues, concerns, and priorities as part of the EJ Element. To tailor goals, policies, and implementation measures, the 17 census tracts were grouped into four distinct EJ communities. The four EJ communities are listed below and shown on Figure EJ-1 of the EJ Element:

- North El Cajon
- North Lemon Grove
- Spring Valley
- Sweetwater

Population and Socioeconomic Characteristics

Examining the racial and ethnic makeup of communities is vital to identifying the strengths and assets of community networks, resources, and other indicators of social capital. It is also important in analyzing disparities related to pollution burdens, health impacts, quality of services, and level of community investments. Race and ethnicity are among the factors considered when measuring health equity and the social determinants of health, along with income, educational attainment, employment status, and access to healthcare. Achieving EJ goals requires that disparate conditions be understood and addressed so that resulting policies and implementation programs can address disproportionate EJ impacts and prevent further inequities.

[1] CalEnviroScreen 4.0 was released in October 2021, but at the time of preparing the EJ Element CalEnviroScreen 3.0 was the most current model.

While a number of community characteristics can be considered in identifying EJ communities, communities of color (i.e., minority communities) and low-income communities often bear a disproportionate burden of pollution and associated health risks based on legacy decisions that place industrial or polluting uses next to these communities. The following defines minority and low-income populations, and describes their representation and distribution within the unincorporated county.

Minority Populations

The Council on Environmental Quality (CEQ) defines the term "minority" as persons from any of the following US Census categories for race: Black/African-American; Asian, Native Hawaiian or Other Pacific Islander; and American Indian or Alaska Native. For purposes of this analysis, "minority" also includes all other nonwhite racial categories that were used in the American Community Survey (ACS) 5-Year Estimates (2014-2018), such as "some other race" and "two or more races." Population density and percent minority information for each EJ community is summarized in Table 2.7-2, presented at the end of this section.

As shown on Table 2.7-2, the population of EJ communities is more racially and ethnically diverse when compared to the county as a whole. According to 2014-2018 ACS Estimates, the county has 54.2 percent people of color overall (compared to California with 62.5 percent). Apart from North El Cajon, which is the only EJ community with a majority White population, the other EJ communities are "majority minority" areas: North Lemon Grove, Spring Valley, and Sweetwater.

Low-income Populations

As a measurement of community well-being, the ability to access economic opportunity and positive health impacts are closely linked. Research indicates that economic opportunity is one of the most powerful predictors of good health, and that impacts on health are especially pronounced for people in or near poverty (HPI 2021). When families are in poverty, they often do not have reliable access to the goods and services that are necessary for a healthy life (Robert Wood Johnson Foundation 2011). Persons living with income below poverty are identified as "low-income," utilizing the annual poverty thresholds established by the US Census. In California, 200 percent of the federal poverty level is often used to measure poverty, with $24,280 as the income threshold for an individual due to high cost of living. For purposes of this analysis, ACS Estimates (2014-2018)[2] and California income thresholds were used to estimate poverty status in EJ communities. Poverty status for each EJ community is summarized in Table 2.7-3, presented at the end of this section.

As shown on Table 2.7-3, 12.5 percent of the population in the unincorporated county live below the federal poverty level. In the EJ communities, North Lemon Grove has the highest poverty level followed by North El Cajon, Spring Valley, and Sweetwater. When considering the high cost of living in California, nearly one out of three residents in the

[2] ACS 2014-2018 population and demographic estimates were the most complete set of data available at the time of preparing the EJ Element.

county have incomes below the $24,280 income threshold. In the EJ communities, North Lemon Grove, North El Cajon, and Spring Valley all have higher poverty levels compared to those of the county.

2.7.2 Regulatory Framework

2.7.2.1 Federal

Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

Executive Order 12898, issued by President William J. Clinton in 1994, requires federal agencies to (1) identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law, (2) develop a strategy for implementing EJ, and (3) promote nondiscrimination in federal programs that affect human health and the environment, as well as provide minority and low-income communities access to public information and public participation. In addition, the Executive Order authorized the creation of an Interagency Working Group on EJ, overseen by the US Environmental Protection Agency, to implement the Executive Order and provide a forum for federal agencies to collectively advance EJ principles.

Executive Order 13175: Consultation and Coordination with Indian Tribal Governments

Executive Order 13175, issued by President William J. Clinton in 2000, recognized tribal rights of self-government and tribal sovereignty, and affirmed and committed the federal government to work with Native American Governments on a government-to-government basis as agencies develop policy on issues that impact Indian communities. This order established specific requirements that the federal government must follow as it develops and carries out policy actions that affect Indian tribes.

Council on Environmental Quality: Environmental Justice – Guidance under the National Environmental Policy Act

CEQ has oversight of the federal government's compliance with Executive Order 12898 and the National Environmental Policy Act (NEPA). In consultation with the US Environmental Protection Agency and other agencies, CEQ developed guidance to assist federal agencies with NEPA procedures to effectively identify and address EJ concerns. Agencies are permitted to supplement CEQ's guidance with their own, more specific guidance tailored to their programs or activities or departments, insofar as is permitted by law. Under NEPA, the identification of a disproportionately high and adverse human health or environmental effect on a low-income or minority population does not preclude a proposed agency action from going forward or compel a finding that a proposed action is environmentally unacceptable. Instead, the identification of such effects is expected to encourage agency consideration of alternatives, mitigation measures, and preferences expressed by the affected community or population (CEQ 1997).

2.7.2.2 State

Senate Bill 535 and Assembly Bill 1550

Authorized by the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), the cap-and-trade program is one of several strategies that California uses to reduce GHG emissions that cause climate change. The state's portion of the cap-and-trade auction proceeds are deposited in the Greenhouse Gas Reduction Fund (GGRF) and used to further the objectives of AB 32. In 2012, the California Legislature passed Senate Bill (SB) 535 (de Leon), directing that 25 percent of the proceeds from the GGRF go to projects that provide a benefit to DACs. In 2016, the legislature passed AB 1550 (Gomez), which now requires that 25 percent of proceeds from the GGRF be spent on projects located in DACs. The law requires the investment plan to allocate (1) a minimum of 25 percent of the available moneys in the fund to projects located within and benefiting individuals living in DACs; (2) an additional minimum of 5 percent to projects that benefit low-income households or to projects located within, and benefiting individuals living in, low-income communities located anywhere in the state; and (3) an additional minimum of 5 percent either to projects that benefit low-income households that are outside of, but within 0.5 mile of, DACs or to projects located within the boundaries of, and benefiting individuals living in, low-income communities that are outside of, but within 0.5 mile of, DACs.

Senate Bill 1000

SB 1000, enacted in 2016, amended California Government Code Section 65302(h) to require that general plans include an EJ element or related goals, policies, and objectives in other elements of general plans with respect to DACs. Inclusion of EJ policies is required when a city or county adopts or revises two or more general plan elements and a DAC is located within the city or county's jurisdictional boundary. EJ-related policies must endeavor to reduce the disproportionate health risks in DACs, promote civic engagement in the public decision-making process, and prioritize improvements that address the needs of DACs. Policies should focus on improving the health and overall well-being of vulnerable and at-risk communities through reductions in pollution exposure, access to healthy foods, healthy homes, improved air quality, and increased physical activity.

Assembly Bill 617

AB 617 of 2017 aims to help protect air quality and public health in communities around industries subject to the state's cap-and-trade program for GHG emissions. AB 617 imposes a new state-mandated local program to address nonvehicular sources (e.g., refineries, manufacturing facilities) of criteria air pollutants and toxic air contaminants (TACs). The bill requires the California Air Resources Board to identify high-pollution areas and directs air districts to focus air quality improvement efforts through the adoption of community emission reduction programs in these identified areas. Currently, air districts review individual stationary sources and impose emissions limits on emitters based on best available control technology, pollutant type, and proximity to nearby

existing land uses. This bill addresses the cumulative and additive nature of air pollutant health effects by requiring communitywide air quality assessment and emission reduction planning, called a community risk reduction plan in some jurisdictions. The California Air Resources Board has developed a statewide blueprint that outlines the process for identifying affected communities, statewide strategies to reduce emissions of criteria air pollutants and TACs, and criteria for developing community emissions reduction programs and community air monitoring plans.

California Department of Justice's Bureau of Environmental Justice

In February 2018, California Attorney General Xavier Becerra established the Bureau of Environmental Justice (Bureau) within the Environment Section at the California Department of Justice. The Bureau enforces environmental laws, including CEQA, to protect communities disproportionately burdened by pollution and contamination. The Bureau accomplishes this through oversight and investigation and by using the law enforcement powers of the Attorney General's Office to identify and pursue matters affecting vulnerable communities.

In 2012, then Attorney General Kamala Harris published a fact sheet titled, "Environmental Justice at the Local and Regional Level," highlighting existing provisions in the California Government Code and CEQA principles that provide for the consideration of EJ in local planning efforts and CEQA. Attorney General Becerra cites the fact sheet on his web page, indicating its continued relevance.

California Government Code Section 65302(h)(4)(A)

Pursuant to California Government Code Section 65302(h)(4)(A), "disadvantaged communities" are defined as (1) "an area identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code" or (2) "a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation."

California Communities Environmental Health Screening Tool

CalEnviroScreen is a mapping tool developed by the Office of Environmental Health Hazards Assessment to help identify low-income census tracts in California that are disproportionately burdened by and vulnerable to multiple sources of pollution. CalEnviroScreen uses environmental, health, and socioeconomic information based on data sets available from state and federal government sources to produce scores for every census tract in the state. Scores are generated using 20 statewide indicators in four categories: exposures, environmental effects, sensitive populations, and socioeconomic factors. Exposures and environmental effects characterize the pollution burden that a community faces, while sensitive populations and socioeconomic factors define population characteristics.

Governor's Office of Planning and Research's 2020 Updated EJ Element Guidelines

The Governor's Office of Planning and Research (OPR) published updated General Plan Guidelines in June 2020 that include revised EJ guidance in response to SB 1000. OPR has also published example policy language in an appendix document along with several case studies to highlight EJ-related policies and initiatives that can be considered by other jurisdictions. Section 4.8 of the General Plan Guidelines contains the EJ guidance. The guidelines offer recommendations for identifying vulnerable communities and reducing pollution exposure related to health conditions, air quality, project siting, water quality, and land use compatibility related to industrial and large-scale agricultural operations, childcare facilities, and schools, among other things. It provides many useful resources, including links to research, tools, reports, and sample general plans.

2.7.2.3 Local

2011 San Diego County General Plan

The County of San Diego General Plan includes an EJ Element that was adopted by the Board of Supervisors on July 14, 2021. The EJ Element reflects the County's commitment to the fair treatment of people of all races, cultures, and incomes concerning the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. The policy framework is tailored to address specific EJ-related and public health–related issues. The EJ Element also includes implementation programs and actions that are incorporated into a stand-alone EJ Implementation Plan. The plan directs the County to develop programs to monitor progress, prioritize funding for EJ communities, establish cross-sector and multi-jurisdictional partnerships to address EJ issues, and other actions as appropriate (County of San Diego 2021a).

The General Plan goals and policies referenced in the EJ Element that are applicable to the CAP Update include the following:

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

> Policy EJ-2.3: Renewable Energy Facilities. Develop criteria to identify and evaluate potential environmental impacts of storage, operation, and maintenance of renewable energy facilities and products that affect EJ Communities.
>
> Policy EJ-2.4: Designated Truck Routes. Consistent with the Mobility Element, minimize heavy truck traffic and designate routes away from residential neighborhoods and other sensitive areas in EJ Communities.
>
> Policy EJ-2.5: Conflicting Land Use Buffers (All Unincorporated Areas). Consistent with the Land Use Element, avoid land use conflicts by ensuring sensitive land

uses are adequately buffered from heavy industrial uses and other facilities that may pose a threat to human health. *See Land Use Element Policies: LU-2.8, LU-4.5, LU6.10, LU-11.2, LU-11.10.*

Goal EJ-4: Protect and Restore Surface Water. Protect and restore surface water bodies in the unincorporated area, including those within EJ Communities, from future contamination.

County of San Diego Office of Sustainability and Environmental Justice

The County is leading a regional effort to reduce community exposures to health hazards, led by its new Office of Sustainability and EJ (OSEJ) (formerly Office of Environmental and Climate Justice). The OSEJ is part of the Land Use and Environmental Group and will lead the County's effort to reduce community exposures to health hazards as a uniquely positioned entity with a geographic scope that includes environmental and climate justice issues in the unincorporated areas of the county, as well as the incorporated cities throughout the region (County of San Diego 2023a).

Strategic Initiatives

The Strategic Initiatives provide the framework for the County to set measurable goals under the following categories: sustainability, equity, empower, community, and justice (County of San Diego 2023b).

General Management System

The County has reimagined its operational approach to planning and decision making by integrating the General Management System with the strategic framework adopted by the Board of Supervisors. The General Management System applies an equity lens to appropriately design programs and services so that underserved communities have equitable opportunities. The policies and programs are developed to ensure equity using data-driven metrics, lived experiences, and community voices (County of San Diego 2023c).

Office of Equity and Racial Justice

The Office of Equity and Racial Justice (OERJ) was established in 2020 to strengthen the County's commitment to racial equity, with the intent that race no longer be a determining factor in a person's life outcomes. This approach supports groups across ethnicity, gender, age, ability, and other identities to live and participate in our society to their full potential. The OERJ's mission is to partner with the community to co-create transformative, enduring, structural, and systemic change in the county by shaping policies, informing budget process, and working toward building more equitable and accessible programs, services, and resources (County of San Diego 2023d).

Budget Equity Assessment Tool

The Budget Equity Assessment Tool is a set of six questions to be completed by each department annually as part of the budget process. Its main purpose is to help county departments understand how their resource allocations affect Black, Indigenous and People of Color, low-income, and other communities historically and currently suffering from inequalities and inequities, and to help ensure that funding allocations are spent in an equitable manner and prioritized through an equity lens (County of San Diego 2022).

Department of Homeless Solutions and Equitable Communities: Office of Equitable Communities

The Office of Equitable Communities is focused on enhancing community engagement and collaborating and devoting efforts to meet the needs of underserved communities with a focus on embracing diversity, social and health equity, economic inclusion, and poverty reduction. The Office ensures equity among all San Diegans using a regional model to enhance community engagement and meet the needs of underserved communities through many services (County of San Diego 2023e).

Public Health Services: Health Equity

In 2008, the County of San Diego Health and Human Services Agency (HHSA) made health equity a priority. This was followed by the health equity framework developed by the Public Health Officer. Currently, educational materials are posted on the Public Health Services (PHS) webpage in multiple languages. Following HHSA's declaration of health equity as an agency priority, the Chronic Disease and Health Disparities Unit (later named the Chronic Disease and Health Equity Unit) was created, with its activities supporting the Building Better Health component of *Live Well San Diego*, focusing on nutrition, physical activity, and tobacco. The PHS Public Health Officer created a health equity framework for the California Conference of Local Health Officers in 2010, which was used to integrate health equity into PHS to prepare for national public health accreditation. As part of this accreditation journey, in 2015, an Office of Health Equity was created (followed by including Climate Change in the name of the unit in 2020). The Health Equity Working Group was also created in 2015 and continues to meet every 2 months and to implement its internally focused health equity work plan. A departmental Health Equity Policy was also created. The PHS also developed Health Equity goals, which are part of the PHS Strategic Plan (County of San Diego 2023f).

2.7.3 Analysis of Effects and Significance Determination

2.7.3.1 Significance Criteria

CEQA does not require analysis of EJ, nor does it have specific thresholds of significance for EJ. However, the following assessment of potential disproportionate environmental effects to low-income and minority populations is consistent with Executive Order 12898 and CEQ guidance and procedures to effectively identify and address EJ concerns under NEPA. Accordingly, a significant effect could occur if the project would:

- Cause a disproportionately high and adverse human health or environmental impact on an EJ community (a minority or a low-income population).

2.7.3.2 Approach to Analysis

To determine whether project implementation would cause a disproportionately high and adverse impact on identified EJ communities (as defined above and in the General Plan EJ Element), this analysis identifies the potential for significant impacts resulting from implementation of the CAP Update to result in disproportionately high and adverse human health or environmental effects on an EJ community. Implementation of the project-specific mitigation measures identified throughout this SEIR would reduce impacts related to energy, greenhouse gas (GHG) emissions, hazards and hazardous materials, transportation, and wildfire to below a level of significance. However, implementation of the CAP Update would result in significant and unavoidable impacts related to aesthetics, agricultural resources, air quality, biological resources, cultural and paleontological resources, hydrology and water quality, tribal cultural resources, land use and planning, and noise. These environmental resources are analyzed in the following section to identify whether related significant impacts would result in disproportionate effects on minority and/or low-income people. For the purposes of this analysis, "disproportionately high and adverse effect" is defined as a condition under which "an adverse effect or impact" (EPA 2004):

- Is predominantly borne by any segment of the population, including, for example, a minority population and/or a low-income population; or

- Will be suffered by a minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect or impact that will be suffered by a non-minority population and/or non-low-income population.

Scope of This SEIR Impact Analysis

As noted above, EJ impacts were not analyzed in the 2011 GPU PEIR. However, impacts on aesthetics, agricultural resources, air quality, biological resources, cultural and paleontological resources, hydrology and water quality, land use and planning, noise, and tribal cultural resources were analyzed, and the impact conclusions related to those resources for the proposed project relative to the 2011 GPU PEIR are included in the individual resource sections and are summarized below. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impacts of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unincorporated county) and its role as a planning document designed to guide future decision-making related to the reduction of GHG emissions within the unincorporated county, the study area for the following analysis is the unincorporated

area of the county within the County's jurisdiction (i.e., excluding tribal lands, state and federally owned lands, and military installations).

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

Proposed CAP Update Strategies

The CAP Update addresses equity through preparation of a cost analysis to understand how populations and communities may experience disproportionate costs or impacts from climate change, and through development of an Equity Implementation Framework, to prioritize climate action in communities that are at the front line of climate change impacts, such as the County's EJ Communities. As described in the General Plan EJ Element and noted in the CAP Update, these communities and populations have historically been impacted by poverty, lack of services, and unequal distribution of economic and social opportunities like access to high-paying careers, healthcare, or education. As a result, these communities are most at risk from the threat of heat, industrial pollution, poor air quality, wildfires, and more. Utilizing the cost benefit analysis and Equity Implementation Framework, the CAP Update would prioritize climate action in frontline communities[3] to ensure that equity-based outcomes and co-benefits are realized equitably throughout the unincorporated county.

As described in Chapter 1, "Project Description," the overarching strategies and associated measures and actions proposed in the CAP Update (see Table 1-2) have been grouped into categories for the purpose of analysis, based on the sector they target (e.g., solid waste, water/wastewater). CAP Update measures and actions with the potential to affect EJ communities are summarized below.

Solid Waste Measures and Actions. This category includes strategies to achieve zero solid waste in County operations and within the unincorporated county. Measures SW-1

[3] Frontline communities are defined in the CAP Update as historically marginalized communities that experience the most immediate and worst impacts of climate change and other injustices and are often communities of color and low-income. The analysis in this section focuses specifically on impacts on EJ communities, which are more precisely defined in the County's General Plan EJ Element to reflect a broader array of environmental harms and disproportionate burdens. The EJ element defines EJ communities as those communities that are disproportionately affected by environmental pollution that can lead to negative public health effects, exposure, or environmental degradation, and establishes the location of these communities within the unincorporated county by identifying pollution burden and population vulnerability in particular areas of the county and using localized data measuring health, wellness, and equity to identify inequities and disparities that need to be addressed through key interventions.

through SW-4 have the potential to result in the construction of new or expanded solid waste facilities to meet waste diversion targets and increase the prevalence of composting, anaerobic digestion, and recycling throughout the county. Implementation of solid waste measures and actions would reduce the air pollution burdens (e.g., methane) faced by EJ communities, would improve health in EJ communities located adjacent to solid waste facilities, and would increase training and job opportunities for EJ communities.

Water and Wastewater Measures and Actions. This category includes strategies to decrease water consumption and increase wastewater and stormwater treatments. Measures W-1 through W-3 would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Implementation of water and wastewater measures and actions is intended to increase access to incentives in frontline communities, would reduce utility bills for homeowners and renters in EJ communities, and would increase education and access to incentives in EJ communities.

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural land and agricultural land. Measures A-1 through A-4 have potential to result in impacts to EJ communities. Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. Implementation of agriculture and conservation measures and actions is intended to increase EJ communities' access to open space, would reduce urban heat islands in EJ communities, and would increase incentives to US Department of Agriculture–defined disadvantaged farming communities.

Energy Measures and Actions. This category includes a strategy to develop policies and programs to increase energy efficiency and renewable energy use. Key measures and actions with potential to result in impacts to EJ communities include Actions E-2.2 and E-2.2.a, which could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. Through Action E-3.2.b, the County would work with partners to promote and support on-site renewable (wind and solar) energy generation and storage (microgrids, site-specific and/or community scale) to increase renewable energy generation and use in the unincorporated area, which would be regulated by existing County ordinances and policies. Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure. Implementation of CAP Update energy measures and actions is intended to improve energy efficiency and air quality in County buildings used by EJ communities, would increase education and access to incentives in EJ communities, and would reduce utility bills for homeowners and renters in EJ communities.

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the vehicle fleet, install electric vehicle charging stations, incentivize the use of alternative fuels and landscaping practices, and support transit and

ridesharing to reduce single-occupancy vehicle use. Implementation of CAP Update built environment and transportation measures and actions is intended to reduce air pollution burdens faced by EJ communities and would prioritize electric vehicle charging stations, pedestrian and bicycle infrastructure, and roadway treatments in EJ communities.

2.7.3.3 Issue 1: Cause a Disproportionately High and Adverse Human Health or Environmental Impact on an EJ Community (a Minority or a Low-Income Population)

Aesthetics

Summary of Project Impacts

Impacts related to aesthetics are analyzed in Sections 2.1.3.3 to 2.1.3.6 of this SEIR. Implementation of the CAP Update would result in potentially significant impacts related to scenic vistas and scenic resources, visual character and quality, or light and glare.

Implementation of the CAP Update could result in new or expanded solid waste facilities (e.g., Actions SW-1.1, SW-3.1, SW-4.1, SW-4.1a, and SW-4.1b), water and wastewater efficiency appliances or systems (e.g., Actions W-1.1, W-2.2, W-2.3, and W-2.4), new farmworker housing if opportunities to increase farmworker housing in the unincorporated area are identified, energy efficiency retrofits and solar and wind renewable energy facilities (e.g., Actions E-3.1, E-3.2, and E-3.3), and transit-supportive roadway treatments and electric vehicle charging stations (e.g., Actions T-3.1 and T-5.1). Because specific locations for these potential developments have not been identified, it is assumed that construction and operation of future development would have the potential to result in impacts to scenic vistas and resources and visual character and quality, if they are sited in areas close to scenic resources. Future development would be required to implement adopted General Plan Policies LU-6.6, LU-6.9, LU-10.2, LU-11.2, LU-12.4, COS-11.3, and COS-12.2 and adopted 2011 GPU PEIR mitigation measures (Mitigation Measures Aes-1.2, Aes-1.6 through Aes-1.9) to ensure that new development would conserve and protect unique and sensitive visual features, the scenic quality, and the visual character and quality of the environment. In addition, implementation of adopted General Plan Policies COS-13.1 through COS-13 and 2011 GPU PEIR Mitigation Measures Aes-4.1 and Aes-4.2 would ensure that no significant impacts related to new light source or glare would occur.

However, development of large-scale renewable energy systems (CAP Update Action E-3.1) would result in potentially significant impacts related to scenic vistas and scenic resources, visual character and quality, and light and glare. Implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Aes-1 (requiring feasible and appropriate project-specific mitigation measures to be incorporated to mitigate aesthetic impacts for all large-scale renewable energy projects), CAP Update Mitigation Measure Aes-2 (requiring a Lighting Mitigation Plan for all large-scale renewable energy projects), and CAP Update Mitigation Measure Aes-3 (requiring a Shadow Flicker Study for all large-scale wind turbine projects) would reduce the potential for significant impacts related to aesthetics resources in the planning area; however, it is not possible to guarantee that all project and cumulative impacts to

aesthetics resources would be reduced to a less-than-significant level because of the uncertainty of the types, locations, and scale of future renewable energy projects. Therefore, implementation of the CAP Update would result in significant and unavoidable impacts related to scenic vistas and scenic resources, visual character and quality, and light and glare. Therefore, implementation of the CAP Update would result in new or more severe significant impacts not identified in the 2011 GPU PEIR related to scenic vistas and scenic resources, visual character and quality, and light and glare.

Impact on EJ Communities

As noted above, the specific locations and designs of the potential new development associated with the CAP Update are not known at this time. Implementation of CAP Update measures and actions would occur within the unincorporated county and could affect the scenic resources, visual character and quality, and dark skies in the county. Adopted General Plan policies and 2011 GPU PEIR mitigation measures would be implemented to reduce the potential contribution of the project and to ensure that any impacts to aesthetics resources are treated appropriately and with respect to all communities, including EJ communities. However, future development of large-scale renewable energy projects would result in significant and unavoidable impacts related to scenic resources, visual character and quality, and light and glare that could affect EJ communities. While development of large-scale renewable energy in EJ communities has the potential to further affect and/or worsen existing adverse environmental conditions in communities, General Plan Policies EJ-2.3 and EJ-2.5 would require evaluation of potential environmental impacts of renewable energy facilities that affect EJ communities and would require adequate buffers for sensitive land uses from heavy industrial uses. Compliance with General Plan policies and adopted mitigation measures would ensure that implementation of the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to aesthetics on an EJ community.

Agriculture and Forestry Resources

Summary of Project Impacts

Impacts related to agricultural resources are analyzed in Sections 2.2.3.3 to 2.2.3.6 of this SEIR. Implementation of the CAP Update would result in potentially significant impacts related to agriculture and forestry resources.

Implementation of CAP update measures and actions associated with solid waste (e.g., Actions SW-1.1, SW-3.1, SW-4.1, SW-4.1a, and SW-4.1b), water and wastewater (e.g., Actions W-1.1, W-2.2, W-2.3, and W-2.4), agriculture and conservation (e.g., Actions A-2.1, A-2.2, and A-3.1,), energy (e.g., Actions E-3.1 through E-3.3), and built environment and transportation (e.g., Actions T-3.1 and T-5.1) would result in potentially significant impacts related to agricultural resources and the loss or conversion of forest land due to the potential development of large-scale renewable energy projects. The adopted General Plan Policies COS-6.2, COS-6.4, and LU-7.1 would ensure that development would be implemented to protect agricultural lands, and Policies LU-16.1 and LU-16.3 would ensure that new solid waste facilities would be sited in areas with appropriate zoning designation

(e.g., industrial land use). In addition, 2011 GPU PEIR Mitigation Measures Agr-1.1 through Agr-1.5 and Agr-2.1 and CAP Update Mitigation Measure Agr-1 (applying the *County Guidelines for Determining Significance for Agricultural Resources* during environment review of all large-scale renewable energy projects) would be implemented to reduce the potential for significant impacts related to conversion of agricultural resources. CAP Update Measures Agr-2 would require that all large-scale renewable energy projects (including both solar and wind projects) apply the *County Guidelines for Determining Significance for Biological Resources*. When impacts to forest land are determined to be significant, these projects are required to implement feasible and appropriate project-specific mitigation measures, including avoidance of sensitive resources, preservation of habitat, revegetation, and resource management. However, due to the uncertainty of the types, locations, and scale of future large-scale renewable energy projects, the impacts would remain significant after mitigation. Implementation of the CAP Update would result in new impacts related to agriculture and forestry resources beyond what was disclosed in the 2011 GPU PEIR.

Impact on EJ Communities

Implementation of the CAP Update would be required to be consistent with the adopted General Plan policies related to agriculture resources protection. As discussed in Sections 2.2.3.3 to 2.2.3.6 of this SEIR, actions that would result in the acquisition and management of conservation lands would have potential to benefit agriculture resources. The adopted General Plan policies and mitigation measures from the 2011 GPU PEIR and this SEIR would be implemented to reduce the potential contribution of the project and to ensure that any impacts to agricultural resources are treated appropriately and with respect to all communities, including EJ communities. However, future large-scale renewable energy projects would result in significant and unavoidable impacts related to conversion of agricultural land to non-agricultural use. Development of large-scale renewable energy in EJ communities has the potential to further affect the community and/or worsen existing adverse environmental conditions in communities. However, General Plan Policy EJ-2.3 requires evaluation of potential environmental impacts of renewable energy facilities that affect EJ communities, and future development of large-scale renewable energy systems would be subject to CEQA. Compliance with General Plan policies and adopted mitigation measures would ensure that implementation of the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to agricultural resources on an EJ community. Therefore, implementation of the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to agricultural resources on an EJ community.

Air Quality

Summary of Project Impacts

Impacts related to air quality are analyzed in Sections 2.3.3.3 to 2.3.3.8 of this SEIR. Implementation of the CAP Update would not conflict with or obstruct implementation of the San Diego County Regional Air Quality Strategy or State Implementation Plan.

Implementation of solid waste measures and actions would result in construction of new or expanded solid waste facilities. Odors may result from the operation of new or expanded facilities. While the specific location of these types of facilities and activities is not known, solid waste projects would be subject to the County odor policies enforced by the San Diego County Air Pollution Control District, including Rule 51 and County Code Sections 63.401 and 63.402, which prohibit nuisance odors and identify enforcement measures to reduce odor impacts to nearby receptors. Therefore, implementation of solid waste measures and their associated actions would result in a less-than-significant impact associated with objectionable odors.

However, construction related to implementation of the CAP Update measures and their associated actions could result in exceedances of local thresholds for criteria air pollutant and nonattainment pollutants and result in exposure of sensitive receptors to TACs. Because of the programmatic nature of the CAP Update, it is not possible to determine the size and location of projects that would be built, nor the details of their construction typically used to estimate emissions such as duration, equipment use, and intensity. Despite the potential for reductions in operational emissions to offset those related to construction, this impact would be potentially significant. It is possible that emissions from individual projects could exceed one or more construction or operations emissions thresholds and expose sensitive receptors to TACs. Therefore, due to the programmatic nature of the General Plan and CAP Update, the potential that subsequent projects may result in emissions that cannot be reduced below established thresholds remains. Implementation of the CAP Update would result in significant and unavoidable impacts related to exceedances of local thresholds for criteria air pollutant and nonattainment pollutants and exposure of sensitive receptors to TACs following implementation of mitigation measures (Adopted Mitigation Measures Air-2.1 through Air-2.13 and Air-4.1 and CAP Update Mitigation Measure Air-2.1), consistent with the conclusions in the 2011 GPU PEIR.

Impact on EJ Communities

Due to the programmatic nature of the CAP Update, it is not possible to determine the locations of future projects. Future projects associated with the CAP Update would be located within the unincorporated county, including the EJ communities, and may result in emissions that cannot be reduced below established thresholds, result in exceedance of local criteria air pollutant thresholds for nonattainment pollutants (i.e., oxides of nitrogen, volatile organic compounds, particulate matter 10 micrometers or less in diameter, and particulate matter 2.5 micrometers or less in diameter), and result in exposure of sensitive receptors to TACs. However, future projects would be required to comply with the EJ Element goals and policies related to reducing pollution exposure and improving air quality in EJ communities. EJ Element Goal EJ-2 protects sensitive land uses (e.g., schools, housing, health facilities, childcare facilities, senior centers, parks) from increased pollution exposure in EJ communities; Policy EJ-2.4 minimizes heavy truck traffic and designated routes away from residential neighborhoods and other sensitive areas in EJ communities; and Policy EJ-2.5 ensures sensitive land uses are adequately buffered from heavy industrial uses and other facilities that may pose a threat to human health. Compliance with the EJ Element goals and policies would ensure that future projects associated with the CAP Update would not worsen existing environmental

conditions related to air quality in EJ communities. In addition, implementation of the CAP Update Measures SW-1, T-1, and T-3 would result in co-benefits related to air quality in EJ communities by reducing solid waste and vehicle contribution to air pollution burdens faced by frontline communities. Therefore, implementation of the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to air quality on an EJ community.

Biological Resources

Summary of Project Impacts

Impacts related to biological resources are analyzed in Sections 2.4.3.3 to 2.4.3.9 of this SEIR. Implementation of CAP Update would result in less-than-significant impacts related to state and federal protected wetlands, local policies and ordinances, and Habitat Conservation Plans and Natural Community Conservation Plans after implementation of General Plan Policies COS-3.1 and COS-3.2; 2011 GPU PEIR Mitigation Measures Bio-1.5 through Bio-1.7 and Bio-2.1 through Bio-2.4; and CAP Update Mitigation Measures Bio-1 and Bio-2. However, future development associated with the CAP Update would result in significant and unavoidable impacts related to special-status species, riparian and other sensitive natural communities, and wildlife movement corridors and nursery sites, consistent with the conclusions in the 2011 GPU PEIR.

Implementation of CAP Update Measures and Actions SW-1.1, SW-3.1, SW-4.1, SW-4.1a, SW-4.1b, W-1.1, W-2.2, W-2.3, W-2.4, E-3.1, E-3.2, E-3.3, T-3.1, and T-5.1 would result in development of new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, small and large wind turbines, and transportation infrastructure improvements. At the programmatic level, it is not possible to determine with certainty that impacts on biological resources resulting from construction activities would be reduced to a less-than-significant level. While all feasible mitigation would be applied at the project level as part of the County's discretionary review process, construction of projects associated with the CAP Update could still adversely affect special-status species, riparian habitats, sensitive natural communities, and wildlife movement corridors and nursery sites. Impacts would be significant and unavoidable, consistent with the impacts disclosed in the 2011 GPU PEIR.

Impact on EJ Communities

Due to the programmatic nature of the CAP Update, it is not possible to determine the locations of future projects. Future projects associated with the CAP Update would be located within the unincorporated county, including the EJ communities. Adverse biological impacts are not anticipated to be disproportionately higher on the EJ communities. Applicable General Plan policies and mitigation measures would be implemented to ensure that any impacts related to biological resources are treated appropriately and with respect to all communities, including EJ communities. Compliance with General Plan policies and adopted mitigation measures would ensure that the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to biological resources on an EJ community.

Cultural and Paleontological Resources

Summary of Project Impacts

Impacts related to cultural and paleontological resources are analyzed in Sections 2.5.3.3 to 2.5.3.7 of this SEIR. Implementation of the CAP Update would result in potentially significant impacts to historical, archaeological, and paleontological resources, and human remains. Implementation of General Plan policies (Policies COS-7.1 through COS-7.3, COS-7.5, COS-9.1, and COS-9.2) and 2011 GPU PEIR mitigation measures (Mitigation Measures Cul-1.1, Cul-1.6, Cul-2.1 through Cul-2.3, Cul-2.5, Cul-2.6, Cul-3.1, Cul-3.2 and Cul-4.1) would reduce the potential impacts to archaeological resources, paleontological resources, and human remains but not to a less-than-significant level. These are new significant impacts that were not discussed in the 2011 GPU PEIR.

Impact on EJ Communities

Due to the programmatic nature of the CAP Update, it is not possible to determine the locations of future projects. Future projects associated with the CAP Update would be located within the unincorporated county, including the EJ communities. Adverse cultural and paleontological impacts could occur in any area within the unincorporated county where cultural or paleontological resources may be located. Adverse cultural resources impacts are not anticipated to be disproportionately higher on the EJ communities. Applicable General Plan policies and mitigation measures would be implemented to ensure that any impacts related to cultural resources are treated appropriately and with respect to all communities, including EJ communities. Compliance with General Plan policies and 2011 GPU PEIR mitigation measures would ensure that impacts would not be disproportionately higher on EJ communities. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to cultural and paleontological resources on an EJ community.

Energy

Summary of Project Impacts

Impacts related to energy are analyzed in Sections 2.6.3.3 and 2.6.3.5 of this SEIR. Implementation of the CAP Update would not result in significant impacts related to energy.

Implementation of the CAP Update would result in temporary construction activities that would consume energy resources. However, CAP Update Action E-2.2 would improve energy efficiency, Action T-1.1.a would promote the use of alternative fuel in construction equipment, and Action T-3.1 would involve the installation of electric vehicle chargers and encourage alternative transportation. Overall, implementation of the CAP Update would not result in wasteful, inefficient, or unnecessary consumption of energy. Rather, implementation of the CAP Update would result in a long-term reduction in energy consumption through encouraging improvements to alternative transportation infrastructure, requiring energy efficiency and water conservation, and enhancing waste processing. The CAP Update would not result in conflict with or obstruction of a state or

local plan for renewable energy efficiency. The impact would be less than significant. Therefore, implementation of the CAP Update would not result in potentially significant impacts not identified in the 2011 GPU PEIR related to energy.

Impact on EJ Communities

The GHG reduction measures proposed within the CAP Update would result in the use of more efficient technology that would generally reduce energy demand and ultimately result in cost saving related to energy use in all communities, including EJ communities. In addition, implementation of the CAP Update Measures T-3, T-5, and T-6 would result in co-benefits related to energy conservation in EJ communities by prioritizing installation of electric vehicle charging stations, prioritizing improvements to pedestrian and bicycle infrastructure, and distributing transit passes in frontline communities. Therefore, implementation of the CAP Update would result in beneficial energy impacts on EJ communities. The CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to energy on an EJ community.

Greenhouse Gas Emissions

Summary of Project Impacts

Impacts related to GHGs are analyzed in Sections 2.8.3.3 and 2.8.3.5 of this SEIR. The goal of the CAP Update is to reduce GHG emissions generated within the unincorporated county by increasing the use of alternatively fueled vehicles, reducing vehicle miles traveled (VMT), generating and utilizing renewable energy, reducing waste generation, and increasing carbon sequestration. Implementation of the CAP Update would not generate significant GHG emissions nor would the CAP Update conflict with the goals of SB 32 and AB 1279. Impacts would be less than significant, consistent with the conclusion of the 2011 GPU PEIR.

Impact on EJ Communities

As noted above, the goal of the CAP Update is to reduce overall GHG emissions within the unincorporated county, including the EJ communities. Implementation of CAP Update Measures S-2, E-3, W-2, T-2, and T-3 would increase frontline communities' access to organic material processing facilities; increase frontline communities' access to incentives for conserving water, using renewable energy use, and purchasing electric vehicles; and increase incentives for low-income residents to transition to zero-emission construction equipment. The CAP Update would result in beneficial impacts related to GHG emissions in EJ communities. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to GHG emissions on an EJ community.

Hazards and Hazardous Materials

Summary of Project Impacts

Impacts related to hazards and hazardous materials are analyzed in Sections 2.9.3.3 to 2.9.3.8 of this SEIR. Implementation of the CAP Update would not result in potentially significant impacts related to hazardous materials and sites, airport hazards, emergency response and evacuation plans, wildland fires, or vectors.

Implementation of these CAP Update measures and actions could result in the construction of new or expanded solid waste facilities; new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure; energy efficiency retrofit; solar and wind renewable energy development; new farmworker housing (if opportunities to increase farmworker housing in the unincorporated area are identified); and pedestrian, bicycle, and transit network improvements. Construction of new facilities and improvements to existing facilities would involve the use of similar types of hazardous materials as are commonly used as part of new development, including paints, oils, solvents, fuels, lubricants, asphalt products, and other materials. The transport, use, and disposal of hazardous materials during construction would be required to comply with the federal, state, and local regulatory requirements. Should the development of these facilities occur on a listed hazardous materials site compiled pursuant to Government Code Section 65962.5, compliance with applicable federal, state, and local regulations related to existing on-site hazardous materials contamination would also be required. In addition, the 2011 GPU PEIR mitigation measures pertaining to airport hazards (Mitigation Measures Haz-1.1, Haz-1.3, and Haz-1.5) would further limit the project impacts on airport hazards by requiring new development projects to be reviewed for compatibility with surrounding airports, military airbases, and land uses.

Implementation of CAP update measures and actions would have potential to result in impacts related to impairing emergency response or evacuation plans. However, adopted General Plan policies (Policies S-1.2, M-1.2, M-3.3, and M-4.3) and 2011 GPU PEIR mitigation measures (Mitigation Measures Haz-3.1, Haz-3.2, and Haz-3.3) would reduce impediments and conflicts with adopted emergency response and evacuation plans to a less-than-significant level by facilitating coordination with applicable planning and emergency services agencies, implementing roadway standards to ensure road improvements are consistent with emergency response and evacuation plans, and requiring the inclusion of fire access roads in planning documents.

Implementation of CAP Update measures and actions in fire-prone areas would have the potential to expose people or structures to significant risk of loss, injury, or death involving wildland fires. However, compliance with General Plan policies (Policies S-4.1 through S-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) would reduce impacts related to wildland fires to a less-than-significant level by minimizing wildfire in the county, locating development away from fire hazard areas, and complying with existing regulations. Impacts related to hazards and hazardous materials would be less than significant with compliance with existing regulations and 2011 GPU PEIR

mitigation measures. No new or more severe significant impacts would occur compared to the 2011 GPU PEIR.

Impact on EJ Communities

Adverse hazards and hazardous materials impacts could occur in any area within the unincorporated county where future projects associated with the CAP Update would occur, including EJ communities. The use and handling of hazardous materials during construction would be conducted in a manner consistent with existing regulations and 2011 GPU PEIR mitigation measures, so that no significant impacts would occur. Adopted General Plan policies and 2011 GPU PEIR mitigation measures would be implemented to reduce the potential contribution of the project and to ensure that any impacts to hazards and hazardous materials are treated appropriately and with respect to all communities, including EJ communities. These impacts are not anticipated to be disproportionately higher on EJ communities. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to hazards and hazardous materials on an EJ community.

Hydrology and Water Quality

Summary of Project Impacts

Impacts related to hydrology and water quality are analyzed in Sections 2.10.3.3 to 2.10.3.6 of this SEIR. Implementation of the CAP Update would result in significant and unavoidable impacts related to water quality issues, groundwater supply, and groundwater recharge and would result in less-than-significant impacts related to surface hydrology and drainage with mitigation incorporated, consistent with the conclusions in the 2011 GPU PEIR.

Future projects associated with the CAP Update could include new or expanded solid waste facilities; new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure; energy efficiency retrofits; solar and wind renewable energy development; new farmworker housing (if opportunities to increase farmworker housing in the unincorporated area are identified); and pedestrian, bicycle, and transit network improvements. Construction of new facilities and improvements to existing facilities would involve the use of heavy equipment, paving, ground disturbance, and other typical construction activities that could adversely affect water quality standards or waste discharge requirements where projects are located near waterways or discharges runoff to stormwater drainage systems. Future projects associated with the CAP Update could also occur in areas that are currently experiencing groundwater supply issues and would contribute to worsening an already unsustainable groundwater supply. At the programmatic level, it is not possible to determine with certainty that impacts on water quality, groundwater supply, and groundwater recharge would be reduced to below a less-than-significant level.

Several federal, state, and local regulations exist that reduce the potential for projects to violate water quality standards, including the Clean Water Act, Porter-Cologne Water

Quality Control Act, National Pollutant Discharge Elimination System permitting requirements, San Diego Basin Plan, Colorado River Basin Plan, County's Watershed Protection, Stormwater Management, and Discharge Control Ordinance, and low-impact development requirements. In addition, General Plan Policies LU-6.5, LU-6.9, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.4 would maximize stormwater filtration and minimize projects impacts to water quality. The 2011 GPU PEIR Mitigation Measures Hyd-1.1 through Hyd-1.5 would further reduce project impacts on surface water and groundwater quality by requiring implementation of the County's Jurisdictional Runoff Management Plan and Watershed Protection, Stormwater Management, and Discharge Control Ordinance, implementation of low impact development standards to minimize runoff and maximize infiltration, implementation of the Stormwater Standards Manual, and utilization of the *County of San Diego Guidelines for Determining Significance: Hydrology and Water Quality* (County of San Diego 2021b) and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources* (County of San Diego 2007). The adopted 2011 GPU PEIR Mitigation Measures Hyd-2.1 through Hyd-2.5 would require compliance with existing regulations and implement programs to protect groundwater supply. However, at the programmatic level, it is not possible to determine with certainty that impacts on water quality, groundwater supply, and groundwater recharge would be reduced to a less-than-significant level.

With compliance with existing 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), impacts related to surface hydrology and drainage from implementation of the CAP Update would be reduced to a less-than-significant level.

Impact on EJ Communities

Adverse hydrology and water quality impacts could occur in any area within the unincorporated county where future projects associated with the CAP Update would occur and are not anticipated to be disproportionately higher on EJ communities. In addition to the General Plan policies and 2011 GPU PEIR mitigation measures listed above, which would be implemented to reduce hydrology and water quality impacts throughout the unincorporated county, future projects associated with the CAP Update would be implemented in compliance with EJ Element Goal EJ-4, which aims to protect and restore surface water bodies in the unincorporated county, including EJ communities, from future contamination. The CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to hydrology and water quality on an EJ community.

Land Use and Planning

Summary of Project Impacts

Impacts related to land use and planning are analyzed in Sections 2.11.3.3 and 2.11.3.5 of this SEIR. Implementation of the CAP Update would result in less-than-significant impacts related to the physical division of established communities or conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact.

Future projects associated with the CAP Update could include new or expanded solid waste facilities; new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure; energy efficiency retrofit; solar and wind renewable energy development; new farmworker housing (if opportunities to increase farmworker housing in the unincorporated area are identified); and pedestrian, bicycle, and transit networks improvements.

New and expanded solid waste facilities would be sited on land that is zoned for this type of land use or allowable conditionally in accordance with adopted General Plan Policies LU-16.1 and LU-16.3. These facilities would not be sited in a manner that would physically divide existing communities. Greywater and stormwater projects would facilitate water efficiency and conservation for existing development and new development as it is approved. These infrastructure improvements, when considered separately from the future development that they may accompany, would not result in the conversion of any land uses or the introduction of new land uses that would be incompatible with existing and planned surrounding land uses. Pedestrian, bicycle, and transit network improvements would likely occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. Future projects associated with the CAP Update would not result in the development of new large-scale infrastructure (e.g., freeway, railroad, airport) or large open space areas that would bisect existing land uses or that would change existing circulation patterns in a manner that would hinder access to existing communities.

Implementation of CAP Update Action E-3.3 would have the potential to result in development of large-scale renewable energy projects. Large-scale renewable energy projects would be required to comply with adopted General Plan policies (e.g., Policies LU-12.4, EJ-2, EJ-2.3, EJ-2.5, EJ-2.7, and EJ-5.2) and implement 2011 GPU PEIR mitigation measures (Mitigation Measures Lan-1.1 through Lan-1.3) to reduce the potential for roadways to physically divide an established community. However, it cannot be guaranteed that impacts related to the physical division of established communities would be reduced to a less-than-significant level because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. This impact would be significant and unavoidable and would be a new significant impact not discussed in the 2011 GPU PEIR.

Future projects associated with the CAP Update are compatible with the goals and initiatives laid out in the County's *2020-2030 County Operations Strategic Sustainability*

Plan, which includes initiatives and goals that focus on energy (reducing energy use and promoting clean energy production), water (reducing potable water consumption and promoting water reuse systems), waste (increasing diversion of solid waste and promoting recycling), and transportation (reducing fleet vehicle emissions and VMT, electrifying the fleet, and expanding electric vehicle charging infrastructure); the County's *Zero Carbon Portfolio Plan,* which presents measures to support and build on existing state, County, and industry goals, including GHG emission reduction goals established by AB 32 and Executive Orders B-30 and B-55; and the County's *Renewable Energy Plan*, which outlines a series of measures to transition existing electricity consumption from fossil-fuel grid electricity to clean, renewable power sources. Therefore, the solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions proposed in the CAP Update would be generally consistent applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact.

Impact on EJ Communities

Adverse land use and planning impacts could occur in any area within the unincorporated county where future projects associated with the CAP Update would occur. As discussed above, development of large-scale renewable energy associated with the CAP Update would have the potential to physically divide an established community. The adopted General Plan policies and 2011 GPU PEIR mitigation measures would be implemented to reduce the potential contribution of the project and to ensure that any impacts related to physically dividing an established community are treated appropriately and with respect to all communities, including EJ communities. Compliance with General Plan policies and 2011 GPU PEIR mitigation measures would ensure that impacts are not anticipated to be disproportionately higher on EJ communities.

Future projects would be required to comply with EJ Element goals and policies intended to mitigate environmental impacts in EJ communities, including Goal EJ-5, which protects and restores surface water bodies in the unincorporated county (including EJ communities) from future contamination; Goal EJ-2, which protects sensitive land uses from increased pollution exposures in EJ communities; Policy EJ-2.3, which develops criteria to identify and evaluate potential environmental impacts of renewable energy facilities on EJ communities; Policy EJ-2.4, which minimizes heavy truck traffic and designates routes away from neighborhoods and sensitive areas in EJ communities; and Policy EJ-2.5, which avoids land use conflicts by establishing adequate buffers around sensitive land uses to protect them from uses that may pose a threat to human health. Implementation of the CAP Update would not conflict with EJ Element goals and policies intended to mitigate environmental impacts. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to land use and planning on an EJ community.

Noise

Summary of Project Impacts

Impacts related to noise are analyzed in Sections 2.12.3.3 to 2.12.3.5 of this SEIR. Implementation of the CAP Update would result in less-than-significant impacts related to excessive noise, groundborne vibration, and excessive noise exposure from a public and private airport with mitigation incorporated.

Implementation of the CAP Update would result in development of new or modified facilities and structures (e.g., new or expanded solid waste facilities, water and wastewater infrastructure and efficiency improvements, and solar and wind renewable energy infrastructure). Development of new or modified facilities and structures could involve the use of limited heavy-duty equipment that would result in noise and groundborne vibration. Future projects associated with the CAP Update would be required to comply with the adopted General Plan Policy N-4.9, which reduces potential noise impacts to noise-sensitive land uses; Policy N-6.4, which requires non-emergency construction to be limited near noise-sensitive land uses; Policy LU-2.8, which requires measures to minimize significant impacts to surrounding areas from uses or operations that cause excessive noise; Policy N-3.1 which limits the extent of exposure that sensitive uses may have to groundborne vibration from construction equipment and other sources; and Policies S-15.1, S-15.2, and S-15.4, which require land uses surrounding airports to be compatible with airport operations. In addition, implementation of the 2011 GPU PEIR Mitigation Measures Noi-1.1, Noi-1.3, Noi-2.1, and Noi-2.4, which require acoustical analysis for projects may result in excessive noise, would reduce noise levels from these activities, and Noi-5.1 and Noi-5.3, which require using applicable ALUCP guidance and assessing noise impacts from private airports and helipads, would ensure that new development would not result in significant noise and vibration impacts.

However, implementation of CAP Update Action E.3.1 would have the potential to result in development of large-scale renewable energy projects. As discussed in Section 3.12.3.3, “Issue 1: Excessive Noise Levels,” implementation of large-scale wind turbine projects could result in potentially significant impacts related to annoyance from low-frequency noise associated with operating large wind turbines. No feasible mitigation measures are available to reduce this impact to a less-than-significant level because noise waivers could be provided under certain circumstances for large-scale wind turbine projects located within the designated Noise Waiver Area on the Wind Resources Map. Therefore, implementation of large-scale wind turbine projects would result in significant and unavoidable impacts related to low-frequency noise. Implementation of the CAP Update would result in new or more severe significant impacts not identified in the 2011 GPU PEIR related to increased ambient low-frequency noise from operating large wind turbines.

Impact on EJ Communities

Noise and vibration would be generated during construction of new or modified facilities and structures, but the impacts would be minimized through implementation of adopted

General Pan policies and 2011 GPU PEIR mitigation measures as discussed above. No excessive noise levels, groundborne vibration, or excessive noise from an airport would occur. Development of large-scale wind turbine projects would result in significant and unavoidable impacts related to low-frequency noise. Adverse low-frequency impacts could occur in any area within the unincorporated county that are suitable for large-scale wind energy development. General Plan Policies EJ-2.3 and EJ-2.5 would reduce impacts to EJ communities by developing criteria to identify and evaluate potential environmental impacts of renewable energy facilities that affect EJ communities and ensuring that sensitive land uses are adequately buffered from heavy industrial uses and other facilities that may pose a threat to human health. Compliance with adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that impacts are not anticipated to be disproportionately higher on EJ communities. The CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to noise and vibration on an EJ community.

Transportation

Summary of Project Impacts

Impacts related to transportation are analyzed in Sections 2.13.3.3 to 2.13.3.7 of this SEIR. Implementation of the CAP Update would result in less-than-significant impacts related to conflict with a program, ordinance or policy addressing the circulation system, and vehicle miles traveled (VMT); and would result in less-than-significant impacts related to substantially increased design hazards and inadequate emergency assess with mitigation incorporated.

The measures and actions proposed under the CAP Update are intended to further statewide and regional goals by promoting policies and actions that reduce GHG emissions through improved solid waste and water/wastewater use and management, increasing the availability of renewable sources of energy, promoting sustainable agricultural practices, and promoting transportation and built environment improvements that encourage the development of multi-modal transportation options and vehicular emissions reductions. Implementation of the CAP Update would be generally consistent with the San Diego Association of Governments' *2021 Regional Plan* which combines the Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan. Impacts related to conflict with a program, ordinance or policy addressing the circulation system would be less than significant.

Implementation of CAP Update measures and actions related to solid waste, water and wastewater, and energy would not increase residential or commercial uses and would only result in minimal numbers of employees. Therefore, the potential impacts to VMT would be less than significant. Implementation of agricultural and conservation measures and actions would not result in impacts to VMT because no new or expanded development would be anticipated from their associated agriculture and conservation activities. However, implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. Implementation of new

farmworker housing would be expected to reduce VMT by locating housing on-site or near agricultural lands where those residents would work, therefore reducing the distance farmworkers commute. CAP Update built environment and transportation measures and actions would also help reduce VMT by conducting new transit-supportive roadways treatments and bicycle and pedestrian facilities, implementing transportation demand management programs, providing educational initiatives to encourage increased alternative transportation use in the unincorporated county.

Future projects associated with the CAP Update could include development of new or expanded solid waste facilities; new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure; energy efficiency retrofits; small- and large-scale solar and wind renewable energy facilities; new farmworker housing (if opportunities to increase farmworker housing in the unincorporated area are identified); and pedestrian, bicycle, and transit network improvements. Future large-scale renewable energy projects are required to obtain a Major Use Permit, which requires projects to undergo the County's discretionary review process. Discretionary large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application, and project-specific mitigation would be required to minimize or eliminate transportation-related impacts, where feasible.

During construction of each project, traffic operations could be degraded, and emergency access could be impeded. Project construction would be required to implement adopted General Plan goals and policies related to transportation hazards. General Plan Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety; Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that if impacts to planned routes would occur, any such impacts would be mitigated; Policy LU-9.8 requires that development within Villages include connected pedestrian routes and amenities; Goal M-4 encourages roads designed to be safe for all users and compatible with their context; Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists; Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access; Policies M-11.2 through M-11.4 require development in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks.

Future projects associated with the CAP Update would also be required to implement the following applicable mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3, Tra-1.4, and Tra-4.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* (County of San Diego 2011) to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. Mitigation Measure Tra-4.4 involves revisions to the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards. Impacts related to transportation hazards and inadequate emergency access would be reduced to a less-

than-significant level with implementation of General Plan policies and 2011 GPU PEIR mitigation measures.

Impact on EJ Communities

As noted above, implementation of the CAP Update would require compliance with the adopted General Plan goals and policies, and implementation of applicable 2011 GPU PEIR mitigation measures. With compliance with adopted goals and policies and applicable mitigation measures, impacts related to transportation would be reduced to less than significant. In addition, implementation of the CAP Update Measures T-4 through T-6 would result in co-benefits related to transportation in EJ communities by reducing air pollution burdens faced by frontline communities and prioritizing improvements to pedestrian and bicycle infrastructure and roadway treatment in frontline communities. General Plan Policy EJ-12.3 also requires prioritizing the incorporation and installation of pedestrian and bicycle facilities in EJ communities. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to transportation on an EJ community.

Tribal Cultural Resources

Summary of Project Impacts

Impacts related to tribal cultural resources are analyzed in Sections 2.14.3.3 and 2.14.3.4 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 project impacts to tribal cultural resources where subsequent CEQA documentation is required. Implementation of 2011 GPU PEIR mitigation measures (Mitigation Measures Cul-2.2, Cul-2.4 through Cul-2.6, and Cul-4.1) and CAP Update SEIR mitigation measures (CAP Update Mitigation Measures TCR-1) would minimize impacts to tribal cultural resources by requiring coordination with local tribes, identification of tribal cultural resources, and Native American monitoring. However, because the specific location of project associated with CAP Update implementation are not known and because they could be implemented in areas where tribal cultural resources are present; project impacts would be potentially significant. This is a new significant impact that was not discussed in the 2011 GPU PEIR.

Impact on EJ Communities

As discussed in the CAP Update, even though tribal lands are outside of the County's land use jurisdiction and therefore emissions from their activities and sources are not included in the CAP Update GHG inventory and measures, the County acknowledges the relationship with tribal nations and the importance of Tribal Ecological Knowledge to understand and respect cultural history. The County will continue to strengthen partnerships with the local tribal nations and elevate the voices of Indigenous people to ensure that they are fully represented in the implementation of the CAP Update. For example, Action A-1.2.a proposes partnering with tribal governments to incorporate tribal ecological knowledge and apply Indigenous land management practices to contribute toward habitat restoration efforts on County land. The co-benefit of implementing Action

A-1.2.a would be increasing educational opportunities with tribal communities to learn about the natural environment.

Adverse tribal cultural resources impacts could occur in any area within the unincorporated county where future projects associated with the CAP Update would occur. However, compliance with CEQA Sections 21080.3.1 and 21084.3 would provide an opportunity to avoid or minimize the disturbance of tribal cultural resources through tribal consultation and CEQA review procedures. Additionally, 2011 GPU PEIR and CAP Update SEIR mitigation measures would be implemented to reduce the potential contribution of the project and to ensure that any impacts to tribal cultural resources are treated appropriately and with respect to all communities, including EJ communities. General Plan Policies EJ-2.3 and EJ-2.5 also would reduce impacts to EJ communities by developing criteria to identify and evaluate potential environmental impacts of renewable energy facilities that affect EJ communities and ensuring that sensitive land uses are adequately buffered from heavy industrial uses and other facilities that may pose a threat to human health. Compliance with CEQA Sections 21080.3.1 and 21084.3, adopted General Plan policies, and 2011 GPU PEIR mitigation measures would ensure that impacts are not anticipated to be disproportionately higher on EJ communities. Therefore, implementation of the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to tribal cultural resources on a tribal community.

Wildfire

Summary of Project Impacts

Impacts related to wildfire are analyzed in Section 2.15.3.3 to 2.15.3.6 of this SEIR. The measures and actions proposed in the CAP Update would have a limited potential to result in impacts related to impairing emergency response or evacuation plans. It is assumed that any new and improved structures generally would not be intended for extended occupancy. As a result, there is limited potential to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Where habitable structures are constructed, they would be unlikely to exacerbate wildfire risk due to slope, prevailing winds, and other factors, as all development would be consistent with adopted General Plan policies and would implement 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7 to address the potential for development to exacerbate wildfire hazards. In addition, the CAP Update would create co-benefits that reduce wildfire risk, thereby helping to make the county more adaptive and resilient to the impacts of climate change. Implementation of the CAP Update would result in a less-than-significant impact related to wildfire with mitigation incorporated. Therefore, implementation of the CAP Update would not result in potentially significant impacts not identified in the 2011 GPU PEIR related to exacerbation of fire risk or exposure of people or structures to post-fire risks.

Impact on EJ Communities

As noted above, impacts related to wildfire would be mitigated to a less-than-significant level through compliance with adopted General Plan policies and implementation of 2011 GPU PEIR mitigation measures. The same General Plan polies and 2021 GPU PEIR mitigation measures would be applied to future projects located within EJ communities to ensure that wildfire impacts would be less than significant. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to wildfire on an EJ community.

2.7.3.4 Cumulative Impacts

The cumulative impact analysis study area for EJ was not established in the 2011 GPU PEIR because EJ is not identified as an environmental resources topic in the CEQA statute or State CEQA Guidelines. For this project, the cumulative study area for EJ impacts includes all the EJ communities within the cumulative study areas discussed in Sections 2.1 through 2.6 and Section 2.8 through 2.15 of this SEIR. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Cause a Disproportionately High and Adverse Human Health or Environmental Impact on an EJ Community (a Minority or a Low-Income Population)

Multiple projects with adverse effects on human health or the environment near an EJ community could generate a cumulative effect on that community. Cumulative development associated with buildout of other planning documents identified within the San Diego region is not expected to collectively contribute effects on minority or low-income populations in a manner that would cause disproportionately high and adverse human health or environmental impact on an EJ community. The project would not cause a disproportionately high and adverse human health or environmental impact on EJ communities and would not result in a substantial incremental effect that would result in a new significant cumulative impact.

2.7.4 Summary of EJ Impacts

As discussed in Section 2.7.1.1 above, the General Plan EJ Element identified the following four EJ communities within the county: North El Cajon, North Lemon Grove, Spring Valley, and Sweetwater. The CAP Update establishes strategies, measures, and actions that the County must take within the unincorporated area of San Diego County to reduce GHG emissions from five sectors: solid waste, water and wastewater, agricultural and conservation, energy, and built environment and transportation. Implementation of the CAP Update could result in construction or modification of facilities or structures in the unincorporated county and could result in potential significant impacts to hazards and hazardous materials, land use and planning, noise, transportation, and wildfire. However, adopted General Plan policies and 2011 GPU PEIR mitigation measures would be applied to reduce these potential significant impacts to a less-than-significant level. Due

to the programmatic level of the CAP Update, it is not possible to determine the size and location of future projects and the potential magnitude of construction activities. No feasible mitigation measures have been identified to reduce impacts related to aesthetics, agricultural resources, air quality, biological resources, cultural and paleontological resources, hydrology and water quality, and tribal cultural resources to a less-than-significant level. These impacts would remain significant following implementation of mitigation measures. Implementation of the CAP Update result in a long-term reduction in energy consumption and GHG emissions through encouraging improvements to alternative transportation infrastructure, requiring energy efficiency and water conservation, and enhancing waste processing.

Although the CAP Update would result in potential significant impacts to the existing environment, the adverse impacts are not anticipated to be disproportionately higher on the EJ communities. One of the EJ Element goals is to support and expand programs and services in the implementation plan to prioritize those that identify EJ communities, address EJ issues, and foster countywide partnerships and programs. The County departments and resources that provide framework, goals, or tools to strengthen the County's commitment to reach environmental equity and justice are discussed in Section 2.7.2.3, above. The CAP Update also includes the following procedures to ensure the GHG reduction measures and actions maximize equity-driven outcomes for our frontline communities:

- Equity Implementation Framework: to serve as guidance for the implementation of inclusive climate actions outlined in the CAP. The developed framework will be a flexible, scalable, and multi-level framework that identifies best practices in implementing and assessing fair and inclusive climate actions, programs, and outcomes and prioritizing communities with the greatest need.

- Disproportionality Cost Analysis: Identify socioeconomic groups or local communities that pay a disproportionate cost and should be compensated by socioeconomic groups or local communities that gain significant benefits from particular measures. An important assessment is consideration of what groups or communities are adversely impacted by both the current situation and proposed solutions.

In addition, as discussed in Section 2.7.2, "Regulatory Framework" and in the CAP Update, the County's OSEJ is leading a regional effort to reduce community exposures to health hazards. OSEJ supports the efforts of neighboring jurisdictions and regulatory entities to remedy environmental disparities and injustices related to issues such as stationary and mobile sources of air pollution; toxic hotspots; GHG emissions; the urban heat island effect; substandard housing; a lack of access to healthy food; lack of transportation options; poor quality neighborhood infrastructure, such as access to broadband and poor connectivity; and a historic deficiency in open space and recreational amenities. The OERJ identifies and addresses systemic bias and disparities to create equitable solutions with County departments and communities. Through the implementation process, the CAP Update investments would prioritize EJ and achieve

equitable outcomes for communities and populations in the unincorporated county that have been historically left behind and most affected by climate change.

2.7.5 Mitigation Measures

2.7.5.1 Issue 1: Cause a Disproportionately High and Adverse Human Health or Environmental Impact on an EJ Community (a Minority or a Low-Income Population)

Mitigation measures listed in Table S-1 in the Executive Summary would be applied throughout the unincorporated county (including EJ communities) to reduce environmental impacts. With implementation of these mitigation measures, implementation of the CAP Update would not cause a disproportionately high and adverse environmental impact on EJ communities.

2.7.6 Significance Conclusions

The CAP Update would not cause a disproportionately high and adverse human health or environmental impact on an EJ community.

Table 2.7-2 Population Density and Percent Minority Information

	County of San Diego	North El Cajon	North Lemon Grove	Spring Valley	Sweetwater
Total Population	3,343,364	3,657	4,153	46,202	27,600
Population Density (people/square mile)	794	1,414	6,328	7,915	6,977
Percent (%) Minority	54.2%	45.4%	86.8%	74.6%	86.8%

Source: US Census Bureau 2019.

Table 2.7-3 Poverty Status

	County of San Diego	North El Cajon	North Lemon Grove	Spring Valley	Sweet Water
Below FPL (% of Population)	12.5%	18%	21%	12.6%	9.9%
Income Below 200 Percent FPL ($24,280 income threshold) (% of Population)	54.2%	45.4%	86.8%	74.6%	86.8%

Note: FPL = federal poverty level.

Source: US Census Bureau 2019.

2.8 Greenhouse Gas Emissions

This section describes the existing conditions in the unincorporated county related to GHG emissions and the potential effects that implementation of the CAP Update may have related to GHG emissions. Specifically, this section presents a summary of regulations applicable to GHG emissions, a summary of climate change science and GHG sources in California and San Diego County, and a discussion of the project's potential GHG emissions and their potential contribution to global climate change. Potential impacts of the project are analyzed, and mitigation measures are provided for those impacts determined to be significant. Because this analysis is subsequent to the adopted 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the climate change setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the 2011 GPU PEIR. The 2011 GPU PEIR evaluated the General Plan's compliance with Assembly Bill (AB) 32; however, since the certification of the 2011 GPU PEIR, new legislation has been adopted in the state of California that set new long-term reduction targets for the state (i.e., Senate Bill [SB] 32 and AB 1279). Therefore, Issue 1: Compliance with AB 32, has been updated to reflect the state's newest long-term reduction goals mandated by SB 32 and AB 1279. The 2022 Scoping Plan contains language that indicates that the initial goal of SB 32 (i.e., reducing 1990 emissions by 40 percent by 2030) would likely need to be revised to meeting a 48 percent reduction in 1990 emission levels by 2030 to meet the ultimate goals of AB 1279 (i.e., reducing 1990 emissions by 85 percent by 2045 and achieve carbon neutrality by no later than 2045). While not codified by formal legislation, this reduction target is notable and considered in the evaluation of the CAP Update. This is evaluated in Issue 2. Issue 1 of this analysis details whether the proposed CAP Update would generate emissions of GHGs, either directly or indirectly, that may have a significant impact on the environment.

Additionally, the 2011 GPU PEIR evaluated the potential effects of global climate change on the General Plan; however, in 2015, the California Supreme Court issued its decision in the *California Building Industry Association v. Bay Area Air Quality Management District* 62 Cal.4th (2015), indicating that according to CEQA statute, projects are not required to analyze the effect of the environment on a project, unless a project's incremental contribution of environmental impacts would exacerbate an existing adverse environmental condition. Given that the purpose of the CAP Update is to reduce GHG emissions within the county, no separate CEQA analysis of the change in effects of climate change on the General Plan due to CAP Update implementation is necessary.

Table 2.8-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. As indicated, implementation of the proposed project would not result in new or more severe significant impacts on climate change.

Table 2.8-1 Summary of Climate Change–Related Impacts

Issue Number	Issue Topic[1,2]	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	GHG Emissions That May Have a Significant Impact on the Environment	General Plan Only: Less Than Significant with Mitigation Incorporated	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less Than Significant with Mitigation Incorporated	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
2	Conflict with an Applicable Plan, Policy, or Regulation for Reducing the Emission of GHGs	General Plan Only: Less Than Significant with Mitigation Incorporated	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less Than Significant with Mitigation Incorporated	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

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

[1] The 2011 GPU PEIR (Issue 1) evaluated the General Plan's compliance with Assembly Bill (AB) 32. However, since the certification of the 2011 GPU PEIR, new legislation has been adopted in the state of California that set new long-term reduction targets for the state (i.e., Senate Bill [SB] 32 and AB 1279). Therefore, Issue 1 has been updated to reflect the state's newest long-term reduction goals mandated by SB 32 and AB 1279. Issue 2 has also been updated to reflect the new reduction goals of AB 1279, consistent with the 2022 Scoping Plan.

[2]The 2011 GPU PEIR (Issue 2) evaluated the potential effects of global climate change on the General Plan; however, in 2015, the California Supreme Court issued its decision in the California Building Industry Association v. Bay Area Air Quality Management District 62 Cal.4th (2015), indicating that according to CEQA statute, projects are not required to analyze the effect of the environment on a project, unless a project's incremental contribution of environmental impacts would exacerbate an existing adverse environmental condition. Given that the purpose of the CAP Update is to reduce GHG emissions within the county, no separate CEQA analysis of the change in effects of climate change on the General Plan due to CAP Update implementation is necessary.

Source: Compiled by Ascent Environmental in 2023.

Comments received during the Notice of Preparation (NOP) scoping process regarding environmental impacts and potential alternatives and mitigation measures included the following: reduce or eliminate natural gas from new development, increase solid waste diversion and recycling, implement building electrification, incorporate green building materials and retrofits, increase renewable energy (wind, solar) use and generation, allow Community Choice Aggregation, support the use of carbon offsets and develop an alternative to provide for their continued use for existing and future projects within the county, utilize and protect natural habitats and ecosystems for use as carbon sinks, purchase undeveloped lands around the region and convert to preserve lands (Fanita Ranch, Harvest Hills, Lilac Hills, Newland Sierra, Otay Ranch Villages, Rancho Guejito), utilize agriculture as a carbon sink, utilize urban vegetation as carbon sink, and urban cooling.

This input is addressed in this section, in the alternatives chapter, and throughout the CAP Update. Copies of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

2.8.1 Existing Conditions

A discussion of global climate change and its effects is included in Section 2.17.1, "Existing Conditions," of the 2011 GPU PEIR and is incorporated by reference. This section includes updates to existing conditions since the adoption of the 2011 GPU PEIR that are relevant to the proposed project.

2.8.1.1 Greenhouse Gas Emissions

Physical Scientific Basis of Greenhouse Gas and Climate Change

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. The quantity of GHGs in the atmosphere responsible for climate change is not precisely known, but it is substantial. No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

Greenhouse Gas Emission Sources

State

Emissions of GHGs are attributable in large part to human activities. The total GHG inventory for California in 2020 was 369 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) (CARB 2022a) This is less than the California Air Resources Board's (CARB's) AB 32 target to reduce emissions to 1990 levels by 2020 equal to 431 $MMTCO_2e$ (CARB 2020). Table 2.8-2, presented at the end of this section, summarizes the statewide GHG inventory for California.

As shown in Table 2.8-2, the sectors that contribute the most GHG emissions are transportation and industrial processes.

County of San Diego

The 2011 GPU PEIR included a baseline GHG emissions inventory for County operations and the unincorporated area for 2006. The CAP Update includes an emissions inventory for the year 2019 to characterize existing conditions. Inventory methods and data collection tools have evolved since the 2011 GPU PEIR and the 2019 inventory provides a current snapshot of emissions in the county.

Table 2.8-3, presented at the end of this section, shows that, in 2019, a total of 2,984,000 $MMTCO_2e$ were generated by activities in the unincorporated county and from County government operations. The largest contributor of GHG emissions was on-road transportation, which includes emissions from gasoline and diesel fuel use from vehicles operating on roadways. The second largest contributor was electricity consumption, which accounts for electricity generated from non-renewable sources and consumed at buildings and facilities.

2.8.2 Regulatory Framework

2.8.2.1 Federal

Energy Policy and Conservation Act

In 1975, Congress enacted the federal Energy Policy and Conservation Act, which established fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. As of 2022, the Corporate Average Fuel Economy standards require an industry-wide fleet average of approximately 49 miles per gallon for passenger cars and light trucks in model year 2026. The new standards will increase fuel efficiency 8 percent annually for model years 2024-2025 and 10 percent annually for model year 2026. They will also increase the estimated fleetwide average by nearly 10 miles per gallon for model year 2026, relative to model year 2021 (DOT 2022).

Massachusetts vs. EPA

On April 2, 2007, in *Massachusetts v. EPA*, the Supreme Court directed the US Environmental Protection Agency (EPA) administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the EPA administrator is required to follow the language of Section 202(a) of the federal Clean Air Act (CAA). On December 7, 2009, the administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the CAA:

- The administrator found that elevated concentrations of GHGs—carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the "endangerment finding."
- The administrator further found the combined emissions of GHGs—CO_2, methane, nitrous oxide, and hydrofluorocarbons—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the "cause or contribute finding."

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the CAA.

2.8.2.2 State

Statewide GHG Emission Targets and Climate Change Scoping Plan

Reducing GHG emissions in California has been the focus of the state government for approximately two decades. GHG emission targets established by the state legislature include reducing statewide GHG emissions to 1990 levels by 2020 (AB 32 of 2006) and reducing them to 40 percent below 1990 levels by 2030 (SB 32 of 2016). Executive Order (EO) S-3-05 calls for statewide GHG emissions to be reduced to 80 percent below 1990 levels by 2050. This target was superseded by AB 1279 which codifies a goal for carbon neutrality and reduced emissions to 85 percent below 1990 levels by no later than 2045. These targets are in line with the scientifically established levels needed in the United States to limit the rise in global temperature to no more than 2 degrees Celsius, the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius (United Nations 2015).

On September 16, 2022, Governor Newsom signed AB 1279 which codified stringent emissions targets for the state of achieving carbon neutrality and an 85 percent reduction in 1990 emissions level by 2045. CARB released the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) on November 16, 2022, as also directed by AB 1279 (CARB 2022b). The 2022 Scoping Plan traces the pathway for the state to achieve its carbon neutrality and a goal of 85 percent reduction below 1990 emissions levels by 2045 using several scenarios that utilized difference suites of technologies and deployment of various regulations. CARB adopted the 2022 Scoping Plan on December 16, 2022.

Senate Bill 375 of 2008

In September 2008, SB 375 was signed into law and aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy, showing prescribed land use allocation in each MPO's Regional Transportation Plan. CARB provides each affected region with reduction targets for GHGs emitted by passenger cars

and light trucks for 2020 and 2035. The San Diego Association of Governments' (SANDAG's) *San Diego Forward: The Regional Plan* (2021 Regional Plan) is a Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that combines and updates two previous plans (the Regional Comprehensive Plan and the RTP/SCS) into one document that looks toward 2050. The 2021 Regional Plan reduces per capita GHG emissions from cars and light-duty trucks to 20 percent below 2005 levels by 2035, exceeding the region's state-mandated target of 19 percent. The 2021 Regional Plan also meets federal air quality conformity requirements. SANDAG submitted the final 2021 RTP/SCS to CARB on December 17, 2021, as required by California Government Code Section 65080(b)(2)(J)(ii) and completed its submittal of supporting information on March 16, 2022. CARB staff performed an evaluation of the 2021 RTP/SCS's quantification of the GHG emissions reduction strategies outlined in the 2021 Regional Plan. The technical analysis performed by CARB concluded that the 2021 Regional Plan would achieve the applicable GHG emissions reduction target for automobiles and light trucks of 19 percent per capita reduction by 2035, relative to 2005 levels, as established by CARB for the region (CARB 2022c). The final determination to approve the 2021 Regional Plan was made by CARB on August 26, 2022.

Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars program, which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles (ZEVs), into a single package of regulatory standards for vehicle model years 2017–2025. The new regulations strengthened the GHG standards for 2017 models and beyond. In addition, the program's ZEV regulation requires battery, fuel cell, and plug-in hybrid electric vehicles (EVs) to account for up to 15 percent of California's new vehicle sales by 2025. In August 2022, CARB adopted the Advanced Clean Cars II program, which sets sales requirements for ZEVs to ultimately reach the goal of 100 percent ZEV sales in the state by 2035.

California Renewables Portfolio Standard

SB X1-2 of 2011 requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB 100 of 2018 sets a three-stage compliance period requiring all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, to generate 52 percent of their electricity from renewables by December 31, 2027; 60 percent by December 31, 2030; and 100 percent carbon-free electricity by December 31, 2045. On September 16, 2022, the state passed SB 1020, the Clean Energy, Jobs, and Affordability Act of 2022, which revised state policy and requires that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California and 100 percent of electricity procured to serve all state agencies by December 31, 2045.

Building Energy Efficiency Standards

Title 24, Part 6

The energy consumption of new residential and nonresidential buildings in California is regulated by the state's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The California Energy Commission updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions. The current California Energy Code will require builders to use more energy-efficient building technologies for compliance with increased restrictions on allowable energy use. The core focus of the building standards has been efficiency, but the 2019 Energy Code ventured into onsite generation by requiring photovoltaic (PV) on new homes, providing significant GHG savings. The most recent is the 2022 California Energy Code which advances the onsite energy generation progress started in the 2019 California Energy Code by encouraging electric heat pump technology and use, establishing electric-ready requirements when natural gas is installed, expanding solar PV system and battery storage standards, and strengthening ventilation standards to improve indoor air quality. The California Energy Commission estimates that the 2022 California Energy Code will save consumers $1.5 billion and reduce GHG emissions by 10 $MMTCO_2e$ over the next 30 years (CEC 2021).

Title 24, Part 11

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The current version is the 2022 CALGreen Code, which took effect on January 1, 2023. As compared to the 2019 CALGreen Code, the 2022 CALGreen Code strengthened sections pertaining to EV and bicycle parking, water efficiency and conservation, and material conservation and resource efficiency, among other sections of the CALGreen Code. The CALGreen Code sets design requirements equivalent to or more stringent than those of the California Energy Code for energy efficiency, water efficiency, waste diversion, and indoor air quality. These codes are adopted by local agencies that enforce building codes and used as guidelines by state agencies for meeting the requirements of EO B-18-12.

Low Carbon Fuel Standard

In January 2007, EO S-1-07 established a Low Carbon Fuel Standard (LCFS). The EO calls for a statewide goal to be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 and for an LCFS for transportation fuels to be established for California. The LCFS applies to all refiners, blenders, producers, or importers (providers) of transportation fuels in California, including fuels used by off-road construction equipment (Wade, pers. comm., 2017). The LCFS is measured on the total fuel cycle and may be met through market-based methods. For example, providers exceeding the performance required by an LCFS receive credits that may be applied to future obligations or traded to providers not meeting the LCFS.

In June 2007, CARB adopted the LCFS as a Discrete Early Action item under AB 32 pursuant to Health and Safety Code Section 38560.5, and in April 2009, CARB approved the new rules and carbon intensity reference values with new regulatory requirements taking effect in January 2011. The standards require providers of transportation fuels to report on the mix of fuels they provide and demonstrate they meet the LCFS intensity standards annually. This is accomplished by ensuring that the number of "credits" earned by providing fuels with a lower carbon intensity than the established baseline (or obtained from another party) is equal to or greater than the "deficits" earned from selling higher-intensity fuels. After some disputes in the courts, CARB readopted the LCFS regulation in September 2015, and the LCFS went into effect on January 1, 2016. CARB is currently amending the LCFS regulation with intent to adopt the amendments in 2023.

EO B-48-18: Zero-Emission Vehicles

In January 2018, EO B-48-18 was signed into law and requires all state entities to work with the private sector to have at least 5 million ZEVs on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 EV charging stations by 2025. It specifies that 10,000 of the EV charging stations should be direct current fast chargers. This EO also requires all state entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor's Office of Business and Economic Development is required to publish a *Plug-in Charging Station Design Guidebook* and update the *Hydrogen Station Permitting Guidebook* to aid in these efforts (Eckerle and Jones 2020). All state entities are required to participate in updating the *2018 Zero-Emissions Vehicle Action Plan* intended to provide direction to state agencies on the most important actions to be executed in 2018 to enable progress toward the 2025 targets and 2030 vision, give stakeholders transparency into the actions state agencies plan to take (or are taking) to further the ZEV market, and create a platform for stakeholder engagement, feedback, and collaboration. Additionally, all state entities are to support and recommend policies and actions to expand ZEV infrastructure at residential land uses, through the LCFS program, and to recommend how to ensure affordability and accessibility for all drivers.

California 2030 Natural and Working Lands Climate Change Implementation Plan

CARB and other state agencies also released the January 2019 Draft California 2030 Natural and Working Lands Climate Change Implementation Plan (CA 2030 NWL Climate Change Implementation Plan) consistent with the carbon neutrality goal of EO B-55-18. The CA 2030 NWL Climate Change Implementation Plan outlines climate objectives for natural and working lands: to maintain them as a resilient carbon sink (i.e., net zero or negative GHG emissions) and set a preliminary goal to reduce GHG emissions from them by at least 15–20 $MMTCO_2e$ by 2030. The plan is projected to result in cumulative emissions of 12.4 to 35.9 $MMTCO_2e$ by 2030 and cumulative emission reductions of -84.2 to -83.1 $MMTCO_2e$ by 2045 (California Environmental Protection Agency et al. 2019).

2.8.2.3 Local

San Diego County Air Pollution Control District

The San Diego County Air Pollution Control District (SDAPCD) has jurisdiction over air quality programs in the county. SDAPCD regulates most air pollutant sources, except for mobile sources, which are regulated by CARB or EPA. State and local government projects, as well as projects proposed by the private sector are subject to SDAPCD requirements if the sources are regulated by SDAPCD. The Scoping Plan does not provide an explicit role for local air districts in implementing AB 32, but it does state that CARB will work actively with air districts in coordinating emissions reporting, encouraging, and coordinating GHG reductions, and providing technical assistance in quantifying reductions. The ability of air districts to control emissions (both criteria pollutants and GHGs) is provided primarily through permitting, as well as through their role as a CEQA lead or responsible agency, the establishment of CEQA thresholds, and the development of analytical requirements for CEQA documents. SDAPCD is responsible for air quality planning in San Diego County. To date, SDAPCD has not developed specific thresholds of significance with regard to the evaluation of GHG emissions in CEQA documents.

San Diego Association of Governments' San Diego Forward: The Regional Plan 2021

The 2021 Regional Plan covers a broad range of topics including air quality, borders and tribal nations, climate change, economic prosperity, emerging technologies, transit and automobile energy efficiency, and fuels, habitat preservation, community health, public facilities, shoreline preservation, transportation, and water quality. The Regional Plan emphasizes the importance of multimodal transportation and places special emphasis on active transportation, such as walking and biking, and reducing car use to minimize GHG emissions, diminish air pollution, and maximize public health. The 2021 Regional Plan also includes an SCS, which identifies five main strategies to complement the goal of sustainability. These strategies focus on job growth and housing in urbanized areas with existing public transportation options, addressing housing needs for all economic segments of the population, the preservation of open space, investment in an accessible transit network, and reduced GHG emissions through the implementation of actions such as increasing public transportation infrastructure and access, encouraging active transportation through upgrades to pedestrian and bike facilities, and incentivizing EV use and providing additional EV infrastructure. The 2021 Regional Plan is designed to be updated every 4 years in accordance with federal law in collaboration with the 18 cities and San Diego County along with regional, state, and federal partners. The 2021 Regional Plan focuses on regional targets through 2050. The 2021 Regional Plan is projected to reduce per capita GHG emissions from cars and light-duty trucks to 20 percent below 2005 levels by 2035, exceeding the region's state-mandated target of 19 percent. The 2021 Regional Plan also meets federal air quality conformity requirements. The goals outlined in the 2021 Regional Plan are as follows:

- the efficient movement of people and goods;
- access to affordable, reliable, and safe mobility; and
- healthier air and reduced GHG emissions.

2011 San Diego County General Plan

The General Plan policies related to GHG emissions that could be applicable to the CAP Update include the following:

Policy COS-14.1: Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

Policy COS-14.2: Villages and Rural Villages. Incorporate a mixture of uses within Villages and Rural Villages that encourage people to walk, bicycle, or use public transit to reduce air pollution and GHG emissions.

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

Policy COS-14.8: Minimize Air Pollution. Minimize land use conflicts that expose people to significant amounts of air pollutants.

Policy COS-14.9: Significant Producers of Air Pollutants. Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design.

Policy COS-14.10: Low-Emission Construction Vehicles and Equipment. Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.

Policy COS-15.1: Design and Construction of New Buildings. Require that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants.

Policy COS-15.3: Green Building Programs. Require all new County facilities and the renovation and expansion of existing County buildings to meet identified "green building" programs that demonstrate energy efficiency, energy conservation, and renewable technologies.

Policy COS-15.4: Title 24 Energy Standards. Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.

Policy COS-15.5: Energy Efficiency Audits**.** Encourage energy conservation and efficiency in existing development through energy efficiency audits and adoption of energy saving measures resulting from the audits.

Policy COS-15.6: Design and Construction Methods. Require development design and construction methods to minimize impacts to air quality.

Policy COS-16.2: Single-Occupancy Vehicles. Support transportation management programs that reduce the use of single-occupancy vehicles.

Policy COS-16.3: Low-Emissions Vehicles and Equipment. Require County operations and encourage private development to provide incentives (such as priority parking) for the use of low- and zero-emission vehicles and equipment to improve air quality and reduce GHG emissions. [Refer also to Policy M-9.3 (Preferred Parking) in the Mobility Element.]

Policy COS-18.2: Energy Generation from Waste. Encourage use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites.

Policy COS-18.3: Alternate Energy Systems Impacts. Require alternative energy system operators to properly design and maintain these systems to minimize adverse impacts to the environment.

*[1]Policy COS-20.1: Climate Change Action Plan. Prepare, maintain, and implement a climate change action plan with a baseline inventory of GHG emissions from all sources; GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures.

Policy COS-20.3: Regional Collaboration. Coordinate air quality planning efforts with federal and state agencies, San Diego Association of Governments (SANDAG), and other jurisdictions.

Green Building Incentive Program

The County of San Diego's Green Building Incentive Program is designed to promote the use of resource efficient construction materials, water conservation, and energy efficiency in new and remodeled residential and commercial buildings. The program offers incentives of reduced plan check turnaround time and a 7.5 percent reduction in plan check and building permit fees for projects meeting program requirements.

Construction and Demolition Recycling Ordinance

The Construction and Demolition Debris Ordinance is designed to divert debris from construction and demolition projects from the landfill disposal in the unincorporated county. The ordinance requires that 90 percent of inserts (i.e., asphalt, concrete, brick, masonry, tile, and dirt) and 70 percent of all other construction materials from a project be recycled. To comply with the ordinance, a Construction and Demolition Debris

[1] The policy and mitigation measures denoted with an asterisk are amended for consistency with the General Plan as part of the CAP Update project. The policy and mitigation measures are shown here in their current form, not as amended by the project.

Management Plan must be submitted, and a fully refundable Performance Guarantee must be paid prior to building permit issuance.

Strategic Plan to Reduce Waste

The County of San Diego Strategic Plan to Reduce Waste is designed to reduce waste sent to landfills. The plan includes 15 programs and policies that focus on different waste types and sources, such as reducing food and other organic waste generated from residential and commercial uses and sets a 75 percent waste diversion target by 2025.

Landscape Ordinance

The County of San Diego's Landscaping Ordinance was adopted in accordance with the state's Model Water Efficient Landscape Ordinance, which establishes water efficiency standards for new and existing landscapes. The County's ordinance applies to new construction for which the County issues a building permit or a discretionary review where the aggregate landscaped area is 500 square feet or more to obtain outdoor water use authorization. For those projects between 500 and 2,500 square feet, the County has a more streamlined process called the Prescriptive Compliance Option. All landscape areas are subject to a Maximum Applied Water Allowance, which sets an upper limit of allowable water use per landscape area.

County Operations Strategic Sustainability Plan

The County's 2020–2030 County Operations Strategic Sustainability Plan (Strategic Plan) supersedes the previously implemented 2015 Strategic Energy Plan. The Strategic Plan sets goals to promote sustainability in four key sectors of County operations: energy, water, waste, and transportation. The goals outlined in the Strategic Plan relating to GHG emissions are as follows:

- reduce energy use and GHG emissions,
- promote clean energy production,
- provide sound facility energy management,
- achieve cost savings,
- reduce fleet vehicle miles traveled (VMT),
- eliminate underutilized vehicles to decrease size of fleet,
- electrify the fleet where possible, and
- expand EV charging infrastructure on County sites for both public and fleet.

The Strategic Plan is intended to consolidate the sustainability planning efforts of other County planning documents under a single County operations purpose (i.e., mission statement).

2.8.3 Analysis of Effects and Significance Determinations

2.8.3.1 Significance Criteria

State CEQA Guidelines Section 15064 and relevant checklist questions contained in Appendix G recommend that a lead agency consider a project's consistency with relevant, adopted plans and discuss any inconsistencies with applicable regional plans, including plans to reduce GHG emissions. Under Appendix G of the State CEQA Guidelines, implementing the project would result in a cumulatively considerable contribution to climate change if it would:

- generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or
- conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

The 2011 GPU PEIR evaluated the General Plan's compliance with AB 32; however, since the certification of the 2011 GPU PEIR, new legislation has been adopted in the state of California that set new long-term reduction targets for the state (i.e., SB 32 and AB 1279). Therefore, Issue 1: Compliance with AB 32, has been updated to reflect the state's newest long-term reduction goals mandated by SB 32 and AB 1279. The 2022 Scoping Plan contains language that indicates that the initial goal of SB 32 (i.e., reducing 1990 emissions by 40 percent by 2030) would likely need to be revised to meeting a 48 percent reduction in 1990 emission levels by 2030 to meet the ultimate goals of AB 1279 (i.e., reducing 1990 emissions by 85 percent by 2045 and achieve carbon neutrality by no later than 2045. While not codified by formal legislation, this reduction target is notable and considered in the evaluation of the CAP Update. This is evaluated in Issue 2. Issue 1 of this analysis details whether the proposed CAP Update would generate emissions of GHGs, either directly or indirectly, that may have a significant impact on the environment.

Additionally, the 2011 GPU PEIR evaluated the potential effects of global climate change on the General Plan; however, in 2015, the California Supreme Court issued its decision in the *California Building Industry Association v. Bay Area Air Quality Management District* 62 Cal.4th (2015), indicating that according to CEQA statute, projects are not required to analyze the effect of the environment on a project, unless a project's incremental contribution of environmental impacts would exacerbate an existing adverse environmental condition. Given that the purpose of the CAP Update is to reduce GHG emissions within the county, no separate CEQA analysis of the change in effects of climate change on the General Plan due to CAP Update implementation is necessary.

2.8.3.2 Approach to Analysis

Impacts related to GHG emissions are analyzed qualitatively based on a review of the CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area is analyzed in the context of existing laws and regulations as well as policies adopted in the

General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant 2011 GPU PEIR mitigation measures are applicable to the proposed project as needed (i.e., upon the determination that an impact is significant) to avoid or minimize project impacts and are considered part of the proposed CAP Update.

Scope of SEIR Impact Analysis

The impact analysis contained within this draft SEIR focuses on whether implementation of the CAP Update would result in new or more severe impacts than were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and actions (referred to herein as measures and actions) to demonstrate progress toward the 2030 and 2045 GHG reduction targets. The measures also include supporting actions intended to put the County on a path to the long-term goal of net zero emissions. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impacts of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unicorporated county and County government operations) and its role as a programmatic planning document designed to guide future decision-making related to the reduction of GHG emissions within the unincorporated county and from County government operations, the study area for this analysis is the unincorporated area of the county within the County's jurisdiction (i.e., all unincorporated lands excluding tribal lands, state and federally owned lands, and military installations).

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

Proposed CAP Update Measures

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

improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to climate change.

The County's 2019 GHG emissions inventory is summarized in Table 2.8-3. GHG emissions reductions associated with CAP Update strategies are summarized in Table 2.8-4. A summary of reductions relative to the CAP Update targets is provided in Table 2.8-5. Note that emissions reductions are presented for the milestone years of 2030 and 2045 as they represent the years for which codified statewide targets have been set (i.e., a 40 and 85 percent reduction from a statewide 1990 GHG inventory by 2030 and 2045, respectively). Emissions and reductions for interim years discussed in the CAP (2035 and 2040) are presented in the CAP Update

Solid Waste Measures and Actions. This category includes strategies, measures, and implementing actions aimed at achieving zero solid waste in County operations and within the unincorporated county. Key measures and actions with potential to result in new or more severe impacts related to GHG emissions include Actions SW-1.1, SW-4.1.a, and SW-4.1.b, which could generate emissions from the construction of new waste handling and recycling facilities as well as performing upgrades to existing facilities.

Water and Wastewater Measures and Actions. This category includes strategies to reduce water consumption and increase wastewater and stormwater treatments. Key measures and actions with potential to result in new or more severe impacts related to GHG emissions include Actions W-2.2 and W-2.3, which would involve the installation of stormwater and greywater capture systems, as well as Action W-1.1, which would involve water-efficiency measures in new and existing County buildings.

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural land and agricultural land. Key actions with potential to result in new or more severe impacts related to GHG emissions include Action A-4.1.b, which would evaluate opportunities for increased farmworker housing; Action A-4.1, which would involve habitat restoration; and Actions A-2.1 and A-2.2, which would involve the delivery and planting of trees.

Energy Measures and Actions. This category includes strategies to develop policies and programs to increase energy efficiency and renewable energy use. Key actions with potential to result in new or more severe impacts related to GHG emissions include Actions E-1.1, E-2.2, E-2.2.d, E-3.2, and E-3.3, which could result in the installation of new small-scale rooftop wind turbines and solar panels. Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the vehicle fleet, install EV charging stations, incentivize the use of alternative fuels and landscaping practices, and to promote and support transit and ridesharing to reduce single-occupancy vehicle use. Key actions with potential to result

in new or more severe impacts related to GHG emissions include Actions T-3.1 and T-3.1.a, which would support new hydrogen fueling infrastructure and installation of EV charging stations, as well as Action T-5.1 2 which would result in the implementation of transit-supportive roadway treatments and bicycle and pedestrian infrastructure.

2.8.3.3 Issue 1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, which was revised in 2018, after certification of the 2011 GPU PEIR, the project would have an impact if it would:

- generate GHG emissions that may have a significant impact on the environment.

The *County of San Diego Guidelines for Determining Significance: Climate Change* (County of San Diego 2018) contains guidance for evaluating project impacts related to climate change within the county. However, the guidance within the document pertaining to climate change is based on a previous CAP that was rescinded following litigation. For this reason, the guidelines pertaining to climate change in the *County of San Diego Guidelines for Determining Significance: Climate Change* are not used in this analysis. The CAP Update includes revised Guidelines for Determining Significance and a new GHG threshold to make these items consistent with new state legislation. Therefore, Appendix G is used to analyze impacts from the project on GHG emissions.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated the potential effects of the General Plan related to consistency with the goals and strategies of AB 32, as well as the effects of global climate change on the General Plan, on pages 2.17-12 through 2.17-27. This analysis is incorporated herein by reference. The 2011 GPU PEIR projected that the General Plan would have a potentially significant impact related to compliance with AB 32 because GHG emissions were projected to increase to 7.1 $MMTCO_2e$ (from 5.3 $MMTCO_2e$ in 1990) by 2020 without incorporation of any GHG-reducing policies or mitigation measures. This amount represents an increase of 24 percent over 2006 levels, and a 36 percent increase from estimated 1990 levels. General Plan policies and mitigation measures in addition to compliance with applicable regulations such as the CAA, Lieberman-Warner Climate Security Act, CARB standards, Title 24 standards, EO S-3-05, AB 32, EO S-01-07, SB 97, SB 1368, SB 1078, SDAPCD standards and existing County programs and policies, would mitigate the potential impacts of global climate change to a less-than-significant level. The analysis in Chapter 2.17 of the 2011 GPU PEIR on pages 2.17-12 through 2.17-33 is incorporated by reference.

CAP Update Impact Analysis

The following section analyzes impacts related to GHG emissions that would result from the implementation of the measures and actions in the CAP Update.[2]

Solid Waste Measures and Actions

Implementation of the measures and actions within this group may result in the expansion of solid waste diversion/recycling programs/incentives and the collection of landfill gas at existing landfills. Emissions of GHGs would occur from the construction of new waste handling and recycling facilities, as well as performing upgrades to existing facilities (Actions SW-1.1, SW-4.1.a, and SW-4.1.b). Emissions of GHGs would occur from construction activities including operation of heavy-duty equipment, vehicle travel by worker commute trips, material delivery, and haul trips. Construction activities would primarily consist of short-term activities such as grading and clearing land and construction of new structures, as well as upgrades to existing ones. Construction activities would occur for relatively short periods of time. These types of construction activities do not typically generate substantial GHG emissions and would be considered short-term GHG emitting investments to facilitate achieving the reduction targets of the CAP Update.

Regarding the operation of new waste handling and recycling facilities, measures and actions in the solid waste group are intended to increase recycling, divert waste from landfills, and increase landfill gas capture rates at landfills. For example, Action SW-3.1 aims to expand landfill gas systems to increase fugitive gas capture by 5 percent at County-owned landfills to decrease fugitive emissions beyond state requirements. Through Action SW-4.1, the County would conduct a feasibility study and implement a landfill gas system pilot project at privately managed landfills to exceed state requirements. Both of these measures would reduce emissions of methane (a GHG emitted during the anaerobic decomposition of waste) in the county by capturing the gas before it is released into the atmosphere. Implementation of Action SW-2.1 would update the County's Strategic Plan to Reduce Waste to include strategies to achieve zero waste (90 percent diversion) by 2045. This would reduce GHG emissions by diverting waste from landfills where it would otherwise decompose and emit methane into the atmosphere. Increases in waste diversion could lead to increased haul truck trips, and associated GHG emissions, to and from composting and recycling facilities. However, it is anticipated that these trips would displace the haul truck trips that would be diverted from the landfill. Therefore, a net increase in the number of haul truck trips and associated GHG emissions within the county would not be anticipated.

These measures and actions would collectively reduce GHG emissions generated within the county by diverting waste from landfills, increasing recycling, and increasing landfill gas capture at landfills. Because these measures collectively reduce the amount of GHG

[2] This analysis does not address the global impacts of climate change on the project in the way that the GPU Update PEIR addressed such impacts on the General Plan given the 2015 publication of the California Building Industry Association v. Bay Area Air Quality Management District opinion in which the California Supreme Court ruled that the California Environmental Quality Act (CEQA) does not generally require consideration of the effects of existing environmental conditions on a proposed project's future users or residents, but that CEQA does mandate analysis of how a project may exacerbate existing environmental hazards.

emissions that would occur from waste handling, it can be assumed that any temporary GHG emissions during implementation of these measures would be offset by the overall net benefit of GHG emissions reductions that would result from implementation of the measures that comprise the solid waste group. The strategies, measures, and actions of the CAP Update are estimated to reduce emissions in exceedance of the targets. Any marginal and temporary increase in emissions is not anticipated to interfere with the ability of the CAP Update to achieve established targets. Therefore, implementation of the measures within the group would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

The CAP Update measures and actions are consistent with General Plan policies that were evaluated in the 2011 GPU PEIR. For example, General Plan Policy COS-14.9 requires that projects that generate potentially significant levels of air pollutants and/or GHGs such as landfill operations incorporate renewable energy; while Policy COS-18.2 encourages the use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites. Therefore, operational emissions from these facilities would generally be within the scope of expected development analyzed in the 2011 GPU PEIR. The impact would be less than significant.

Water and Wastewater Measures and Actions

Implementation of measures and actions within the water and wastewater groups would increase water efficiency and conservation. Implementation of the measures and actions may result in new building requirements, building retrofits, and water efficiency programs. GHG emissions from water and wastewater facilities and upgrades would occur from construction activities including operation of heavy-duty equipment, vehicle travel by worker commute trips, material delivery, and haul trips. Construction activities would primarily consist of grading and clearing land, construction of small structures, and the installation of new pipelines or additions to existing pipelines. Operation of these facilities and structures would generate GHG emissions from maintenance trips, worker commute trips, and the use of electricity to power pumps and treatment facilities. However, operation of these facilities does not typically require a substantial number of employees and maintenance trips along pipelines are typically infrequent and last for short periods of time. Further, Actions W-2.1 and W-2.4 would improve water efficiency, and therefore reduce electricity use, by reducing outdoor water use for landscaping purposes for new development and by reducing potable water consumption by 23 percent for existing and new County buildings and by 20 percent for existing and new development in the unincorporated county by incentivizing water efficiency and conservation.

Because these measures collectively reduce the amount of GHG emissions that would occur from water/wastewater treatment and transportation within the county, it can be assumed that any temporary GHG emissions during implementation of these measures would be offset by the overall net benefit of GHG emissions reductions that would result from implementation of the measures that comprise the water and wastewater group. Therefore, implementation of the measures within the group would generate GHG emissions that would have a less-than-significant impact on the environment.

Agriculture and Conservation Measures and Actions

Implementation of measures and actions within the agriculture and conservation group would result in the acquisition and preservation of natural lands (Actions A-1.1 and A-1.2), as well as improve land management practices to protect habitat and increase carbon storage (Action A-1.2.a). Additionally, measures and actions in the group aim to reduce GHG emissions from agricultural operations (Measure A-5), increase tree planting (Measure A-2), and create additional housing for farmers (Action A-4.1.b). Projects that could result from implementation of these measures and actions could include but would not be limited to: preservation of agricultural lands, carbon farming, natural/working lands restoration, on-farm anaerobic digesters, incentivizing manure composting, reducing agricultural water costs, carbon farming programs, open space/habitat restoration plans, tree planting, incentivizing transition to cleaner (e.g., renewable diesel and electric) agricultural equipment, and increasing farmworker housing.

Some measures and actions within this group could involve some type of ground disturbing construction activity and would generate GHG emissions. For example, Action A-4.1.b would evaluate opportunities for increased farmworker housing, which could involve the subsequent construction of housing for farmworkers. GHG emissions from construction activities would result primarily from use of heavy-duty equipment, worker commute trips, vendor truck trips, and haul trips. Additionally, Actions T-2.1 and T-2.2 would promote the use of alternative fuel in construction equipment and would therefore reduce GHG emissions resulting from the combustion of fossil fuel related to construction activities. Additionally, GHG emissions would occur from the combustion of fossil fuels which would occur during the delivery and planting of trees as stated in Action A-2.1, as well as from habitat restoration activities included in Action A-2.1.

Regarding operations, actions which involve tree planting, as described above, would not reduce GHG emissions but would instead aid in the removal of GHG emissions from the atmosphere through carbon sequestration. Additionally, these measures could reduce electricity demand associated with the use of air conditioning by providing shade as well as reduce water demand for watering as compared to current baseline watering usage without implementation of the CAP Update measures, as it is assumed that new trees would be drought tolerant. Action A-4.1 would involve the development of a Carbon Farming Program to increase carbon sequestration on 3,000 acres of land by 2030 and 36,214 acres of land by 2045. By 2030, Action A-5.1 would reduce GHG emissions associated with agricultural operations in the area by 3 percent by developing a program to incentivize a transition to cleaner fuels (e.g., renewable diesel, electric equipment) and the efficient use of energy and water (e.g., LED grow lights and water re-use). See Tables 2.8-4 and 2.8-5 for a summary of GHG reductions and a comparison to the GHG reduction targets Lastly, Actions A-4.1.a and A-4.1.b would reduce GHG emissions from vehicle trips by developing a food sourcing policy to prioritize local food suppliers and identifying opportunities for farmer housing to reduce trip lengths for farmers, respectively.

Implementation of the GHG reduction measures and their associated actions which comprise the agriculture and conservation group would collectively reduce GHG emissions generated within the county by incentivizing the transition to cleaner fuels,

promoting the efficient use of energy and water, reducing the need for cooling through the planting of trees in residential areas, and reducing VMT associated with food delivery and farm worker commute trips. Lastly, Actions A-1.2, A-1.2.a, and A-4.1 would increase carbon sequestration through the restoration of natural land and the development of a Carbon Farming program, thus removing existing CO_2 emissions from the atmosphere. Some emissions of GHGs could occur from the treatment and transportation of water used to irrigate the new trees. Because these measures collectively reduce the amount of GHG emissions that would occur from agricultural operations within the county, as well as remove GHG emissions from the atmosphere, it can be assumed that any operations- or construction-related GHG emissions would be offset by the overall net benefit of agriculture-related GHG emissions reductions that would result from implementation of the measures that comprise the agriculture and conservation group. Therefore, implementation of the measures within the agriculture and conservation group would generate GHG emissions that would have a less-than-significant impact on the environment.

Energy Measures and Actions

Implementation of measures and actions within the energy group would increase building energy efficiency, develop renewable energy generation infrastructure, and increase electrification in the unincorporated county. Some of these measures and their associated actions would result in investments in local job training, incentive programs and amendments to County codes regarding energy, among other initiatives. Other measures and actions could result in large-scale wind turbines and solar arrays, as well as energy-storage systems. Additional actions include energy efficiency retrofits on existing residential and non-residential structures, including rooftop or ground-mounted solar PV arrays or small wind turbines, grid infrastructure improvements, upgraded mechanical systems, and other similar improvements. Implementation of these measures and their associated actions would generally involve some type of ground disturbing construction activity.

Implementation of measures which could result in the installation of new large- and small-scale rooftop wind turbines and solar panels (Actions E-1.1, E-2.2, and E-3.3) would produce emissions of GHGs during construction. GHG emissions from construction activities would result from use of heavy-duty equipment, fugitive dust from earth moving and grading activities, worker commute trips, vendor truck trips, and haul trips. Construction activities may include grading and clearing but generally would not include construction of new buildings or structures. Construction activities related to small-scale renewables infrastructure would likely be relatively small in scale, occur intermittently, and last for only short periods of time.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating renewable energy. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level. Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and

project-specific mitigation would minimize or eliminate impacts related to GHG emissions to the extent feasible in compliance with State CEQA Guidelines Section 15126.4.

The large-scale production of energy from solar PV systems generally includes a variety of infrastructure components such as arrays, substation site, battery storage, collection system, and overhead and underground transmission facilities. Large-scale wind turbines infrastructure generally includes wind turbines (300–500 feet to the topmost blade tip), substation, meteorological towers, overhead and underground collector cable system, and overhead transmission lines. Emissions of GHGs could occur during construction of these systems. Emissions of GHGs from construction activities would primarily result from use of heavy-duty equipment, vendor truck trips, and haul trips. Construction activities may include grading and clearing but would not include construction of new buildings or structures. These activities would result in emissions of GHGs. The greatest potential for GHG emissions during construction would be emissions from diesel-powered construction equipment and heavy-duty truck trips (such as those used to transport renewable systems components).

Regarding operations, solar PV energy panels and small-scale wind turbines typically do not result in substantial activities related to operating the equipment, and include only minor maintenance activities, such as regular inspections, repairs, and removing debris as necessary. These activities could result in small amounts of GHG emissions from the combustion of fossil fuels used in maintenance vehicles.

Operation of large-scale renewable energy systems would not directly produce substantial GHG emissions because no large emission-generating equipment would be operated. Operation could result in the operation of stationary sources such as generators. While the sizes, scale, and location of renewable infrastructure is unknown, typical emissions associated with these facilities are low and occur infrequently such that substantial emission of GHGs during operation is not expected.

Action E-2.2 would reduce GHG emissions by decreasing operational energy consumption through amending the County's Code of Regulatory Ordinances to require Tier 2 CALGreen energy efficiency requirements for existing development projects. Action E-1.1 would reduce GHG emissions by implementing the County Facilities Zero Carbon Portfolio Plan to achieve 90 percent reduction in operational carbon emissions by 2030 through building electrification and zero net energy construction, energy efficiency, energy management, and renewable energy use and generation. On balance, measures and actions relating to the construction of large- and small-scale renewables infrastructure would reduce GHG emissions by reducing reliance on fossil fuels to generate electricity.

Implementation of the GHG reduction measures and their associated actions which comprise the energy group would collectively reduce GHG emissions generated within the county by implementing large- and small-scale renewable infrastructure, improving energy efficiency in new and existing buildings, incentivizing renewable energy use, and amending County codes and ordinances to improve energy efficiency and renewable energy utilization. Because these measures collectively reduce the amount of GHG

emissions that would occur as a result of the usage and generation of energy within the county, it can be assumed that any temporary GHG emissions during implementation of these measures would be offset by the by the overall net benefit of energy-related GHG emissions reductions that would result from implementation of the measures that comprise the energy group. Additionally, all projects resulting from the implementation of these measures would be subject to applicable adopted General Plan policies (see Section 2.8.2, "Regulatory Framework"). These policies would further reduce impacts associated with energy. For example, General Plan Policy COS-14.7 encourages development projects that use energy recovery, PV, and wind energy, while Policy COS-18.3 requires alternative energy system operators to properly design and maintain these systems to minimize adverse impacts to the environment. These policies would aid in reducing impacts related to energy by encouraging and incentivizing renewable energy use and generation, thus decreasing reliance on fossil fuels for energy generation and therefore reducing GHG emissions associated with the combustion of fossil fuels. The impact would be less than significant.

Built Environment and Transportation Measures and Actions

Implementation of measures and actions within the built environment and transportation group would encourage a shift towards alternative modes of transportation (, encourage alternative fuel use, and reduce single-occupancy vehicle trips. These measures and their associated actions would be implemented through activities such as constructing EV charging stations, implementing transit-supportive roadway treatments (e.g., transit signal priority, bus-only signal phases, queue jumps, curb extensions to speed passenger loading, and dedicated bus lanes), transportation demand management programs, improving roadways to encourage/expand multimodal transportation, incentivizing active transportation, and constructing new bicycle and pedestrian projects as well as improving existing ones. While locations for such improvements have not been identified, because of the nature of these improvements, these would most likely occur near residential and commercial centers throughout the unincorporated areas. The size, scale, and location of these improvements is unknown.

Implementation of actions that would result in new hydrogen fueling and EV charging stations (Actions T-3.1 and T-3.1.a), as well as the implementation of transit-supportive roadway treatments and bicycle and pedestrian infrastructure (Action T-5.1) that would generally involve some type of ground disturbing construction activity and would therefore generate GHG emissions. GHG emissions from construction activities would result primarily from use of heavy-duty equipment, worker commute trips, vendor truck trips, and haul truck trips. Construction activities would be relatively small in scale and would not include construction of new buildings or structures. Additionally, Actions T-2.1 and T-2.2 would promote the use of alternative fuel in construction equipment and would, therefore, reduce GHG emissions resulting from the combustion of fossil fuel related to construction activities if otherwise not implemented.

Operational emissions would be primarily from mobile sources (i.e., transportation and maintenance trips for infrastructure), but overall, the proposed measures and their associated actions are anticipated to reduce long-term GHG emissions by reducing the

amount of fossil fuels combusted primarily from reduced vehicle use trips regionally, which would offset any increased vehicle trips associated with maintenance, reduced VMT, and increased alternative fuel use. It is reasonable to assume that implementation of the measures and actions would result in reductions in GHG emissions because these measures would collectively reduce the amount of fossil fuel consumed for transportation-related activities. Action T-3.1 would involve the installation of publicly accessible EV chargers, while other transportation-related actions such as Action T-6.1 would encourage alternative transportation such as biking and walking; Action T-6.2 would additionally reduce VMT, vehicle trips, and idling time through improving traffic efficiency in the county through roadway improvements.

Thus, any temporary GHG emissions during implementation of these measures and their associated actions would be offset by the by the overall net benefit of transportation-related GHG emissions reductions after implementation of the measures and their associated actions in the built environment and transportation group. Therefore, implementation of the measures within the built environment and transportation group would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Additionally, all projects resulting from the implementation of these measures and actions would be subject to applicable adopted General Plan policies (see Section 2.8.2, “Regulatory Framework”). These policies would further reduce impacts associated with the built environment and transportation. For example, General Plan Policy CC-1.4 includes review of traffic operations to implement measures that improve flow and reduce idling such as improving traffic signal synchronization and decreasing stop rate. These policies would collectively reduce GHG emissions by reducing vehicle idle time, reducing VMT, and reducing vehicle trips within the county, therefore reducing the combustion of fossil fuels for transportation and associated GHG emissions. The impact would be less than significant.

Summary

The CAP Update would not generate GHG emissions that may have a significant impact on the environment. Construction related to implementation of the measures and their associated actions could result in emissions of GHGs. However, the CAP Update has been developed to reduce GHG emissions associated with buildout of the General Plan. Construction of any future projects required to implement the CAP Update would be sporadic and inherently short-term and would facilitate the development of projects that would ultimately reduce GHG emissions. In comparison to the emissions estimated in the 2011 GPU PEIR, any increase in GHG emissions associated with construction of projects to implement the CAP Update would be minor when evaluated in the broader scope of the General Plan’s total construction activity.

Operation of the measures and actions would, by design, reduce GHG emissions within the unincorporated county to the extent that the County has done its “fair share” in assisting the state in meeting its long-term GHG reduction targets. These measures and actions would reduce GHG emissions throughout the county through the implementation of actions such as reducing VMT, encouraging EV and alternate transportation use, incentivizing alternative fuel use in agricultural equipment, increasing the use and

generation of renewable energy in the unincorporated county, increasing landfill gas capture at landfills and improving water and energy efficiency in water usage, treatment and transportation activities. Thus, any temporary GHG emissions would be offset by the overall net benefit of GHG emissions reduction. Therefore, implementation of these measures and their associated actions would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Additionally, all projects resulting from the implementation of these measures and actions would be subject to the applicable adopted General Plan policies (see Section 2.8.2, "Regulatory Framework").

Therefore, impacts related to GHG emissions associated with implementation of the solid waste, water and wastewater, agriculture and conservation, energy and built environment and transportation measures and actions in the CAP Update would be less than significant. The findings of the 2011 GPU PEIR concluded that impacts would be less than significant with mitigation; however, the CAP Update would not result in a significant impact warranting the implementation of mitigation for the reasons identified above. Therefore, implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.8.3.4 Issue 2: Conflict with an Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, which has been updated since the certification of the 2011 GPU PEIR, the project would have an impact if it would:

- conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated the potential effects of the General Plan related to consistency with the goals and strategies of AB 32 as well as the effects of global climate change on the General Plan. It was projected that the General Plan would result in increased emissions of 24 percent over 2006 levels, and a 36 percent increase from estimated 1990 levels by 2020. This was considered a potentially significant impact in regard to conflict with AB 32 prior to mitigation. Additionally, it was determined that impacts related to the effect of climate on the General Plan would be potentially significant because it was projected that the effects of climate change would impact water supply, wildfires, energy needs, and public health in the county. Both of these impacts were considered less than significant with mitigation General Plan policies and mitigation measures in addition to compliance with applicable regulations such as the CAA, Lieberman-Warner Climate Security Act, CARB standards, Title 24 standards, EO S-3-

05, AB 32, EO S-01-07, SB 97, SB 1368, SB 1078, SDAPCD standards and existing County programs and policies, would mitigate the potential impacts of GHG emissions on global climate change to a less-than-significant level.

CAP Update Impact Analysis

The strategies, measures, and actions included in the CAP Update were developed in consideration of the long-term GHG reduction goals of the 2022 Scoping Plan. Appendix D of the 2022 Scoping Plan identifies three key sectors that may be targeted during CAP development to ensure that local governments are doing their "fair share" in assisting the state in meeting its long-term GHG reduction goal of achieving carbon neutrality and reducing statewide emissions by 85 percent from a 1990 baseline level by 2045. These include building decarbonization (i.e., the full electrification of development and elimination of on-site natural gas usage), VMT reduction, and the electrification of the mobile source sector. The CAP Update has been prepared in consideration of reducing natural gas usage, reducing VMT within the county and from County operations, and the transition to EVs from internal combustion engine vehicles.

The 2022 Scoping Plan includes Appendix D "Local Actions" which advises local governments on actions which can be taken at the local level to achieve the GHG reduction goals of the 2022 Scoping Plan. Appendix D "Local Actions" includes a table of "priority strategies" which was developed by CARB staff to provide a list of the most impactful strategies local governments can take to reduce GHGs (CARB 2022). This table is provided at the end of this section. These areas and strategies are designated "priority" because they are the GHG reduction opportunities over which local governments have the most authority and the highest GHG reduction potential. According to CARB, by prioritizing climate action in these areas, local governments will be addressing the largest sources of emissions under their authority and meaningfully tackling climate change, as well as aligning with State climate goals and protecting public health and welfare (CARB 2022). Appendix D "Local Actions" also states that local governments should, if feasible, develop CEQA-Qualified CAPs for the purpose of demonstrating projects' consistency with the CEQA-Qualified CAP and therefore demonstrating consistency with the 2022 Scoping Plan.

The types of future projects that would be implemented consistent with the CAP Update also are intended to maintain consistency with the Regional Plan, which encompasses the RTP/SCS required by SB 375 to address the regional approach to achieving GHG reduction targets set by CARB; comply with federal civil rights requirements (Title VI); and address environmental justice considerations, air quality conformity, and public participation. As described above, the 2021 Regional Plan reduces per capita GHG emissions from cars and light-duty trucks to 20 percent below 2005 levels by 2035, exceeding the region's state-mandated target of 19 percent. The 2021 Regional Plan also meets federal air quality conformity requirements.

Implementation of the CAP Update, and in particular those measures and actions aimed at promoting multimodal transportation and reducing VMT, would align with the goals of

the Regional Plan by achieving GHG reductions through reductions in anthropogenic GHG emissions. Total emissions generated under the CAP Update may differ from emissions anticipated from the numeric targets established as part of the Regional Plan; the reason is that the CAP mitigates for potential buildout of the County's 2011 General Plan assuming no land use or transportation changes, while the Regional Plan includes SANDAG's anticipated land use and transportation changes. However, the CAP Update does not make land use recommendations or changes; rather it represents implementation of a mitigation measure set forth in the 2011 GPU PEIR requiring preparation of a qualified Climate Action Plan.

As discussed above, the current inventory of GHG emissions reflects existing (2019) conditions (see Table 2.8-3) and extends the analysis of GHG emissions associated with growth in the unincorporated county beyond 2020 to be consistent with recent legislative changes under SB 32 and AB 1279. The project would update and implement Goal COS-20 and Policy COS-20.1 of the General Plan.

Solid Waste Measures and Actions

Actions SW-1.1 and SW-2.1 would result in the diversion of waste from landfills. This could result in increased haul truck trips to and from waste facilities; however, it is anticipated that the haul truck trips to the organics processing facility would displace the haul truck trips that would be diverted from the landfill and would not result in increased emissions from hauling trips. Therefore, a net increase of GHG emissions is not anticipated. Because these actions would not result in an increase in VMT associated with haul trucks, they would therefore not conflict with the goals of the 2022 Scoping Plan or the 2021 Regional Plan, both of which include goals to reduce VMT and associated GHG emissions.

In fact, these measures and actions would align with the 2022 Scoping Plan's goal of reducing fossil fuel consumption by utilizing landfill emissions for energy generation. Action SW-3.1 aims to expand landfill gas systems to increase fugitive gas capture by 5 percent at County-owned landfills to decrease fugitive emissions beyond state requirements. Action SW-4.1 is intended to incentivize gas capture at privately managed landfills to exceed state requirements by 5 percent in the unincorporated area. Both of these actions would reduce emissions of methane. These actions would align with the GHG emissions reduction goals of the 2022 Scoping Plan by capturing emissions of methane from landfills that would otherwise be released into the atmosphere.

Water and Wastewater Measures and Actions

Implementation of the GHG reduction measures and their associated actions which comprise the water and wastewater group would collectively reduce GHG emissions generated within the county by improving water efficiency and reducing water demand, thus reducing GHG emissions associated with water and wastewater treatment and transportation. For example, Actions W-2.1 and W-2.2 would amend the County's Code of Regulatory Ordinances for new and existing development to require (Tier 2) CALGreen water efficiency requirements, including the installation of stormwater and greywater

capture systems. The measures and actions within the water and wastewater group would improve water efficiency and therefore decrease water demand. Because these measures collectively reduce the amount of GHG emissions that would occur from water/wastewater treatment and transportation within the county, it can be assumed that any temporary GHG emissions during implementation of these measures would be offset by the overall net benefit of GHG emissions reductions that would result from implementation of the measures and actions that comprise the water and wastewater group. These reductions in fossil fuel combustion and improvements in the efficiency of energy used to treat water would align with the goals of the priority strategies discussed above and presented in Table 2.8-5 by implementing policies and retrofits which would improve energy efficiency (i.e., the more efficient use of energy in water treatment).

Agriculture and Conservation Measures and Actions

Implementation of these measures and actions would collectively reduce GHG emissions generated within the county by incentivizing the transition to cleaner fuels, promoting the efficient use of energy and water, reducing the need for cooling through the planting of trees in residential areas, and reducing VMT associated with food delivery and farmer commutes. First, Actions A-1.1 and A-1.2 would involve the preservation and restoration of natural lands, consistent with the conservation and restoration goals of the 2022 Scoping Plan. Action A-2.1, which would increase tree planting in residential and nonresidential areas, would not reduce GHG emissions but would instead aid in the removal of GHGs from the atmosphere through carbon sequestration. Actions A-1.2 and A-4.1 would also increase carbon sequestration through the restoration of natural lands. Additionally, actions that would involve tree planting in residential areas could reduce electricity demand, and therefore fossil fuel use, associated with the use of air conditioning by providing shade as well as reduce water demand for watering as compared to baseline water demand without implementation of the CAP Update measures, as it is assumed that new trees would be drought tolerant. This would align with the GHG reduction goals of the 2022 Scoping Plan by reducing GHG emissions associated with electricity generation. Additionally, Action A-4.1 would involve the development of a Carbon Farming Program to increase carbon sequestration on 3,000 acres by 2030. Action A-5.1 would reduce GHG emissions associated with agricultural operations in the area by 3 percent by developing a program to incentivize a transition to cleaner fuels (e.g., renewable diesel, electric equipment) and the efficient use of energy and water (e.g., LED grow lights and water re-use). These measures and actions would align with the goals of the 2022 Scoping Plan by increasing carbon sequestration and reducing fossil fuel use for electricity generation. Lastly, Actions A-4.1.a and A-4.1.b would reduce GHG emissions from vehicle trips by developing a food sourcing policy to prioritize local food suppliers and evaluating opportunities to build additional housing to reduce trip lengths for farmer workers, respectively. This would align with the goals of the 2021 Regional Plan by reducing VMT and associated GHG emissions. This would also align with the goals of the priority strategies discussed above and presented in Table 2.8-5 by preserving natural and working lands, as well as increasing energy efficiency.

Energy Measures and Actions

Measures and actions included in the energy group would collectively reduce the demand and usage of fossil fuels for energy generation in both residential and nonresidential applications by retrofitting existing buildings to improve energy efficiency, requiring that new residential, commercial, and industrial development be all-electric, and increasing renewable energy use and generation. These measures and actions would assist the state in meeting its carbon neutrality goals by decarbonizing existing and future development, a goal of the 2022 Scoping Plan. These measures and actions would also be consistent with the General Plan, which also includes policies that would reduce impacts related to energy. For example, General Plan Policy COS-14.7 encourages development projects that use energy recovery, PV, and wind energy. Policy COS-18.3 requires alternative energy system operators to properly design and maintain alternative systems to minimize adverse impacts to the environment. This policy would apply to energy systems developed through implementation of the CAP Update. The measures and actions in the CAP Update would aid in improving energy efficiency in the county and reducing emissions associated with the generation of electricity. This would further align with the goals of the 2022 Scoping Plan.

Actions E-1, E-2, and E-3 collectively reduce the demand and usage of fossil fuels in both residential and nonresidential applications by retrofitting existing buildings to improve energy efficiency, requiring that new residential, commercial, and industrial development be all-electric, and increasing renewable energy use and generation. These actions would be conducive to assisting the state in meeting its carbon neutrality goals by decarbonizing existing and future development. This would also align with the goals of the priority strategies discussed above and presented in Table 2.8-5 by facilitating the deployment of renewable energy production and increasing energy efficiency in new and existing development.

Built Environment and Transportation Measures and Actions

Measures and actions related to the built environment and transportation would encourage the use of alternatively fueled vehicles through the implementation of actions such as Actions 3.1 and 3.1.a which would involve the installation of EV chargers and incentivize hydrogen fueling stations, thus facilitating the statewide goal of transitioning the on-road vehicle fleet to be fully electric. Other transportation-related actions such as Action T-6.1 would encourage alternative transportation such as biking and walking; Action T-5.1.b would reduce VMT, vehicle trips, and idling time through improving traffic efficiency in the county through roadway improvements. These improvements would reduce GHG emissions resulting from the combustion of fossil fuel by reducing gasoline and diesel fuel consumption as well as reducing VMT, which aligns with the goals of Appendix D of the 2022 Scoping Plan to lower statewide VMT. This would also align with the goals of the priority strategies discussed above and presented in Tables 2.4-8 and 2.8-5 by increasing the electrification of transportation and increasing access to clean mobility options. While the construction required to implement these measures may require some energy consumption, ultimately the measures would improve energy efficiency and reduce fossil fuel consumption. Action T-1.1.a would promote the use of

alternative fuel in construction equipment and reduce the consumption of gasoline and diesel fuel. Therefore, construction associated with implementation of the CAP Update would not prohibit the County from meeting its fair share of emissions reductions, nor would it obstruct statewide achievement of the GHG reduction goals outlined in the 2022 Scoping Plan.

The 2021 Regional Plan, which focuses on transportation efficiency, energy efficiency, air quality improvement, vehicle electrification, improving multimodal transportation options and viability, and achieving GHG reduction targets, would also be relevant to the implementation of the CAP Update. As discussed above in Criterion (a), although implementation of the CAP Update would emit some GHGs during construction and operation, GHG reduction measures such T-4.1, T-4.2, T-4.3, and T-4.6 would involve the installation of EV chargers and hydrogen fueling stations thus facilitating the statewide goal of transitioning the on-road vehicle fleet to be fully electric. Other transportation-related measures such as T-6.1 would encourage alternative transportation such as biking and walking and therefore reduce VMT in the county. Measures and their associated actions that support the conversion from gasoline or diesel to electricity or alternative fuels and reduce VMT in the county would directly support 2021 Regional Plan goals and strategies.

Summary

Implementation of the CAP Update would not conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. The CAP Update would result in decreased GHG emissions compared to the baseline and would achieve the GHG reduction targets for 2030 and 2045. See Tables 2.8-4 and 2.8-5 for a summary of GHG reductions and a comparison to the GHG reduction targets. Modeling was also conducted to evaluate GHG reductions that would result from implementation of the CAP Update for 2035 and 2040.

All GHG-related measures within the CAP Update would support the 2022 Scoping Plan's goal of achieving GHG reduction targets because the CAP Update is intended to reduce GHG emissions generated within the county and from County operations. Additionally, CAP Update measures and actions which reduce VMT and transportation-related GHG emissions would also support the goals of the 2021 Regional Plan. Therefore, impacts related to adherence with the goals of applicable GHG reduction plans would be less than significant. The findings of the 2011 GPU PEIR concluded that impacts would be less than significant with mitigation; however, the CAP Update would not result in a significant impact warranting the implementation of mitigation for the reasons identified above. Therefore, implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.8.3.5 Cumulative Impact Analysis

As explained in the 2011 GPU PEIR (pages 2.17-27 and 2.17-28), climate change is a "global phenomenon which is cumulative by nature." This analysis uses the same scope

identified in the 2011 GPU PEIR. Therefore, the impacts of CAP Update implementation described above also serve as the proposed project's cumulative analysis.

The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Result in Cumulatively Considerable GHG Emissions That May Have a Significant Impact on the Environment

Climate change is the result of the combined, worldwide contributions of GHG to the atmosphere. Cumulative development has resulted in a cumulatively significant effect. The 2011 GPU PEIR concludes that General Plan policies and mitigation measures would reduce cumulative impacts of the General Plan such that the General Plan would not result in cumulatively considerable GHG emissions that would have a significant impact on the environment.

Global climate change is inherently cumulative; thus, impacts associated with the CAP Update discussed above in Section 2.8.3.3, "Issue 1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment," also serve as the proposed project's cumulative impact analysis. Therefore, pursuant to the impact analysis above, the project would not result in a considerable contribution to a cumulative impact. The impact would be less than significant. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

While the CAP Update has no cumulative GHG impacts of its own, and any in-process GPAs will be required to analyze their own GHG impacts without reliance on the CAP Update or this SEIR analysis, Chapter 4 of this SEIR addresses potential cumulative impacts of in-process GPAs.

Issue 2: Result in a Cumulatively Considerable Conflict with an Applicable Plan, Policy or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs

Climate change is the result of the combined, worldwide contributions of GHG to the atmosphere. Cumulative development has resulted in a cumulatively significant effect. The 2011 GPU PEIR concludes that General Plan policies and mitigation measures would reduce cumulative impacts of the General Plan such that the General Plan would not result in cumulatively considerable conflict with an applicable plan, policy, or regulation related to GHG emissions.

As described above, because global climate change is inherently cumulative, impacts associated with the CAP Update discussed above in Section 2.8.3.4, "Issue 2: Conflict with an Applicable Plan, Policy or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs," also serve as the cumulative impact analysis for the CAP Update. Therefore, pursuant to the impact analysis above, the project would not result in a considerable contribution to a cumulative impact. The impact would be less than significant. There **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

While the CAP Update has no cumulative GHG impacts of its own, and any in-process GPAs will be required to analyze their own GHG impacts without reliance on the CAP Update or this SEIR analysis, Chapter 4 of this SEIR addresses potential cumulative impacts of in-process GPAs.

2.8.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would not generate significant GHG emissions nor would the CAP Update conflict with the goals of SB 32 and AB 1279. Implementation of the CAP Update would not result in new or more severe significant impacts related to GHG emissions.

2.8.5 Mitigation Measures

As discussed in Section 2.8.3, "Analysis of Effects and Significance Determinations," the CAP Update would result in less-than-significant impacts because the CAP Update would result in substantial GHG reductions from implementation of GHG reducing actions. While emissions would be generated during the construction period of implementing GHG reducing actions, this level of emissions would be offset by the GHG benefits acquired though renewable energy, solid waste management, VMT reductions, electrification of the mobile source sector, carbon sequestration, and efficient water usage and wastewater treatment. Therefore, the mitigation identified in the 2011 GPU EIR are not necessary to reduce impacts and no new mitigation measures would be required.

2.8.6 Significance Conclusions

Issue 1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment

The goal of the CAP Update is to reduce GHG emissions generated within the county by increasing the use of alternatively fueled vehicles, reducing VMT, generating and utilizing renewable energy, reducing waste generation, and increasing carbon sequestration. While construction related to the CAP Update implementation would result in some GHG emissions, the measures and actions would result in an overall net reduction in GHG emissions, as described in the analysis above. Thus, implementation of the CAP Update would not result in the generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment. This impact would be **less than significant** and the project **would not result in a considerable contribution** to a significant cumulative impact. This **would not be a new or more severe impact** than identified in the 2011 GPU PEIR.

Issue 2: Conflict with an Applicable Plan, Policy or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs

As stated previously, all GHG-related measures within the CAP Update would support the 2022 Scoping Plan and the 2021 Regional Plan's goal of achieving GHG reduction targets because the CAP Update is intended to reduce GHG emissions generated within

the Plan Area. The proposed CAP Update would not conflict with or obstruct implementation of 2022 Scoping Plan or the 2021 Regional Plan as the measures themselves have been developed in consideration of these plans and their GHG reduction goals. Therefore, implementation of the measures and actions described above would not conflict with these plans. This impact would be **less than significant** and the project **would not result in a considerable contribution** to a significant cumulative impact. This **would not be a new or more severe impact** than identified in the 2011 GPU PEIR.

Table 2.8-2 Statewide Greenhouse Gas Emissions by Economic Sector in 2020

Sector	Emissions (MMTCO2e)	Percent
Transportation	136	37
Industrial	73	20
Electric Power	60	16
Commercial & Residential	39	11
Agriculture	32	9
High GWP	21	6
Recycling & Waste	9	2
Total	369	100

Notes: Totals may not sum due to rounding.

$MMTCO_2e$ = million metric tons of carbon dioxide equivalent.

Source: CARB 2022a.

Table 2.8-3 County Greenhouse Gas Emissions Inventory by Sector in 2019

Sector	Emissions ($MTCO_2e$)	Percent
On-road Transportation	1,331,000	45
Electricity	599,000	20
Natural Gas	478,000	16
Waste	193,000	6
Agriculture	134,000	4
Propane	121,000	4
Off-road Transportation	71,000	2
Water	39,000	1
Wastewater	18,000	1
Total	2,984,000	100

Notes: Totals may not sum due to rounding.

$MTCO_2e$ = metric tons of carbon dioxide equivalent.

Source: Modeling by Ascent Environmental 2023.

Table 2.8-4 Summary of GHG Reductions by CAP Update Strategy

CAP Strategy	Measure	MTCO2e Reductions by Target Year	
		2030	2045
Transportation and Built Environment			
Decarbonize the On-Road and Off-Road Vehicle Fleet	T-1: Reduce fleet and small equipment emissions from County Operations	7,905	13,255
	T-2: Increase the use of low-carbon and zero-emission landscaping and off-road construction equipment in the unincorporated area	9,710	86,376
	T-3: Install electric vehicle charging stations and provide incentives for zero-emissions vehicles in the unincorporated area	218,884	297,184
Support Active Transportation and Reduce Single-Occupancy Vehicle Trips	T-4: Reduce emissions from County employee commutes	13,703	10,408
	T-5: Improve County roadways to encourage walking, biking, rolling to/from transit and destinations and increase transportation efficiency	1,970	2,882
	T-6: Support transit and transportation demand management to reduce single occupancy vehicle trips in the unincorporated area	16,660	38,637
Energy			
Increase Building Energy Efficiency, Renewable Energy, and Electrification in the Unincorporated Area and County Operations	E-1: Develop policies and programs to increase energy efficiency, renewable energy use, and electrification in County Operations	13,715	16,858
	E-2: Develop policies and programs to increase energy efficiency and electrification in the unincorporated area	142,476	519,440
	E-3: Develop policies and programs to increase renewable energy use, generation, and storage in the unincorporated area	176,906	0
Solid Waste			
Increase Solid Waste Diversion in the Unincorporated Area and County Operations	SW-1: Achieve zero waste in County operations	1,048	1,571
	SW-2: Achieve zero waste within the unincorporated area	37,804	57,779
Increase Availability of Sustainable Solid Waste Facilities in the Unincorporated Area and County Operations	SW-3: Improve waste management practices at County-owned solid waste facilities to reduce emissions	0	9,283
	SW-4: Improve waste management practices in the unincorporated area to reduce emissions and increase waste diversion	1,373	60,164

CAP Strategy	Measure	MTCO2e Reductions by Target Year	
		2030	2045
Water and Wastewater			
Decrease Potable Water Consumption in the Unincorporated Area and County Operations	W-1: Develop policies and programs to increase water efficiency, retention, recycling, and reuse to reduce potable water consumption in County operations	3	0
	W-2: Develop policies and programs to increase indoor and outdoor water conservation (including water efficiency, retention, recycling, and reuse) in new and existing development in the unincorporated area	442	0
Increase Stormwater Collection, Water Pumping, and Wastewater Treatment Efficiency	W-3: Develop programs to increase stormwater and wastewater treatment efficiency to reduce imported potable water use in the unincorporated area	10,046	1,869
Agriculture and Conservation			
Preserve Natural Lands and Improve Land Management Practices to Protect Habitat and Increase Carbon Storage	A-1: Acquire and manage conservation lands to preserve natural lands and maximize carbon storage potential in the unincorporated area	63,319	92,441
	A-2: Develop a tree planting program that expands canopy across the unincorporated area and prioritizes underserved communities	2,937	6,776
Support Climate-Friendly Farming Practices and Preserve Agricultural Land	A-3: Preserve agricultural lands to prioritize carbon storage and balance economic and development goals	9,699	17,327
	A-4: Incentivize carbon farming to expand carbon storage capacity on agricultural land and support climate-friendly farming practices in the unincorporated area	10,758	121,556
	A-5: Reduce greenhouse gas emissions from agricultural operations	1,559	19,638
Total GHG Emissions Reductions		**740,914**	**1,373,447**

Notes: Totals may not sum due to rounding.

$MTCO_2e$ = metric tons of carbon dioxide equivalent.

[1] **Emissions reductions for these measures/actions were only projected out to 2040 as Action W-1.1 and Actions W-2.1 and W-2.2 set target years of 2030 and 2026, respectively, for their implementation.**

[2] **Modeling for the actions which comprise Measure W-2 showed no measurable emissions reductions past 2040.**

Source: Modeling by Ascent Environmental 2023.

Table 2.8-5 Summary of CAP Targets and Reductions Achieved

	$MTCO_2e$ by Target Year	
	2030	2045
Anthropogenic Emissions		
Total GHG Emissions with Anthropogenic GHG Emissions Reductions	1,669,858	435,369
Percent reduction below 2019 levels	44.0%	85.4%
Carbon Storage		
GHG Emissions Removed by Carbon Storage Measures	13,771	129,556
Total GHG Emissions with Anthropogenic GHG Emissions Reductions and Carbon Storage Measures	1,656,086	305,813
Percent reduction below 2019 levels	44.5%	89.8%
Target Reduction Below 2019 Levels	43.6%	85.4%
Meets Target?	Yes	Yes

Notes: Totals may not sum due to rounding.

$MTCO_2e$ = metric tons of carbon dioxide equivalent.

Source: Modeling by Ascent Environmental 2023.

Table 2.8-6 Priority GHG Reduction Strategies for Local Government Climate Action

Priority Areas	Priority Strategies
Transportation Electrification	Convert local government fleets to zero-emission vehicles (ZEV)
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as permit streamlining, infrastructure siting, consumer education, or preferential parking policies)
VMT Reduction	Reduce or eliminate minimum parking standards in new developments
	Adopt and implement Complete Streets policies and investments, consistent with general plan circulation element requirements
	Increase public access to shared clean mobility options (such as planning for and investing in electric shuttles, bike share, car share, transit)
	Implement parking pricing or transportation demand management pricing strategies
	Amend zoning or development codes to enable mixed-use, walkable, and compact infill development (such as increasing allowable density of the neighborhood)
	Preserve natural and working lands
Building Decarbonization	Adopt all-electric new construction reach codes
	Adopt policies and incentive programs to implement energy efficiency retrofits (such as weatherization, lighting upgrades, replacing energy intensive appliances and equipment with more efficient systems, etc.)
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings
	Adopt policies and incentive programs to reduce electrical loads from equipment plugged into outlets (such as purchasing Energy Star equipment for municipal buildings, occupancy sensors, smart power strips, equipment controllers, etc.)
	Facilitate deployment of renewable energy production and distribution and energy storage

Source: CARB 2022.

2.9 Hazards and Hazardous Materials

This section describes existing conditions for hazards and hazardous materials, airports, vector hazards, emergency response and evacuation plans, and wildland fire risks within the unincorporated county, and evaluates the potential effects that implementation of the CAP Update may have on these resources. Because the analysis is subsequent to the certified 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the hazards and hazardous materials setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the 2011 GPU PEIR.

Table 2.9-1 summarizes the impact conclusions reached in the 2011 GPU PEIR for hazards and hazardous materials and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. The evaluation of hazardous materials-related topics has been consolidated into one discussion because the physical changes resulting from implementation of the CAP Update that would occur from construction activities would result in similar impacts for each issue area. Once operational, the infrastructure improvements associated with implementation of the CAP Update would not require the routine use of potentially hazardous materials and would not have the potential to encounter sites with existing contamination. As indicated in Table 2.9-1, implementation of the CAP Update would not result in any new or more severe significant impacts on hazards and hazardous materials.

Table 2.9-1 Summary of Hazards and Hazardous Materials–Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			Potential New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	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)	General Plan Only: Less than Significant	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less than Significant	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			Potential New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
2	Public and Private Airports	General Plan Only: Less than Significant with Mitigation	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less than Significant	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
3	Emergency Response and Evacuation Plans	General Plan Only: Less than Significant with Mitigation	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less than Significant	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
4	Wildland Fires	General Plan Only: Significant and Unavoidable	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
5	Vectors	General Plan Only: Less than Significant	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less than Significant	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

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

Source: Compiled by Ascent Environmental in 2023.

During the Notice of Preparation (NOP) scoping process, the County received comments concerning wildfire risk and chemical hazards. Copies of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

2.9.1 Existing Conditions

The 2011 GPU PEIR includes a discussion of existing conditions within the unincorporated county related to hazards and hazardous materials in Section 2.7, "Hazards and Hazardous Materials." The 2011 GPU PEIR divides the discussion of existing conditions into five topics: hazardous materials sites, airport hazards, wildland fires, vectors, and emergency response and evacuation plans. While there have been some updates to the designation of Fire Hazard Severity Zones (FHSZs) within the unincorporated county (see Section 2.15, "Wildfire," for additional detail), no substantial changes to the existing conditions for hazards and hazardous materials have been identified that would alter the conclusions or require a supplemental discussion of the existing conditions as described in the 2011 GPU PEIR. Therefore, the existing conditions in the 2011 GPU PEIR remain applicable and are hereby incorporated by reference. A summary of the existing conditions, as described on pages 2.7-1 through 2.7-20 of the 2011 GPU PEIR, is provided below.

2.9.1.1 Hazardous Materials Sites

The hazardous materials existing conditions discussion in the 2011 GPU PEIR includes information from the following databases:

- Hazardous Waste and Substances sites from California Department of Toxic Substances Control (DTSC) EnviroStor database;
- Leaking Underground Storage Tank Sites by County and Fiscal Year from the State Water Resources Control Board (SWRCB) GeoTracker database;
- Solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside the waste management unit;
- Active Cease and Desist Orders and Cleanup and Abatement Orders from SWRCB;
- Hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (H&SC), identified by DTSC;
- Active and closed solid waste sites (Solid Waste Inventory System database) maintained by the California Integrated Waste Management Board;
- Hazardous Materials Establishment Listing maintained by the County; and
- The Site Assessment and Mitigation (SAM) Case Listing of contaminated sites that have previously or are currently undergoing environmental investigations and/or remedial actions is maintained by the County.

As described in the 2011 GPU PEIR, a variety of existing and historical land uses and conditions are present within the county that may have resulted in site contamination, representing potential hazards for humans and the environment when land development, including related earthwork for site preparation, are proposed on those lands. There are several known and potential hazardous materials sites within the unincorporated area of the county, including multiple sites listed on DTSC's EnviroStor database, SWRCB's

GeoTracker database, California Integrated Waste Management Board's Solid Waste Inventory System database, and the County's SAM Case listing. Additionally, historic land uses such as burn sites, landfills, formerly used defense sites, agriculture, and petroleum storage may have caused on-site contamination that could be disturbed by future land development activities.

2.9.1.2 Airport Hazards

Airport-related hazards include the protection of airspace, consideration of flight patterns, and general land use compatibility with nearby land uses. As described in the 2011 GPU PEIR, there are eight County-owned public airports located in San Diego County. Of these, six are located within the unincorporated area. These airports include Agua Caliente Airstrip, Borrego Valley Airport, Fallbrook Community Airpark, Jacumba Airport, Ocotillo Airport, and Ramona Airport. The Gillespie Field and McClellan-Palomar Airports are also owned by the County but are located within incorporated areas. Airport Land Use Compatibility Plans (ALUCPs) are adopted for all of these airports.

2.9.1.3 Vectors

A vector is any insect, arthropod, rodent, or other animal of public health significance that can cause human discomfort or injury or is capable of harboring or transmitting the causative agents of human disease. In the county, the most significant vector populations include mosquitoes, rodents, flies, and fleas and sources include standing water and composting/manure. Diseases that can be transmitted include arboviruses, Zika, dengue, yellow fever, and chikungunya viruses (via mosquitos); plague and hantavirus (via rodents); dysentery, salmonella, e-coli infection, and cholera (via flies); and plague, tapeworm, and typhus (via fleas).

2.9.1.4 Emergency Response and Evacuation Plans

Potential hazards or events that may trigger an emergency response action in the county include earthquakes, tsunamis, floods, wildland fires, landslides, droughts, hurricanes, tropical storms, and freezes. Emergency response actions could also be triggered from a hazardous material incident, water or air pollution, a major transportation accident, water, gas, or energy shortage, an epidemic, a nuclear accident, or terrorism.

The Unified Disaster Council (UDC) is the governing body of the Unified San Diego County Emergency Services Organization that addresses disasters and emergency situations at the local level. The UDC is chaired by a member of the San Diego County Board of Supervisors and consists of representatives from the 18 incorporated cities. The County of San Diego Office of Emergency Services serves as staff to the UDC.

In San Diego County, there is a comprehensive emergency plan known as the Operational Area Emergency Operations Plan (OA EOP). Since certification of the 2011 GPU PEIR, the OA EOP was updated in August 2022 and now contains the following 16 annexes:

- Annex A – Emergency Management
- Annex B – Fire and Rescue Mutual Aid Operations
- Annex C – Law Enforcement Mutual Aid Operations
- Annex D – Mass-Casualty Incident Operations
- Annex E – Public Health Operations
- Annex F – Department of the Chief Medical Examiner Operations
- Annex G – Care and Shelter Operations
- Annex H – Environmental Health Operations
- Annex I – Communications and Warning Systems
- Annex J – Construction and Engineering Operations
- Annex K – Logistics
- Annex L – Emergency Public Information Plan
- Annex M – Behavioral Health Operations
- Annex N – (Not Assigned)
- Annex O – Animal Services
- Annex P – Terrorism
- Annex Q – Evacuation

In addition to the OA EOP and associated annexes, the Multi-Jurisdictional Hazard Mitigation Plan was developed with the participation of all local governments in San Diego County, including every incorporated city and the County. The plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments, and identifies goals, objectives, and actions for each jurisdiction in the county. The plan has been incorporated into the General Plan Safety Element. Safety Element Policy S-1.4 identifies the County's intent to review and update this plan every five years. Hazards profiled in the plan include wildfire, structure fire, flood, coastal storms, erosion, tsunami, earthquakes, liquefaction, rain-induced landslides, dam failure, hazardous materials incidents, nuclear materials release, and terrorism.

2.9.2 Regulatory Framework

Section 2.7, "Hazards and Hazardous Materials," of the 2011 GPU PEIR (pages 2.7-20 through 2.7-28) describes the regulatory framework related to hazards and hazardous materials and is hereby incorporated by reference. Specific regulations discussed in the 2011 GPU PEIR that may be applicable to the CAP Update include the following:

2.9.2.1 Federal

- International Fire Code
- Resource Conservation and Recovery Act of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984 (RCRA)
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986
- Hazardous Materials Transportation Act
- Federal Aviation Administration (FAA) Regulations
- Federal Insecticide, Fungicide, and Rodenticide Act
- Federal Occupational and Safety and Health Act
- US Department of Defense (DOD) Air Installations Compatible Use Zone (AICUZ) Program
- The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288), as amended, (42 US Code Sections 5121–5206), and Related Authorities
- Federal Response Plan of 1999

All regulations in the 2011 GPU PEIR were reviewed during the preparation of this SEIR to ensure they remain valid. In addition to the above, the following federal laws, regulations, and policies have been adopted/updated since certification of the 2011 GPU PEIR.

14 Code of Federal Regulations Part 77

Federal law 14 Code of Federal Regulations (CFR) Part 77 Notification Criteria requires project sponsors of structures or objects such as antennas, trees, or construction cranes, that exceed the Part 77 height criteria to submit to the FAA a Notice of Proposed Construction or Alteration (Form 7460-1). Additionally, the FAA may require notification for structures that may cause signal reception interference with navigational aids. The Part 77 height criteria also apply to any construction or alteration that is more than 200 feet above the ground; and any construction or alteration that exceeds an imaginary surface extending outward and upward at any of the following slopes:

- 100 to 1 for a horizontal distance of 20,000 feet from the nearest point of the nearest runway of each airport with its longest runway more than 3,200 feet in actual length, excluding heliports.
- 50 to 1 for a horizontal distance of 10,000 feet from the nearest point of the nearest runway of each airport with its longest runway no more than 3,200 feet in actual length, excluding heliports.
- 25 to 1 for a horizontal distance of 5,000 feet from the nearest point of the nearest landing and takeoff area of each heliport.

2.9.2.2 State

- Government Code Section 65962.5(a), Cortese List
- H&SC, Hazardous Materials Release Response Plans and Inventory
- Title 14 Division 1.5 of the California Code of Regulations (CCR)
- Title 22 of the CCR & Hazardous Waste Control Law, Chapter 6.5
- Title 23 of the CCR, Underground Storage Tank Act
- Title 27 of the CCR, Solid Waste
- H&SC Section 25270 et seq., Aboveground Petroleum Storage Act
- California Human Health Screening Levels
- Senate Bill 1889, Accidental Release Prevention Law/California Accidental Release Prevention Program (CalARP)
- Emergency Response to Hazardous Materials Incidents
- California Fire Code (CFC)
- California Education Code
- California State Aeronautics Act
- California fire regulations
- California Emergency Services Act
- California Natural Disaster Assistance Act

All regulations in the 2011 GPU PEIR were reviewed during the preparation of this SEIR to ensure they remain valid. In addition to the above, the following state laws, regulations, and policies have been adopted/updated since certification of the 2011 GPU PEIR.

Title 8 of the California Code of Regulations; California Occupational Safety and Health Act

Title 8 of CCR Section 1532.1 (8 CCR 1532.1) is a rule developed by the federal Occupational Safety and Health Administration in 1993 and adopted by the State of California. Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The federal Occupational Safety and Health Administration and the California Division of Occupational Safety and Health (Cal/OSHA) are responsible for ensuring worker safety in the workplace. Cal/OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices.

Title 8 includes regulations pertaining to hazard control (including administrative and engineering controls), hazardous chemical labeling and training requirements, hazardous exposure prevention, hazardous material management, and hazardous waste operations.

These regulations also include compliance with Injury Illness Prevention Program requirements (8 CCR 3203), which ensure that workers are properly trained to recognize workplace hazards and to take appropriate steps to reduce potential risks due to hazards. A site Health and Safety Plan must be prepared prior to commencing any work at a contaminated site or involving disturbance of building materials containing hazardous substances to protect workers from exposure to potential hazards.

Title 8 also specifies requirements for the removal and disposal of asbestos-containing materials (ACMs). In addition to providing information regarding how to remove ACMs, specific regulations limit the time of exposure, regulate access to work areas, require demarcation of work areas, prohibit certain activities in the presence of ACM removal activities, require the use of respirators, require monitoring of work conditions, require appropriate ventilation, and require qualified persons for ACM removal.

Title 8 also covers the removal of lead-based paint (LBP). Specific regulations cover the demolition of structures that contain LBP, the process associated with its removal or encapsulation, remediation of lead contamination, the transportation, disposal, storage, and containment of lead or materials containing lead, and maintenance operations associated with construction activities involving lead, such as LBP.

Lastly, these regulations require implementation of engineering and work practice controls such as respiratory protection, protective clothing, housekeeping, hygiene practices, and signage requirements to meet worker exposure limits. Medical monitoring and training requirements are also identified.

2.9.2.3 Local

- San Diego County, SAM Program
- San Diego County Board Policy I-132, Valley Center Mitigation Policy

All regulations in the 2011 GPU PEIR were reviewed during the preparation of this SEIR to ensure they remain applicable to the analysis. In addition to the above, the following local laws, regulations, and policies have been adopted/updated since certification of the 2011 GPU PEIR.

San Diego County Zoning Ordinance, Renewable Energy Regulations

Sections 6950–6959 of the County Zoning Ordinance prescribe reasonable standards and procedures for the installation and operation of solar energy systems and wind turbines.

Photovoltaic (PV) solar energy systems for on-site use are allowed as an accessory use in all zones upon approval of a building permit unless the property is subject to a Special Area Designator or is governed by a Discretionary Permit. Setback and height requirements are established in Section 6954(a).

Ordinance 10261 amended the San Diego County Zoning Ordinance to update and streamline provisions related to small wind energy turbines. This ordinance is consistent with state laws that encourage the construction of small wind energy turbines. The amendments made by this ordinance are intended to set forth reasonable standards and procedures for the installation and operation of small wind turbines to improve and enhance public welfare and safety, and to implement the Energy Element of the San Diego County General Plan. The amendments to Section 6951 allow a maximum of three small wind turbines on a legal lot as an accessory use to the primary use of the lot in accordance with several requirements, including height restrictions (the wind turbine height may exceed the height limit of the zone in accordance with Section 4620.j, but shall not exceed 80 feet), lighting restrictions (a small wind turbine shall not include any exterior lights unless required by law), locations restrictions (a small wind turbine tower shall not be located on a ridgeline, and the turbine blades shall not exceed the height of the ridgeline in an area within 150 feet of the ridgeline), and design guidelines (which prohibit use of trellis towers and guy wires and require that power lines connecting turbine towers to structures are installed underground). Installation of a small wind turbine requires approval of a Building Permit to ensure the turbine meets current Uniform Building Code and approval of a Zoning Verification Permit to ensure the turbine complies with County Zoning regulations.

San Diego County Emergency Operations Plan

The OA EOP provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. Since certification of the 2011 GPU PEIR, the County updated the OA EOP in August 2022. The plan is used by all key partner agencies within the county to respond to major emergencies and disasters.

Cities in the region are encouraged to adopt the OA EOP as their own with modifications as appropriate. The current plan was updated in 2022 by the Office of Emergency Services and the UDC of the Unified San Diego County Emergency Services Organization. The updated OA EOP now contains the following 16 annexes:

- Annex A – Emergency Management
- Annex B – Fire and Rescue Mutual Aid Operations
- Annex C – Law Enforcement Mutual Aid Operations
- Annex D – Mass-Casualty Incident Operations
- Annex E – Public Health Operations
- Annex F – Department of the Chief Medical Examiner Operations
- Annex G – Care and Shelter Operations
- Annex H – Environmental Health Operations
- Annex I – Communications and Warning Systems

- Annex J – Construction and Engineering Operations
- Annex K – Logistics
- Annex L – Emergency Public Information Plan
- Annex M – Behavioral Health Operations
- Annex N – (Not Assigned)
- Annex O – Animal Services
- Annex P – Terrorism
- Annex Q – Evacuation

These annexes describe the operational actions, roles, and responsibilities of departments, agencies, and supporting organizations of a particular function. The plan is complete with 16 functional annexes. (Annex N has been replaced by the stand-alone Recovery Plan.)

2011 San Diego County General Plan

The General Plan policies related to hazards and hazardous materials that are applicable to the CAP Update include the following:

> Policy LU-6.11: Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high hazard fire areas or other unmitigable hazardous areas.
>
> Policy LU-10.2: Development—Environmental Resource Relationship. Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.
>
> Policy S-1.1: Minimize Exposure to Hazards. Minimize the populations exposed to hazards by assigning land use designations, density allowances, and roadway classifications that reflect site-specific constraints and hazards. Coordinate with SANDAG on regional planning projects that accomplish this across jurisdictions.
>
> Policy S-1.2: Public Facilities Location. Advise, and where appropriate, require new development to locate future public facilities, including new essential and sensitive facilities, in appropriate locations with respect to the County's hazardous areas and State law that allow for temporary refuge for sheltering in place.
>
> Policy S-1.3: Risk Reduction Programs. Support efforts and programs that reduce the risk of natural and human-caused hazards and response time to these hazards.
>
> Policy S-1.4: Multi-Jurisdictional Hazard Mitigation Plan. Review and update the County's MJHMP every five years.

Policy S-1.5: Post-disaster Reconstruction. Participate in the development of programs and procedures that emphasize coordination between appropriate public agencies and private entities to remove debris and promote the rapid reconstruction of the County following a disaster event and facilitate the upgrading of the built environment as expeditiously as possible.

Policy S-1.8: County Updates. Update County Ordinances, Standards, and Design Guidelines to integrate the best practices and regulations that reduce hazard vulnerability and improve resilience throughout the county.

Policy S-1.10: Familiarity with National and State Response Planning. Ensure that all relevant and pertinent County of San Diego personnel are familiar with the National Incident Management System (NIMS), the National Response Framework (NRF), the State of California Standardized Emergency Management Systems (SEMS), and any other relevant response plans consistent with their position in the County's Emergency Management Program.

Policy S-2.2: Evacuation Impediments. Advise, and where appropriate, require all new developments to help eliminate impediments to evacuation within existing community plan areas, where limited ingress/egress conditions could impede evacuation events.

Policy S-2.4: Prioritize CIP Roadways. Future CIP projects should prioritize development of roadways that serve as evacuation routes or require roadway improvements to existing roads to better function during an evacuation.

Policy S-2.5: Existing Development within Hazard Zones. Implement warning systems and evacuation plans for developed areas located within known hazard areas (i.e., flood, wildfire, earthquake, other hazards).

Policy S-2.5: Evacuation Access. All development proposals are required to identify evacuation routes at the Community Plan level and identify and facilitate the establishment of new routes needed to ensure effective evacuation. Evacuation routes should be incorporated into existing Community Wildfire Protection Plans where available.

Policy S-3.3: Updated Data and Information. Periodically update County datasets to include newer, more relevant information and mapping to support effective emergency response and hazard mitigation. Provide updated information to emergency responders to help ensure easier and faster response times.

Policy S-3.4: Coordination with Public Utilities. Public Safety Power Shutoff (PSPS) coordination between the County and SDGE should occur in order to limit the impacts on residents and businesses. SDGE and the County should continue to collaborate while monitoring weather conditions to ensure pertinent information is shared.

Policy S-4.1: Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.

Policy S-4.2: Development in Hillsides and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.

Policy S-4.3: Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets, peninsulas, or islands of flammable vegetation within a development.

Policy S-4.4: Service Availability. Plan for development where fire and emergency services are available or planned.

Policy S-4.6: Fire Protection Plans. Ensure that development located within fire hazard areas implement measures in a Fire Protection Plan that reduce the risk of structural and human loss due to wildfire.

Policy S-4.7: Fire Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire hazard areas.

Policy S-5.1: Fuel Management Programs. Support programs consistent with State law that require fuel management/modification within established defensible space boundaries and when strategic fuel modification is necessary outside of defensible space, balance fuel management needs to protect structures with the preservation of native vegetation and sensitive habitats.

Policy S-13.1: Land Use Location. Require that land uses involving the storage, transfer, or processing of hazardous materials be located and designed to minimize risk and comply with all applicable hazardous materials regulations.

Policy S-13.2: Industrial Use Restrictions. Restrict industrial uses that store, process, or transport significant amounts of hazardous material to areas designated as High Impact-Industrial.

Policy S-13.3: Hazards-Sensitive Uses. Require that land uses using hazardous materials be located and designed to ensure sensitive uses, such as schools, hospitals, daycare centers, and residential neighborhoods, are protected. Similarly, avoid locating sensitive uses near established hazardous materials users or High Impact Industrial areas where incompatibilities would result.

Policy S-13.4: Contaminated Lands. Require areas of known or suspected contamination to be assessed prior to reuse. The reuse shall be in a manner that

is compatible with the nature of the contamination and subsequent remediation efforts.

Policy S-13.5: Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.

Policy S-17.2: Land Use Compatibility. Require land uses surrounding airports to be compatible with the operation of each airport.

Policy S-17.4: Hazardous Obstructions within Airport Approach and Departure. Restrict development of potentially hazardous obstructions or other hazards to flight located within airport approach and departure areas or known flight patterns and discourage uses that may impact airport operations or do not meet Federal or State aviation standards.

Policy S-17.5: Private Airstrip and Heliport Location. Locate private airstrips and heliports outside of safety zones and flight paths for existing airports where they are compatible with surrounding established and planned land use, and in a manner to avoid impacting public roadways and facilities.

Policy COS-18.3: Alternate Energy Systems Impacts. Require alternative energy system operators to properly design and maintain these systems to minimize adverse impacts to the environment.

In addition, the General Plan Safety Element identifies major freeways and state routes (SRs) as potential evacuation routes within the county, including Interstate 5 (I-5), I-15, I-8, I-805, SR 52, SR 54, SR 56, SR 67, SR 75, SR 76, SR 78, SR 84, SR 125, SR 163, and SR 905.

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Haz-1.1: Implement the Guidelines for Determining Significance, Airport Hazards, when reviewing new development projects to ensure compatibility with surrounding airports and land uses and apply appropriate mitigation when impacts are significant.

Adopted Mitigation Measure Haz-1.3: Review the AICUZ when reviewing new development projects within the study area. Ensure that such development projects are consistent with the land use compatibility and safety policies therein.

Adopted Mitigation Measure Haz-1.5: Coordinate with the San Diego County Regional Airport Authority (SDCRAA) and County Airports for issues related to airport planning and operations.

Adopted Mitigation Measure Haz-3.1: Facilitate coordination between DPLU (now PDS) and the Office of Emergency services to implement and periodically update the Hazard Mitigation Plan.

Adopted Mitigation Measure Haz-3.2: Implement the CEQA Guidelines for Determining Significance to ensure that discretionary projects do not adversely impact emergency response or evacuation plans. Also implement the County Public Road Standards and County Private Road Standards during these reviews and ensure that road improvements are consistent with Emergency Response and Evacuation Plans. Apply appropriate mitigation when impacts are significant.

Adopted Mitigation Measure Haz-3.3: Prepare Fire Access Road network plans and include in Community Plans or other document as appropriate. Also implement the County Fire Code and require fire apparatus access roads and secondary access for projects.

Adopted Mitigation Measure Haz-4.1: Identify and minimize potential fire hazards for future development by using and maintaining a database that identifies fire prone areas, locating development away from Fire Hazard areas whenever practicable, and adhering to the County Guidelines for Determining Significance for Wildland Fires & Fire Protection and applying appropriate mitigation when impacts are significant.

Adopted Mitigation Measure Haz-4.2: Conduct effective and environmentally sensitive brush management measures such as: addressing habitat-specific fire controls within Resource Management Plans; implementation of the Weed Abatement Ordinance and enforcing proper techniques for maintaining defensible space around structures; coordination with the local FAHJ to ensure that district goals for fuel management and fire protection are being met; and recognizing the Memorandum of Understanding between the wildlife agencies and fire authorities that guides the abatement of flammable vegetation without violating environmental regulations for habitat protection.

Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.

Adopted Mitigation Measure Haz-4.4: Create a Conservation Subdivision Program that facilitates conservation-oriented, fire-safe, project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary.

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate

that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

2.9.3 Analysis of Effects and Significance Determinations

2.9.3.1 Significance Criteria

Based on guidance provided in Appendix G of the State CEQA Guidelines, the *County of San Diego Guidelines for Determining Significance: Hazardous Materials and Existing Contamination* (County of San Diego 2007a), *County of San Diego Guidelines for Determining Significance: Airport Hazards* (County of San Diego 2007b), *County of San Diego Guidelines for Determining Significance: Emergency Response Plans* (County of San Diego 2007c), and *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Vectors* (County of San Diego 2009), the proposed project would result in a significant impact on hazards and hazardous materials if it would:

- create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment;
- emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area;

- impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;
- implement a BMP for stormwater management or construction of a wetland, pond, or other wet basin that could create sources of standing water for more than 72 hours and, as a result, could substantially increase human exposure to vectors, such as mosquitoes, that are capable of transmitting significant public health diseases or creating nuisances;
- include a use that involves the production, use, and/or storage of manure or proposes a composting operation or facility and as a result, could substantially increase human exposure to vectors that are capable of transmitting significant public health diseases or creating nuisances; or
- result in a substantial increase in the number of residents located within one-quarter mile of a significant offsite vector breeding source; including but not limited to, standing water (e.g., agricultural ponds, reservoirs) and sources of manure generation or management activities (e.g., confined animal facilities, horse keeping operations, composting operations).

2.9.3.2 Approach to Analysis

Impacts related to hazards and hazardous materials were analyzed qualitatively based on a review of CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Updated is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential hazard and hazardous materials impacts associated with implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant 2011 GPU PEIR mitigation measures are applicable to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update.

Scope of SEIR Impact Analysis

The impact analysis contained within this draft SEIR focuses on whether implementation of the CAP Update would result in new or more severe impacts than were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impacts of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unicorporated county) and its role as a programmatic planning document designed to guide future decision-making related to the reduction of GHGs within the unincorporated county, the study area for the CAP Update is the unincorporated area of the county within the County's jurisdiction (i.e., all

unincorporated lands excluding tribal lands, state and federally owned lands, and military installations).

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

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies, measures, and actions proposed in the CAP Update (see Table 1-2) have been grouped into subcategories for the purpose of analysis, based on the sector they target. CAP Update measures that would have the potential to result in new or more severe impacts, as compared to the conclusions of the 2011 GPU PEIR, related to hazards and hazardous materials are summarized below. CAP Update measures and actions that would involve development of policies and programs that would not result in direct physical effects or those that would result in limited physical improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to hazards and hazardous materials.

Solid Waste Measures and Actions. This category includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to hazards and hazardous materials include those that could result in new or expanded composting and recycling facilities (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

Water and Wastewater Measures and Actions. This category includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Key actions with potential to result in new or more severe impacts related to hazards and hazardous materials include those that could result in the construction of new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure (Actions W-1.1 W-2.2, W-2.3, and W-2.4)

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural and agricultural lands, improve land management practices to protect habitat and increase carbon storage, and support climate-friendly farming practices. This category also includes an action that would evaluate opportunities for the construction of farmworker housing (Action A-4.1.b). Therefore, the measures and actions

are not expected to result in new or more severe impacts related to hazards and hazardous materials.

Energy Measures and Actions. This category includes strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Key actions with potential to result in new or more severe impacts related to hazards and hazardous materials include those that could result in the construction and operation of renewable energy infrastructure (Actions E-3.2 and E-3.3). Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more severe impacts related to hazards and hazardous materials include those that could result in the construction of new electric vehicle charging, hydrogen fueling infrastructure, and pedestrian and bicycle infrastructure (Actions T-3.1, T-3.1.a, and T-5.1).

2.9.3.3 Issue 1: Create a Hazard from Transport, Use, Disposal, or Accidental Release of Hazardous Materials; Proximity to Schools; and Being Located on Sites Containing Hazardous Materials

This analysis describes the potential for implementation of the CAP Update to result in hazards to the public or the environment due to the transport, use, disposal, or accidental release of hazardous materials; emission or handling of acutely hazardous substances in proximity to schools; and location of subsequent development on contaminated sites.

Guidelines for Determination of Significance

The *County of San Diego Guidelines for Determining Significance: Hazardous Materials and Existing Contamination* (County of San Diego 2007a), which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, provides guidance for addressing the following significance criteria listed in Appendix G of the State CEQA Guidelines:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school; and,

- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

Based on the County's guidelines, a project would result in a significant impact related to hazardous materials if:

- The project is a business, operation, or facility that proposes to handle hazardous substances in excess of the threshold quantities listed in Chapter 6.95 of the H&SC, generate hazardous waste regulated under Chapter 6.5 of the H&SC, and/or store hazardous substances in underground storage tanks regulated under Chapter 6.7 of the H&SC, and the project will not be able to comply with applicable hazardous substance regulations.
- The project is a business, operation, or facility that would handle regulated substances subject to CalARP risk management plan requirements that in the event of a release could adversely affect children's health due to the presence of a school or daycare within one-quarter mile of the facility.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to the transport, use, and disposal of hazardous materials, accidental release of hazardous materials, use of hazardous materials in proximity to schools, and contaminated sites from the adoption of the goals and policies contained within the General Plan and development associated with the General Plan land use map. The 2011 GPU PEIR determined that anticipated development under the General Plan would result in less-than-significant project impacts related to hazardous materials and existing contamination in the unincorporated county.

The 2011 GPU PEIR determined that implementation of the General Plan would result in an increase in the transportation, use, and disposal of hazardous materials from an increase in land uses that commonly store, use, and dispose of hazardous materials, such as limited impact industrial, medium impact industrial, and high impact industrial development. Additionally, industries and businesses using hazardous materials would expand or increase to accommodate the projected population growth under the General Plan. These land uses could potentially be located within one-quarter mile of an existing or proposed school or daycare. Lastly, the 2011 GPU PEIR determined that General Plan land uses and development could be located on contaminated sites, such as those listed pursuant to Government Code 65962.5, burn dump sites, active, abandoned or closed landfills, Formerly Used Defense Sites, areas with historic or current agriculture, or areas with petroleum contamination.

However, the 2011 GPU PEIR concluded that implementation of the General Plan would result in less-than-significant impacts related to potential increases in hazards to the public and environment from the transportation, use and disposal of hazardous materials, an accidental release of hazardous materials, and existing hazardous materials sites

because development would be required to comply with applicable federal, state, and local regulations, policies, plans, and guidelines related to hazardous materials and existing contamination. These include applicable General Plan policies as well as the Clean Air Act (CAA) Chemical Accident Prevention Provision, RCRA, CERCLA, Hazardous Materials Transportation Act, Robert T. Stafford Disaster Relief and Emergency Assistance Act, the California H&SC, CFC, Title 22, CCR Titles 23 and 27, Aboveground Petroleum Storage Act, CalARP, Emergency Response to Hazardous Materials Incidents, the California Emergency Services Act, and the County Consolidated Fire Code, all of which strictly regulate the transportation, use, and disposal of hazardous materials.

The discussion of impacts related to hazardous materials and sites can be found in Section 2.7, "Hazards and Hazardous Materials," of the 2011 GPU PEIR (pages 2.7-28 through 2.7-39) and is hereby incorporated by reference.

CAP Update Impact Analysis

The following discussion describes the potential for implementation of the proposed CAP Update measures to result in effects related to hazardous materials and sites.

Solid Waste Measures and Actions

The CAP Update includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to hazardous materials and sites include those that would result in the development of new or expanded recycling and composting facilities (e.g., Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

Implementation of these CAP Update measures and actions could result in the construction of new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 include development of zero waste policies which would result in new or expanded composting and recycling facilities to divert solid waste from landfills. Specific locations for any new and expanded facilities have not been identified. The construction of new or expanded solid waste facilities would involve the routine transport, use, and disposal of hazardous materials typically used in construction, including paints, oils, solvents, fuels, lubricants, asphalt products, and other materials. Hazardous waste generated during construction may consist of welding materials, fuel and lubricant containers, paint and solvent containers, and cement products containing strong basic or acidic chemicals. However, similar to what was described in the 2011 GPU PEIR, the transport, use, and disposal of hazardous materials during construction would be required to comply with federal, state, and local regulatory requirements, including CAA Chemical Accident Prevention Provision, RCRA, CERCLA, Hazardous Materials Transportation Act, Robert T. Stafford Disaster Relief and Emergency Assistance Act, the California H&SC, CFC, Title 22, CCR Titles 23 and 27, Aboveground Petroleum Storage Act, CalARP, Emergency Response to Hazardous Materials Incidents, the California

Emergency Services Act, and the County Consolidated Fire Code, all of which strictly regulate the transportation, use, and disposal of hazardous materials.

While specific locations for new and expanded solid waste facilities have not been identified, it is assumed that the development of these facilities would occur in accordance with the General Plan and its policies to reduce the potential for hazardous materials impacts. For example, General Plan Policy LU-16.1 requires that new solid waste management identified in the San Diego County Integrated Waste Management Plan (County of San Diego 2005) are sited in a manner that minimizes environmental impacts and in accordance with applicable local land use policies. In addition, General Plan Policy LU-16.3 encourages the establishment of new recycling and resource recovery facilities in areas with industrial land use designations or other appropriate areas based on the type of recycling. Similarly, Policy S-1.1 aims to minimize exposing populations to hazards by assigning land use designations, density allowances, and roadway classifications that reflect site-specific constraints and hazards. Policy S-13.1 requires land uses involving the storage, transfer, or processing of hazardous materials to be located and designed to minimize risk and comply with all applicable hazardous materials regulations. Policy S-13.2 aims to restrict industrial uses that store, process, or transport significant amounts of hazardous material to areas designated as High Impact-Industrial. Lastly, Policy S-13.3 requires land uses using hazardous materials to be located and designed to ensure sensitive uses, such as schools, hospitals, daycare centers, and residential neighborhoods, are protected. This policy also aims to avoid locating sensitive uses near established hazardous materials users or High Impact Industrial areas where incompatibilities would result.

The proper siting of new or expanded solid waste facilities in accordance with applicable General Plan policies would ensure that these types of facilities are not developed in residential areas or in proximity to schools or other sensitive receptors. Compliance with these regulatory requirements and General Plan policies also would ensure that the construction of new or expanded solid waste facilities would not create a significant hazard to the public or the environment or emit hazardous emissions during construction activities or operations.

Additionally, there is a potential that new or expanded solid waste facilities could be constructed on sites that are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, as well as burn dump sites, active, abandoned or closed landfills, Formerly Used Defense Sites, areas with historic or current agriculture, or areas with petroleum contamination. However, similar to what was described in the 2011 GPU PEIR, the development of solid waste facilities on these sites would be required to comply with existing federal, state, and local regulations related to existing on-site hazardous materials contamination, including many of the same regulations described above.

With implementation of General Plan policies and compliance with regulatory requirements, implementation of solid waste measures and actions would not result in hazards to the public or environment related to the transport, use, disposal, or accidental

release of hazardous materials; proximity to schools; or sites containing hazardous materials. The impact would be less than significant.

Water and Wastewater Measures and Actions

The CAP Update includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Implementation of CAP Update Actions W-1.1, W-2.2, W-2.3, and W-2.4 could result in the construction of new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The construction of new recycled water and stormwater capture and reuse infrastructure would occur in conjunction with existing or proposed development and would not result in the transport, use, and disposal of hazardous materials beyond those described in the 2011 GPU PEIR. The construction of this infrastructure would involve the use of similar types of hazardous materials as are commonly used as part of new development, including paints, oils, solvents, fuels, lubricants, asphalt products, and other materials. Similar to what was described in the 2011 GPU PEIR, the transport, use, and disposal of hazardous materials during construction would be required to comply with the federal, state, and local regulatory requirements described above. Should the development of these facilities occur on a listed hazardous materials site compiled pursuant to Government Code Section 65962.5, compliance with applicable federal, state, and local regulations related to existing on-site hazardous materials contamination would similarly be required, including many of the same regulations described above. Compliance with these regulatory requirements and General Plan policies would ensure that the construction of new recycled water and stormwater capture and reuse infrastructure would not create a significant hazard to the public or the environment or emit hazardous emissions during construction activities or operations.

With implementation of General Plan policies and compliance with regulatory requirements, implementation of water and wastewater measures and actions would not result in hazards to the public or environment related to the transport, use, disposal, or accidental release of hazardous materials; proximity to schools; or sites containing hazardous materials. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

The CAP Update includes strategies to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. CAP Update Actions A-1.1, A-1.2, A-1.2.a, A-3.1, A-4.1, A-4.1.c, and A-4.1.d would result in acquiring and managing conservation lands and improving land management practices on existing agricultural land to improve carbon sequestration. These actions would be consistent with

General Plan Policies LU-7.1, COS-6.2, and COS-6.4, which were adopted for the purpose of protecting agricultural operations and preserving agricultural lands. Because these actions are focused on conservation and preservation of natural and agricultural lands, they would not result in any construction or the development of uses that would involve the routine transport, use, and disposal of hazardous materials. Therefore, with implementation of General Plan policies and compliance with regulatory requirements, implementation of agriculture and conservation measures and actions would not result in hazards to the public or environment related to the transport, use, disposal, or accidental release of hazardous materials; proximity to schools; or sites containing hazardous materials. The impact would be less than significant.

Energy Measures and Actions

The CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects.

Implementation of CAP Update Actions E-2.2 and E-3.3 would include the construction of new infrastructure to promote renewable energy use and electrification. Requirements would include retrofitting and improving existing residential and non-residential structures and County facilities to meet energy efficiency requirements. These retrofits could include rooftop or ground-mounted PV solar arrays or small wind turbines, upgraded mechanical systems, and other similar improvements. With the exception of wind turbines, these types of improvements generally would be made to existing buildings or would be ancillary to new development. Additionally, new large-scale renewable energy infrastructure could be developed through Action E-3.3.

Construction associated with renewable energy projects, including PV solar arrays and small and large wind turbines, would involve the transport, use, and disposal of hazardous materials typically used during construction, including paints, oils, solvents, fuels, lubricants, asphalt products, and other materials. Similar to what was described in the 2011 GPU PEIR and 2012 Wind Energy EIR, the transport, use, and disposal of hazardous materials during construction would be required to comply with the federal, state, and local regulatory requirements described above. Specific locations for new small- and large-scale wind turbines have not been identified; however, these facilities would be developed in accordance with the County's Wind Energy Ordinance Sections 6950–6952. Some small wind turbines would be roof-mounted and would not result in ground disturbance, while others would require the erection of turbine towers and construction of concrete foundations. As described on page 2.6-29 of the 2012 Wind Energy EIR, small wind turbines are permitted as accessory structures without a discretionary permit but would still require a building permit, which would not be issued if the turbines were located on a contaminated site under Government Code Section 65962.5. Additionally, turbines would not require the routine use and storage of hazardous materials and would only utilize small amounts of lubricating oils and hydraulic fluids for ongoing operations.

Large-scale renewable energy systems would require construction activities including earthmoving, the use of construction equipment, and the use of worker vehicles, and may require the use of some hazardous materials to operate or maintain equipment but would be required to obtain a Major Use Permit (MUP) and undergo the County's discretionary review process prior to receiving a permit to develop or operate. Any use of hazardous materials during construction or operations would be evaluated and regulated through the discretionary process, including the preparation of Hazardous Materials Business Plans, as needed.

With implementation of General Plan policies and compliance with regulatory requirements, implementation of energy measures and actions would not result in hazards to the public or environment related to the transport, use, disposal, or accidental release of hazardous materials; proximity to schools; or sites containing hazardous materials. The impact would be less than significant.

Built Environment and Transportation Measures and Actions

The CAP Update includes measures and actions to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Actions T-4.1, T-4.1.a, T-4.2, T-5.1, and T-6.2.a would result in programs to reduce emissions from County employee commutes; improvements to pedestrian, bicycle, and transit networks; programs to encourage active modes of transportation and reduce single occupancy vehicle trips; and the incorporation of Transportation Demand Management strategies. Because of the nature of such improvements (i.e., limited size and within existing transportation corridors), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development.

Construction associated with these improvements would involve the transport, use, and disposal of hazardous materials typically used during construction, including paints, oils, solvents, fuels, lubricants, asphalt products, and other materials. Similar to what was described in the 2011 GPU PEIR, the transport, use, and disposal of hazardous materials during construction would be required to comply with the federal, state, and local regulatory requirements described above. Similarly, should the development of these facilities occur on a listed hazardous materials site compiled pursuant to Government Code Section 65962.5, compliance with applicable federal, state, and local regulations related to existing on-site hazardous materials contamination would also be required, including many of the same regulations described above. Compliance with regulatory requirements and General Plan policies would ensure that the construction these improvements would not create a significant hazard to the public or the environment or emit hazardous emissions during construction activities or operations.

With implementation of General Plan policies and compliance with regulatory requirements, implementation of built environment and transportation measures and actions would not result in hazards to the public or environment related to the transport, use, disposal, or accidental release of hazardous materials; proximity to schools; or sites containing hazardous materials. The impact would be less than significant.

Summary

As detailed in the 2011 GPU PEIR, compliance with existing federal, state, and local regulations related to hazardous materials would ensure that projects implemented under the CAP Update would not result significant impacts related to hazardous materials, contaminated sites, or emissions of hazardous materials in proximity to schools. Additionally, General Plan Policies LU-16.1, LU-16.3, S-1.1, S-13.1, S-13.2, and S-13.3 would ensure the proper siting of new or expanded solid waste facilities so that these facilities are not developed in residential areas or in proximity to schools or other sensitive receptors.

With implementation of adopted General Plan policies and compliance with existing regulatory requirements, implementation of the CAP Update would not result in new or substantially more severe impacts related to hazardous materials compared to the 2011 GPU PEIR. Impacts related to hazardous materials associated with implementation of the solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions in the CAP Update would remain **less than significant**, consistent with the conclusions in the 2011 GPU PEIR**.** Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.9.3.4 Issue 2: Result in Safety Hazards or Excessive Noise from Public and Private Airports

This analysis describes the potential for implementation of the CAP Update to result in impacts related to public and private airports. Note that potential impacts related to excessive airport noise are discussed in Section 2.12, “Noise.”

Guidelines for Determination of Significance

The *County of San Diego Guidelines for Determining Significance: Airport Hazards* (County of San Diego 2007b), which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, provides guidance for addressing the following significance criteria listed in Appendix G of the State CEQA Guidelines:

- For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would it result in a safety hazard or excessive noise for people residing or working in the project area.

Based on the County’s guidelines, a project would result in a significant impact related to airport hazards if:

- The project is located within an established aircraft influence area for a public or public use airport and proposes a development intensity, flight obstruction, or other land use that conflicts with the ALUCP or Comprehensive Land Use Plan (if no

ALUCP is adopted) and as a result, the project may result in a significant airport hazard.

- The project is located within 2 miles of a public or public use airport or within 1 mile of a private airport, and proposes any of the following:
    - Residential densities inconsistent with the California Airport Land Use Planning Handbook's Safety Compatibility Criteria Guidelines for Maximum Residential Density (Table 2.9-2, presented at the end of this section) and as a result, the project may result in a significant airport hazard.
    - Non-residential land uses that exceed the California Airport Land Use Planning Handbooks Safety Compatibility Criteria Guidelines for Maximum Non-Residential Intensity (Table 2.9-3, presented at the end of this section) and as a result, the project may result in a significant airport hazard.
    - An incompatible use identified in the California Airport Land Use Planning Handbook's Safety Compatibility Criteria Guidelines for Safety Compatibility Zones – Prohibited Uses (see Table 2.9-4, presented at the end of this section) and as a result, the project may result in a significant airport hazard.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to public and private airport hazards from the adoption of the goals and policies contained within the General Plan and development associated with the General Plan land use map. The 2011 GPU PEIR determined that implementation of the General Plan would result in potentially significant impacts related to airport safety hazards because it would allow the development of higher density land uses near existing public airports and would also allow development within two miles of a private airport, which would have the potential to increase the risk of safety hazards associated with airport operations. The 2011 GPU PEIR determined that these impacts would be reduced through a combination of the following:

- Complying with a combination of federal and state regulations and County processes, including but not limited to:
    - FAA regulations that establish safety standards for civil aviation (e.g., 14 CFR Part 77);
    - DOD AICUZ regulations, which establishes safety compatibility criteria for military air bases;
    - State Aeronautics Act, which establishes air safety standards; and
    - County requirements to comply with applicable ALUCPs for any development projects near public airports.

- Implementing General Plan goals and policies related to airport hazards, including LU-4.7, M-7.1, S-15.1, S-15.2, S-15.3, and S-15.4, all of which address hazards to the public and environment near airports. Note that the General Plan Safety Element was recently updated in August 2021. The Safety Element policies referenced in the 2011 GPU PEIR are now identified as Policies S-17.2 (General Plan Policy S-15.1), S-17.3 (General Plan Policy S-15.2), S-17.4 (General Plan Policy S-15.3), and S-17.5 (General Plan Policy S-15.4).
- Implementing Mitigation Measures Haz-1.1 through Haz-1.5 and Haz-2.1 identified in the 2011 GPU PEIR to ensure compatibility between airports and land uses and avoid potential airport operation-related hazards.

The 2011 GPU PEIR concluded that impacts related to public and private airport hazards would be reduced to less than significant with implementation of the General Plan policies and 2011 GPU PEIR mitigation measures, as well as compliance with applicable regulations such as FAA regulations, DOD AICUZ regulations, the State Aeronautics Act, as applicable ALUCPs. Enforcement of existing regulations and implementation of General Plan policies and 2011 GPU PEIR mitigation measures would reduce hazards related to development near public and private airports to less than significant. The discussion of impacts can be found in Section 2.7, “Hazards and Hazardous Materials” (pages 2.7-39 through 2.7-43), of the 2011 GPU PEIR and is hereby incorporated by reference. The full text of the specific policies related to airport hazards is provided above in Section 2.9.2, “Regulatory Framework,” while the full text of applicable 2011 GPU PEIR mitigation measures is provided below in Section 2.9.5, “Mitigation Measures.”

CAP Update Impact Analysis

The following discussion describes the potential for implementation of the proposed CAP Update measures to result in effects related to airport hazards.

Solid Waste Measures and Actions

The CAP Update includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to hazardous materials and sites include those that would result in the development of new or expanded recycling and composting facilities (e.g., Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

Implementation of these CAP Update measures and actions could result in the construction of new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 include development of zero waste policies which would result in new or expanded composting and recycling facilities to divert solid waste from landfills. Specific locations for any new and expanded facilities have not been identified. However, any new or expanded solid waste facilities would be required to comply with federal, state, and local regulations related to airport safety and hazards, including FAA regulations such as 14 CFR Part 77, DOD AICUZ regulations, the State Aeronautics Act, and applicable ALUCPs. These regulations require proposed structures that exceed certain height

criteria to undergo an Obstruction Evaluation/Airport Airspace Analysis (14 CFR Part 77), consideration of land use compatibility with nearby military airbases (DOD AICUZ regulations) and public airports (ALUCPs). Should the FAA's Obstruction Evaluation/Airport Airspace Analysis determine that a new or expanded solid waste facility has the potential to result in hazards to air navigation, the incorporation of measures such as marking and/or lighting would be required to ensure that no hazards to air navigation occur.

While specific locations for new and expanded solid waste facilities have not been identified, it is assumed that the development of these facilities would occur in accordance with the General Plan and its policies to reduce the potential for airport-related hazards. General Plan Policy S-17.2 requires land used surrounding airports to be compatible with the operation of each airport. Policy S-17.3 requires operational plans for new public/private airports and heliports, as well as future operational changes to existing airports, to be compatible with existing and planned land uses that surround the airport facility. While this policy would not be implemented by future projects associated with the CAP Update, it would require consideration of any such projects should they be built or planned in areas surrounding existing or new airports and/or heliports. Lastly, Policy S-17.4 restricts development of potentially hazardous obstructions or other hazards to flight located within airport approach and departure areas or known flight patterns and discourage uses that may impact airport operations or do not meet federal or state aviation standards.

In addition to the regulations and General Plan policies described above, the following 2011 GPU PEIR mitigation measures also would be applied to the CAP Update to minimize impacts related to airport hazards: Mitigation Measure Haz-1.1, which requires new development projects to be reviewed in accordance with the *County of San Diego Guidelines for Determining Significance: Airport Hazards* to ensure compatibility with surrounding airports and land uses; Mitigation Measure Haz-1.3, which requires new development projects to be reviewed in accordance with the applicable AICUZ to ensure consistency with the land use compatibility and safety policies; and Mitigation Measure Haz-1.5, which requires coordination with the SDCRAA and County airports for issues that may affect airport planning and operations. Implementation of these 2011 GPU PEIR mitigation measures, along with the General Plan policies described above, would ensure that new or expanded solid waste facilities would not create safety hazards related to airport operations. The impact would be less than significant with mitigation.

Water and Wastewater Measures and Actions

The CAP Update includes measures and actions to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Implementation of CAP Update Actions W-1.1, W-2.2, W-2.3, and W-2.4 would involve construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing

recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The construction of new recycled water and stormwater capture and reuse infrastructure would not result in potential hazards related to airport operations. Any new or expanded physical structures associated with implementing water conservation measures and actions would be ancillary to existing or proposed development and would be relatively minor in size and scale, and therefore are not anticipated to be tall enough to pose hazards to air navigation.

Based on the discussion above, implementation of water and wastewater measures and actions that would be implemented under the CAP Update would not create safety hazards related to airport operations. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. These measures would result in the preservation of natural and agricultural lands in the unincorporated county. Therefore, implementation of these measures would not increase airport hazards.

Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified. It is anticipated that new farmworker housing would be low density and in proximity to existing agricultural operations, which are generally in more rural areas of the unincorporated county and not in the vicinity of any airports. However, should any new farmworker housing be developed in proximity to an existing airport, it would be required to comply with federal, state, and local regulations related to airport safety and hazards, including FAA regulations such as 14 CFR Part 77, DOD AICUZ regulations, the State Aeronautics Act, and applicable ALUCPs. Additionally, new farmworker housing would be required to implement adopted General Plan goals and policies related to airport hazards, including General Plan Policies S-17.2, S-17.3, and S-17.4, as described above. Lastly, 2011 GPU PEIR Mitigation Measures Haz-1.1, Haz-1.3, and Haz-1.5 require new development projects to be reviewed for compatibility with surrounding airports, military airbases, and land uses, as well as coordination with the SDCRAA and County airports for issues that may affect airport planning and operations. Compliance with existing regulations and implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures would ensure that new farmworker housing associated with the CAP Update would not result in airport hazards.

Based on the discussion above, implementation of Agricultural and Conservation measures and actions that would be implemented under the CAP Update would not create safety hazards related to airport operations. The impact would be less than significant with mitigation.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects.

Implementation of CAP Update Action E-2.2 and Action E-3.3 could result in the construction of new renewable energy infrastructure and energy efficiency retrofits on existing residential and non-residential structures and County facilities. These retrofits could include rooftop or ground-mounted PV solar arrays or small wind turbines, upgraded mechanical systems, and other similar improvements. Potential PV solar arrays, small-scale wind turbines, and other building retrofits and improvements would occur in areas of existing development, and in association with new development, which would include energy-efficient mechanical equipment at the time of construction. Additionally, new large-scale renewable energy infrastructure, such as large-scale PV solar or concentrated solar, and wind turbines, could be developed as a result of Action E-3.3. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level and assumes development of typical, currently available technologies. The potential for construction of large-scale renewable energy infrastructure was not evaluated in the 2011 GPU PEIR, but potential wind energy impacts were evaluated in the 2012 Wind Energy Ordinance EIR and are incorporated by reference as applicable.

Large-scale renewable energy infrastructure would generally be constructed in primarily undeveloped locations that are productive for generating renewable energy. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees.

The main compatibility concerns for the protection of airport airspace are related to airspace obstructions (e.g., building height, antennas) and hazards to flight (e.g., wildlife attractants, distracting lighting, or glare) that could produce visual or electronic impairment to navigation. This would occur if the structures were located too close to an airport runway, were too tall, or produced glare or lighting that could cause a distraction to pilots. Specific locations for renewable energy projects have not been identified; however, it is possible that small- and large-scale solar arrays or small- and large-scale wind turbines would be constructed within an Airport Influence Area (area around an airport for which an ALUCP exists), within 2 miles of a public airport, or within the safety zone for an airport, and could potentially result in a safety risk.

Federal law requires proposed structures that exceed FAA Regulations Part 77 height criteria to undergo an Obstruction Evaluation/Airport Airspace Analysis. These

regulations apply to any construction or alteration that is more than 200 feet above the ground, and any construction or alteration that exceeds an imaginary surface extending outward and upward at any of the slopes identified in Section 2.9.2, “Regulatory Framework.” The development of any structures meeting these criteria must submit a Notice of Proposed Construction or Alteration (Form 7460-1) to the FAA. Additionally, the FAA published a final policy in May 2021 addressing the construction of solar energy systems on airport property, specifically federally obligated airports with control towers. Federally obligated airports are public airports that have accepted federal assistance either in the form of grants or property conveyances. Under the final policy, airports must file a Notice of Proposed Construction or Alteration with the FAA that includes a statement that the project will not cause any visual impact (i.e., glare) that could affect pilot approaches.

The placement of small-scale PV solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance Section 6954(a), which limits the height and scale of these facilities. Rooftop PV solar energy panels generally do not involve construction that would substantially change roof lines or add substantial massing or height such that the altered buildings would have the potential to result in hazards to air navigation. The County’s Renewable Energy Zoning Ordinance Section 6954(a) requires the height of on-site PV solar energy systems be no taller than the height designator of the zone, except for on-site energy use systems that may extend no more than 5 feet above the roofline. In the event any small-scale PV solar would be installed on existing County airport facilities with a control tower, the County would be required to file a Notice of Proposed Construction or Alteration with the FAA for review and approval to demonstrate that there would be no visual impact on air traffic. Similarly, large-scale PV solar projects would be subject to the County’s Renewable Energy Zoning Ordinance Section 6954(b). Section 6954(b) requires the location, size, design, and operating characteristics of offsite PV solar systems that are less than 10 acres to be compatible with adjacent uses, residents, buildings, or structures, with consideration given to harmony in scale, bulk, coverage, and density. Offsite PV solar systems that are 10 acres or more are considered a Major Impact Service and Utility and are required to obtain a MUP. Section 6954(b) requires any solar system more than 200 feet in height to comply with FAA safety height requirements.

Additionally, wind turbines of all sizes are regulated by the County’s Wind Energy Ordinance Sections 6950–6952 and would be required to comply with regulations specific to size and scale of the turbines. Small wind turbines that meet the zoning verification requirements would be limited to a height of no more than 80 feet for small turbines, would have relatively small blades on a vertical or horizontal axis, and would be prohibited on ridgelines. In addition, these structures cannot include guy wires for structural support or aboveground power lines. Similar to small- and large-scale solar systems, small and large wind turbines proposed in proximity to airports that exceed FAA Regulations Part 77 height criteria would be subject to FAA requirements and would be required to undergo an Obstruction Evaluation/Airport Airspace Analysis. Because large wind turbines may range in height from 300 to 500 feet at the topmost blade tip, they would be required to display aviation lighting per FAA requirements if they are taller than 200 feet.

Future discretionary renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would be required to minimize or eliminate airport hazard impacts to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Additionally, as described on pages 2.6-38 through 2.6-39 of the 2012 Wind Energy EIR, all large-scale wind turbine projects would be required to obtain a MUP. Therefore, these facilities would be required to undergo discretionary review which would provide the opportunity to evaluate if any land use conflicts related to airports existed.

In addition to the regulatory requirements described above, the General Plan policies and 2011 GPU PEIR mitigation measures pertaining to airport hazards (Mitigation Measures Haz-1.1, Haz-1.3, and Haz-1.5) would further limit the project impacts on airport hazards by requiring new development projects to be reviewed for compatibility with surrounding airports, military airbases, and land uses, as well as coordination with the SDCRAA and County airports for issues that may affect airport planning and operations. The impact would be less than significant with mitigation.

Built Environment and Transportation Measures and Actions

The built environment and transportation measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Action T-1.1) and Active Transportation Program (Action T-5.1). Other measures and actions would affect the design of existing and planned roadways. Action T-6.2 would implement transit-supportive roadway treatments such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Action T-3.1 would result in the installation of publicly available electric vehicle charging stations. Action T-3.1.a would support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts that could facilitate future infrastructure construction. Several measures and actions would further support alternative modes of transportation without resulting in physical changes that could result in airport-related hazards.

Where CAP Update measures and actions result in physical changes to the environment, these improvements would be located throughout the county and would occur in areas that are developed with existing residential and commercial uses. None of these improvements would have the potential to increase airport hazards because any physical changes would be relatively minor and would not introduce any uses that would be incompatible with airport operations. The impact would be less than significant.

Summary

With 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), implementation of the CAP Update would not result in new or substantial increase in magnitude of impacts related to airport hazards compared to the 2011 GPU PEIR. Therefore, impacts related to airport hazards associated with

implementation of the solid waste, water and wastewater, agriculture and conservation, energy and built environment and transportation measures and actions in the CAP Update would remain **less than significant with mitigation**, consistent with the conclusions in the 2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.9.3.5 Issue 3: Impair or Interfere with Emergency Response and Evacuation Plans

This analysis describes the potential for implementation of the CAP Update to result in impacts related to emergency response and evacuation plans.

Guidelines for Determination of Significance

The *County of San Diego Guidelines for Determining Significance: Emergency Response Plans* (County of San Diego 2007c), which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, provides guidance for addressing the following significance criteria listed in Appendix G of the State CEQA Guidelines:

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Based on the County's guidelines, a project would result in a significant impact related to emergency response and evacuation plans if:

- The project proposes one of the following unique institutions in a dam inundation zone as identified on the inundation map prepared by the dam owner:
  - Hospital
  - School
  - Skilled nursing facility
  - Retirement home
  - Mental health care facility
  - Care facility with patients that have disabilities
  - Adult and childcare facility
  - Jails/detention facility
  - Stadium, arena, amphitheater
  - Any other use that would involve concentrations of people that could be exposed to death in the event of a dam failure

- The project proposes a structure or tower 100 feet or greater in height on a peak or other location where no structures or towers of similar height already exist and as a result, the project could cause hazards to emergency response aircraft resulting in interference with the implementation of an emergency response.

Impact Analysis

2011 GPU PEIR Determination

As discussed in Section 2.7, "Hazards and Hazardous Materials," the 2011 GPU PEIR evaluated impacts related to emergency response and evacuation plans with the adoption of the goals and policies contained within the General Plan and buildout of the unincorporated county at the planning horizon. The 2011 GPU PEIR concluded that implementation of the General Plan would increase development in areas of the county that would not have accounted for growth in their existing emergency response and evacuation plans. Therefore, implementation of the General Plan would have the potential to impair emergency response and evacuation plans. However, the County would implement applicable General Plan policies listed above in Section 2.9.2, "Regulatory Framework," and applicable 2011 GPU PEIR mitigation measures listed below in Section 2.9.5, "Mitigation Measures," which would reduce a project's potential for impairing emergency response and evacuation plans by requiring projects to comply with standards for adequate emergency access.

As discussed in the 2011 GPU PEIR (page 2.7-44), the County reviews development proposals for consistency with existing emergency response and evacuation plans. In addition, the San Diego County Fire Protection District is responsible for discretionary project reviews to ensure that development projects include adequate emergency access. Compliance with General Plan policies (Policies S-1.3, M-1.2, M-3.3, and M-4.4), 2011 GPU PEIR mitigation measures (Mitigation Measures Haz-3.1, Haz-3.2, and Haz-3.3), and other applicable regulations listed in Section 2.9.2, "Regulatory Framework," would reduce impacts related to impairment of emergency response and evacuation plans because the General Plan policies and 2011 GPU PEIR mitigation measures would require improvement of road network to shorter routes that support emergencies services, require multiple ingress/egress routes, require coordination between agencies to implement and update the Hazard Mitigation Plan, and require preparation of Fire Access Road network plans and include in Community Plans. The 2011 GPU PEIR determined that impacts would be less than significant after mitigation. The discussion of impacts can be found in Section 2.7, "Hazards and Hazardous Materials" (pages 2.7-43 through 2.7-45 and 2.7-53), of the 2011 GPU PEIR and is incorporated by reference.

CAP Update Impact Analysis

The following sections describe the potential impacts to emergency response and evacuation that could result from implementation of CAP Update measures and actions.

Solid Waste Measures and Actions

Implementation of CAP Update solid waste measures and actions (e.g., Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b) could result in construction of new or expanded solid waste facilities in the unincorporated county. Implementation of the CAP Update does not propose changes to the OA EOP, the Multi-Jurisdictional Hazard Mitigation Plan, the OA EOP, or any other emergency plan. Construction activities would include vegetation clearing and piling, grading, site preparation, soil disturbances, concrete pouring and preparation, and construction and refueling. These construction activities may include the presence of vehicles, heavy equipment, heat-generating equipment and activities, and sparks from various sources as well as use of fuels, and combustible materials during construction. However, construction of the new or expanded solid waste facilities would have the potential to interfere with emergency plans and procedures if authorities are not properly notified or emergency routes are blocked.

Operation of the types of solid waste related projects that would occur consistent with the CAP Update generally would not result in development within areas of high fire risk or introduce new population into the unincorporated county. To minimize any potential impacts related to emergency response and evacuation, future development of solid waste facilities would be required to comply with adopted General Plan Policy S-1.3, which supports risk reduction programs and Policy M-3.3, which requires development of multiple ingress/egress routes. Furthermore, implementation of 2011 GPU PEIR Mitigation Measure Haz-3.1 to ensure authorities would prevent impediments to emergency response and evacuation plans, Mitigation Measure Haz-3.2 to avoid conflicts with adopted emergency response and evacuation plans, and Mitigation Measure Haz-3.3 to implement the County Fire Code and to include fire apparatus access and secondary access road, would ensure that impacts related to emergency response and evacuation are minimized by ensuring that emergency vehicle access is maintained during project construction and operation and that evacuation routes remain available to the extent feasible during wildfire events. Therefore, implementation of 2011 GPU PEIR mitigation measures and adopted General Plan policies would ensure that future development of solid waste facilities would not impact adopted emergency response and evacuation plans.

Therefore, implementation of CAP Update solid waste measures and actions would not substantially affect emergency response or evacuation plans. The impact would be less than significant with mitigation.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Measures W-1 and W-2 include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliance, smart irrigation system, and stormwater and grey water capture systems. Implementation of Measure W-3 would have the potential to result in installation

of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. Implementation of these measures would not interfere with emergency response or excavation plans because installation and operation of the proposed water and wastewater infrastructure improvements would not require the any road closures. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, planting and protecting trees, and providing incentive to encourage carbon farming. These measures would result in the preservation of natural and agricultural lands in the unincorporated county. Interference with an adopted emergency response plan is unlikely to result from implementing these measures and actions because they would not involve extensive long-term construction that would impair emergency vehicle access or block evacuation routes. Additionally, these uses would not introduce new development within high fire risk areas that would increase population such that evacuation or emergency vehicle access routes would become congested.

Some measures and actions would direct the County to conduct evaluations that could result in subsequent programs with the potential to result in projects with potential to conflict with established emergency response plans. For example, Implementation of Action A-4.1.b would result in evaluation of opportunities to increase farmworker housing that could lead to construction of new farmworker housing. It is assumed that new farmworker housing would move existing residents in the county closer to work and provide housing for seasonal farmworkers, and would not result in an overall increase in population within the unincorporated county. If the existing emergency response and evacuation plans do not account for population changes in areas zoned for agricultural use, development of new farmworker housing would have the potential to increase the risk to loss of life in the event of an emergency. The impact would be potentially significant. However, the location or extent of potential future housing development is unknown at this time, and future discretionary projects, including farmworker housing projects, would be subject to an environmental review process and would be required to implement regulations that support emergency response and evacuation plans and mitigate for fire-related impacts. Future projects would also be required to conform to adopted General Plan policies, including Policies S-1.2, M-1.2, M-3.3, and M-4.3, to support emergency services. In addition, the 2011 GPU PEIR Mitigation Measures Haz-3.1, Haz-3.2, and Haz-3.3 would prevent impediments and conflicts with adopted emergency response and evacuation plans. Implementation of the adopted General Plan policies and the identified 2011 GPU PEIR mitigation measures would ensure that future development of farmworker housing would not impact adopted emergency response and evacuation plans.

Therefore, implementation of CAP Update agriculture and conservation measures and actions would not substantially affect emergency response or evacuation plans. The impact would be less than significant with mitigation.

Energy Measures and Actions

Implementation of the CAP Update Measure E-3 and associated implementing actions would involve implementation of policies, programs, and mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. Implementation of CAP Update Measure E-3, Action E-3.2, and Action E-3.3 could result in development of small- and large-scale renewable energy projects, which would have the potential to result in impacts to adopted emergency response and evacuation plans.

Construction activities associated with the development of renewable energy projects under the CAP Update would have the potential to interfere with emergency response plans if authorities are not properly notified or emergency routes are blocked. However, projects being implemented under the CAP Update would be required to implement applicable 2011 GPU PEIR mitigation measures, including Mitigation Measure Haz-3.2, which requires the County to implement guidelines and measures to ensure that projects do not adversely impact existing emergency response and evacuation plans.

Once operational, small-scale renewable energy projects would not obstruct implementation of emergency response and evacuation plans because these projects would have limited height structures (e.g., solar panels shall not extend more than five feet above the highest pint of the roof and small wind turbines shall not exceed 80 feet) that would not be expected to affect navigable airspace and thus would not interfere with emergency air support services. In addition, operation of small-scale renewable energy projects would require few maintenance workers and would not involve activities requiring regular trucks or other vehicle trips that would impede access.

The development of large-scale renewable energy systems would result in large projects that occur over many acres, and generally include large and tall components, including tall wind turbines as well as new roads, transmission lines, and fencing. While specific locations for these projects have not been selected, projects would primarily be in areas of the county that are suited to the type of energy that the infrastructure is intended to produce, and therefore would generally be located away from population centers or areas with great evacuation need.

Future discretionary projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to the facilitation of emergency response and evacuation plans to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Additionally, all large-scale renewable energy projects would be required to undergo the County's discretionary review process to obtain a MUP. In the case of large-scale wind turbines, as described on page 2.6-40 of the 2012 Wind Energy EIR, tall structures (300–500 feet tall) could potentially affect the ability of emergency air support services to carry out missions associated with an emergency response and may also result in obstructions on roads that are used as emergency access or evacuation. However, all large-scale renewable energy systems would require a MUP, and the County would be required to review all proposals for consistency with existing emergency

response and evacuation plans. Additionally, projects would be required to comply with the applicable General Plan policies listed in Section 2.9.2, "Regulatory Framework," and 2011 GPU PEIR Mitigation Measures Haz-3.2 and Haz-3.3 pertaining to emergency response and evacuation, which would further reduce the potential for impacts.

Therefore, implementation of CAP Update energy measures and actions would not substantially affect emergency response or evacuation plans. The impact would be less than significant with mitigation.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update Measure T-3 would result in construction of new or expanded pedestrian and bicycle improvements and electric vehicle charge stations, which could result in physical impacts. It is assumed that installation of electric vehicle charge stations would occur within exiting parking lots or parking garages, so that construction activities would be minimal, and no road closures would be required and no impact to emergency response or evacuation plans would occur.

Prior to construction activities, transportation infrastructure improvements with potential to disrupt traffic within County or state right-of-way would be required to obtain traffic control permits and develop traffic control plans in accordance with County requirements. Project plans would be reviewed by the County or other applicable transportation agencies to ensure that projects do not adversely impact emergency evacuation routes as designated in County emergency response and evacuation plans. Furthermore, transportation infrastructure projects would be required to comply with the applicable General Plan policies listed in Section 2.9.2, "Regulatory Framework," and 2011 GPU PEIR Mitigation Measures Haz-3.2 and Haz-3.3 pertaining to emergency response and evacuation. Therefore, overall impacts related to impairment of emergency response and evacuation plans from implementation of transportation infrastructure improvements would be similar to those identified in the 2011 GPU PEIR. Once operational, no roads would be closed or blocked; therefore, implementation of the CAP Update built environment and transportation measures and actions would not impair emergency response or evacuation plans. The impact would be less than significant with mitigation.

Summary

The measures and actions proposed in the CAP Update would have a limited potential to result in impacts related to impairing emergency response or evacuation plans. Where development would occur as a result of CAP Update implementation, adopted General Plan policies, including Policies S-1.2, M-1.2, M-3.3, and M-4.3, and 2011 GPU PEIR Mitigation Measures Haz-3.1, Haz-3.2, and Haz-3.3 would prevent impediments and conflicts with adopted emergency response and evacuation plans. Accordingly, implementation of the CAP Update measures and actions would not result in new impacts or a substantial increase in the magnitude of existing impacts related to emergency response and evacuation plans compared to the 2011 GPU PEIR. Therefore, impacts related to emergency response and evacuation plans associated with implementation of the solid waste, water and wastewater, agriculture and conservation, energy and built

environment and transportation measures and actions in the CAP Update would remain **less than significant with mitigation,** consistent with the conclusions in the 2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.9.3.6 Issue 4: Expose People or Structures to Wildland Fire Hazards

This analysis describes the potential for implementation of the CAP Update to result in impacts related to wildland fires.

Guidelines for Determination of Significance

The *County of San Diego Guidelines for Determining Significance: Wildland Fire and Fire Protection* (County of San Diego 2022), which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, provides guidance for addressing the following significance criteria listed in Appendix G of the State CEQA Guidelines:

- The project would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to wildland fires with the adoption of the goals and policies contained within the General Plan and the development anticipated throughout the planning horizon. Implementation of the General Plan would result in land uses that allow residential, commercial, and industrial development in areas that are prone to wildland fires. The 2011 GPU PEIR determined that anticipated development under the General Plan would result in potentially significant impacts related to wildland fires. The 2011 GPU PEIR determined that the impacts could be reduced through a combination of the following:

- Complying with a combination of federal, state, and local regulations and permits and existing County regulatory processes related to wildland fire hazards (e.g., County Vegetation and Other Flammable Materials Ordinance, County Removal of Fire Hazards Regulatory Ordinance, County Consolidated Fire Code).
- Implementing General Plan goals and policies related to wildland fire hazards, including LU-6.11, LU-10.2, S-3.1, S-3.2, S-3.3, S-3.4, S-3.6, and S-4.1. Note that the General Plan Safety Element was recently updated in August 2021. The Safety Element policies referenced in the 2011 GPU PEIR are now generally identified as Policies S-4.1 (General Plan Policy S-3.1), S-4.2 (General Plan Policy S-3.2), S-4.3 (General Plan Policy S-3.3), S-4.4 (General Plan Policy S-3.4), S-4.6 (General Plan Policy S-3.6), and S-5.1 (General Plan Policy S-4.1).

- Implementing Mitigation Measures Haz-4.1, Haz-4.2, Haz-4.3, and Haz-4.4 identified in the 2011 GPU PEIR related to wildland fire hazards.

Although the General Plan policies and 2011 GPU PEIR mitigation measures would reduce the potential for impacts related to wildland fire hazards, the 2011 GPU PEIR determined that these policies and mitigation measures would not reduce the impacts to less than significant because the majority of the unincorporated county is located in a High or Very High FHSZ. The 2011 GPU PEIR determined that impacts would remain significant and unavoidable.

The discussion of impacts can be found in Section 2.7, "Hazards and Hazardous Materials," pages 2.7-45 through 2.7-48 of the 2011 GPU PEIR and is incorporated by reference. The full text of the specific policies related to wildland fire hazards is provided above in Section 2.9.2, "Regulatory Framework," while the full text of applicable 2011 GPU PEIR mitigation measures is provided below in Section 2.9.5, "Mitigation Measures."

CAP Update Impact Analysis

The following discussion describes the potential for implementation of the proposed CAP Update measures and actions to result in effects related to wildland fires.

Solid Waste Measures and Actions

Implementation of CAP Update solid waste measures and actions would increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Implementation of Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b could result in potential construction of new or expanded solid waste facilities in the unincorporated county. Specific locations for these facilities have not been identified. The unincorporated county contains many wildland-urban interface (WUI) areas, which are areas where development is located close to lands prone to brush fires, and majority of the unincorporated county is in areas classified as a High or Very High FHSZ or State Responsibility Area, which means these areas are at higher risk of adverse effects from wildfire events. If the new or expanded solid waste solid waste facilities are to be constructed in areas adjacent to or within a High or Very High FHSZ, they would have the potential to expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

New or expanded solid waste facilities would be required to conform with the currently adopted General Plan policies related to wildfire protection, including but not limited to: Policy LU-6.11 to direct development away from hazardous wildfire areas; Policy LU-6.10 to protect property and residents from natural and human-induced hazards; Policy S-4.1 to locate, site, design, and construction new development to enhance defensibility and to minimize the risk of structural loss and life safety resulting from wildfire; Policy S-4.2 to require development located on ridgelines, top of slopes, saddles or other topographic areas to be sited and designed to account for topography in wildland areas that pose a greater fire risk; Policy S-4.3 to site and design new developments to minimize the likelihood of a wildfire spreading to structures; Policy S-4.4 to locate new developments to where fire and emergency services are available; Policy S-4.6 to implement measures

to mitigate wildfire risks to structures and humans; and Policy S-4.7 to require new development to meet current ignition resistance construction codes. Complying with these adopted General Plan policies would minimize wildfire risk from new or expanded solid waste facilities.

In addition, new or expanded solid waste facilities would be required to implement 2011 GPU PEIR Mitigation Measures Haz-4.1 through Haz-4.4 to reduce impacts from wildland fires. These mitigation measures require development to be located away from fire hazard areas, conducting vegetation management, enforcing the Building and Fire Codes, and creating a program that facilitates conservation-oriented, fire-safe, project design. Furthermore, 2011 GPU PEIR Mitigation Measure Pub-1.5 requires discretionary project applications to include commitments from available fire protection districts, Mitigation Measure Pub-1.6 identifies fire-prone areas and ensures development proposals meet the requirements set forth by the applicable fire jurisdiction, and Mitigation Measure Pub-1.7 implements the Building and Fire Code to ensure there are adequate fire protection in place. Compliance with the adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that implementation of CAP Update solid waste measures and actions would not expose people or structures to significant risks of loss, injury, or death involving wildland fires. The impact would be less than significant with mitigation.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Implementation of these measures would generally result in the installation of water efficient appliances, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. Implementation of these measures would not result in new population growth or construction of new structures; therefore, implementation of CAP Update water and wastewater measures and actions would not expose people or structures to significant risks of loss, injury, or death involving wildland fires. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. No new population growth would occur as a result of these measures and actions, and it is assumed that construction of new structures would not be required for managing and preserving conservation, natural, and agricultural lands, promoting carbon framing, or protecting and planting trees.

However, implementation of Action A-4.1.b could result in the identification of opportunities to increase farmworker housing in the unincorporated county. As discussed above, the unincorporated county contains WUI areas and Very High FHSZs. Construction of new farmworker housing in WUI areas or a Very High FHSZ would have the potential to expose people and structures to significant risks involving a wildland fire. However, future farmworker housing development that occurs as a result of evaluations conducted through the CAP Update would be required to conform to the currently adopted General Plan policies related to wildfire protection, including Policy LU-6.11 to direct development away from hazardous wildfire areas; Policy S-4.1 to locate, site, design, and construct new development to enhance defensibility and to minimize the risk of structural loss and life safety resulting from wildfire; Policy S-4.2 to require new development located on ridgelines, top of slopes, saddles or other topographic areas to be sited and designed to account for topography areas that pose a greater fire risk; Policy S-4.3 to site and design new developments to minimize the likelihood of a wildfire spreading to structures; Policy S-4.4 to locate new developments to where fire and emergency services are available; Policy S-4.6 to implement measures to mitigate wildfire risks to structures and humans; and Policy S-4.7 to require new development to meet current ignition resistance construction codes. Compliance with these adopted policies would limit wildfire risks associated with the construction of new farmworker housing in areas prone to wildfire.

In addition, future farmworker housing development would implement applicable 2011 GPU PEIR mitigation measures to ensure that fire services and fire protection are in place for new development, including Mitigation Measure Pub-1.5, which requires discretionary project applications to include commitments from available fire protection districts; Mitigation Measure Pub-1.6, which requires the identification of fire prone areas during the review of development projects and that development proposals meet the requirements set forth by the applicable fire jurisdiction; and Mitigation Measure Pub-1.7, which requires implementation of the Building and Fire Codes and that there are adequate fire protection services in place. In addition, Mitigation Measures Haz-4.1 through Haz-4.4 would further reduce impacts by requiring development to be located away from fire hazard areas, conducting vegetation management, enforcing the Building and Fire Codes, and creating a program that facilitates conservation-oriented, fire-safe, project design. Compliance with the adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that future farmworker housing development would not expose people or structures to significant risks of loss, injury, or death involving wildland fires. The impact would be less than significant with mitigation.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions (e.g., Measure E-3, Action E-3.2, and Action E-3.3) would involve implementation of policies, programs, and mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs have the potential to result in development of various renewable energy projects in the unincorporated county, such as new small-scale PV solar arrays and wind turbine projects and large-scale PV solar, concentrated solar, and

wind turbines. Specific locations for the potential renewable energy system projects are unknown, but they could be located in WUI areas or Very High FHSZs. Impacts related to the exposure of people or structures to wildland fires would be potentially significant if potential renewable energy development are located in a WUI area or Very High FHSZ.

In accordance with the County's Zoning Ordinance, small-scale PV solar systems (under 500 square feet) and up to three small wind turbines are permitted without a discretionary permit if specific zoning criteria are met in accordance with the ordinance. Even though there is a lack of discretionary oversight for small-scale renewable energy projects, all projects would be required to comply with federal, state, and local regulations to minimize or prevent wildfire. The small-scale renewable energy projects would also be required to implement the currently adopted General Plan policies listed in Section 2.9.2, "Regulatory Framework," including Policy LU-6.11 to direct development away from hazardous wildfire areas; Policy S-4.1 to locate, site, design, and construct new development to enhance defensibility and to minimize the risk of structural loss and life safety resulting from wildfire; Policy S-4.2 to require new development located on ridgelines, top of slopes, saddles or other topographic areas to be sited and designed to account for topography areas that pose a greater fire risk; Policy S-4.3 to site and design new developments to minimize the likelihood of a wildfire spreading to structures; Policy S-4.4 to locate new developments to where fire and emergency services are available; Policy S-4.6 to implement measures to mitigate wildfire risks to structures and humans; and Policy S-4.7 to require new development to meet current ignition resistance construction codes.

Furthermore, implementation of 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7, which would require compliance with the Building and Fire Code to ensure there are adequate fire service levels and would require site designs to incorporate features that reduce fire hazards, and Mitigation Measure Pub-1.6, which requires compliance with applicable requirements from the local fire authority, would reduce impacts related to wildland fires. In addition, Mitigation Measures Haz-4.1, Haz-4.2, and Haz-4.4 would further reduce impacts by locating development away from fire hazard areas, conducting vegetation management, and creating a program that facilitates conservation-oriented, fire-safe, project design. Compliance with the adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that future small-scale renewable energy projects would not expose people or structures to significant risks of loss, injury, or death involving wildland fires.

Implementation of CAP Update Action E-3.3 could result in development of large-scale renewable energy projects, such as large-scale PV solar or concentrated solar, and wind turbines. Large-scale renewable energy infrastructure would generally be constructed in primarily undeveloped locations that are productive for generating renewable energy. While specific locations for projects have not been identified, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Due to the majority of the unincorporated county is located in WUI areas or Very High FHSZ, it is likely that future large-scale renewable

energy projects would be located in these high fire risk areas, which could expose people or structures to significant risks of loss, injury, or death involving wildland fires.

However, future large-scale renewable energy projects would be subject to discretionary review and would be evaluated for project-specific impacts under CEQA at the time of application. Project-specific mitigation would be required to reduce and minimize impacts related to wildland fires to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. In addition, future large-scale renewable energy projects would be required to comply with the currently adopted General Plan policies related to fire protection, including Policy S-4.1 which requires development to be located, designed, and constructed to provide adequate defensibility, Policy S-4.2 which requires development located near areas where the terrain or topography affects its susceptibility to wildfires to include design features to reduce the increased risk from fire, Policy S-4.3 which minimizes flammable vegetation around the development, Policy S-4.4 which requires development to locate in areas with available or planned fire and emergency services, Policy S-4.6 which requires development of a fire protection plan if a project is located in a fire hazard area, Policy S-4.7 which require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes, Policy S-5.1 which requires fuel management within established defensible space boundaries, and Policy COS-18.3 to requires alternative energy system operations to design and maintain the systems to minimize adverse impacts to the environment.

In addition, implementation of 2011 GPU PEIR Mitigation Measures Haz-4.1 through Haz-4.4 would further reduce impacts by locating development away from fire hazard areas, conducting vegetation management, enforcing the Building and Fire Codes, and creating a program that facilitates conservation-oriented, fire-safe, project design; Mitigation Measure Pub-1.5 would ensure that discretionary projects include commitments from available fire protection district; Mitigation Measure Pub-1.6 would ensure compliance with applicable requirements from local fire authority; and Mitigation Measure Pub-1.7 would ensure that the Building and Fire Codes are implemented to provide adequate fire protection. Compliance with the adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the potential impacts related to exposing people or structures to significant risks of loss, injury, or death involving wildland fires. However, construction and operation of large-scale renewable energy projects would have the potential to introduce people and structures into areas highly susceptible to wildland fires. Therefore, construction and operation of large-scale renewable energy projects in these areas would have the potential to expose people or structures to significant risks involving wildland fires. The impacts would remain significant, consistent with the 2021 GPU PEIR.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update Measure T-3 could result in future infrastructure development that would result in impacts related to wildland fires in the unincorporated county. More specifically, implementation of CAP Update would result in new or expanded pedestrian and bicycle improvements, electric vehicle charging stations, and other measures and actions to promote sustainable transportation options. Development of pedestrian and bicycle improvements would occur on existing roadways, and electric

vehicle charging stations would be installed in existing parking lots and garages. Implementation of the proposed transportation infrastructures projects would be connected to existing roadways and located within existing facilities. Future projects consistent with these measures would not involve the construction of new structures intended for human occupancy. As such, the construction of these projects would not result in impacts related to exposing people or structures to significant risks of loss, injury, or death involving wildland fires. The impact would be less than significant.

Summary

Federal, state, and local regulations exist to minimize or prevent wildfire, and implementation of the adopted General Plan policies listed in Section 2.9.2, "Regulatory Framework," would aid in the efforts to prevent wildfire in the county by managing vegetation, preparing for the threat of wildfire based upon location and weather conditions, and ensuring development occurs in areas with adequate fire services. Implementation of 2011 GPU PEIR Mitigation Measures Haz-4.1 through Haz-4.4, Pub-1.5, Pub-1.6, and Pub-1.7 would require locating development away from fire hazard areas, compliance with the Building and Fire Codes, site design to incorporate features to reduce fire hazards, and that there are adequate fire service levels available to serve potential development. However, development of large-scale renewable energy projects would have the potential to introduce people and structures to areas highly susceptible to wildland fires. The impacts related to exposing people or structures to significant risks of loss, injury, or death involving wildland fires would be remain **significant with mitigation** incorporated, consistent with the 2011 GPU PEIR. Therefore, implementation of the CAP Update **would not result in a new or more significant impact** than identified in the 2011 GPU PEIR.

2.9.3.7 Issue 5: Expose Humans to Vectors

This analysis describes the potential for implementation of the CAP Update to result in impacts related to vectors.

Guidelines for Determination of Significance

Based on the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Vectors* (County of San Diego 2009), which is reflective of the guidelines that were utilized in the 2011 GPU PEIR, a project would have a significant impact related to vectors if:

- The project proposes a BMP for stormwater management or construction of a wetland, pond or other wet basin that could create sources of standing water for more than 72 hours, and as a result, could substantially increase human exposure to vectors, such as mosquitoes, that are capable of transmitting significant public health diseases or creating nuisances;

- The project proposes a use that involves the production, use and/or storage of manure or proposes a composting operation or facility and as a result, could

substantially increase human exposure to vectors that are capable of transmitting significant public health diseases or creating nuisances; or

- The project would result in a substantial increase in the number of residents located within one-quarter mile of a significant offsite vector breeding source; including but not limited to, standing water (e.g., agricultural ponds, reservoirs) and sources of manure generation or management activities (e.g., confined animal facilities, horse keeping operations, composting operations).

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to vectors with the adoption of the goals and policies contained within the General Plan and the development anticipated through the planning horizon. The 2011 GPU PEIR determined that implementation of the General Plan would allow for the creation of sources of standing water that would persist for more than 72 hours, which could substantially increase human exposure to vectors, such as mosquitoes, that are capable of transmitting potentially significant public health diseases or creating nuisances. Additionally, the General Plan would encourage agricultural operations that involve the production, use, and/or storage of manure or a composting operation. The 2011 GPU PEIR determined that anticipated development under the General Plan would result in potentially significant impacts related to vectors.

The 2011 GPU PEIR concluded that impacts related to vectors would be reduced to less than significant with implementation of the General Plan policies and compliance with applicable regulations and processes such as the Center for Disease Control Division of Vector-Borne Infectious Diseases' requirements, which implements programs to prevent hazards from vectors, and H&SC Sections 116110–116112, which establish mosquito abatement and vector control districts, as well as the County Department of Environmental Health and Quality's Vector Surveillance Program. The discussion of impacts can be found in Section 2.7, "Hazards and Hazardous Materials" (pages 2.7-48 and 2.7-49), of the 2011 GPU PEIR and is hereby incorporated by reference.

CAP Update Impact Analysis

Solid Waste Measures and Actions

Implementation of CAP Update Measures SW-1 through SW-4 and associated implementing actions have the potential to result in the construction of new or expanded solid waste facilities, including new composting/anaerobic digestion facilities and on-farm digesters. These facilities could be located in rural areas or in proximity to developed communities and could result in new vector breeding sources. If the new vector breeding source is located near a substantial human population, a potentially adverse environmental effect could occur.

New or expanded solid waste facilities, including composting facilities, would be required to comply with federal, state, and local regulations and programs that aid in the prevention

of new vector breeding sources, as well as provide vector control as needed. This includes compliance with the Center for Disease Control Division of Vector-Borne Infectious Diseases' requirements and H&SC Sections 116110–116112, which are both described above. Additionally, the County Department of Environmental Health and Quality reviews project development plans for adequate vector control when projects have the potential to create new vector breeding sources. Therefore, compliance with existing regulations and processes associated with vector control would reduce the potential for new or expanded solid waste facilities to create new vector breeding sources. The impact would be less than significant.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Implementation of CAP Update Measures W-1 and W-2 would have the potential to result in installation of water efficient appliance, smart irrigation system, and stormwater and greywater capture systems. Implementation of CAP Update Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. Water efficient appliances, irrigation systems, and stormwater and wastewater treatment systems would generally be installed indoors. While these systems would generally be installed indoors, it is anticipated that stormwater and greywater capture systems would be installed outside and would likely hold standing water for more than 72 hours. As such, these facilities could result in new vector breeding sources. However, any new water and wastewater measures and actions that would have the potential to introduce new vector breeding sources would be subject to the same federal, state, and local regulations and processes described above, including Center for Disease Control Division of Vector-Borne Infectious Diseases' requirements, H&SC Sections 116110–116112, and County Department of Environmental Health and Quality requirements. Therefore, compliance with existing regulations and processes associated with vector control would reduce the potential for implementation of water and wastewater measures and actions to create new vector breeding sources. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and incentivizing carbon farming. The acquisition of conservation lands, preserving natural and agricultural lands, planting and protecting trees, and implementing carbon farming would not create new vector breeding sources. However, Action A-4.1.c would incentivize voluntary alternative manure management (e.g., compost bedded barn, solid separation) projects, which could create conditions that are conducive to vector breeding. The introduction of composting would result in similar vector impacts as those discussed in the 2011 GPU PEIR, which identified agricultural operations that involve the production, use, and/or storage of manure or a composting operation as a potential vector breeding source (2011 GPU PEIR page 2.7-48). Similar to what was described in the

2011 GPU PEIR, composting operations would be subject to the same federal, state, and local regulations and processes described above, including Center for Disease Control Division of Vector-Borne Infectious Diseases' requirements, H&SC Sections 116110–116112, and County Department of Environmental Health and Quality requirements. Therefore, compliance with existing regulations and processes associated with vector control would reduce the potential for implementation of water and wastewater measures and actions to create new vector breeding sources. The impact would be less than significant.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities, and the project could include rooftop or ground-mounted solar arrays or small wind turbines, modern mechanical systems, and other similar improvements. Specifically, Actions E-3.2 and E-3.3 would include the construction of new infrastructure to promote renewable energy use and electrification. Requirements for new development would include retrofitting and improving existing buildings to meet energy efficiency requirements and installing new energy infrastructure, including small- and large-scale solar and battery storage systems and small- and large-scale wind turbines (roof- or ground-mounted systems).

The implementation of these measures and actions would not include any components that would create sources of standing water for more than 72 hours, involve the production, use, and/or storage of manure or proposes a composting operation or facility, or result in a substantial increase in the number of residents located within one-quarter mile of a significant offsite vector breeding source. Therefore, implementation of the energy measures and actions of the CAP Update would not create new vector breeding sources. The impact would be less than significant.

Built Environment and Transportation Measures and Actions

The CAP Update includes measures and actions to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Actions T-4.1, T-4.1.a, T-4.2, T-5.1, and T-6.2.a would result in programs to reduce emissions from County employee commutes; improvements to pedestrian, bicycle and transit networks; programs to encourage active modes of transportation and reduce single occupancy vehicle trips; and the incorporation of Transportation Demand Management strategies. Because of the nature of such improvements (i.e., limited size and within existing transportation corridors), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. These improvements are not expected to occur on undeveloped land. As such, implementation of these measures and actions would not result in new impervious surfaces that could create new sources of standing water for more than 72 hours and potentially increase human exposure to vectors. Therefore, implementation of the built environment and transportation measures and actions of the

CAP Update would not create new vector breeding sources. The impact would be less than significant.

Summary

Compliance with existing federal, state, and local regulations and processes related to vector control would ensure that implementation of the CAP Update would not result in new or substantial increase in magnitude of impacts related to vectors compared to the 2011 GPU PEIR. Therefore, impacts related to vectors associated with implementation of the solid waste, water and wastewater, agriculture and conservation, energy and built environment and transportation measures and actions in the CAP Update would remain **less than significant**, consistent with the conclusions in the 2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.9.3.8 Cumulative Impact Analysis

The cumulative impact analysis study area for hazards and hazardous materials in the 2011 GPU PEIR was identified as the unincorporated county and immediately surrounding areas (as described on pages 2.7-49 and 2.7-50 of the 2011 GPU PEIR). This analysis uses the same scope identified in the 2011 GPU PEIR. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Transport, Use, Disposal, or Accidental Release of Hazardous Materials; Proximity to Schools; and Sites Containing Hazardous Materials

Cumulative development includes facilities that involve the use, storage, disposal or transport hazardous materials, and potentially increase hazards to the public or the environment. For example, the general plans of surrounding jurisdictions contain industrial land use designations that allow businesses to handle large quantities of hazardous materials. Additionally, the transportation of hazardous materials would increase in the region as a result of an expanded and improved highway system, as proposed in the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy and San Diego Association of Governments (SANDAG) 2021 Regional Plan (combination of Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan).

The 2011 GPU PEIR concluded that cumulative impacts related to hazardous materials and sites would not be significant with compliance with applicable federal, state, and local regulations, including CAA Chemical Accident Prevention Provision, RCRA, CERCLA, Hazardous Materials Transportation Act, Robert T. Stafford Disaster Relief and Emergency Assistance Act, the California H&SC, CFC, Title 22, CCR Titles 23 and 27, Aboveground Petroleum Storage Act, CalARP, Emergency Response to Hazardous Materials Incidents, the California Emergency Services Act, and the County Consolidated Fire Code. Cumulative projects in Mexico would not be subject to these regulations;

however, any transportation of hazardous materials from Mexico into the United States would be required to comply with the above-mentioned regulations.

Implementation of the CAP Update measures and actions would have the potential to result in construction of new or expanded solid waste, renewable energy, and transportation facilities in the unincorporated county. As discussed in Section 2.9.3.3, "Issue 1: Create a Hazard from Transport, Use, Disposal, or Accidental Release of Hazardous Materials; Proximity to Schools; and Being Located on Sites Containing Hazardous Materials," new facilities would be required to comply with the applicable federal, state, and local regulations above, as well as implement General Plan Policies LU-16.1, LU-16.3, S-1.1, S-13.1, S-13.2, and S-13.3.

The 2011 GPU PEIR did not identify a cumulative impact related to hazardous materials. Similar to the conclusions of the 2011 GPU PEIR, the project would not result in a substantial incremental effect that would result in a new significant cumulative impact. The cumulative impact would be **less than significant**.

Issue 2: Public and Private Airports

Impacts would be cumulative in nature if the project in combination with cumulative development would contribute to a regional increase in airport hazards to the public or the environment. The 2011 GPU PEIR concluded that because cumulative projects would result in less than significant cumulative impacts related to airport hazards with compliance with the federal, state, and local regulations related to airport safety, implementation of the General Plan would not contribute to a potentially significant cumulative impact.

Implementation of the CAP Update would include components that could create safety hazards to air navigation. Specifically, the construction of new or expanded solid waste facilities, new farmworker housing, and renewable energy projects could result in potential airport-related safety hazards. However, as discussed in Section 2.9.3.4, "Issue 2: Result in Safety Hazards or Excessive Noise from Public and Private Airports," 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 reduce potential impacts to less than significant.

Similar to the conclusions of the 2011 GPU PEIR, the project would not result in a substantial incremental effect that would result in a new significant cumulative impact. This cumulative impact would be **less than significant**.

Issue 3: Emergency Response and Evacuation Plans

Impacts would be cumulative in nature if the project in combination with cumulative development would contribute to a regional impairment of emergency response or evacuation plans. The 2011 GPU PEIR determined that cumulative projects 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. Therefore, due to existing regulations, cumulative projects would not result in a significant cumulative impact.

The 2011 GPU PEIR concluded that because cumulative projects would result in less than significant cumulative impacts, and compliance with existing regulations and implementation of General Plan policies and 2011 GPU PEIR mitigation measures would reduce impacts of the General Plan to less than significant, the General Plan in combination with other cumulative projects would not contribute to a significant cumulative impact.

Implementation of the CAP Update measures would include components that could potentially impair emergency response and evacuations plans. However, as discussed in Section 2.9.3.5, "Issue 3: Impair or Interfere with Emergency Response and Evacuation Plans," adopted General Plan policies, including Policies S-1.2, M-1.2, M-3.3, and M-4.3, and 2011 GPU PEIR Mitigation Measures Haz-3.1, Haz-3.2, and Haz-3.3 would prevent impediments and conflicts with adopted emergency response and evacuation plans and would reduce potential impacts to less than significant.

Similar to the conclusions of the 2011 GPU PEIR, the project would not result in a substantial incremental effect that would result in a new significant cumulative impact. This cumulative impact would be **less than significant**.

Issue 4: Wildland Fires

As noted above, the majority of the unincorporated county is in WUI areas or a High and Very High FHSZ. Given the amount of high fire hazard zones in the unincorporated county, and consistent with the conclusion of the GPU PEIR, a significant cumulative impact related to exposing people or structures to significant risks of loss, injury, or death involving wildland fires in the unincorporated county and immediate surrounding areas. The General Plan establishes land uses that allow residential, commercial, and industrial development in areas that are prone to wildland fires. Implementation of the General Plan results in a potentially significant impact from the exposure of people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands. Therefore, the 2011 GPU PEIR concluded that the General Plan's contribution to this significant cumulative impact would be cumulatively considerable.

Implementation of the CAP Update measures and actions would result in future development that could expose people or structures to significant risks of loss, injury, or death involving wildland fires. However, as discussed in Section 2.9.3.6, "Issue 4: Expose People or Structures to Wildland Fire Hazards," adopted General Plan policies and 2011 GPU PEIR mitigation measures, including 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 Mitigation Measures Haz-4.1 through Haz-4.4 and Pub-1.5 through Pub-1.7, would reduce the potential impacts but not to a less-than-significant level.

Because there is a significant cumulative impact related to wildland fires may result from cumulative development within the unincorporated county and immediately surrounding areas, and the potential exists for future projects associated with the CAP Update to increase the risk of exposing people or structures to significant risks of loss, injury, or

death involving wildland fires, the project would contribute the existing cumulative impact. Therefore, the project would result in a considerable contribution to a significant impact related to wildland fires. However, this impact would be consistent with the conclusion of the GPU PEIR and the project would not result in a substantial incremental effect that would result in a new significant cumulative impact. The cumulative impact would remain **significant and unavoidable**.

Issue 5: Vectors

Cumulative projects, such as surrounding jurisdiction's general plans, would potentially contribute to vector breeding sources. Cumulative projects that incorporate environmental measures such as conserving wetlands or encouraging agricultural operations would inadvertently increase vector breeding sources. However, these projects would be required to follow would be subject to the same federal, state, and local regulations and processes described above, including Center for Disease Control Division of Vector-Borne Infectious Diseases' requirements, H&SC Sections 116110–116112, and County Department of Environmental Health and Quality requirements discussed above. Cumulative projects in Mexico would not be subject to these regulations; however, cumulative projects in Mexico would be unlikely to contribute to a cumulative impact because of the limited area of exposure. Therefore, the 2011 GPU PEIR concluded that cumulative project compliance with established requirements would reduce potential cumulative impacts to below a level of significance. A significant cumulative impact with respect to vectors would not occur.

Implementation of the CAP Update measures would include components that could create new vector breeding sources, including new or expanded composting/anaerobic digestion facilities and new stormwater and greywater capture systems. However, as discussed in Section 2.9.3.7, "Issue 5: Expose Humans to Vectors," compliance with existing federal, state, and local regulations and processes related to vector control would ensure that implementation of the CAP Update would result in less than significant vector impacts. Similar to the conclusions of the 2011 GPU PEIR, the project would not result in a substantial incremental effect that would result in a new significant cumulative impact. This cumulative impact would be **less than significant**.

2.9.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would not result in potentially significant impacts related to hazardous materials and sites, airport hazards, emergency response and evacuation plans, wildland fires, or vectors.

2.9.5 Mitigation Measures

2.9.5.1 Issue 1: Transport, Use, Disposal, or Accidental Release of Hazardous Materials; Proximity to Schools; and Sites Containing Hazardous Materials

Project level and contributions to cumulative impacts were determined to be less than significant; therefore, no mitigation measures are required.

2.9.5.2 Issue 2: Public and Private Airports

The mitigation measures applicable to public and private airports that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Haz-1.1: Implement the Guidelines for Determining Significance, Airport Hazards, when reviewing new development projects to ensure compatibility with surrounding airports and land uses and apply appropriate mitigation when impacts are significant.
>
> Adopted Mitigation Measure Haz-1.3: Review the AICUZ when reviewing new development projects within the study area. Ensure that such development projects are consistent with the land use compatibility and safety policies therein.
>
> Adopted Mitigation Measure Haz-1.5: Coordinate with the San Diego County Regional Airport Authority (SDCRAA) and County Airports for issues related to airport planning and operations.

2.9.5.3 Issue 3: Emergency Response and Evacuation Plans

The mitigation measures applicable to emergency response and evacuation plans that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Haz-3.1: Facilitate coordination between DPLU (now PDS) and the Office of Emergency services to implement and periodically update the Hazard Mitigation Plan.
>
> Adopted Mitigation Measure Haz-3.2: Implement the CEQA Guidelines for Determining Significance to ensure that discretionary projects do not adversely impact emergency response or evacuation plans. Also implement the County Public Road Standards and County Private Road Standards during these reviews and ensure that road improvements are consistent with Emergency Response and Evacuation Plans. Apply appropriate mitigation when impacts are significant.
>
> Adopted Mitigation Measure Haz-3.3: Prepare Fire Access Road network plans and include in Community Plans or other document as appropriate. Also implement

the County Fire Code and require fire apparatus access roads and secondary access for projects.

2.9.5.4 Issue 4: Wildland Fires

The mitigation measures applicable to wildland fires impacts that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

Adopted Mitigation Measure Haz-4.1: Identify and minimize potential fire hazards for future development by using and maintaining a database that identifies fire prone areas, locating development away from Fire Hazard areas whenever practicable, and adhering to the County Guidelines for Determining Significance for Wildland Fires & Fire Protection and applying appropriate mitigation when impacts are significant.

Adopted Mitigation Measure Haz-4.2: Conduct effective and environmentally sensitive brush management measures such as: addressing habitat-specific fire controls within Resource Management Plans; implementation of the Weed Abatement Ordinance and enforcing proper techniques for maintaining defensible space around structures; coordination with the local FAHJ to ensure that district goals for fuel management and fire protection are being met; and recognizing the Memorandum of Understanding between the wildlife agencies and fire authorities that guides the abatement of flammable vegetation without violating environmental regulations for habitat protection.

Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.

Adopted Mitigation Measure Haz-4.4: Create a Conservation Subdivision Program that facilitates conservation-oriented, fire-safe, project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary.

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are

required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

2.9.5.5 Issue 5: Vectors

Project level impacts and contributions to cumulative impacts were determined to be less than significant; therefore, no mitigation measures are required.

2.9.6 Significance Conclusions

2.9.6.1 Issue 1: Transport, Use, Disposal, or Accidental Release of Hazardous Materials; Proximity to Schools; and Sites Containing Hazardous Materials

With implementation of adopted General Plan policies and compliance with existing federal, state, and local regulations related to hazardous materials, implementation of the CAP Update would result in project and cumulative impacts associated with the transport, use, and disposal of hazardous materials, accidental release of hazardous materials, use of hazardous materials in proximity to schools, and contaminated sites. Therefore, impacts from implementation of the CAP Update would remain **less than significant** and **would not result in a considerable contribution** such that a new significant cumulative impact would occur. Implementation of the CAP Update **would not result in a new significant impact** not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

2.9.6.2 Issue 2: Public and Private Airports

The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although there is a potential for some types of projects to result in airport-related safety hazards, compliance with existing federal, state, and local regulations related to airports and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that project-level and cumulative impacts associated with potential airport hazards would remain **less than significant with mitigation** and **would not result in a considerable contribution** such that a new significant cumulative impact would occur. Implementation of the CAP Update **would not result in a new significant impact** not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

2.9.6.3 Issue 3: Emergency Response and Evacuation Plans

The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although there is a potential for some types of

projects to impair emergency response and evacuation plans, implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that project-level and cumulative impacts associated with impairing implementation of emergency response and evacuation plans would remain **less than significant with mitigation** and **would not result in a considerable contribution** such that a new significant cumulative impact would occur. Implementation of the CAP Update **would not result in a new significant impact** not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

2.9.6.4 Issue 4: Wildland Fires

The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county, including areas susceptible to wildland fires. Compliance with existing regulations related to wildfire protection and implementation of adopted General Plan policies and 2011 GPU PEIR Mitigation Measures Haz-4.1 through Haz-4.4 and Pub-1.5 through Pub-1.7 would reduce the project-level and cumulative impacts but not to a less-than-significant level. Therefore, impacts associated with exposing people or structures to significant risks of loss, injury, or death involving wildland fires would be **significant and unavoidable** and **would result in a considerable contribution** to an existing significant cumulative impact. This impact would be consistent with the conclusion of the 2011 GPU PEIR. Therefore, implementation of the CAP Update **would not result in a new significant impact** not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

2.9.6.5 Issue 5: Vectors

The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although there is a potential for some types of projects to create new vector breeding sources, compliance with existing federal, state, and local regulations related to vector control and implementation of adopted General Plan policies would ensure that project and cumulative impacts associated with vectors would remain **less than significant** and **would not result in a considerable contribution** such that a new significant cumulative impact would occur. Implementation of the CAP Update **would not result in a new significant impact** not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Table 2.9-2 Maximum Residential Density

Current Setting	Safety Compatibility Zones [a]					
	(1) Runaway Protection Zone	(2) Inner Approach/ Departure Zone	(3) Inner Turning Zone	(4) Outer Approach/ Departure Zone	(5) Sideline Zone	(6) Traffic Pattern Zone
	Average number of dwelling units (du) per gross acre					
Rural Farmland/ Open Space (Minimal Development)	0	Maintain current zoning if less than density Criteria for rural / suburban setting				No limit
Rural/Suburban (Mostly to Partially Undeveloped)	0	1 du per 10 – 20 ac.	1 du per 2 – 5 ac.	1 du per 2 – 5 ac.	1 du per 1 – 2 ac.	No limit
Urban (Heavily Developed)	0	0	Allow infill at up to average of surrounding residential area [b]			No limit

Notes:

[a] Clustering to preserve open land encouraged in all zones.

[b] See Chapter 3 of the California Airport Land Use Planning Handbook (January 2002) for discussion of infill development criteria; infill is appropriate only if nonresidential uses are not feasible.

Source: Caltrans 2011.

Table 2.9-3 Maximum Non-Residential Intensity

Current Setting	Safety Compatibility Zones					
	(1) Runaway Protection Zone	(2) Inner Approach/ Departure Zone	(3) Inner Turning Zone	(4) Outer Approach/ Departure Zone	(5) Sideline Zone	(6) Traffic Pattern Zone
	Average number of people per gross acre [a]					
Rural Farmland/Open Space (Minimal Development)	0[b]	10–25	60–80	60–80	80–100	150
Rural/Suburban (Mostly to Partially Undeveloped)	0[b]	25–40	60–80	60–80	80–100	150
Urban (Heavily Developed)	0[b]	40–60	80–100	80–100	100–150	No limit [c]
Multipliers for above numbers [d]						
Maximum Number of People per Single Acre	x 1.0	x 2.0	x 2.0	x 3.0	x 2.0	x 3.0
Bonus for Special Risk-Reduction Bldg. Design	x 1.0	x 1.5	x 2.0	x 2.0	x 2.0	x 2.0

Notes:

[a] Also see Table 2.9-4 for guidelines regarding uses that should be prohibited regardless of usage intensity.

[b] Exceptions may be permitted for agricultural activities, roads, and automobile parking provided that FAA criteria are satisfied.

[c] Large stadiums and similar uses should be prohibited.

[d] Multipliers are cumulative (e.g., maximum intensity per single acre in inner safety is 2.0 times the average intensity for the site, but with risk-reduction building design is 2.0 x 1.5 = 3.0 times the average intensity).

Source: Caltrans 2011.

Table 2.9-4 Safety Compatibility Zones – Prohibited Uses

Safety Compatibility Zone	Prohibited Uses
Zone 1 Runway Protection Zone	• Prohibit all new structures • Prohibit residential land uses • Avoid nonresidential uses except if very low intensity in character and confined to the sides and outer end of the area
Zone Inner Approach/ Departure Zone	• Prohibit residential uses except on large, agricultural parcels • Limit nonresidential uses to activities which attract few people (uses such as shopping centers, most eating establishments, theaters, meeting halls, multi-story office buildings, and labor-intensive manufacturing plants unacceptable) • Prohibit children's schools, day care centers, hospitals, nursing homes • Prohibit hazardous uses (e.g., aboveground bulk fuel storage)
Zone 3 Inner Turning Zone	• Limit residential uses to very low densities (if not deemed unacceptable because of noise) • Avoid nonresidential uses having moderate or higher usage intensities (e.g., major shopping centers, fast food restaurants, theaters, meeting halls, buildings with more than three aboveground habitable floors are generally unacceptable) • Prohibit children's schools, large day care centers, hospitals, nursing homes • Avoid hazardous uses (e.g., aboveground bulk fuel storage)
Zone 4 Outer Approach/ Departure Zone	• In undeveloped areas, limit residential uses to very low densities (if not deemed unacceptable because of noise); if alternative uses are impractical, allow higher densities as infill in urban areas • Limit nonresidential uses as in Zone 3 • Prohibit children's schools, large day care centers, hospitals, nursing homes
Zone 5 Sideline Zone	• Avoid residential uses unless airport related (noise usually also a factor) • Allow all common aviation-related activities provided that height-limit criteria are met • Limit other nonresidential uses similarly to Zone 3, but with slightly higher usage intensities • Prohibit children's schools, large day care centers, hospitals, nursing homes
Zone 6 Traffic Pattern Zone	• Allow residential uses • Allow most nonresidential uses; prohibit outdoor stadiums and similar uses with very high intensities • Avoid children's schools, large day care centers, hospitals, nursing homes

Notes:

Definitions: As used in this table, the follow meanings are intended:

Allow: **Use is acceptable**

Limit: **Use is acceptable only if density/intensity restrictions are met**

Avoid: **Use generally should not be permitted unless no feasible alternative is available**

Prohibit: **Use should not be permitted under any circumstances**

Children's Schools: **Through grade 12**

Large Day Care Centers: **Commercial facilities as defined in accordance with state law; for the purposes here, family day care homes and noncommercial facilities ancillary to a place of business are generally allowed.**

Aboveground Bulk Storage of Fuel: **Tank size greater than 6,000 gallons (this suggested criterion is based on Uniform Fire Code criteria which are more stringent for larger tank sizes)**

[1] **The prohibitions are pursuant to the California Airport Land Use Planning Handbook, Chapter 9, pp. 9-44 and 9-45, Basic Safety Compatibility Qualities, Table 9B.**

Source: Caltrans 2011.

2.10 Hydrology and Water Quality

This section describes the existing conditions for hydrology and water quality, including groundwater resources, surface water resources, stormwater drainage systems, groundwater quality, surface water quality, and flooding and dam inundation areas within the county, and evaluates the potential for implementation of the CAP Update to result in impacts on these resources. Because this analysis is subsequent to the certified 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the existing setting and impact analysis for hydrology and water quality from the 2011 GPU PEIR as it applies to the CAP Update and supplements with updates to setting conditions since certification of the 2011 GPU PEIR.

Table 2.10-1 summarizes the impact conclusions reached in the 2011 GPU PEIR for hydrology and water quality and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. The evaluation of water quality-related impacts has been consolidated into one discussion because the physical changes resulting from implementation of the CAP Update measures and actions would result in a similar potential to affect both surface water and groundwater quality. Similarly, the evaluation of hydrology- and drainage-related impacts, including erosion or siltation, flooding and flood hazards, stormwater capacity, and seiche, tsunami, and mudflow hazards, have been consolidated into one discussion for the sake of brevity because the physical changes resulting from implementation of the CAP Update measures and actions would result in generally the same discussion for all issue areas. Accordingly, the issue topics in Table 2.10-1 are different than those in the 2011 GPU PEIR. As indicated in Table 2.10-1, implementation of the CAP Update would not result in a new or more severe impact on hydrology and water quality.

Table 2.10-1 Summary of Hydrology and Water Quality–Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			Potential New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Surface Water and Groundwater Quality	General Plan Only: Significant and Unavoidable	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Cumulatively Considerable Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			Potential New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
2	Groundwater Supply and Recharge	General Plan Only: Significant and Unavoidable	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Cumulatively Considerable Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
3	Surface Hydrology and Drainage	General Plan Only: Less than Significant with Mitigation	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Not Cumulatively Considerable	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

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

Source: Compiled by Ascent Environmental in 2023.

No comments related to water quality and hydrology were received by the County during the Notice of Preparation (NOP) scoping process. Copies of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

2.10.1 Existing Conditions

The 2011 GPU PEIR includes a discussion of existing conditions of the unincorporated county related to hydrology and water quality in Section 2.8, “Hydrology and Water Quality.” No substantial changes to the existing conditions for hydrology and water quality have been identified that would alter the conclusions or require a supplemental discussion of the existing conditions as described in the 2011 GPU PEIR. Therefore, the existing conditions in the 2011 GPU PEIR remain applicable and are herein incorporated by reference. A summary of the existing conditions, as described on pages 2.8-1 through 2.8-25 of the 2011 GPU PEIR, is provided below.

- The county overlies a complex groundwater resource consisting of various aquifer types that may experience shortages from large groundwater users.
- The county spans two hydrologic regions, which are further subdivided into 16 hydrologic units in unincorporated county, that contain various surface waters, including estuaries, lagoons, bays, lakes, reservoirs, rivers, and creeks.
- Most of the unincorporated county consists of rural land that does not support or require stormwater drainage facilities. However, urban areas primarily within the western part of the unincorporated county are supported by a stormwater conveyance system.

- Urbanization has contributed to increased pollutants and impervious surfaces in the watershed. Because the stormwater conveyance system is not connected with the sanitary sewer system, urban runoff is not treated before being discharged to surface waters.
- The San Diego Regional Water Quality Control Board (RWQCB) has adopted the San Diego Basin Water Quality Control Plan (San Diego Basin Plan), which designates beneficial uses for water bodies in the San Diego Region and establishes water quality objectives and implementation plans to protect those beneficial uses. Water quality contaminants within the unincorporated county include metals, nutrients (phosphorus and nitrogen), petroleum products (gasoline, diesel, oil, and grease), pathogens (bacteria and viruses), pesticides and herbicides, radioactive elements, sediments, and total dissolved solids.
- The potential for flooding is high in the unincorporated county. Major storm events have produced floods that have resulted in property losses and extensive damage to public infrastructure throughout the unincorporated county.

2.10.2 Regulatory Framework

Section 2.8, “Hydrology and Water Quality,” of the 2011 GPU PEIR, pages 2.8-25 through 2.8-30, describes the regulatory framework related to hydrology and water quality and is herein incorporated by reference. Specific regulations discussed in the 2011 GPU PEIR that may be applicable to the CAP Update include the following:

2.10.2.1 Federal

- Clean Water Act (CWA)
- National Flood Insurance Act
- National Flood Insurance Reform Act

2.10.2.2 State

- Porter-Cologne Water Quality Control Act
- Cobey-Alquist Floodplain Management Act of 1965
- National Pollutant Discharge Elimination System (NPDES) Permits
- California Groundwater Rights
- California Water Code
- Assembly Bill 3030 – Sustainable Groundwater Management Act

In addition to the above, the following state laws, regulations, and policies have been adopted or updated since certification of the 2011 GPU PEIR.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act, effective January 1, 2015, requires local public agencies in certain groundwater basins throughout the state to sustainably manage groundwater resources, and authorizes State Water Resources Control Board (SWRCB) intervention in areas where local agencies are unable or unwilling to do so. The long-term planning required by the act is designed to provide a buffer against drought and climate change and contribute to reliable water supplies regardless of weather patterns in the state. Within the county, the San Pasqual Valley, San Luis Rey Valley – Upper San Luis Rey Valley, and Borrego Valley – Borrego Springs basins are identified as medium- and high-priority basins. These basins are required by the Sustainable Groundwater Management Act to develop groundwater sustainability agencies and groundwater sustainability plans and manage groundwater for long-term sustainability.

State Water Resources Control Board Construction General Permit

Construction activities that disturb 1 acre or more of land must obtain coverage under the SWRCB Construction General Permit (Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-006-DWQ). Under the terms of the permit, applicants must file complete and accurate Notice of Intent and Permit Registration Documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction best management practices (BMPs) and prepare a construction Storm Water Pollution Prevention Plan (SWPPP) containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site.

Future development projects occurring within the county would be required to comply with the Construction General Permit if more than 1 acre would be disturbed during construction.

Water Quality Control Policy for Siting, Design, Operation and Maintenance of Onsite Wastewater Treatment Systems

On June 19, 2012, the SWRCB adopted Resolution No. 2012-0032, the Onsite Wastewater Treatment Systems (OWTS) Policy, which establishes a statewide, risk-based, tiered approach for the regulation and management of OWTS installations and replacements and sets the level of performance and protection expected from OWTS. In accordance with California Water Code Section 13290 et seq., the OWTS Policy sets standards for OWTS that are constructed or replaced, that are subject to a major repair, that pool or discharge waste to the surface of the ground, and that have affected, or will affect, groundwater or surface water to a degree that makes it unfit for drinking water or other uses, or cause a health or other public nuisance condition. The OWTS Policy also includes minimum operating requirements for OWTS that may include siting, construction, and performance requirements; requirements for OWTS near certain waters listed as impaired under Section 303(d) of the CWA; requirements authorizing local agency implementation of the requirements; corrective action requirements; minimum monitoring

requirements; exemption criteria; requirements for determining when an existing OWTS is subject to major repair; and a conditional waiver of waste discharge requirements.

The SWRCB approved the San Diego RWQCB's Nitrate/OWTS Policy Basin Plan amendment on November 17, 2015. The Office of Administrative Law approved the RWQCB's Nitrate/OWTS Policy Basin Plan amendment on May 17, 2016. An OWTS Policy Update was subsequently issued on April 17, 2018, which includes a renewal for the conditional waiver in the OWTS Policy that expired on May 13, 2018, and an amendment to the total maximum daily load list included in the OWTS Policy.

2.10.2.3 Local

- San Diego Basin Plan
- Colorado River Basin Plan
- San Diego County Board of Supervisors (BOS) Policy I-45, Definition of Watercourses in the Subject of Flood Control
- San Diego County BOS Policy I-68, Proposed Projects in Floodplains with Defined Floodways
- San Diego County BOS Policy I-73, Hillside Development Policy
- County of San Diego Code of Regulatory Ordinances Section 91.1.105.10, Flood Damage Prevention Ordinance
- County of San Diego Code of Regulatory Ordinances Sections 86.601–86.608, Resource Protection Ordinance (RPO)
- County of San Diego Code of Regulatory Ordinances Sections 67.801–67.814, Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO)
- San Diego County Code of Regulatory Ordinances Sections 67.701–67.703, 67.710–67.711, 67.720–67.722, Groundwater Ordinance
- San Diego County Code of Regulatory Ordinances Sections 87.101–87.804, Grading Ordinance

In addition to the above, the following local laws, regulations, and policies have been adopted/updated since certification of the 2011 GPU PEIR.

Water Quality Control Plan for the San Diego Basin

The Basin Plan was most recently amended in May 2016 and designates water quality objectives for constituents that could potentially cause an adverse effect or impact on the beneficial uses of water. The intent of the amended Basin Plan remains consistent with that described in Section 2.9.2.2, "Local," of the 2011 GPU PEIR.

County of San Diego Jurisdictional Runoff Management Program

The County's Jurisdictional Runoff Management Program (JRMP), approved on July 26, 2015, and updated in 2019, was prepared in response to regulatory requirements adopted by the RWQCB (County of San Diego 2019). The purpose of the JRMP document is to guide implementation of programs and strategies to reduce pollutants discharged from the County's storm drain system to receiving waters.

The goal of the JRMP is to establish a programmatic framework for the implementation of stormwater management activities in accordance with Water Quality Improvement Plan strategies and other jurisdictional plans, design standards, and ordinances. By providing and implementing programs for new land development and redevelopment projects, impacts on receiving waters and other environmental resources are minimized. The JRMP also complies with federal and state laws.

County of San Diego Best Management Practices Design Manual

Adopted in February 2016 and last updated in September 2020, the County's BMP Manual guides land development and public improvement projects in the unincorporated area to reach compliance with the Regional Municipal Separate Storm Sewer System (MS4) Permit and reduce the discharge of pollutants in stormwater to the maximum extent practicable (MEP) (County of San Diego 2020). The BMP Manual is focused on project design requirements and related post-construction requirements. Specifically, the BMP Manual provides guidance on which stormwater management requirements apply to a given project; defines the performance standards for source control and site design BMPs, stormwater pollution control BMPs, and hydromodification management BMPs based on the Regional MS4 Permit; outlines the required steps to the comprehensive stormwater management design process; contains the source control and site design requirements applicable to all development; outlines the process of determining which category of on-site pollution control BMP or combination of BMPs is most appropriate for a given project and how those BMPs should be designed; provides guidance for meeting the performance standards for the two components of hydromodification management (i.e., protection of critical coarse sediment yield areas and flow control for post-project runoff); and describes the long-term maintenance requirements for structural BMPs.

The BMP Manual establishes the minimum BMP requirements applicable to all development projects, regardless of size or type. These measures include general BMP siting, source control BMPs, and site design BMPs. The County's 2013 MS4 Permit requires co-permittees to impose additional requirements on those projects considered Priority Development Projects (PDPs), which are required to comply with structural BMP performance requirements specified in the BMP Manual. These additional requirements focus on retention of the 85th percentile storm event. If on-site retention is not feasible, other alternatives are available, including partial retention and biofiltration. PDPs are also required to comply with hydromodification management BMP requirements, as specified in the BMP Manual, which address flow duration impacts and critical sediment yield areas. All projects must meet the following general requirements:

- on-site BMPs must be located so as to remove pollutants from runoff prior to its discharge to any receiving waters, and as close to the source as possible;
- structural BMPs must not be constructed within waters of the United States; and
- on-site BMPs must be designed and implemented with measures to avoid the creation of nuisance or pollution associated with vectors (e.g., mosquitos, rodents, or flies).

All projects must complete a Storm Water Intake Form to determine if they are a development project and to assess their priority and project type. The Storm Water Intake Form determines which type of Stormwater Quality Management Plan (SWQMP) Form is required for each development project.

The MS4 Permit establishes separate performance standards for (1) source control and site design practices, (2) stormwater pollutant control BMPs, and (3) hydromodification management BMPs. Each development project must be designed to satisfy any of several potentially applicable performance standards. Performance standards are specific design objectives to be achieved through the implementation of BMPs.

Baseline Source Control and Site Design BMPs must be implemented for all development projects wherever it is applicable and feasible to do so. These BMPs help to prevent the on-site generation of pollutants and flows and to keep them from leaving the site. The following source control BMPs must be implemented at all development projects where applicable and feasible:

- Prevention of illicit discharges into the MS4;
- Storm drain system stenciling or signage;
- Protection of outdoor material storage areas from rainfall, run-on, runoff, and wind dispersal;
- Protection of materials stored in outdoor work areas from rainfall, run-on, runoff, and wind dispersal;
- Protection of trash storage areas from rainfall, run-on, runoff, and wind dispersal; and
- Use of any additional BMPs determined to be necessary by the County of San Diego to minimize pollutant generation at each project.

The following site design practices must be implemented at all Development Projects, where applicable and feasible:

- Maintenance or restoration of natural storage reservoirs and drainage corridors (including topographic depressions, areas of permeable soils, natural swales, and ephemeral and intermittent streams);

- Buffer zones for natural water bodies (where buffer zones are technically infeasible, require project applicant to include other buffers such as trees, access restrictions, etc.);
- Conservation of natural areas within the project footprint, including existing trees, other vegetation, and soils;
- Construction of streets, sidewalks, or parking lot aisles to the minimum widths necessary, provided public safety is not compromised;
- Minimization of the impervious footprint of the project;
- Minimization of soil compaction to landscaped areas;
- Disconnection of impervious surfaces through distributed pervious areas;
- Landscaped or other pervious areas designed and constructed to effectively receive and infiltrate, retain, and/or treat runoff from impervious areas, prior to discharging to the MS4;
- Small collection strategies located at, or as close as possible to, the source (i.e., the point where stormwater initially meets the ground) to minimize the transport of runoff and pollutants to the MS4 and receiving waters;
- Use of permeable materials for projects with low traffic areas and appropriate soil conditions;
- Landscaping with native or drought tolerant species; and
- Harvesting and using precipitation.

An Enhanced Site Design BMP is any site design BMP used specifically to reduce the Design Capture Volume (DCV) within a Drainage Management Area. This can be achieved either by adjusting the impervious runoff factor of one or more surfaces or by implementing BMPs that receive and mitigate a portion of the DCV. Because DCV reduction is not required, this performance standard is optional.

However, implementation of Enhanced Site Design BMPs is strongly encouraged for all PDPs as a means of reducing or eliminating the need for other, more complex or costly BMPs needed to satisfy Structural Performance Standards for the remaining DCV.

Structural Performance Standards are numeric design standards for reducing or eliminating stormwater flows and pollutant loads from PDP sites. They specifically address the remaining volume of runoff within a Drainage Management Area (either the DCV or a greater volume) after the application of all other site design and source control BMPs described above. Storm Water Pollutant Control BMPs for PDPs must meet the following performance standards:

1. Each PDP shall implement BMPs designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire) on site the pollutants contained in the volume of stormwater runoff produced from a 24-hour, 85th percentile storm event (DCV).

a. If it is not technically feasible to implement retention BMPs for the full DCV on site for a PDP, then the PDP shall utilize biofiltration BMPs for the remaining volume not reliably retained. Biofiltration BMPs must be designed as described in Appendix F of the BMP Manual to have an appropriate hydraulic loading rate to maximize stormwater retention and pollutant removal, as well as to prevent erosion, scour, and channeling within the BMP, and must be sized to:

    i. Treat 1.5 times the DCV not reliably retained on site, or

    ii. Treat the DCV not reliably retained on site with a flow-thru design that has a total volume, including pore spaces and pre-filter detention volume, sized to hold at least 0.75 times the portion of the DCV not reliably retained on site.

b. If biofiltration BMPs are not technically feasible, then the PDP shall utilize flow-thru treatment control BMPs (selected and designed per Appendix J.5 of the BMP Manual) to treat runoff leaving the site, and participate in offsite alternative compliance to mitigate for the pollutants from the DCV not reliably retained onsite pursuant to Section 2.2.1.(b). Flow-thru treatment control BMPs must be sized and designed to:

    i. Remove pollutants from storm water to the MEP (defined by the MS4 Permit) by following the guidance in Appendix J.5 of the BMP Manual; and filter or treat either: 1) the maximum flow rate of runoff produced from a rainfall intensity of 0.2 inch of rainfall per hour, for each hour of a storm event, or 2) the maximum flow rate of runoff produced by the 85th percentile hourly rainfall intensity (for each hour of a storm event), as determined from the local historical rainfall record, multiplied by a factor of two (both methods may be adjusted for the portion of the DCV retained on site as described in Appendix J.5 of the BMP Manual), and

    ii. Meet the flow-thru treatment control BMP treatment performance standard described in Appendix J.5 of the BMP Manual.

2. A PDP may be allowed to participate in an offsite alternative compliance program in lieu of fully complying with the performance standards for storm water pollutant control BMPs on site.

For many PDP sites, additional BMPs may be needed to preserve the supply of critical coarse sediment to water bodies. Any PDP that is not exempt from hydromodification management requirements must either comply with critical coarse sediment requirements or demonstrate that they do not apply.

County of San Diego Low Impact Development Handbook

The County's Low Impact Development Handbook: Stormwater Management Strategies (County of San Diego 2014) was created in 2007 and updated in July 2014 by a multidisciplinary Technical Advisory Committee. The goal of the County's low impact development (LID) program is to protect water quality by preserving and mimicking natural hydrologic functions through the use of stormwater planning and management techniques on a project site. The purpose of the LID Handbook is to provide a comprehensive list of LID planning and stormwater management techniques for developers, builders, contractors, planners, landscape architects, engineers, and government employees as guidance to reference before developing a project site. The document serves as a guidance document for the planning, application, design, and maintenance of LID BMPs. LID feasibility and applicability criteria and specific LID requirements are specified in the BMP Manual.

County of San Diego Code of Regulatory Ordinances, Sections 67.801–67.814, Watershed Protection, Stormwater Management, and Discharge Control Ordinance

The current WPO was adopted in March 2008 and amended in January 2016. The stated purposes of this ordinance are to protect the health, safety, and general welfare of county residents; to protect water resources and improve water quality; to cause the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of stormwater as a resource; and to ensure the County of San Diego is compliant with applicable state and federal law. The WPO contains discharge prohibitions and requirements that vary depending on the type of land use activity and location in the county. The WPO defines the requirements legally enforceable by the County in its unincorporated areas.

In accordance with the WPO, the County requires the development of an SWQMP to be submitted with discretionary and ministerial permit applications. The purpose of the SWQMP is to mitigate stormwater impacts by identifying effective permanent BMPs for implementation. The SWQMP review process considers the project location, receiving water quality, anticipated project impacts and associated pollutants, and mitigation for impacts with the selection of BMPs. The SWQMP provides needed information to address both stormwater and non-stormwater issues. The Preliminary Grading Plan and Preliminary Hydrology/Drainage Study are an integral part of the SWQMP and provide the technical basis for the SWQMP. The SWQMP requires, but is not limited to, the following elements:

- Water quality pollutants of concern, treatment volume based on water quality design storm, site plans and adjacent land use, and soil characteristics;
- Mitigation measures to protect water quality, pollution prevention BMPs (MEP Based), site design BMPs, source control BMPs, LID BMPs, and structural treatment BMPs;

- Mitigation measures to prevent increases in downstream erosion to MEP, site design BMPs, source control BMPs, LID BMPs, and structural treatment BMPs;
- Any infiltration BMPs proposed for use on site; and
- Agreements, easements, licenses relating to proposed BMP construction, location, maintenance, or changes in drainage character.

As defined in the WPO, each proposed project is required to implement measures to ensure that (1) pollutant discharges and runoff flows from development are reduced to the MEP, (2) receiving water quality objectives are not violated throughout the life of the project, and (3) runoff flows from development are managed to reduce erosive forces that may impact surface water beneficial use and/or habitat.

The WPO also contains LID requirements. LID is a stormwater management approach that maintains the natural hydrologic character of a site or region by using design techniques that infiltrate, filter, store, evaporate, and detain runoff on site. A LID Handbook was developed in December 2007 by the County of San Diego Department of Public Works to provide the development community with guidance on implementing LID strategies and practices (County of San Diego 2014). The WPO has incorporated LID site design BMP requirements in Section 67.806, General Best Management Practice Requirements, to be applicable to all development projects with the potential to add pollutants to stormwater or to affect the flow rate or velocity of stormwater runoff. This requirement defines the general standard for LID site design. The more explicit LID site design requirements for PDPs have been included in Section 67.810/67.811, Additional Planning, Design and Post-Construction Requirements for Development Projects. The BMP Manual includes a discussion of LID Site Design requirements.

All construction sites determined to be a land disturbance activity, as defined in the WPO, are required to meet General BMP Requirements (Attachment 2.2 of Section 67.806) and the Additional BMP Requirements for Construction Projects (Section 67.809). Section 67.806 (Attachment 2.2) of the WPO includes the list of general BMP requirements applicable to all dischargers. Section 67.809 (Attachment 2.2) of the WPO includes the list of additional BMPs to be implemented and maintained for construction projects. At a minimum, the County has determined that the following pollution control practices be adequately implemented and maintained year-round on all non-exempt projects:

- Project Planning
- Good Site Management “Housekeeping,” including waste management
- Non-stormwater Management
- Erosion Control
- Sediment Control
- Run-on and Run-off Control
- Active/Passive Sediment Treatment Systems, where applicable

- Any other construction BMPs suggested by the applicable Water Quality Improvement Plan and deemed to be effective at controlling erosion and sedimentation.

Disturbed soil areas are considered active whenever soil-disturbing activities have occurred, continue to occur, or will occur during the ensuing 14 days. Non-active areas must be protected within 14 days of cessation of soil-disturbing activities or prior to the onset of precipitation, whichever occurs first.

San Diego County Zoning Ordinance, Renewable Energy Regulations

Sections 6950–6959 of the County Zoning Ordinance prescribe reasonable standards and procedures for the installation and operation of solar energy systems and wind turbines.

Photovoltaic solar energy systems for on-site use are allowed as an accessory use in all zones upon approval of a building permit unless the property is subject to a Special Area Designator or is governed by a Discretionary Permit. Setback and height requirements are established in Section 6954(a).

Ordinance 10261 amended the San Diego County Zoning Ordinance to update and streamline provisions related to small wind energy turbines. This ordinance is consistent with state laws that encourage the construction of small wind energy turbines. The amendments made by this ordinance are intended to set forth reasonable standards and procedures for the installation and operation of small wind turbines to improve and enhance public welfare and safety, and to implement the Energy Element of the General Plan. The amendments to Section 6951 allow a maximum of three small wind turbines on a legal lot as an accessory use to the primary use of the lot in accordance several requirements, including height restrictions (the wind turbine height may exceed the height limit of the zone in accordance with Section 4620.j, but shall not exceed 80 feet), lighting restrictions (a small wind turbine shall not include any exterior lights unless required by law), location restrictions (a small wind turbine tower shall not be located on a ridgeline, and the turbine blades shall not exceed the height of the ridgeline in an area within 150 feet of the ridgeline), and design guidelines (which prohibit use of trellis towers and guy wires and require that power lines connecting turbine towers to structures are installed underground). Installation of a small wind turbine requires approval of a Building Permit to ensure the turbine meets current Uniform Building Code and approval of a Zoning Verification Permit to ensure the turbine complies with County Zoning regulations.

2011 San Diego General Plan

The General Plan policies related to hydrology and water quality that are applicable to the CAP Update include the following:

> Policy LU-6.5: Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development techniques as well as a combination of site design, source control,

and stormwater best management practices, where applicable and consistent with the County's LID Handbook.

Policy LU-6.9: Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.

Policy LU-6.10: Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.

Policy LU-6.12: Flooding. Document and annually review areas within floodways and 100- and 200-year floodplains to ensure areas subject to flooding are accurately mapped in accordance with AB 162 (enacted January 1, 2008). (See also Policy S-9.1)

Policy LU-8.1: Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

Policy LU-8.2: Groundwater Resources. Require development to identify adequate groundwater resources in groundwater dependent areas, as follows:

- In areas dependent on currently identified groundwater overdrafted basins, prohibit new development from exacerbating overdraft conditions. Encourage programs to alleviate overdraft conditions in Borrego Valley.
- In areas without current overdraft groundwater conditions, evaluate new groundwater-dependent development to assure a sustainable long-term supply of groundwater is available that will not adversely impact existing groundwater users.

Policy LU-13.1: Adequacy of Water Supply. Coordinate water infrastructure planning with land use planning to maintain an acceptable availability of a high quality sustainable water supply. Ensure that new development includes both indoor and outdoor water conservation measures to reduce demand.

Policy LU-13.2: Commitment of Water Supply. Require new development to identify adequate water resources, in accordance with State law, to support the development prior to approval.

Policy LU-14.1: Wastewater Facility Plans. Coordinate with wastewater agencies and districts during the preparation or update of wastewater facility master plans and/or capital improvement plans to provide adequate capacity and assure consistency with the County's land use plans.

Policy LU-14.2: Wastewater Disposal. Require that development provide for the adequate disposal of wastewater concurrent with the development and that the infrastructure is designed and sized appropriately to meet reasonably expected demands.

Policy LU-14.3: Wastewater Treatment Facilities. Require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency. Coordinate the planning and design of such facilities with the appropriate agency to be consistent with applicable sewer master plans.

Policy LU-14.4: Sewer Facilities. Prohibit sewer facilities that would induce unplanned growth. Require sewer systems to be planned, developed, and sized to serve the land use pattern and densities depicted on the Land Use Map. Sewer systems and services shall not be extended beyond either Village boundaries or extant Urban Limit Lines, whichever is more restrictive, except:

- When necessary for public health, safety, or welfare;
- When within existing sewer district boundaries;
- When necessary for a conservation subdivision adjacent to existing sewer facilities; or
- Where specifically allowed in the community plan.

Policy LU-16.1: Location of Waste Management Facilities. Site new solid waste management facilities identified in the San Diego County Integrated Waste Management Plan, in a manner that minimizes environmental impacts and prevents groundwater degradation, and in accordance with applicable local land use policies.

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

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

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

Policy COS-4.3: Stormwater Filtration. Maximize stormwater filtration and/or infiltration in areas that are not subject to high groundwater by maximizing the natural drainage patterns and the retention of natural vegetation and other pervious surfaces. This policy shall not apply in areas with high groundwater,

where raising the water table could cause septic system failures, moisture damage to building slabs, and/or other problems.

Policy COS-4.4: Groundwater Contamination. Require land uses with a high potential to contaminate groundwater to take appropriate measures to protect water supply sources.

Policy COS-5.1: Impact to Floodways and Floodplains. Restrict development in floodways and floodplains in accordance with policies in the Flood Hazards section of the Safety Element.

Policy COS-5.2: Impervious Surfaces. Require development to minimize the use of directly connected impervious surfaces and to retain stormwater run-off caused from the development footprint at or near the site of generation.

Policy COS-5.3: Downslope Protection. Require development to be appropriately sited and to incorporate measures to retain natural flow regimes, thereby protecting downslope areas from erosion, capturing runoff to adequately allow for filtration and/or infiltration, and protecting downstream biological resources.

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

Policy S-9.1: Landslide Risks. Direct development away from areas with high landslide, mudslide, or rock fall potential when engineering solutions have been determined by the County to be infeasible.

Policy S-9.2: Risk of Slope Instability. Prohibit development from causing or contributing to slope instability.

Policy S-10.1: Floodplain Data. Maintain and expand floodplain data and information throughout the County, to better understand current and future floodplain conditions and changes associated with development activities and mitigation projects.

Policy S-10.2: Floodplain Maps. Manage development based on federal floodplain maps. County maps shall also be referred to, and in case of conflict(s) between the County floodplain maps and the federal floodplain maps, the more stringent of restrictions shall apply.

Policy S-10.3: Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal floodproofing standards and siting criteria to prevent flow obstruction.

Policy S-10.4: Development in Flood Hazard Areas. Require development within mapped flood hazard areas to be sited and designed to minimize on and off-site hazards to health, safety, and property due to flooding.

Policy S-10.5: Development in Villages. Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.

Policy S-10.6: Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single-family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

Policy S-10.7: Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.

Policy S-11.1: Land Uses within Floodways. Limit new or expanded uses in floodways to agricultural, recreational, and other such low intensity uses and those that do not result in an increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset impacts to, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.

Policy S-11.2: Use of Natural Channels. Require the use of natural channels for County flood control facilities except where necessary to protect existing structures from a current flooding problem and where natural channel use is deemed infeasible. The alternative must achieve the same level of biological and other environmental protection, such as water quality, hydrology, and public safety.

Policy S-11.3: Flood Control Facilities. Require flood control facilities to be adequately sized, constructed, and maintained to operate effectively.

Policy S-11.4: Stormwater Management. Require development to incorporate low impact design, including site design, source control, and other measures to minimize stormwater impacts on drainage and flood control facilities and promote

groundwater recharge, where feasible. In addition, require projects that are classified as Priority Development Projects to also incorporate pollutant control and hydromodification management measures.

Policy S-11.5: Development Site Improvements. Require development to provide necessary on- and off-site improvements to stormwater runoff and drainage facilities.

Policy S-11.6: Stormwater Hydrology. Ensure development avoids diverting drainages, increasing velocities, and altering flow rates to off-site areas to minimize adverse impacts to the area's existing hydrology.

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Hyd-1.1: Update and implement the County of San Diego's Jurisdictional Urban Runoff Management Program (JURMP).

Adopted Mitigation Measure Hyd-1.2: Implement and revise as necessary the Watershed Protection Ordinance to reduce the adverse effects of polluted runoff discharges on waters and to encourage the removal of invasive species and restore natural drainage systems.

Adopted Mitigation Measure Hyd-1.3: Establish and implement low impact development (LID) standards for new development to minimize runoff and maximize infiltration.

Adopted Mitigation Measure Hyd-1.4: Revise and implement the Stormwater Standards Manual requiring appropriate measures for land use with a high potential to contaminate surface water or groundwater resources.

Adopted Mitigation Measure Hyd-1.5: Utilize the County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects.

Adopted Mitigation Measure Hyd-2.1: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available water districts. Also implement and revise as necessary Board Policy G-15 to conserve water at County facilities.

Adopted Mitigation Measure Hyd-2.2: Implement the Groundwater Ordinance to balance groundwater resources with new development. Also revise the Ordinance Relating to Water Conservation for Landscaping (currently Zoning Ordinance Sections 6712 through 6725) to further water conservation through the use of recycled water.

Adopted Mitigation Measure Hyd-2.3: Establish a water credits program between the County and the Borrego Water District to provide a streamlined and consistent process for the permanent cessation of outdoor water intensive uses such as irrigated agricultural or golf course land.

Adopted Mitigation Measure Hyd-2.4: Coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and implementation and enhancement of water conservation programs.

Adopted Mitigation Measure Hyd-2.5: Implement and revise as necessary the Resource Protection Ordinance and Policy I-68 Proposed Projects in Flood Plains / Floodways to restrict development in flood plains / floodways.

Adopted Mitigation Measure Hyd-3.1: Implement, and revise as necessary, ordinances to require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater.

Adopted Mitigation Measure Hyd-3.2: Implement, and revise, as necessary the Resource Protection Ordinance to limit development on steep slopes. Also incorporate Board Policy I-73, the Hillside Development Policy, into the Resource Protection Ordinance to the extent that it will allow for one comprehensive approach to steep-slope protections.

Adopted Mitigation Measure Hyd-3.3: Implement the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability.

Adopted Mitigation Measure Hyd-4.1: Implement the Flood Damage Prevention Ordinance to reduce flood losses in specified areas.

Adopted Mitigation Measure Hyd-4.2: Implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses.

Adopted Mitigation Measure Hyd-4.3: Implement and revise as necessary Board Policies such as: Policy I-68, which establishes procedures for projects that impact floodways; Policy I-45, which defines watercourses that are subject to flood control; and Policy I-56, which permits, and establishes criteria for, staged construction of off-site flood control and drainage facilities by the private sector when there is a demonstrated and substantial public, private or environmental benefit.

Adopted Mitigation Measure Hyd-6.1: Implement the Resource Protection Ordinance to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological and drainage problems.

Adopted Mitigation Measure Hyd-8.2: Review discretionary projects for dam inundation hazards through application of the County's Guidelines for Determining Significance for Hydrology and Guidelines for Determining Significance for Emergency Response Plans.

2.10.3 Analysis of Effects and Significance Determinations

2.10.3.1 Significance Criteria

Based on Appendix G of the State CEQA Guidelines, the *County of San Diego Guidelines for Determining Significance: Hydrology and Water Quality* (County of San Diego 2021), and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources* (County of San Diego 2007a), the proposed project would result in a significant impact on hydrology and water quality if it would:

- violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
- substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;[1]
- substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    - result in substantial erosion or siltation on- or off-site;
    - substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
    - create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
    - impede or redirect flood flows;
- in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation;
- conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan; or[2]
- result in substantial erosion or the loss of topsoil.

[1] This threshold has been revised from the County's format to be consistent with the updated Appendix G checklist.
[2] This threshold has been revised from the County's format to be consistent with the updated Appendix G checklist.

2.10.3.2 Approach to Analysis

Impacts related to hydrology and water quality are analyzed qualitatively based on a review of CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for hydrology and water quality impacts associated with the implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant 2011 GPU PEIR mitigation measures are applicable to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update.

Scope of SEIR Impact Analysis

The impact analysis contained within this draft SEIR focuses on whether implementation of the CAP Update would result in new or more severe impacts than were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impacts of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unicorporated county) and its role as a programmatic planning document designed to guide future decision-making related to the reduction of GHGs within the unincorporated county, the study area for the CAP Update is the unincorporated area of the county within the County's jurisdiction (i.e., all unincorporated lands excluding tribal lands, state and federally owned lands, and military installations).

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

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies, measures, and actions proposed in the CAP Update (see Table 1-2) have been grouped into subcategories for the purpose of analysis, based on the sector they target. CAP Update measures that would have the potential to result in new or more severe impacts, as

compared to the conclusions of the 2011 GPU PEIR, related to hazards and hazardous materials are summarized below. CAP Update measures and actions that would involve development of policies and programs that would not result in direct physical effects or those that would result in limited physical improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to hydrology and water quality.

Solid Waste Measures and Actions. This category includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to hydrology and water quality include those that could result in new or expanded composting and recycling facilities (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

Water and Wastewater Measures and Actions. This category includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Key actions with potential to result in new or more severe impacts related to hydrology and water quality include those that could result in the construction of new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure (Actions W-1.1 W-2.2, W-2.3, and W-2.4).

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural and agricultural lands, improve land management practices protect habitat and increase carbon storage, and support climate-friendly farming practices. This category also includes exploration of opportunities for construction of farmworker housing. Key actions with potential to result in new or more severe impacts related to hydrology and water quality include those that involve habitat restoration (Actions A-1.2 and A-4.1).

Energy Measures and Actions. This category includes strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Key actions with potential to result in new or more severe impacts related to hydrology and water quality include those that could result in the construction and operation of renewable energy infrastructure (Actions E-3.2 and E-3.3). Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more severe impacts related to hydrology and water quality include those that could result in the construction of new electric vehicle charging, hydrogen fueling infrastructure, and pedestrian and bicycle infrastructure (Actions T-4.1, T-4.2, T-4.3, T-4.6, and T-6.1).

2.10.3.3 Issue 1: Degrade Surface Water and Groundwater Quality

This analysis describes the potential for implementation of the CAP Update to result in impacts on surface water and groundwater quality.

Guidelines for Determination of Significance

The *County of San Diego Guidelines for Determining Significance: Hydrology and Water Quality* (County of San Diego 2021) and *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources* (County of San Diego 2007a), which are reflective of the guidelines that were utilized in the 2011 GPU PEIR, provide guidance for addressing the following significance criteria listed in Appendix G of the State CEQA Guidelines:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation;
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Note that the analysis of the CAP Update's potential to conflict with or obstruct implementation of sustainable groundwater management plan as it relates to groundwater supplies is provided in Section 2.10.3.4, "Issue 2: Decrease Groundwater Supply and Interfere with Groundwater Recharge."

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts on surface water and groundwater quality resulting from the adoption of the goals and policies contained within the General Plan and anticipated development of the land use map through the planning horizon. The 2011 GPU PEIR determined that development under the General Plan would contribute both point and non-point source pollutants that would have the potential to violate water quality standards or waste discharge requirements, or otherwise degrade surface water quality. In addition, the 2011 GPU PEIR determined that development of General Plan land uses would result in potentially significant impacts on water quality from proposing land uses in groundwater dependent areas that are currently experiencing groundwater contamination, which may also exacerbate existing groundwater quality impacts. The placement of groundwater dependent land uses in areas with water quality constituents at concentrations above Primary Federal or State Maximum Contaminant Levels would violate water quality standards, such as those for nitrates, naturally occurring radionuclides, leaking underground fuel tanks, and other constituents of concern. The

2011 GPU PEIR determined that the impacts could be reduced through a combination of the following:

- Complying with a combination of federal, state, and local regulations and permits and existing County regulatory processes related to maintaining water quality standards (e.g., NPDES Construction General Permit, JRMP, WPO, BOS Policy I-84).
- Implementing General Plan goals and policies related to protection of water quality, including LU-6.5, LU-6.9, LU-14.1, LU-14.2, LU-14.3, LU-14.4, COS-4.2, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.5.
- Implementing Mitigation Measures Hyd-1.1 through Hyd-1.10 identified in the 2011 GPU PEIR related to protection of water quality.

Although the General Plan policies and 2011 GPU PEIR mitigation measures would reduce the potential for impacts on surface water and groundwater quality, the 2011 GPU PEIR determined that these policies and mitigation measures would not reduce the impact to a less-than-significant level because smaller construction activities (i.e., less than 1 acre) would have the potential to contribute pollutants in quantities that would exceed water quality standards or otherwise significantly degrade water quality. In addition, the 2011 GPU PEIR determined that impacts associated with groundwater quality would not be mitigated to below a level of significance because land uses would still be proposed in areas that are currently experiencing groundwater contamination, thereby exacerbating groundwater quality impacts. Therefore, the 2011 GPU PEIR concluded that impacts on surface water and groundwater quality would be significant and unavoidable.

Additional mitigation for groundwater quality impacts would have required water to be imported from outside the area where groundwater was contaminated, required the construction of water treatment systems to reduce constituents in groundwater impaired areas, or placed a moratorium on building permits and development applications in groundwater constrained areas. However, these measures were rejected as infeasible. Specific General Plan policies related to groundwater quality are listed above under Section 2.10.2, “Regulatory Framework,” and 2011 GPU PEIR mitigation measures are listed in Section 2.10.5, “Mitigation Measures.”

The discussion of impacts can be found in Section 2.8, “Hydrology and Water Quality” (pages 2.8-30 through 2.8-36), of the 2011 GPU PEIR and is incorporated by reference.

CAP Update Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures to result in impacts on surface water and groundwater quality.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County

operations and more generally in the unincorporated county. Implementation of CAP Update measures and actions could result in potential construction of new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 would include development of zero waste policies which may result in new or expanded composting and recycling facilities to divert solid waste from landfills.

Although specific locations for any new or expanded recycling and composting facilities have not been identified, because of the nature of these improvements, they would most likely occur near industrial and commercial areas throughout the unincorporated county and in accordance with the General Plan. For example, Policy LU-16.3 encourages the establishment of new recycling and resource recovery facilities in areas with industrial land use designations or other appropriate areas based on the type of recycling.

The construction of new or expanded recycling and composting facilities associated with implementing the CAP Update could involve the use of heavy equipment, paving, ground disturbance, and other typical construction activities that could adversely affect water quality standards or waste discharge requirements where projects are located near waterways or discharge runoff to stormwater drainage systems. These violations could result in conflicts with existing water quality control plans. Furthermore, construction activities could risk the release of pollutants in areas that are subject to inundation. Pollutants associated with construction activities typically include soils, debris, other materials generated during demolition and clearing, fuels and other fluids associated with the equipment used for construction, paints, other hazardous materials, concrete slurries, and asphalt materials. These pollutants would degrade water quality if they were carried by stormwater or other runoff into surface waters.

These potential construction-related water quality impacts are similar to those identified in the 2011 GPU PEIR, which determined that development would have the potential to result in substantial additional sources of polluted runoff that would have short-term impacts on surface water quality from construction activities. Similar to what was described in the 2011 GPU PEIR, construction sites of 1 acre or more in size are required to prepare a SWPPP pursuant to the NPDES permit program. The SWPPP would identify BMPs that must be implemented to reduce the potential for pollutants from construction to degrade water quality. In compliance with the NPDES permit program, the construction of new or expanded solid waste facilities that are 1 acre or more in size would be required to implement BMPs that minimize disturbance, protect slopes, reduce erosion, and limit or prevent various pollutants from entering surface water runoff. However, similar to what was described in the 2011 GPU PEIR, potential water quality impacts could occur if new or expanded solid waste facilities would involve less than 1 acre of construction because these projects would not be subject to the NPDES permit program, and therefore would still have the potential to contribute pollutants such as soils, debris and other materials in quantities that would exceed water quality standards and otherwise significantly degrade water quality.

Following construction of any new or expanded solid waste facilities, operation of these facilities could have the potential to degrade water quality through non-point source pollution into surface water and groundwater bodies. Development of these facilities could

result in new impervious surfaces that would increase urban runoff containing oil, grease, metals, pathogens, total dissolved solids, sediments, or toxic chemicals, which could degrade water quality if they enter surface water or groundwater bodies. Additionally, if new or expanded solid waste facilities are developed in proximity to CWA Section 303(d) impaired water bodies, they could contribute both point and non-point source pollutants to these water bodies that could violate water quality standards. Lastly, the development of new or expanded solid waste facilities in groundwater dependent areas that are currently experiencing groundwater contamination would have the potential to contribute to the continued degradation of these existing water quality impacted areas.

Several federal, state, and local regulations exist that reduce the potential for projects to violate water quality standards. These include, but are not limited to the CWA, which establishes water quality standards for all waters of the United States; Porter-Cologne Water Quality Control Act, which requires region-specific basin plans; NPDES, which regulates point source and nonpoint source discharges to surface waters of the United States; San Diego Basin Plan, which sets water quality objectives for the San Diego Basin; Colorado River Basin Plan, which sets water quality objectives for the Colorado River Basin; WPO, which protects water resources and improves water quality; and LID requirements, which establish stormwater management techniques.

In addition, it is assumed that the development of new or expanded solid waste facilities would occur in accordance with the General Plan and its policies to reduce the potential for surface water and groundwater quality impacts. General Plan Policies LU-6.5 and LU-6.9 would ensure that development implements sustainable stormwater management techniques and conforms with natural topography to limit grading. Policies COS-4.3 and COS-4.4 require maximizing stormwater filtration and minimizing groundwater contamination from certain land uses. Policies COS-5.2, COS-5.3, and COS-5.4 require development projects to minimize impervious surfaces, be appropriately sited and incorporate measures to retain natural flow regimes, and avoid impacts to the water quality in local reservoirs, groundwater resources, recharge areas, watersheds, and other local water sources.

In addition to the regulations and General Plan policies described above, the following 2011 GPU PEIR mitigation measures also would be applied to the CAP Update to minimize water quality impacts: Mitigation Measure Hyd-1.1, which requires implementation of the County's JRMP; Mitigation Measure Hyd-1.2, which requires implementation of the WPO to reduce the adverse effects of polluted runoff discharges on waters; Mitigation Measure Hyd-1.3, which requires implementation of LID standards for new development to minimize runoff and maximize infiltration; Mitigation Measure Hyd-1.4, which requires implementation of the Stormwater Standards Manual requiring appropriate measures for land use with a high potential to contaminate surface water or groundwater resources; and Mitigation Measure Hyd-1.5, which requires utilization of the *County of San Diego Guidelines for Determining Significance: Hydrology and Water Quality* and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources*.

Implementation of these 2011 GPU PEIR mitigation measures, along with the General Plan policies and regulatory requirements described above, would reduce the potential for new or expanded solid waste facilities to degrade surface water or groundwater quality. However, the effectiveness of mitigation cannot be determined with certainty at a programmatic level. Therefore, the impacts related to water quality issues would be significant, consistent with the conclusions in the 2011 GPU PEIR.

Water and Wastewater Measures and Actions

The CAP Update includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Implementation of CAP Update Actions W-1.1, W-2.2, W-2.3, and W-2.4 could result in the construction of new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The construction of new recycled water and stormwater capture and reuse infrastructure would occur in conjunction with existing or proposed development and would not result in significant water quality impacts. Rather, these measures and actions would facilitate water efficiency and conservation for existing development and new development as it is approved, which would reduce the amount of stormwater runoff that could contribute to degraded water quality. Accordingly, these actions could improve water quality compared to existing conditions. As such, implementation of these actions is not anticipated to degrade surface water or groundwater quality. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of Measures A-1 through A-4 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. These measures would result in the preservation of natural and agricultural lands in the unincorporated county. Therefore, implementation of these measures would generally benefit water quality.

However, implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. It is anticipated that new farmworker housing would be low density and in proximity to existing agricultural operations, which are generally in more rural areas of the unincorporated county. The development of new farmworker housing would have the potential to result in similar construction and operation-related water quality impacts described above and in the 2011 GPU PEIR. Construction-related impacts could occur from the use of heavy equipment, paving, ground disturbance, and other typical construction activities that generate pollutants such

as debris, other materials generated during demolition and clearing, fuels and other fluids associated with the equipment used for construction, paints, other hazardous materials, concrete slurries, and asphalt materials. Additionally, new farmworker housing would result in new impervious surfaces that could increase urban runoff that contains pollutants and impact surface water and groundwater quality.

Similar to what was described in the 2011 GPU PEIR, construction of new farmworker housing would be subject to the federal, state, and local regulations described above that reduce the potential for projects to degrade surface water and groundwater quality, and would likely be required to undergo subsequent CEQA analysis. New farmworker housing would also be required to implement adopted General Plan goals and policies related to water quality, including Policies LU-6.5, LU-6.9, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.4, as described above. Lastly, 2011 GPU PEIR Mitigation Measures Hyd-1.1 through Hyd-1.5 require implementation of the County's JRMP and WPO, implementation of LID standards to minimize runoff and maximize infiltration, implementation of the Stormwater Standards Manual, and utilization of the *County of San Diego Guidelines for Determining Significance: Hydrology and Water Quality* and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources*. Compliance with existing regulations and implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures would reduce the potential for new farmworker housing associated with the CAP Update to degrade surface water or groundwater quality. However, the effectiveness of mitigation cannot be determined with certainty at a programmatic level. Therefore, the impacts related to water quality issues would be significant, consistent with the conclusions in the 2011 GPU PEIR.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects.

Implementation of CAP Update Measure E-2 and Measure E-3 could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. These retrofits could include rooftop or ground-mounted photovoltaic solar arrays or small wind turbines, energy storage systems, upgraded mechanical systems, and other similar improvements. Potential solar photovoltaic, small-scale wind turbines, and other building retrofits and improvements would occur in areas of existing development, and in association with new development, which would include energy-efficient mechanical equipment at the time of construction.

Rooftop photovoltaic solar energy panels and upgraded mechanical systems generally do not involve construction that would have the potential to impact water quality. However, the development of renewable energy projects such as ground-mounted photovoltaic solar arrays or small wind turbines would have the potential to result in similar construction-related water quality impacts described above and in the 2011 GPU PEIR.

These construction-related impacts could occur from the use of heavy equipment, paving, ground disturbance, and other typical construction activities that generate pollutants such as debris, other materials generated during demolition and clearing, fuels and other fluids associated with the equipment used for construction, paints, other hazardous materials, concrete slurries, and asphalt materials. Once operational, small wind turbines would use small amounts of lubricating oils and hydraulic fluids for ongoing operations. It is not anticipated that the development of renewable energy projects would result in new impervious surfaces that could increase urban runoff.

Similar to what was described in the 2011 GPU PEIR, construction of new renewable energy projects would be subject to the same federal, state, and local regulations described above that reduce the potential for projects to degrade surface water and groundwater quality. Additionally, wind turbines of all sizes are regulated by the County's Wind Energy Ordinance Sections 6950–6952. Section 6591(a)(1)(ii)(b) of the Wind Energy Ordinance prohibits any part of the wind turbine from being located closer than 300 feet or five times the turbine height, whichever is greater, from blue line watercourses or water bodies as identified on the current US Geological Survey Topographic Map as posted on the agency's website. Section 6591(a)(2) limits the area of ground disturbance (including grading, clearing, brushing, and grubbing) during installation to more than a 25-foot radius around the base of the tower and no more than 4 feet wide for the access path to the tower. Compliance with these sections of the Wind Energy Ordinance would further reduce the potential for small wind turbines to impact water quality.

Implementation of proposed CAP Update Action E-3.3 could result in the construction of new large-scale renewable energy systems, including large-scale solar technologies such as photovoltaic solar and concentrated solar, and wind turbines. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level and assumes that common current technologies for wind and solar would be utilized. The potential for construction of large-scale renewable energy infrastructure was not evaluated in the 2011 GPU PEIR, but potential wind energy impacts were evaluated in the 2012 Wind Energy Ordinance EIR and are incorporated by reference as applicable.

Large-scale renewable energy infrastructure would generally be constructed in primarily undeveloped locations that are productive for generating renewable energy. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees.

Large-scale renewable solar systems can range in size from 2 to several thousand acres. The location of large-scale photovoltaic solar systems is limited by the County's Zoning Ordinance Section 6954(b)(3), which requires a Major Use Permit (MUP) for projects over 10 acres. Projects that would be less than 10 acres would be required to obtain an Administrative Permit in accordance with the County's Zoning Ordinance Section

6954(b)(1). These projects would be required to comply with County development requirements, ordinances, and permitting procedures in addition to compliance with federal, state, and local regulations and policies (e.g., CWA, NPDES permits, WPO) described in Section 2.10.2, "Regulatory Framework," that are in place to protect water quality in the county. Future discretionary large-scale renewable energy projects would also be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would be implemented to minimize or eliminate impacts related to surface water and groundwater quality.

Large-scale wind energy projects could also be developed under proposed CAP Update Action E-3.3. The location of large-scale wind turbine farms would be limited by the County's Wind Energy Ordinance, which sets forth requirements related to setbacks, noise, height, and locations where large turbines are allowed. Additionally, all large wind turbine projects would be required to obtain an MUP in accordance with the County's Wind Energy Ordinance Section 6592 and would also be evaluated under CEQA. Furthermore, as described on pages 3.1.2-14 and 3.1.2-15 of the 2012 Wind Energy Ordinance EIR, the large-scale production of energy from wind turbines would not result in significant impacts on water quality because all future large wind turbine projects would be required to comply with the Grading Ordinance, WPO, LID requirements, and MUP process prior to approval. The potential development of large-scale wind turbine farms under the CAP Update would be similar to those evaluated in the 2012 Wind Energy Ordinance EIR.

In addition to the regulatory requirements described above, implementation of adopted General Plan goals and policies (Policies LU-6.5, LU-6.9, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.4) and 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Hyd-1.1 through Hyd-1.5) related to water quality would further reduce project impacts on surface water and groundwater quality by requiring implementation of the County's JRMP and WPO, implementation of LID standards to minimize runoff and maximize infiltration, implementation of the Stormwater Standards Manual, and utilization of the *County of San Diego Guidelines for Determining Significance: Hydrology and Water Quality* and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources*. Compliance with existing regulations and implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures would reduce the potential for implementation of CAP Update energy measures and actions to degrade surface water or groundwater quality. While the 2012 Wind Energy EIR determined that water quality impacts from small- and large-scale wind energy projects would be less than significant, the effectiveness of mitigation for other energy projects that could occur under the CAP Update (e.g., large-scale solar systems) cannot be determined with certainty at a programmatic level. Therefore, the impacts related to water quality issues would be significant, consistent with the conclusions in the 2011 GPU PEIR.

Built Environment and Transportation Measures and Actions

The CAP Update includes measures and actions to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Actions T-

4.1 and T-4.2 would result in programs to reduce emissions from County employee commutes; improvements to pedestrian, bicycle, and transit networks; programs to encourage active modes of transportation and reduce single occupancy vehicle trips; and the incorporation of Transportation Demand Management strategies. Because of the nature of such improvements (i.e., limited size and within existing transportation corridors), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development.

Construction associated with these improvements would result in similar water quality impacts described above and in the 2011 GPU PEIR, and could involve the use of heavy equipment, paving, ground disturbance, and other typical construction activities that generate pollutants such as debris, other materials generated during demolition and clearing, fuels and other fluids associated with the equipment used for construction, paints, other hazardous materials, concrete slurries, and asphalt materials. Following construction, operation of these infrastructure improvements would not have the potential to degrade water quality because it is anticipated that they would be located in existing developed areas and therefore would not introduce new impervious surfaces that could increase urban runoff.

However, similar to what was described in the 2011 GPU PEIR, implementation of these infrastructure improvements would be subject to the same federal, state, and local regulations described above that reduce the potential for projects to degrade surface water and groundwater quality. The development of these infrastructure improvements would also be required to implement adopted General Plan goals and policies related to water quality, including Policies LU-6.5, LU-6.9, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.4, as described above. Lastly, 2011 GPU PEIR Mitigation Measures Hyd-1.1 through Hyd-1.5 require implementation of the County's JRMP and WPO, implementation of LID standards to minimize runoff and maximize infiltration, implementation of the Stormwater Standards Manual, and utilization of the *County of San Diego Guidelines for Determining Significance: Hydrology and Water Quality* and *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources*. Compliance with existing regulations and implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures would reduce the potential for implementation of the built environment and transportation measures and actions of the CAP Update to degrade surface water or groundwater quality. However, the effectiveness of mitigation cannot be determined with certainty at a programmatic level. Therefore, the impacts related to water quality issues would be significant, consistent with the conclusions in the 2011 GPU PEIR.

Summary

As detailed in the GPU PEIR 2011, although compliance with existing regulations and the implementation of General Plan policies and 2011 GPU PEIR mitigation measures would reduce impacts on surface water and groundwater quality, these impacts would not be reduced to a less-than-significant level because smaller construction activities (i.e., less than 1 acre) would have the potential to contribute pollutants in quantities that would exceed water quality standards or otherwise significantly degrade water quality. In

addition, the 2011 GPU PEIR determined that impacts associated with groundwater quality would not be mitigated to below a level of significance because land uses would still be proposed in areas that are currently experiencing groundwater contamination, thereby exacerbating groundwater quality impacts.

Future projects implemented under the CAP Update would be required to comply with existing federal, state, and local regulations and implement adopted General Plan policies (Policies LU-6.5, LU-6.9, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.4) and 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Hyd-1.1 through Hyd-1.5). While all feasible mitigation would be applied at the project level as part of the County's discretionary review process, construction of projects associated with the CAP Update could still adversely affect water quality because the exact location and nature of projects is not known. At the programmatic level, it is not possible to determine with certainty that impacts on surface water and groundwater quality would be reduced to below a level of significance. Therefore, the impacts related to water quality issues would be potentially significant, consistent with the conclusions in the 2011 GPU PEIR. However, implementation of the CAP Update **would not result in new or more severe impacts** compared to the 2011 GPU PEIR.

2.10.3.4 Issue 2: Decrease Groundwater Supply and Interfere with Groundwater Recharge

This analysis describes the potential for implementation of the CAP Update to result in impacts related to groundwater supply and recharge.

Guidelines for Determination of Significance

The *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources* (County of San Diego 2007a), which are reflective of the guidelines that were utilized in the 2011 GPU PEIR, provide guidance for addressing the following significance criteria listed in Appendix G of the State CEQA Guidelines:

- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to groundwater supply and recharge resulting from the adoption of the goals and policies contained within the General Plan and anticipated development of the land use map through the planning horizon. The 2011 GPU PEIR determined that development anticipated through the planning horizon would

result in an exacerbation of groundwater supply impacts that are already being experienced in parts of the unincorporated county. Maximum development of the land uses proposed in the General Plan would cause impacts in four geographic areas: (1) areas that experience a 50-percent reduction in groundwater storage; (2) areas that may be currently impacted by the combined drawdown of existing wells; (3) areas that experience a high frequency of low well yield; and (4) Borrego Valley.

The 2011 GPU PEIR determined that impacts would be reduced with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures, as well as compliance with applicable regulations related to groundwater supply and recharge. General Plan policies that would address groundwater supplies include Policy LU-8.1, which requires land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley; Policy LU-8.2, which requires development to identify adequate groundwater resources in groundwater dependent areas; Policy LU-13.1, which requires coordination of water infrastructure planning with land use planning to maintain an acceptable availability of a high quality sustainable water and requires new development to include water conservation measures; Policy LU-13.2, which requires new development to identify adequate water resources; Policy COS-4.1, which requires development to reduce the waste of potable water through use of efficient technologies and conservation efforts supply; as well as Policies LU-6.5, LU-6.9, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.4 described above. In addition, the 2011 GPU PEIR identified Mitigation Measures Hyd-1.1 through Hyd-1.5 and Mitigation Measures Hyd-2.1 through Hyd-2.5 to address groundwater supply impacts.

However, the 2011 GPU PEIR concluded that groundwater supply impacts would remain significant and unavoidable because even with mitigation measures in place, implementation of the General Plan would allow land uses and development to occur in areas that are already experiencing groundwater supply impacts, thereby worsening the unsustainable use of groundwater supplies.

In addition, additional mitigation for groundwater supply impacts was considered that would have required all projects to share well water, secure water contracts to import groundwater from other non-impacted groundwater basins, or place a moratorium on building permits and development applications. However, these measures were rejected as infeasible. Specific General Plan policies related to groundwater supply are listed above under Section 2.10.2, “Regulatory Framework,” and 2011 GPU PEIR mitigation measures are listed in Section 2.10.5, “Mitigation Measures.”

The discussion of impacts can be found in Section 2.8, “Hydrology and Water Quality” (pages 2.8-30 through 2.8-42), and is incorporated by reference.

CAP Update Impact Analysis

The following discussion describes the potential for implementation of the proposed CAP Update measures to result in effects related to groundwater supply and recharge.

Solid Waste Measures and Actions

The CAP Update includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to groundwater supplies and recharge include those that would result in the development of new or expanded recycling and composting facilities (e.g., Actions SW-1.1, SW-2.1, SW-4.1.a, and SW-4.1.b).

Implementation of these CAP Update measures and actions could result in the construction of new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 include development of zero waste policies that would result in new or expanded composting and recycling facilities to divert solid waste from landfills. Because of the nature of these improvements, it is anticipated that they would be developed near industrial and commercial areas throughout the unincorporated county and in accordance with the General Plan. For example, Policy LU-16.3 encourages the establishment of new recycling and resource recovery facilities in areas with industrial land use designations or other appropriate areas based on the type of recycling.

Although new or expanded solid waste facilities would likely be located near developed industrial and commercial areas, because no specific locations have been identified, there is a potential that development of these facilities could occur on or in the vicinity of groundwater aquifers. The development of new or expanded solid waste facilities could result in new impervious surfaces that would have the potential to interfere with groundwater recharge and decrease the availability of groundwater supplies. The development of new or expanded solid waste facilities would have the potential to result in similar impacts on groundwater supply and recharge described in the 2011 GPU PEIR. The development of new or expanded solid waste facilities in areas of the unincorporated county that are currently experiencing groundwater supply issues would contribute to worsening an already unsustainable groundwater supply. This includes areas that experience a 50 percent reduction of groundwater in storage; areas that may be currently impacted by the combined drawdown of existing wells; areas that experience a high frequency of low well yield; and the Borrego Valley.

Several federal, state, and local regulations exist that reduce impacts to groundwater supplies and recharge. These include, but are not limited to the: Porter-Cologne Water Quality Control Act, which requires region-specific Basin Plans; San Diego Basin Plan, which sets water quality objectives for the San Diego Basin; Colorado River Basin Plan, which sets water quality objectives for the Colorado River Basin; WPO, which protects water resources and improves water quality; and the County Groundwater Ordinance, which is intended to mitigate potential groundwater impacts of discretionary projects.

Through the County's Groundwater Ordinance and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources*, projects are currently reviewed on a case-by-case basis when proposing to use groundwater. Pump tests and modeling are typically required to demonstrate a viable water supply. These requirements are described in greater detail in

these documents. In addition, specific guidance and mitigation is provided in the groundwater guidelines for all projects in Borrego since they all rely on its aquifer for water. It should also be noted that groundwater in Borrego Valley is currently managed through local water agencies (Borrego Water District and Borrego Springs Park Community Services District). Management efforts aimed at addressing the overdraft condition of the Borrego aquifer include groundwater preservation fees; irrigated agricultural land purchases; tiered water rates; water recycling; artificial recharge; monitoring and data gathering; importation from other nearby basins or districts; and potential water storage and recovery efforts.

Additionally, it is assumed that the development of new or expanded solid waste facilities would occur in accordance with the General Plan and its policies to reduce the potential for groundwater supply and recharge impacts. General Plan policies that would address groundwater supplies include Policies LU-6.5, LU-6.9, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.4 described above, as well as Policy LU-8.1, which requires land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley; Policy LU-8.2, which requires development to identify adequate groundwater resources in groundwater dependent areas; Policy LU-13.1, which requires coordination of water infrastructure planning with land use planning to maintain an acceptable availability of a high quality sustainable water and requires new development to include water conservation measures; Policy LU-13.2, which requires new development to identify adequate water resources; and Policy COS-4.1, which requires development to reduce the waste of potable water through use of efficient technologies and conservation efforts supply.

In addition to the regulations and General Plan policies described above, the following 2011 GPU PEIR mitigation measures also would be applied to the CAP Update to minimize water quality impacts: Mitigation Measure Hyd-2.1, which requires implementation of BOS Policy I-84 requiring that discretionary project applications include commitments from available water districts; Mitigation Measure Hyd-2.2, which requires implementation of the Groundwater Ordinance to balance groundwater resources with new development; Mitigation Measure Hyd-2.4, which requires the County to coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and implementation and enhancement of water conservation programs; Mitigation Measure Hyd-2.5, which requires implementation of the RPO and BOS Policy I-68 “Proposed Projects in Flood Plains/Floodways” to restrict development in flood plains/floodways; and Mitigation Measures Hyd-1.1 through Hyd-1.5 described above.

Compliance with existing regulations and implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures would reduce potential impacts on groundwater supply and recharge from new or expanded solid waste facilities. However, the effectiveness of mitigation cannot be determined with certainty at a programmatic level. Therefore, the impacts related to groundwater supply and recharge would be potentially significant, consistent with the conclusions in the 2011 GPU PEIR.

Water and Wastewater Measures and Actions

The CAP Update includes measures and actions to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Implementation of CAP Update Actions W-1.1, W-2.2, W-2.3, and W-2.4 would involve construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The construction of new recycled water and stormwater capture and reuse infrastructure would occur in conjunction with existing or proposed development and would not result in significant groundwater supply or recharge impacts. Rather, these measures and actions would facilitate water efficiency and conservation for existing development and new development as it is approved, which would reduce the demand on groundwater supplies from development. Accordingly, these actions could be beneficial to groundwater supplies and recharge compared to existing conditions. As such, implementation of these actions is not anticipated to substantially decrease groundwater supplies or interfere substantially with groundwater recharge. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of Measures A-1 through A-4 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. These measures would result in the preservation of natural and agricultural lands in the unincorporated county. Therefore, implementation of these measures would not decrease groundwater supply or interfere with groundwater recharge.

Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified. It is anticipated that new farmworker housing would be low density and in proximity to existing agricultural operations, which are generally in more rural areas of the unincorporated county that are dependent on groundwater. Additionally, new farmworker housing would potentially result in new impervious surfaces that could interfere with groundwater recharge. The development of new farmworker housing would have the potential to result in similar impacts on groundwater supply and recharge described in the 2011 GPU PEIR. The development of new farmworker housing in areas of the unincorporated county that are currently experiencing groundwater supply issues would contribute to worsening an already unsustainable groundwater supply. This includes areas that experience a 50 percent reduction of groundwater in storage; areas that may be currently impacted by the combined drawdown of existing wells; areas that experience a high frequency of low well yield; and the Borrego Valley.

Several federal, state, and local regulations exist that reduce impacts to groundwater supplies and recharge. These include, but are not limited to the: Porter-Cologne Water Quality Control Act, which requires region-specific Basin Plans; San Diego Basin Plan, which sets water quality objectives for the San Diego Basin; Colorado River Basin Plan, which sets water quality objectives for the Colorado River Basin; WPO, which protects water resources and improves water quality; and the County Groundwater Ordinance, which is intended to mitigate potential groundwater impacts of discretionary projects.

Through the County's Groundwater Ordinance and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources*, projects are currently reviewed on a case-by-case basis when proposing to use groundwater. Pump tests and modeling are typically required to demonstrate a viable water supply. These requirements are described in greater detail in these documents. In addition, specific guidance and mitigation is provided in the groundwater guidelines for all projects in Borrego since they all rely on its aquifer for water. It should also be noted that groundwater in Borrego Valley is currently managed through local water agencies (Borrego Water District and Borrego Springs Park Community Services District). Management efforts aimed at addressing the overdraft condition of the Borrego aquifer include groundwater preservation fees; irrigated agricultural land purchases; tiered water rates; water recycling; artificial recharge; monitoring and data gathering; importation from other nearby basins or districts; and potential water storage and recovery efforts.

Additionally, it is assumed that the development of new farmworker housing would occur in accordance with the General Plan and its policies to reduce the potential for groundwater supply impacts. General Plan policies that would address groundwater supplies include Policies LU-6.5, LU-6.9, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.4 described above, as well as Policy LU-8.1, which requires land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley; Policy LU-8.2, which requires development to identify adequate groundwater resources in groundwater dependent areas; Policy LU-13.1, which requires coordination of water infrastructure planning with land use planning to maintain an acceptable availability of a high quality sustainable water and requires new development to include water conservation measures; Policy LU-13.2, which requires new development to identify adequate water resources; and Policy COS-4.1, which requires development to reduce the waste of potable water through use of efficient technologies and conservation efforts supply.

In addition to the regulations and General Plan policies described above, the following 2011 GPU PEIR mitigation measures also would be applied to the CAP Update to minimize groundwater supply impacts: Mitigation Measure Hyd-2.1, which requires implementation of Board Policy I-84 requiring that discretionary project applications include commitments from available water districts; Mitigation Measure Hyd-2.2, which requires implementation of the Groundwater Ordinance to balance groundwater resources with new development; Mitigation Measure Hyd-2.4, which requires the County to coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and implementation and

enhancement of water conservation programs; Mitigation Measure Hyd-2.5, which requires implementation of the RPO and BOS Policy I-68 “Proposed Projects in Flood Plains/Floodways” to restrict development in flood plains/floodways; and Mitigation Measures Hyd-1.1 through Hyd-1.5 described above.

Compliance with existing regulations and implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures would reduce potential impacts on groundwater supply and recharge from new farmworker housing. However, the effectiveness of mitigation cannot be determined with certainty at a programmatic level. Therefore, the impacts related to groundwater supply and recharge would be potentially significant, consistent with the conclusions in the 2011 GPU PEIR.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects.

Implementation of CAP Update Measure E-2 and Measure E-3 could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. These retrofits could include rooftop or ground-mounted photovoltaic solar arrays or small wind turbines, upgraded mechanical systems, energy storage systems, and other similar improvements. Potential solar photovoltaic, small-scale wind turbines, and other building retrofits and improvements would occur in areas of existing development, and in association with new development, which would include energy-efficient mechanical equipment at the time of construction. The construction and operation of these types of renewable energy projects are not anticipated to require the use of groundwater, nor would they result in new impervious surfaces that could substantially interfere with groundwater recharge. Therefore, implementation of these actions is not anticipated to substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

Additionally, implementation of CAP Update Action E.3.3 could result in the construction of new large-scale renewable energy infrastructure including photovoltaic solar, concentrator solar, and wind turbines. The potential for the construction of large-scale renewable energy infrastructure was not evaluated in the 2011 GPU PEIR but potential wind energy impacts were evaluated in the 2012 Wind Energy EIR, and a summary of that analysis is provided below and is herein incorporated by reference.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating the renewable energy source. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage,

and scale of this type of infrastructure which relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees.

Water consumption from renewable energy resources varies considerably depending on the type of technology and cooling features used. There are currently two types of centralized solar power generating facilities: concentrator solar power plants (CSPs) and photovoltaic power plants. CSP facilities face challenges focused on water consumption because of the large amounts of water required for cooling and steam generation. The result is that water consumption at CSP facilities are comparable to water-intensive, traditional thermal power technologies (Mielke et al. 2010: 36). Solar photovoltaic systems, meanwhile, do not require significant quantities of water during normal operation (US Department of Energy 2006). Concentrated solar photovoltaic systems require more water than traditional solar photovoltaic technologies, but in amounts that are still less than traditional, nonrenewable thermal power plants (Mielke et al. 2010: 37). Solar photovoltaic technology has the potential to offset negative water consumption trends associated with nonrenewable energy resources. However, depending on the mix of new solar technologies that may be developed, if they favor CSP facilities, there could be significant and unavoidable impacts related to groundwater consumption.

The 2012 Wind Energy EIR evaluated impacts on groundwater resources associated with the development of large-scale wind turbine facilities on pages 3.2-16 to 3.2-17. All projects would be subject to discretionary review and would be required to obtain an MUP. As part of the County's discretionary review process, all large wind projects would be evaluated under CEQA and would be required to implement measures to minimize impacts on groundwater resources, as necessary. MUPs are subject to the county Groundwater Ordinance, WPO, and other local or regional plans, policies, or regulations. The 2012 Wind Energy EIR concluded on page 3.1.2-35 that there would be no significant impacts on groundwater resources and, therefore, no mitigation would be required.

Depending on the type and scale of large-scale renewable energy projects that would be developed under the CAP, there could be an increase in the overall quantity of groundwater drawn from local groundwater basins. Future discretionary large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to groundwater resources to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. In addition, MUPs are subject to the county Groundwater Ordinance, WPO, and other local or regional plans, policies, or regulations implemented to reduce impacts on groundwater resources. However, additional water consumption needed for large-scale renewable energy projects, especially in the large quantities required for CSP facilities, could substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, the impacts related to groundwater supply and recharge would be potentially significant, consistent with the conclusions in the 2011 GPU PEIR.

Built Environment and Transportation Measures and Actions

The built environment and transportation measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Action T-1.1) and Active Transportation Plan (Action T-5.1). Other measures and actions would affect the design of existing and planned roadways. Action T-6.2 would implement transit-supportive roadway treatments such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Action T-3.1 would result in the installation of publicly available electric vehicle charging stations. Action T-3.1.a would support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts that could facilitate future infrastructure construction. Several measures and actions would further support alternative modes of transportation without resulting in physical changes that could decrease groundwater supplies or substantially interfere with groundwater recharge.

Where CAP Update measures and actions result in physical changes to the environment, these improvements would be located throughout the county and would occur in areas that are developed with existing residential and commercial uses. None of these improvements would require the use of groundwater for construction or operation, and therefore would not substantially decrease groundwater supplies. Additionally, because these improvements would likely be in existing developed areas, they would not introduce new impervious surfaces that could substantially interfere with groundwater recharge. Therefore, implementation of these actions is not anticipated to substantially decrease groundwater supplies or interfere substantially with groundwater recharge. The impact would be less than significant.

Summary

As detailed in the GPU PEIR 2011, although compliance with existing regulations and the implementation of General Plan policies and 2011 GPU PEIR mitigation measures would reduce impacts on groundwater supply and recharge, these impacts would not be reduced to a less-than-significant level because implementation of the General Plan would allow land uses and development to occur in areas that are already experiencing groundwater supply impacts, thereby worsening the unsustainable use of groundwater supplies. In addition, additional mitigation for groundwater supply impacts was considered that would have required all projects to share well water, secure water contracts to import groundwater from other non-impacted groundwater basins, or place a moratorium on building permits and development applications. However, these measures were rejected as infeasible.

Future projects implemented under the CAP Update would be required to comply with existing federal, state, and local regulations and implement adopted General Plan policies (Policies LU-6.5, LU-6.9, LU-8.1, LU-8.2, LU-13.1, LU-13.2, COS-4.1, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.4) and 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Hyd-1.1 through Hyd-1.5 and Hyd-2.1 through Hyd-2.5).

While all feasible mitigation would be applied at the project level as part of the County's discretionary review process, construction of projects associated with the CAP Update could still adversely affect groundwater supplies and recharge because of the location and nature of projects. Furthermore, additional water consumption needed for large-scale renewable energy projects, especially in the large quantities required for CSP facilities, could substantially decrease groundwater supplies or interfere substantially with groundwater recharge. At the programmatic level, it is not possible to determine with certainty that impacts on groundwater supplies and recharge would be reduced below a level of significance. Therefore, the impacts related to groundwater supply and recharge would be potentially significant, consistent with the conclusions in the 2011 GPU PEIR. However, implementation of the CAP Update **would not result in a new or more severe impact** compared to the 2011 GPU PEIR.

2.10.3.5 Issue 3: Surface Hydrology and Drainage

This following discussion describes the potential for implementation of the proposed CAP Update measures to result in effects related to surface hydrology and drainage.

Guidelines for Determination of Significance

The *County of San Diego Guidelines for Determining Significance: Hydrology and Water Quality* (County of San Diego 2021), which are reflective of the guidelines that were utilized in the 2011 GPU PEIR, provide guidance for addressing the following significance criteria listed in Appendix G of the State CEQA Guidelines:

- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
- result in substantial erosion or siltation on- or off-site;
- substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- impede or redirect flood flows.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated impacts related to surface hydrology and drainage from the adoption of the goals and policies contained within the General Plan and anticipated development of the land use map through the planning horizon. The 2011 GPU PEIR determined that ground disturbing construction activities and new development would have the potential to alter drainage patterns and increase the rate and amount of surface runoff that could cause potentially significant impacts related to erosion and siltation, flooding,

stormwater drainage system capacity, polluted runoff, and flood flows. The 2011 GPU PEIR determined that anticipated development under the General Plan would result in potentially significant impacts related to surface hydrology and drainage.

The 2011 GPU PEIR concluded that impacts related to surface hydrology and drainage would be reduced to a less-than-significant level with implementation of the General Plan policies and 2011 GPU PEIR mitigation measures, as well as compliance with applicable regulations related to site drainage, including the National Flood Insurance Act, National, Flood Insurance Reform Act, Cobey-Alquist Floodplain Management Act; BOS Policy I-45; County Flood Damage Prevention Ordinance; County Grading, Clearing, and Watercourse Ordinance; and RPO. General Plan policies that would address surface hydrology and drainage include Policies LU-6.5, LU-6.10, LU-6.12, COS-5.1, S-8.1, S-8.2, S-9.1, S-9.2, S-9.3, S-9.4, S-9.5, S-9.6, S-10.1, S-10.2, S-10.3, S-10.4, S-10.5, and S-10.6. In addition, the 2011 GPU PEIR identified Mitigation Measures Hyd-1.2 through Hyd-1.5, Hyd-2.5, Hyd-3.1, Hyd-3.2, Hyd-3.3, Hyd-4.1 through Hyd-4.3, Hyd-6.1, Hyd-8.1, and Hyd-8.2 to address potential impacts on surface hydrology and drainage. Enforcement of existing regulations and implementation of General Plan policies and 2011 GPU PEIR mitigation measures would reduce impacts on surface hydrology and drainage to less than significant.

The discussion of impacts can be found in Section 2.8, “Hydrology and Water Quality” (pages 2.8-42 through 2.8-50), of the 2011 GPU PEIR and is incorporated by reference. The full text of the specific policies related to surface hydrology and drainage is provided above in Section 2.10.2, “Regulatory Framework,” while the full text of applicable 2011 GPU PEIR mitigation measures is provided below in Section 2.10.5, “Mitigation Measures.”

CAP Update Impact Analysis

Solid Waste Measures and Actions

The CAP Update includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to hazardous materials and sites include those that would result in the development of new or expanded recycling and composting facilities (e.g., Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b). Implementation of these CAP Update measures and actions could result in the construction of new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 include development of zero waste policies that would result in new or expanded composting and recycling facilities to divert solid waste from landfills.

The construction of new and expanded solid waste facilities could involve the use of heavy equipment, paving, ground disturbance, and other typical construction activities that could contribute to temporary changes in drainage patterns. Development of these projects could also permanently alter local drainage characteristics of individual sites and influence erosion and siltation, flooding, stormwater drainage system capacity, polluted runoff, and flood flows. Compliance with regulations relating to grading and drainage would limit these

effects for projects that are subject to the requirements of the County grading ordinance. In areas where new construction for projects would take place, the peak flow and volume of storm water runoff generated from such areas would be affected by development through conversion of vegetated or otherwise pervious surfaces to impervious surfaces (e.g., roads, roofs, driveways, walkways) and by the development of drainage systems that might more effectively connect these impervious surfaces to water bodies. The travel time of runoff originally traveling as overland sheet flow could be reduced when routed into constructed conveyance systems directly from impervious surfaces. Soil compaction from activities at energy facilities could also reduce the local permeability of natural surfaces. Overall, an increase in impervious surfaces could increase the rate and volume of runoff and eliminate some natural storage and infiltration capacity along drainage paths. Consequently, sites could be subject to onsite ponding, or onsite or offsite flooding, especially during the wet season or during storm events. An increase in impervious surfaces could also increase the amount of polluted runoff that enters existing stormwater drainage systems.

Although specific locations for any new and expanded facilities have not been identified, any facilities would be sited outside of flood hazard zones in accordance with applicable federal, state, and local regulations. These regulations include the National Flood Insurance Act, which establishes flood-risk zones within floodplain areas; National Flood Insurance Reform Act, which reduces the risk of flood damage to properties; Cobey-Alquist Floodplain Management Act, which protects people and property from flooding hazards; BOS Policy I-45, which identifies procedures to use when proposed projects impact floodways; County Flood Damage Prevention Ordinance, which regulates development within all areas of special flood hazards and areas of flood-related erosion hazards and establishes policies that minimize public and private losses due to flood conditions; the County Grading, Clearing and Watercourses Ordinance, which requires the lowest floor of structures to be elevated to or above the level of the 100-year flood; County Subdivision Ordinance, which requires mapping and drainage easements to avoid certain drainages; and RPO, which prohibits development of permanent structures for human habitation in a floodway.

Compliance with these regulations would similarly address impacts on surface hydrology and drainage. The configuration of individually proposed new projects would be designed to address onsite ponding and discharges to offsite waterways. While development projects would divert stormwater flows differently from the current pattern of drainage on both developed and undeveloped land, new drainage systems would be designed in a manner to minimize erosion, sedimentation, and flooding in compliance with local and state laws and regulations. In addition, projects would be required to incorporate post-construction BMPs and LID strategies that are designed to treat polluted runoff associated with new impervious surfaces before entering stormwater drainage systems.

Additionally, new or expanded solid waste facilities would be required to implement General Plan policies that address surface hydrology and drainage. These include General Plan Policy LU-6.5 described above, as well as Policy LU-6.10, which requires development to be located and designed to protect property and residents from the risks of natural and man-induced hazards; Policy COS-5.1, which restricts development in

floodways and floodplains in accordance with policies in the Flood Hazards section of the Safety Element; Policy S-9.1, which directs development away from areas with high landslide, mudslide, or rock fall potential; Policy S-9.2, which prohibits development from causing or contributing to slope instability; Policy S-9.3, which requires development within mapped flood hazard areas be sited and designed to minimize on-site and off-site hazards; Policy S-9.4, which allows new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated; Policy S-9.5, which prohibits development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain; Policy S-9.6, which prohibits development in dam inundation areas that may interfere with the County's emergency response and evacuation plans; Policy S-10.1, which limits new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and that do not meet certain criteria identified in the policy; Policy S-10.2, which would require the use of natural channels for County flood control facilities; Policy S-10.3, which would require flood control facilities to be adequately sized, constructed, and maintained to operate effectively; Policy S-10.4, which would require new development to incorporate measures to minimize storm water impacts; Policy S-10.5, which would require new development to provide necessary on-site and off-site improvements to storm water runoff and drainage facilities; and Policy S-10.6, which would ensure new development maintains the existing hydrology of the area.

In addition to the regulations and General Plan policies described above, the following 2011 GPU PEIR mitigation measures also would be applied to the CAP Update to minimize impacts on surface hydrology and drainage: Mitigation Measures Hyd-1.2 through Hyd-1.3, as described above; Mitigation Measure Hyd-2.5, as described above; Mitigation Measure Hyd-3.1, which requires the County to implement ordinances that require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater; Mitigation Measure Hyd-3.2, which requires the County to implement the RPO to limit development on steep slopes; Mitigation Measure Hyd-3.3, which requires implementation of the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability; Mitigation Measure Hyd-4.1, which requires the County to implement the Flood Damage Prevention Ordinance (Regulatory Code 91.1.105.10) to reduce flood losses in specified areas; Mitigation Measure Hyd-4.2, which requires the County to implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses; Mitigation Measure Hyd-4.3, which requires the County to implement specific BOS policies that relate to impacts on floodways and flood-control measures; Mitigation Measure Hyd-6.1, which requires that the County implement the RPO to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological and drainage problems; and Mitigation Measure Hyd-8.2, which requires the County to review discretionary projects for dam inundation hazards through application of the *County of San Diego Guidelines for Determining Significance: Hydrology and Water Quality* and *County of San Diego Guidelines for Determining Significance: Emergency Response Plans*.

Compliance with existing regulations and implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures would ensure that new or expanded solid waste facilities associated with the CAP Update would not alter surface hydrology or drainage. The impact would be less than significant with mitigation.

Water and Wastewater Measures and Actions

The CAP Update includes measures and actions to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Implementation of CAP Update Actions W-1.1, W-2.2, W-2.3, and W-2.4 would involve construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The construction of new recycled water and stormwater capture and reuse infrastructure would not result in potential impacts on surface hydrology and drainage. Rather, these measures actions would facilitate water efficiency and conservation for existing development and new development as it is approved, which would reduce the amount of stormwater runoff that could alter local drainage characteristics of individual sites and influence erosion and siltation, flooding, stormwater drainage system capacity, polluted runoff, and flood flows. Accordingly, these actions could be beneficial to surface hydrology and drainage. Additionally, any new or expanded physical structures associated with implementing water conservation measures and actions would be ancillary to existing or proposed development and would be relatively minor in size and scale, and therefore would not alter surface hydrology or drainage. As such, implementation of these actions is not anticipated to alter surface hydrology or drainage. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of Measures A-1 through A-4 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. These measures would result in the preservation of natural and agricultural lands in the unincorporated county. Therefore, implementation of these measures would generally benefit surface hydrology and drainage.

However, implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. It is anticipated that new farmworker housing would be low density and in proximity to existing agricultural operations, which are generally in more rural areas of the unincorporated county. The development of new farmworker housing would have the potential to result in similar construction and

operation-related impacts on surface hydrology and drainage described above and in the 2011 GPU PEIR. These impacts could include temporary changes in drainage patterns from construction as well as permanent alterations to local drainage characteristics of individual sites, which could influence erosion and siltation, flooding, stormwater drainage system capacity, polluted runoff, and flood flows.

Similar to what was described in the 2011 GPU PEIR, construction of new farmworker housing would be subject to the same federal, state, and local regulations described above that reduce the potential for projects to alter surface hydrology and drainage. New farmworker housing would also be required to implement adopted General Plan goals and policies related to surface hydrology and drainage, including Policies LU-6.5, LU-6.10, LU-6.12, COS-5.1, S-8.1, S-8.2, S-9.1, S-9.2, S-9.3, S-9.4, S-9.5, S-9.6, S-10.1, S-10.2, S-10.3, S-10.4, S-10.5, and S-10.6, as described above. Lastly, new farmworker housing would be required to implement 2011 GPU PEIR 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, as described above.

Compliance with existing regulations and implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures would ensure that new farmworker housing associated with the CAP Update would not alter surface hydrology and drainage. The impact would be less than significant with mitigation.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects.

Implementation of CAP Update Measure E-2 and Measure E-3 could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. These retrofits could include rooftop or ground-mounted photovoltaic solar arrays or small wind turbines, energy storage systems. upgraded mechanical systems, and other similar improvements. Potential solar photovoltaic, small-scale wind turbines, and other building retrofits and improvements would occur in areas of existing development, and in association with new development, which would include energy-efficient mechanical equipment at the time of construction. Construction of these types of new renewable energy projects is not anticipated to require substantial ground-disturbing activities that could alter drainage patterns. Rather, it is anticipated that construction activities would only require minor ground disturbance such as trenching for wires and piping.

However, implementation of CAP Update Action E.3.3 could result in the construction of new large-scale renewable energy infrastructure including photovoltaic solar, concentrator solar, and wind turbines. The potential for the construction of large-scale renewable energy infrastructure was not evaluated in the 2011 GPU PEIR but potential

wind energy impacts were evaluated in the 2012 Wind Energy EIR and a summary of that analysis is provided below and is herein incorporated by reference.

The use of heavy equipment, paving, ground disturbance, and other typical construction activities associated with new large-scale renewable energy infrastructure could adversely affect water quality standards where projects are located near waterways or discharges runoff to stormwater drainage systems. Development of these projects could alter local drainage characteristics of individual sites and influence onsite or offsite flooding. Compliance with regulations relating to grading and drainage would limit these effects for projects that are subject to the requirements of the County's Grading Ordinance. In areas where new construction for projects would take place, the peak flow and volume of storm water runoff generated from such areas would be affected by development through conversion of vegetated or otherwise pervious surfaces to impervious surfaces (e.g., roads, roofs, driveways, walkways) and by the development of drainage systems that might more effectively connect these impervious surfaces to water bodies. The travel time of runoff originally traveling as overland sheet flow could be reduced when routed into constructed conveyance systems directly from impervious surfaces. Soil compaction from activities at large-scale renewable energy facilities could also reduce the local permeability of natural surfaces. Overall, an increase in impervious surfaces could increase the rate and volume of runoff and eliminate some natural storage and infiltration capacity along drainage paths. Consequently, sites could be subject to onsite ponding, or onsite or offsite flooding, especially during the wet season or during storm events.

All discretionary projects would be required to comply with the WPO, the Flood Damage Prevention Ordinance, the Grading Ordinance and the RPO. The configuration of individually proposed new projects would be designed to address onsite ponding and discharges to offsite waterways. While large-scale renewable energy projects could divert stormwater flows differently from the current pattern of drainage on both developed and undeveloped land, new drainage systems would be designed in a manner to minimize hydrology and drainage effects in compliance with local and state laws and regulations.

The 2012 Wind Energy EIR evaluated impacts relating to hydrology and drainage associated with the development of large-scale wind turbine facilities on pages 3.2-17 to 3.2-20 and determined impacts to be less than significant. All large-scale renewable energy projects would be required to obtain a grading permit as part of the MUP discretionary review process and comply with the County's Grading Ordinance. Projects would also be required to prepare and implement a SWQMP, which would contain construction and post-construction BMPs, and LID strategies for erosion and flood control. Additionally, PDPs are required to have a Major SWQMP and are subject to hydromodification control requirements. The criteria that define PDPs commonly apply to large-scale renewable energy facilities (non-residential and 1 acre in size or greater; hillside development greater than 1 acre; new paved surfaces that are greater than 5,000 square feet and intended for transportation).

The MUP review process also requires the submittal of pre-project and post-project drainage information to ensure that drainage patterns are not substantially altered with

implementation of the project. All large-scale renewable energy projects are subject to obtaining an MUP, which would require compliance with all applicable local, state, and federal regulations that address flood hazards. Moreover, because these improvements would generally occur in existing developed areas, they would not be sited in flood hazards areas in accordance with applicable federal, state, and local regulations, including National Flood Insurance Act; National Flood Insurance Reform Act; Cobey-Alquist Floodplain Management Act; BOS Policy I-45; County Flood Damage Prevention Ordinance; the County Grading, Clearing and Watercourses Ordinance; County Subdivision Ordinance; and RPO. Additionally, new renewable energy projects would be required to implement adopted General Plan goals and policies related to surface hydrology and drainage, including Policies LU-6.5, LU-6.10, LU-6.12, COS-5.1, S-8.1, S-8.2, S-9.1, S-9.2, S-9.3, S-9.4, S-9.5, S-9.6, S-10.1, S-10.2, S-10.3, S-10.4, S-10.5, and S-10.6, as described above. Lastly, renewable energy projects would be required to implement 2011 GPU PEIR 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, as described above.

Compliance with existing regulations and implementation of applicable General Plan policies and 2011 GPU PEIR mitigation measures would ensure that new renewable energy projects associated with the CAP Update would not alter surface hydrology and drainage. The impact would be less than significant with mitigation.

Built Environment and Transportation Measures and Actions

The built environment and transportation measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Measure T-1.1) and Active Transportation Plan (Measure T-5.1). Other measures and actions would affect the design of existing and planned roadways. Measure T-6.2 would implement transit-supportive roadway treatments such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Measure T-3.1 would result in the installation of publicly available electric vehicle charging stations. Action T-3.1.a would support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts that could facilitate future infrastructure construction. Several measures and actions would further support alternative modes of transportation without resulting in physical changes that could alter surface hydrology or drainage.

Where CAP Update measures and actions result in physical changes to the environment, these improvements would be located throughout the county and would occur in areas that are developed with existing residential and commercial uses. None of these improvements would have the potential to alter surface hydrology or drainage because any physical changes would be relatively minor and would likely be located in existing developed areas, and therefore would not be located in flood hazard areas. Therefore, implementation of these actions is not anticipated to alter surface hydrology or drainage. The impact would be less than significant.

Summary

With compliance with existing 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), implementation of the CAP Update would not result in a new or substantial increase in magnitude of impacts related to surface hydrology and drainage compared to the 2011 GPU PEIR. Therefore, impacts related to surface hydrology and drainage associated with implementation of the solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions in the CAP Update would remain less than significant with mitigation**,** consistent with the conclusions in the 2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.10.3.6 Cumulative Impact Analysis

The cumulative impact analysis study area for hydrology and water quality in the 2011 GPU PEIR was identified as drainage basins, watersheds, water bodies or groundwater basins, depending on the location of the potential impact and its tributary area (as described on page 2.8-58 of the 2011 GPU PEIR). This analysis uses the same scope identified in the 2011 GPU PEIR. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Surface Water and Groundwater Quality

This section describes potential cumulative impacts related to surface water and groundwater quality with implementation of the CAP Update. Impacts would be cumulative in nature if the project, in combination with cumulative development, would contribute to degraded water quality within drainage basins, watersheds, water bodies or groundwater basins.

The 2011 GPU PEIR determined that cumulative development would result in a potentially significant cumulative impact on water quality. Although required regulations would minimize the cumulative impact of projects in the United States, watersheds or receiving waters that receive runoff from projects in Mexico would not be protected by the same requirements. The 2011 GPU PEIR concluded that cumulative impacts on surface water and groundwater quality from development anticipated through the planning horizon would be reduced with implementation of the General Plan policies and 2011 GPU PEIR mitigation measures listed above, and compliance with applicable federal, state, and local regulations; however, the impacts would remain significant and unavoidable.

Implementation of the CAP Update measures would include components that could degrade surface water and groundwater quality. Specifically, the construction of new or expanded solid waste facilities, new farmworker housing, and renewable energy projects

could degrade surface water and groundwater quality. As discussed in Section 2.10.3.3, "Issue 1: Degrade Surface Water and Groundwater Quality," compliance with existing federal, state, and local regulations and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures (Adopted 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. Therefore, the project, in combination with other reasonably foreseeable projects in the region, would result in a considerable contribution to an existing cumulative effect. The cumulative impact would be significant, consistent with the conclusion in the 2011 GPU PEIR. This **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

Issue 2: Groundwater Supply and Recharge

This section describes potential cumulative impacts related to groundwater supply and recharge with implementation of the CAP Update. Impacts would be cumulative in nature if the project, in combination with cumulative development, would contribute to decreased groundwater supplies or substantially interfere with groundwater recharge within the groundwater dependent areas of the unincorporated county and the immediately adjacent jurisdictional areas that share groundwater basins with county areas.

The 2011 GPU PEIR concluded that cumulative impacts to groundwater supplies resulting from the development anticipated through the planning horizon would be reduced with implementation of the General Plan policies and 2011 GPU PEIR mitigation measures listed above, and compliance with applicable federal, state, and local regulations; however, the impacts would remain significant and unavoidable.

Implementation of the CAP Update measures would include components that could decrease groundwater supplies and interfere with groundwater recharge. Specifically, the construction of new or expanded solid waste facilities, new farmworker housing, and large-scale renewable energy projects could impact groundwater resources. As discussed in Section 2.10.3.4, "Issue 2: Decrease Groundwater Supply and Interfere with Groundwater Recharge," compliance with existing federal, state, and local regulations and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures (Adopted 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. Therefore, the project, in combination with other reasonably foreseeable projects in the region, would result in a considerable contribution to an existing cumulative effect. The cumulative impact would be significant, consistent with the conclusions in the 2011 GPU PEIR. This **would not result in a new or more severe impact** compared to the 2011 GPU PEIR.

Issue 3: Surface Hydrology and Drainage

This section describes potential cumulative impacts related to surface hydrology and drainage with implementation of the CAP Update. Impacts would be cumulative in nature

if the project, in combination with cumulative development, would contribute to altered surface hydrology and drainage within drainage basins, watersheds, water bodies or groundwater basins.

The 2011 GPU PEIR determined that cumulative projects would result in less-than-significant cumulative impacts on surface hydrology and drainage with compliance with the federal, state, and local regulations. The 2011 GPU PEIR concluded that cumulative impacts on surface hydrology and drainage from implementation of the General Plan would not be significant with compliance with applicable federal, state, and local regulations and implementation of the General Plan policies and 2011 GPU PEIR mitigation measures listed above.

Implementation of the CAP Update measures would include components that could alter surface hydrology and drainage. Specifically, the construction of new or expanded solid waste facilities, 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, “Issue 3: Surface Hydrology and Drainage,” 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.

The 2011 GPU PEIR did not identify an existing cumulative effect related to surface hydrology and drainage from cumulative projects. Cumulative growth projected in the 2021 Regional Plan is not anticipated to generate additional effects on hydrology and drainage in the cumulative condition. Similar to the conclusions of the 2011 GPU PEIR, implementation of the CAP Update would not result in a substantial incremental effect that would result in a new significant cumulative impact. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.10.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would not result in new or more severe significant impacts on surface water and groundwater quality, groundwater supply and recharge, or surface hydrology and drainage.

2.10.5 Mitigation Measures

The following section lists the mitigation measures from the 2011 GPU PEIR that are applicable to the proposed project. No new mitigation measures have been proposed to avoid or minimize hydrology and water quality impacts resulting from the proposed project.

2.10.5.1 Issue 1: Surface Water and Groundwater Quality

The mitigation measures applicable to surface water and groundwater quality that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Hyd-1.1: Update and implement the County of San Diego's Jurisdictional Runoff Management Program (JRMP).[3]
>
> Adopted Mitigation Measure Hyd-1.2: Implement and revise as necessary the Watershed Protection Ordinance to reduce the adverse effects of polluted runoff discharges on waters and to encourage the removal of invasive species and restore natural drainage systems.
>
> Adopted Mitigation Measure Hyd-1.3: Establish and implement low impact development (LID) standards for new development to minimize runoff and maximize infiltration.
>
> Adopted Mitigation Measure Hyd-1.4: Revise and implement the Stormwater Standards Manual requiring appropriate measures for land use with a high potential to contaminate surface water or groundwater resources.
>
> Adopted Mitigation Measure Hyd-1.5: Utilize the County *Guidelines for Determining Significance for Hydrology and Water Quality*[4] and *Groundwater Resources* to identify adverse environmental effects.

2.10.5.2 Issue 2: Groundwater Supply and Recharge

The mitigation measures applicable to groundwater supply and recharge that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Hyd-2.1: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available water districts. Also implement and revise as necessary Board Policy G-15 to conserve water at County facilities.
>
> Adopted Mitigation Measure Hyd-2.2: Implement the Groundwater Ordinance to balance groundwater resources with new development. Also revise the Ordinance Relating to Water Conservation for Landscaping (currently Zoning Ordinance Sections 6712 through 6725) to further water conservation through the use of recycled water.

[3] This mitigation measure has been updated to reflect the current name of the program.
[4] This mitigation measure has been updated to reflect the latest version of the County's *Guidelines for Determining Significance: Hydrology and Water Quality*, which was last updated in August 2021.

Adopted Mitigation Measure Hyd-2.3: Establish a water credits program between the County and the Borrego Water District to provide a streamlined and consistent process for the permanent cessation of outdoor water intensive uses such as irrigated agricultural or golf course land.

Adopted Mitigation Measure Hyd-2.4: Coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and implementation and enhancement of water conservation programs.

Adopted Mitigation Measure Hyd-2.5: Implement and revise as necessary the Resource Protection Ordinance and Policy I-68 Proposed Projects in Flood Plains / Floodways to restrict development in flood plains / floodways.

2.10.5.3 Issue 3: Surface Hydrology and Drainage

The mitigation measures applicable to surface hydrology and drainage that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include the following:

Adopted Mitigation Measure Hyd-3.1: Implement, and revise as necessary, ordinances to require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater.

Adopted Mitigation Measure Hyd-3.2: Implement, and revise, as necessary the Resource Protection Ordinance to limit development on steep slopes. Also incorporate Board Policy I-73, the Hillside Development Policy, into the Resource Protection Ordinance to the extent that it will allow for one comprehensive approach to steep-slope protections.

Adopted Mitigation Measure Hyd-3.3: Implement the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability.

Adopted Mitigation Measure Hyd-4.1: Implement the Flood Damage Prevention Ordinance to reduce flood losses in specified areas.

Adopted Mitigation Measure Hyd-4.2: Implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses.

Adopted Mitigation Measure Hyd-4.3: Implement and revise as necessary Board Policies such as: Policy I-68, which establishes procedures for projects that impact floodways; Policy I-45, which defines watercourses that are subject to flood control; and Policy I-56, which permits, and establishes criteria for, staged construction of off-site flood control and drainage facilities by the private sector when there is a demonstrated and substantial public, private or environmental benefit.

Adopted Mitigation Measure Hyd-6.1: Implement the Resource Protection Ordinance to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological and drainage problems.

Adopted Mitigation Measure Hyd-8.2: Review discretionary projects for dam inundation hazards through application of the County's Guidelines for Determining Significance for Hydrology and Guidelines for Determining Significance for Emergency Response Plans.

2.10.6 Significance Conclusions

2.10.6.1 Issue 1: Surface Water and Groundwater Quality

The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although compliance with existing federal, state, and local regulations related to surface water and groundwater quality and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce project-level and cumulative impacts, these impacts would not be reduced to a less-than-significant level because of the uncertainty of the types, locations, and scale of projects implemented under the CAP Update. Therefore, similar to the conclusions in the 2011 GPU PEIR, the CAP Update would have a **significant and unavoidable impact** and **would result in a considerable contribution** to a significant cumulative impact on surface water and groundwater quality. However, this **would not be a new or more severe impact** compared to the 2011 GPU PEIR.

2.10.6.2 Issue 2: Groundwater Quality and Supply

The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although compliance with existing federal, state, and local regulations related to groundwater supply recharge and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce project-level and cumulative impacts, these impacts would not be reduced to a less-than-significant level because of the uncertainty of the types, locations, and scale of projects implemented under the CAP Update. Therefore, similar to the conclusions in the 2011 GPU PEIR, the CAP Update would have a **significant and unavoidable impact** and **would result in a considerable contribution** to a significant cumulative impact on groundwater supply and recharge. However, this **would not be a new or more severe impact** compared to the 2011 GPU PEIR.

2.10.6.3 Issue 3: Surface Hydrology and Drainage

The CAP Update would result in the development and redevelopment of infrastructure throughout the unincorporated county. Although there is a potential for some types of projects to alter surface hydrology and drainage, compliance with existing federal, state, and local regulations and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that project-level and cumulative impacts on

surface hydrology and drainage would remain **less than significant** and **would not result in a considerable contribution** such that a new significant cumulative impact would occur. Implementation of the CAP Update **would not result in a new or more severe impact** not discussed in the 2011 GPU PEIR.

2.11 Land Use and Planning

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

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

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

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

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

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

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

Source: Compiled by Ascent Environmental in 2023.

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

2.11.1 Existing Conditions

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

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

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

2.11.2 Regulatory Framework

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

2.11.2.1 Federal

No federal land use regulations are applicable to the project.

2.11.2.2 State

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

2.11.2.3 Local

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

San Diego Association of Governments 2021 Regional Plan

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

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

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

2020-2030 County Operations Strategic Sustainability Plan

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

County of San Diego Zero Carbon Portfolio Plan

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

County of San Diego Renewable Energy Plan

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

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

County of San Diego Strategic Plan to Reduce Waste

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

Airport Land Use Compatibility Plans

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

Local Coastal Program Land Use Plan

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

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

County of San Diego Low Impact Development Handbook

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

2011 San Diego County General Plan

San Diego County General Plan Policies

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

Land Use Element

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

> Policy LU-6.5: Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development (LID) techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County's LID Handbook.
>
> Policy LU-7.1: Agricultural Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.
>
> Policy LU-12.4: Planning for Compatibility. Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character

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

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

Conservation and Open Space Element

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

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

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

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

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

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

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

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

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

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

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

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

Environmental Justice Element

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

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

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

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

Policy EJ-2.5: Conflicting Land Use Buffers (All Unincorporated Areas). Consistent with the Land Use Element, avoid land use conflicts by ensuring sensitive land

uses are adequately buffered from heavy industrial uses and other facilities that may pose a threat to human health.

Policy EJ-2.6: Pollution Reduction Incentives (All Unincorporated Areas). Encourage existing stationary sources of emissions to use feasible measures to minimize emissions that could have potential impacts on air quality. Incentivize non-conforming uses to relocate to appropriate industrial zones if currently impacting sensitive land uses.

Policy EJ-2.7: New Sensitive Land Uses (All Unincorporated Areas). Consistent with the Land Use Element, avoid locating new homes, schools, childcare and eldercare facilities, parks and recreation, and health care facilities within 500 feet of freeways, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

Policy EJ-3.7: Carbon Sequestration Efforts (All Unincorporated Areas). Consistent with the Land Use Element and Climate Action Plan, support and promote carbon sequestration and carbon farming efforts for agricultural lands in unincorporated areas to mitigate air, water, and soil pollution exposure and help build climate resilience.

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

Policy EJ-6.5: Low-Income Homeowners (All Unincorporated Areas). Provide assistance and program referrals for low-income homeowners to maintain and improve residential properties through rehabilitation and energy efficiency and weatherization assistance programs.

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

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

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

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

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

County of San Diego Community Plan and Subregional Plan Updates

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

2011 San Diego County GPU PEIR

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

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

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

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

2.11.3 Analysis of Effects and Significance Determinations

2.11.3.1 Significance Criteria

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

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

2.11.3.2 Approach to Analysis

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

Scope of SEIR Analysis

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

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

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

Proposed CAP Update Strategies

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

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

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

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

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

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

2.11.3.3 Issue 1: Physically Divide an Established Community

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

Guidelines for Determination of Significance

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

- physically divide an established community.

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

Impact Analysis

2011 GPU PEIR Determination

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

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

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

- Policy LU-4.4: Development Compatibility with Military Facilities. Ensure compatibility of new development with the current and planned mission and operations of U.S. government military installations.
- Policy LU-11.2: Compatibility with Community Character. Require that commercial, office, and industrial development be located, scaled, and designed to be compatible with the unique character of the community.
- Policy LU-12.4: Planning for Compatibility. Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts.
- Policy M-10.6: On-Street Parking. Minimize on-street vehicular parking outside Villages and Rural Villages where on-street parking is not needed, to reduce the width of paved shoulders and provide an opportunity for bicycle lanes to retain rural character in low-intensity areas. Where on-street parking occurs outside Villages and Rural Villages, require the design to be consistent with the rural character. [See applicable community plan for possible relevant policies.]
- Policy H-2.1: Development that Respects Community Character. Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element. [See applicable community plan for possible relevant policies.]
- Policy M-1.3: Treatment of High-Volume Roadways. To avoid bisecting communities or town centers, consider narrower rights-of-way, flexibility in design standards, and lower design speeds in areas planned for substantial development. Reduce noise, air, and visual impacts of new freeways, regional arterials, and Mobility Element roads, through landscaping, design, and/or careful location of facilities.

- Implementing the following mitigation measures identified in the 2011 GPU PEIR that would ensure that future infrastructure and development do not conflict with other local plans and regional planning efforts:
  - Adopted Mitigation Measure Lan-1.1: Coordinate with adjacent cities and other agencies regarding planning efforts and resource protection. This includes working with SANDAG during updates to the RTP to ensure that regional roads are properly planned, sited, and designed. Additional on-going consultations include coordination with state, federal, and local agencies regarding the high speed rail, the Sunrise Powerlink, and tribal casinos.
  - Adopted Mitigation Measure Lan-1.2: Coordinate with land owners, other departments, and community groups to ensure that both public and private

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

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

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

CAP Update Impact Analysis

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

Solid Waste Measures and Actions

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

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

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

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

Water and Wastewater Measures and Actions

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

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

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

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

Agriculture and Conservation Measures and Actions

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

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

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

Energy Measures and Actions

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

Small-Scale Energy Systems

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

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

Large-Scale Renewable Energy Systems

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

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

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

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

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

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

Built Environment and Transportation Measures and Actions

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

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

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

Summary

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

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

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

Guidelines for Determination of Significance

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

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

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

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

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

Impact Analysis

2011 GPU PEIR Determination

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

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

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

CAP Update Impact Analysis

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

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

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

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

Solid Waste Measures and Actions

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

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

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

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

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

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

Water and Wastewater Measures and Actions

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

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

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

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

Agriculture and Conservation Measures and Actions

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

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

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

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

Energy Measures and Actions

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

Small-Scale Energy Systems

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

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

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

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

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

Large-Scale Renewable Energy Systems

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

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

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

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

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

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

Built Environment and Transportation Measures and Actions

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

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

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

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

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

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

Summary

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

2.11.3.5 Cumulative Impact Analysis

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

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

Issue 1: Physically Divide an Established Community

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

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

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

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

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

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

2.11.4 Summary of New or More Severe Significant Impacts

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

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

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

2.11.5 Mitigation Measures

2.11.5.1 Issue 1: Physically Divide an Established Community

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

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

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

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

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

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

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

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

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

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

2.11.6 Significance Conclusions

2.11.6.1 Issue 1: Physically Divide an Established Community

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

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

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

2.12 Noise

This section describes existing conditions for noise within the unincorporated county. It includes definitions of common noise descriptors; summaries of applicable noise regulations, acoustic fundamentals, and existing ambient noise conditions; and an analysis of potential short- and long-term noise impacts associated with implementation of the CAP Update. Potential noise impacts are analyzed, and mitigation measures are provided for those impacts determined to be significant. Because this analysis is subsequent to the adopted 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the noise setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with updates to setting conditions since certification of the 2011 GPU PEIR.

Table 2.12-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. As indicated, implementation of the proposed project would not result in new or more severe significant impacts related to noise.

Table 2.12-1 Summary of Noise-Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1[1]	Excessive Noise Levels (Temporary Construction Noise)	General Plan Only: Less-Than-Significant Impact after Mitigation	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less-Than-Significant Impact after Mitigation	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
	Excessive Noise Levels (Permanent Operational Noise)	General Plan Only: Significant and Unavoidable Impact	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Significant and Unavoidable Cumulative Impact	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
2	Excessive Groundborne Vibration	General Plan Only: Less-Than-Significant Impact after Mitigation	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less-Than-Significant Impact after Mitigation	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
3	Excessive Noise from a Public or Private Airport	General Plan Only: Less-Than-Significant Impact after Mitigation	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Less-Than-Significant Impact after Mitigation	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

[1] **Since the certification of the 2011 GPU PEIR, the California Natural Resources Agency revised the State CEQA Guidelines in 2018. This draft SEIR uses the updated State CEQA Guidelines, which combine temporary and permanent noise impact thresholds under one impact question.**

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

Source: Compiled by Ascent Environmental in 2023.

No comments related to noise and vibration were received during the Notice of Preparation (NOP) scoping process. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

2.12.1 Existing Conditions

The 2011 GPU PEIR included a discussion of existing noise conditions within the unincorporated county in Section 2.11.1, “Noise,” pages 2.11-1 through 2.11-9. Some development has occurred in the unincorporated county since the adoption of the 2011 GPU PEIR leading to a potential increase in ambient noise levels. Therefore, the 2011 GPU PEIR conditions represent a conservative baseline for comparison of potential future noise levels. Therefore, the existing conditions in the 2011 GPU PEIR would be applied to the project and are herein incorporated by reference.

2.12.1.1 Noise Measurements

No new ambient noise measurements were obtained as part of this analysis. Measured ambient noise levels, as wells as baseline traffic noise levels in the unincorporated county, are provided as part of the 2011 GPU PEIR. Specifically, the 2011 GPU PEIR

provided a summary of community noise levels (Equivalent Energy Level [L_{eq}])[1] measured for the various land uses within the unincorporated county, including:

- Freeways and Highways – 70 A-weighted decibels (dBA)
- Major Arterials – 66–71 dBA
- Passenger Rail – 70 dBA
- Airports – 56 dBA
- Commercial – 65–69 dBA
- Industrial – 61–62 dBA
- Agricultural – 44–68 dBA
- Other Uses – 59–74 dBA
- Noise-Sensitive Uses – 43–65 dBA

2.12.1.2 Transportation Noise Generators

Roadways

The most substantial and common source of noise on roadways is traffic in the unincorporated county. The roadway network in the unincorporated county consists of state highways, interstate highways, regional arterials, local public roads, and private roads. Noise would vary by time of day depending on traffic volumes, the speed of the traffic, the type of vehicles using a particular roadway, and pavement conditions. Highways and arterials generally accommodate high-speed, high-volume traffic, and are designed to provide for the movement of people and goods between and within communities in the county. The interstate highways in the unincorporated county include Interstate (I-) 15, I-5, and I-8. Major state highways include State Route (SR) 94, SR 78, SR 79, and SR 76. Examples of major arterials include Jamacha Road in Valle de Oro Community Planning Area, Sweetwater Road in Spring Valley Community Planning Area, and Tecate Road in Mountain Empire Subregion. Local roads serve lower speed, lower volume traffic and provide access to local residential neighborhoods and commercial and industrial areas in each of the communities throughout the unincorporated county.

Airports

Noise generated from aviation operations is concentrated around airport buildings, runways, and along approach and departure routes. There are seven public airport operations in the unincorporated county (Table 2.11-2 of the 2011 GPU PEIR). Additionally, 29 smaller private-use airports are scattered throughout the unincorporated county.

[1] All noise levels were short-term (15-minute) measurements.

Railroads

There are two railroad corridors within the San Diego region, which are operated by five railroad providers. The railroad corridors are primarily located within incorporated cities. The San Diego & Arizona Eastern Railway's Desert Line is the primary freight rail line that traverses the unincorporated county. However, this line is not currently operating (Smith 2022). The extent of the noise generated from passenger and freight trains depends on many factors, including the frequency of train operations, the number of railway cars, the type of engine, and the number of grade crossings that require warning bells or horns. In addition, train pass-by events would cause adjacent land use to be affected by groundborne vibration.

2.12.1.3 Non-Transportation Noise Generators

Industrial, Commercial, Extractive, and Agricultural Sources

Non-transportation related noise generators are commonly called "stationary," "fixed," "area," or "point" sources of noise. Industrial processing; mechanical equipment; pump stations; and heating, ventilating, and air conditioning equipment are examples of fixed location, non-transportation noise sources within the unincorporated county.

Noise generated by industrial and commercial operations, maintenance, manufacturing, truck traffic (loading docks), and warehousing noise can affect surrounding noise-sensitive land uses. Noise perceived as disruptive by residents in proximity to existing agricultural operations has the potential to result from the operation of agricultural machinery in the evening or early morning hours when many residents desire a quiet environment. In addition, operation of exterior exhaust and cooling system equipment typically used in greenhouse operations can be a source of noise that has the potential to affect surrounding land uses.

Temporary and/or Nuisance Noise

Intermittent or temporary neighborhood noise from amplified music, public address systems, barking dogs, landscape maintenance, stand-by power generators, motorized recreation, and construction activities are disturbing to residents but are difficult to attenuate and control. The 2011 GPU PEIR identified that 74 percent of the noise complaints received by the County's Office of Noise Control in the unincorporated county are associated with barking dogs. Roosters and machinery are also common sources of noise complaints, each accounting for approximately 7 percent of complaints. The least common source of noise complaints are birds, accounting for approximately 2 percent of noise complaints.

2.12.2 Regulatory Framework

The 2011 GPU PEIR included a summary of the regulatory framework related to noise in Chapter 2.11, "Noise" (pages 2.11-9 through 2.11-14), and it is herein incorporated by

reference. Specific regulations discussed in the 2011 GPU PEIR and applicable to the project include the following:

2.12.2.1 Federal

- Federal Aviation Administration (FAA) Standards
- Federal Highway Administration Standards
- Federal Railroad Administration Standards
- Federal Transit Administration (FTA) Standards
- US Office of Surface Mining Reclamation and Enforcement

2.12.2.2 State

- California Noise Control Act of 1973
- California Noise Insulation Standards (CCR Title 24)
- California Airport Noise Standards (CCR, Title 21, Section 5000 et seq.)
- Streets and Highways Code; California Vehicle Code (Sections 27200–27207)
- California Harbors and Navigation Code
- California Streets and Highway Code (Sections 215.5–216-5)

2.12.2.3 Local

- Airport Land Use Compatibility Plans (ALUCPs)
- The Adopted County of San Diego General Plan Noise Element
- San Diego County Code of Regulatory Ordinances, Title 3, Division 6, Chapter 4, Sections 36.401–36.435, Noise Ordinance
- San Diego County Code of Regulatory Ordinances, Title 6, Division 3, Chapter 4, Sections 63.401–63.402, Agricultural Enterprise and Consumer Information Ordinance

2011 San Diego County General Plan

The policies addressing noise that were adopted as part of the General Plan and are applicable to the project include the following:

> Policy LU-2.8: Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.
>
> Policy M-2.4: Roadway Noise Buffers. Incorporate buffers or other noise reduction measures consistent with standards established in the Noise Element

into the siting and design of roads located next to sensitive noise-receptors to minimize adverse impacts from traffic noise. Consider reduction measures such as alternative road design, reduced speeds, alternative paving, and setbacks or buffers, prior to berms and walls.

Policy N-1.4: Adjacent Jurisdiction Noise Standards. Incorporate the noise standards of an adjacent jurisdiction into the evaluation of a project when it has the potential to impact the noise environment of that jurisdiction.

Policy N-1.5: Regional Noise Impacts. Work with local and regional transit agencies and/or other jurisdictions, as appropriate, to provide services or facilities to minimize regional traffic noise and other sources of noise in the County.

Policy N-2.1: Development Impacts to Noise Sensitive Land Uses. Require an acoustical study to identify inappropriate noise levels where development may directly result in any existing or future noise sensitive land uses being subject to noise levels equal to or greater than 60 Community Noise Equivalent Level (CNEL) and require mitigation for sensitive uses in compliance with the noise standards listed in Table N-2 in the Noise Element.

Policy N-2.2: Balconies and Patios. Assure that in developments where the exterior noise level on patios or balconies for multi-family residences or mixed-use developments exceed 65 CNEL, a solid noise barrier is incorporated into the building design of the balconies and patios while still maintaining the openness of the patio or balcony.

Policy N-3.1: Groundborne Vibration. Use the Federal Transit Administration and Federal Railroad Administration guidelines, where appropriate, to limit the extent of exposure that sensitive uses may have to groundborne vibration from trains, construction equipment, and other sources.

Policy N-4.1: Traffic Noise. Require that projects proposing General Plan amendments that increase the average daily traffic beyond what is anticipated in this General Plan do not increase cumulative traffic noise to off-site noise sensitive land uses beyond acceptable levels.

Policy N-4.2: Traffic Calming. Include traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise in development that may impact noise sensitive land uses.

Policy N-4.3: Jurisdictional Coordination. Coordinate with California Department of Transportation (Caltrans), the City of San Diego, and other adjacent jurisdictions, as appropriate, for early review of proposed new and expanded State freeways, highways, and road improvement projects within or affecting the unincorporated County to: 1) locate facilities where the impacts to noise sensitive land uses would be minimized, and 2) develop and include noise abatement

measures in the projects to minimize and/or avoid the impacts to noise sensitive land uses.

Policy N-4.5: Roadway Location. Locate new or expanded roads designated in the Mobility Element in areas where the impact to noise sensitive land uses would be minimized.

Policy N-4.9: Airport Compatibility. Assure the noise compatibility of any development projects that may be affected by noise from public or private airports and helipads during project review by coordinating, as appropriate, with appropriate agencies such as the San Diego County Regional Airport Authority (SDCRAA) and the Federal Aviation Administration (FAA).

Policy N-6.1: Noise Regulations. Develop and regularly update codes and ordinances as necessary to regulate impacts from point, intermittent, and other disruptive noise sources.

Policy N-6.2: Recurring Intermittent Noise. Minimize impacts from noise in areas where recurring intermittent noise may not exceed the noise standards listed in Table N-2, but can have other adverse effects.

Policy N-6.3: High-Noise Equipment. Require development to limit the frequency of use of motorized landscaping equipment, parking lot sweepers, and other high-noise equipment if their activity will result in noise that affects residential zones.

Policy N-6.4: Hours of Construction. Require development to limit the hours of operation as appropriate for non-emergency construction and maintenance, trash collection, and parking lot sweeper activity near noise sensitive land uses.

Policy N-6.6: Code Enforcement. Provide sufficient resources within the County for effective enforcement of County codes and ordinances.

Policy S-15.1: Land Use Compatibility. Require land uses surrounding airports to be compatible with the operation of each airport.

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Noi-1.1: Require an acoustical analysis whenever a new development may result in any existing or future noise sensitive land uses being subject to on-site noise levels of 60 dBA (CNEL) or greater, or other land uses that may result in noise levels exceeding the “Acceptable” standard in the Noise Compatibility Guidelines (Table N-1 in the Noise Element).

Adopted Mitigation Measure Noi-1.3: Require an acoustical study for projects proposing amendments to the County General Plan Land Use Element and/or

Mobility Element that propose a significant increase to the average daily traffic due to trips associated with the project beyond those anticipated in the General Plan.

Adopted Mitigation Measure Noi-2.1: For Land Use Designations defined in Table 2.11-14, a groundborne vibration technical study shall be required for proposed land uses within the following distances from the Sprinter Rail Line right-of-way and the property line: 600 feet of a Category 1 Land Use, 200 feet of a Category 2 Land Use, and 120 feet of a Category 3 Land Use. If necessary, mitigation shall be required for land uses in compliance with the standards listed in Tables 2 and 3 of the County of San Diego Guidelines for Determining Significance – Noise.

Adopted Mitigation Measure Noi-2.4: Require an acoustical study whenever a proposed extractive land use facility may result in a significant noise impact to existing noise sensitive land uses, or when a proposed noise sensitive land use may be significantly affected by an existing extractive land use facility. The results of the acoustical study may require a "buffer zone" to be identified on all Major Use Permit applications for extractive facilities whenever a potential for a noise impact to noise sensitive land uses may occur.

Adopted Mitigation Measure Noi-5.1: Use the applicable Airport Land Use Compatibility Plan's (ALUCP) as guidance/reference during development review of projects that are planned within an Airport Influence Area (AIA). Any projects that are within the AIA shall be submitted to the SDCRAA for review.

Adopted Mitigation Measure Noi-5.3: Consult with the FAA standards and the County Noise Ordinance as a guide for assessing noise impacts from private airports and helipads.

2.12.3 Analysis of Effects and Significance Determinations

2.12.3.1 Significance Criteria

Based on guidance provided in Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance: Noise* (County of San Diego 2009), except as provided in Public Resources Code Section 21099, the proposed project would result in a significant noise impact if it would:

- result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- result in generation of excessive groundborne vibration or groundborne noise levels;
- for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

2.12.3.2 Approach to Analysis

Impacts related to noise are analyzed based on a review of the CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area is analyzed in the context of existing laws and regulations as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant 2011 GPU PEIR mitigation measures are already applicable to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update.

Scope of SEIR Impact Analysis

The impact analysis contained within this draft SEIR focuses on whether implementation of the CAP Update would result in new or more severe impacts than were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impacts of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unincorporated county) and its role as a programmatic planning document designed to guide future decision-making related to the reduction of GHGs within the unincorporated county, the study area for noise is the unincorporated area of the county within the County's jurisdiction (i.e., all unincorporated lands excluding tribal lands, state and federally owned lands, and military installations).

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

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies and associated measures and actions proposed in the CAP Update (see Table 1-2) have been grouped into categories for the purpose of analysis, based on the sector they target (e.g., solid waste, water/wastewater). CAP Update measures and actions that would have the potential to affect noise are summarized below.

CAP Update actions and measures that would involve development of policies and programs that would not result in direct physical effects or those that would result in limited physical improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to noise.

Solid Waste Measures and Actions. This category includes strategies, measures, and implementing actions aimed at achieving zero solid waste in County operations and within the unincorporated county. Key measures and actions with the potential to result in new or more severe impacts related to noise include Measures SW-1 through SW-4, which have the potential to result in the construction of new or expanded solid waste facilities to meet waste diversion targets, and increase the prevalence of composting, anaerobic digestion, recycling throughout the unincorporated county.

Water and Wastewater Measures and Actions. This category includes strategies to decrease water consumption and increase wastewater and stormwater treatments. Key measures and actions with the potential to result in new or more severe impacts related to noise include Measures W-1 through W-3, which would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency.

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural land and agricultural land. Key measures and actions with the potential to result in new or more severe impacts related to noise include Measures A-1 through A-2. Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified.

Energy Measures and Actions. This category includes a strategy to develop policies and programs to increase energy efficiency and renewable energy use. Key actions with the potential to result in new or more severe impacts related to noise are included to support Measure E-3. For example, Action E-3.2 could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. Through Action E-3.2.b, the County would work with partners to promote and support on-site renewable (wind and solar) energy generation and storage (microgrids, site-specific and/or community scale) to increase renewable energy generation and use in the unincorporated area, which would be regulated by existing County ordinances and policies. Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the vehicle fleet, install electric vehicle charging stations, incentivize the use of alternative fuels and landscaping practices, and promote and support transit and ridesharing to reduce single-occupancy vehicle use. Generally, a shift from gas powered cars to electric engines and alternative modes of transportation would not result in increased noise. However, actions with the potential to result in construction

of new or improved facilities (e.g., Actions T-5.1 and T-6.2) may generate new or more severe impacts related to noise.

2.12.3.3 Issue 1: Excessive Noise Levels

This section describes the potential for implementation of the CAP Update to result in excessive noise levels.

Guidelines for Determination of Significance

Appendix G of the State CEQA Guidelines establishes the following guideline for determining significance of effects related to excessive noise levels:

- result in generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

The CEQA thresholds provided by the *County of San Diego Guidelines for Determining Significance: Noise* (County of San Diego 2009) state that a significant impact would occur if project implementation would result in the exposure of any on- or off-site existing or reasonably foreseeable future noise-sensitive land use to exterior or interior noise in excess of any of the following:

1. Construction (temporary or periodic) noise levels that exceed

    a. 75 dBA for an 8-hour period, between 7 a.m. and 7 p.m., if impulsive noise exceeds 82 dBA maximum sound level (L_{max}) at an occupied residential, village zoning, or civic use or 85 dBA L_{max} at an occupied agricultural, commercial, or industrial use; or if noise is generated between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, or any time on Sundays or holidays, or

2. Operational (permanent) noise levels that exceed

    a. Exterior Locations:

        i. Roadways and all other noise sources: 60 or 65 dBA (CNEL) in the Noise Compatibility Guidelines or an increase of 10 dBA (CNEL) over pre-existing noise in areas where the ambient noise level is 49 dBA (CNEL) or less.

        ii. Railroads: 60 dBA (CNEL) or an increase of 10 dBA (CNEL) over pre-existing noise in areas where the ambient noise level is 49 dBA (CNEL) or less.

    b. Interior Locations:

        i. 45 dBA (CNEL)

The above guidelines are based on the updated State CEQA Guidelines for noise impact analysis (California Natural Resources Agency 2018) and the *County of San Diego Guidelines for Determining Significance: Noise* (County of San Diego 2009). Since the certification of the 2011 GPU PEIR, the Natural Resources Agency finalized the State CEQA Guidelines in 2018. The above updated State CEQA Guidelines for noise reflect the guidelines for determination of significance for Issues 1 (Excessive Noise Levels), 3 (Permanent Increase in Ambient Noise Levels), and 4 (Temporary or Periodic Increase in Ambient Noise Levels) applied in the 2011 GPU PEIR.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated excessive noise levels (i.e., roadways and railroads) at noise-sensitive uses; temporary increases in ambient noise levels resulting from construction of new land uses and infrastructure; and permanent increase in ambient noise levels resulting from operation of traffic on new roadways or roadway improvements and new industrial facilities and other noise-generating uses.

It was determined that future development under the General Plan would have the potential to expose noise-sensitive land uses to excessive noise levels. The 2011 GPU PEIR concluded that these impacts would be reduced to below a level of significance through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; the adopted General Plan goals and policies; and specific mitigation measures/implementation programs identified in the 2011 GPU PEIR. Specific policies related to noise are listed above under Section 2.12.2, “Regulatory Framework.” Mitigation measures identified in the 2011 GPU PEIR include Noi-1.1 to Noi-1.9, which would require an acoustical analysis for new development that may result in noise levels exceeding the “Acceptable” standard listed in the Noise Element, coordination with agencies to identify and analyze appropriate route alternatives, and implementation procedures to ensure that a public participation process is available for affected communities. With implementation of mitigation and compliance with existing regulations and adopted General Plan policies, the 2011 GPU PEIR concluded that this impact would be reduced to a less-than-significant level. The discussion of this impact can be found in Chapter 2.11, “Noise,” on pages 2.11-14 through 2.11-19 and 2.11-35.

The 2011 GPU PEIR determined that future development under the General Plan would have the potential to expose sensitive land uses to excessive temporary noise from construction and nuisance noise from development intensification and concluded that these impacts would be reduced to below a level of significance through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; the adopted General Plan goals and policies; and specific mitigation measures/implementation programs identified in the 2011 GPU PEIR. Specific mitigation measures identified in the 2011 GPU PEIR include Adopted Mitigation Measures Noi-4.1 and Noi-4.2, which require the County to periodically review and revise to the Noise Ordinance and augment staff and equipment as appropriate to facilitate enforcement of Noise Ordinance. Specific policies related to noise are listed above under

Section 2.12.2, “Regulatory Framework.” The discussion of impacts can be found in Section 2.11.3.4 (pages 2.11-28 through 2.11-32 and 2.11-36 and 2.11-37) of the 2011 GPU PEIR.

The 2011 GPU PEIR determined that implementation of the General Plan would result in significant and unavoidable impacts related to a permanent increase in ambient noise levels. Even with the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; the adopted General Plan goals and policies; and specific mitigation measures/implementation programs identified in the 2011 GPU PEIR, the impacts would not be reduced to below a level of significance. The County determined that the following mitigation measures would be infeasible to reduce impacts associated with permanent increases in ambient noise levels to below a level of significance because the measure would prohibit the construction of many roadway projects proposed in the Circulation Element: Noi-1.3 (requiring an acoustical study for projects proposing amendments to the General Plan), Noi-1.4 (editing the Guidelines for Determining Significance to promote design and measures that minimize motor vehicle traffic noise), Noi-1.5 (coordinating with agencies to identify and analyze appropriate route alternatives that may minimize noise impacts), Noi-1.8 (implement procedures with agencies to ensure that a public participation process is available for the affected communities), Noi-2.3 (reviewing industrial facility applications to ensure they are located in appropriate areas), Noi-2.4 (requiring an acoustical study for a facility that may result in a significant noise impact), Noi-3.1 (ensuring that new County road improvement projects would not exceed the County’s Noise Standards or exceed 3 dB over existing conditions), and Noi-3.2 (determining appropriate noise reduction site design techniques). Specific policies related to noise are listed above under Section 2.12.2, “Regulatory Framework,” above.

CAP Impact Analysis

The following sections describe the effects related to noise that could result from the implementation of the measures and actions proposed in the CAP Update.

Solid Waste Measures and Actions

Excessive Noise Levels (Temporary Construction Noise)

Implementation of the CAP Update measures and associated implementing actions would have the potential to result in new or expanded solid waste facilities. For example, Actions SW-1.1 and SW-2.1 include development of zero waste policies that may result in new or expanded composting and recycling facilities to divert solid waste from landfills. Specific locations for new and expanded facilities have not been identified. Therefore, these improvements are analyzed at a programmatic level.

Construction noise levels that could result from the implementation of projects associated with the implementation of CAP Update would fluctuate depending on the type, number, size, and duration of usage for the varying equipment. The effects of construction noise largely depend on the type of construction activities occurring on any given day, noise levels

generated by those activities, distances to noise-sensitive receptors, and the existing ambient noise environment in the receptor's vicinity. Construction generally occurs in several discrete stages and each phase requires the use of varying equipment types and quantities at varying intensities. These variations in the operational characteristics of the equipment change the effect they have on the noise environment of the project site and in the surrounding communities for the duration of the construction process.

To assess noise levels associated with the various equipment types and operations, construction equipment can be considered to operate in two modes: mobile and stationary. Mobile equipment sources move around a construction site performing tasks in a recurring manner (e.g., loaders, graders, dozers). Stationary equipment operates in a location for an extended period to perform continuous or periodic operations. Operational characteristics of heavy construction equipment are additionally typified by short periods of full-power operation followed by extended periods of operation at lower power, idling, or powered-off conditions.

Additionally, when construction-related noise levels are being evaluated, activities that occur during the more noise-sensitive evening and nighttime hours are of increased concern. Because exterior ambient noise levels typically decrease during the late evening and nighttime hours as traffic volumes and commercial activities decrease, construction activities performed during these more noise-sensitive periods of the day can result in increased annoyance and potential sleep disruption for occupants of nearby residential uses.

The site preparation phase typically generates the most substantial noise levels because of the on-site equipment associated with grading, compacting, and excavation, which uses the noisiest types of construction equipment. Site preparation equipment and activities include backhoes, bulldozers, loaders, and excavation equipment (e.g., graders and scrapers). It is not anticipated that the types of projects that could be implemented under the CAP Update would involve the construction of large structures; however, construction of large structural elements and mechanical systems could require the use of a crane for placement and assembly tasks, which may generate noise. A detailed construction equipment list is not currently available; however, it is expected that the primary sources of noise for this project type would include backhoes, bulldozers, and excavators. Noise levels from typical types of construction equipment can range from approximately 74 to 94 dBA at 50 feet.

Based on this information and accounting for typical usage factors of individual pieces of equipment and activity types, on-site construction could result in hourly average noise levels of 87 dBA L_{eq} at 50 feet and maximum noise levels of 90 dBA L_{max} at 50 feet from the simultaneous operation of heavy-duty equipment.

Future projects associated with implementation of the CAP Update would be required to perform an acoustical analysis, as required by 2011 GPU PEIR Mitigation Measures Noi-1.1, Noi-1.3, and Noi-2.4, and would be evaluated for consistency with land use compatibility guidelines prior to development. Further, these projects would be regulated by the County Noise Ordinance and would require approval of building permits. Finally,

all development projects would be required to comply with San Diego County Code Sections 36.408 and 36.409, Construction Equipment, which regulates construction-related noise. With implementation of the identified 2011 GPU PEIR mitigation measures and existing regulations, no substantial increases in periodic noise would occur and the impact would remain less-than-significant.

Excessive Noise Levels (Permanent Operational Noise)

Operation of new or expanded solid waste facilities would result in increased haul truck trips to and from the facility; however, it is anticipated that the haul truck trips to the facility would be displaced by the haul trucks trips that would be diverted from landfills. Therefore, no net increase in the number of haul truck trips and associated traffic-related noise within the county would occur. The loudest equipment that would be in operation at a composting facility would be the grinder and front-end loader. Equipment would operate continuously but would be dependent on the volume of materials received and the need to move materials. In the case of the aerated static pile composting, large blowers would push and pull air through the piles. These blowers have the potential to operate 24 hours per day. Composting methods use electric motors to power pumps, impellers, or compressors. When properly installed, operated, and maintained, these motors generally produce noise levels less than 54 dBA at 30 feet (SWRCB 2015). As stated above, all new and existing facilities would be required to demonstrate consistency with land use compatibility guidelines as described in Zoning Ordinance Section 6952(f) as well as perform acoustical analyses as stated in Adopted Mitigation Measures Noi-1.1, Noi-1.3, and Noi-2.4. In addition, adopted General Plan Policy LU-2.8 would require measures to minimize significant impacts to surrounding areas from uses or operations that cause excessive noise.

Because these projects would be required to perform an acoustical analysis, be determined consistent with land use compatibility guidelines, and would be regulated by the County Noise Ordinance, excessive noise from operations would be minimized. Therefore, implementation of measures would result in less-than-significant operational noise impacts related to new or expanded solid waste facilities.

Water and Wastewater Measures and Actions

Excessive Noise Levels (Temporary Construction Noise)

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Measures W-1 and W-2 include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping.

Installation of water efficient appliances, irrigation systems, and stormwater and grey water capture systems would generally not require the use of heavy equipment that would result in excessive noise impacts. Construction of stormwater and wastewater treatment systems associated with the CAP Update would be regulated by the County Noise Ordinance and require approval of a building permit. In addition, these projects would be required to comply with San Diego County Code Sections 36.408 and 36.409, Construction Equipment, which regulates construction-related noise. Similar to construction of new or expanded solid waste facilities, development of stormwater and wastewater treatment systems would be required to perform an acoustical analysis as required by 2011 GPU PEIR Mitigation Measures Noi-1.1, Noi-1.3, and Noi-2.4 and would be required to be determined consistent with land use compatibility guidelines to proceed with development. With implementation of the identified 2011 GPU PEIR mitigation measures and existing regulations, temporary and periodic noise impacts would be less than significant.

Excessive Noise Levels (Permanent Operational Noise)

Operations of water and wastewater projects associated with the CAP Update would result in the generation of noise from the usage of equipment typical of this land use type, such as pumps, generators, and utility trucks. These projects would also be subject to Zoning Ordinance Section 6952(f) and Adopted Mitigation Measures Noi-1.1, Noi-1.3, and Noi-2.4, which are intended to reduce any potential exposure of sensitive receptors to excessive levels of noise. Water and wastewater measures and actions would result in less-than-significant permanent noise impacts.

Agriculture and Conservation Measures and Actions

Excessive Noise Levels (Temporary Construction Noise)

Implementation of Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. These projects would result in preservation of existing natural, conservation, and agricultural lands and would not require construction activities.

Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county, if opportunities to increase farmworker housing in the unincorporated area are identified. Development of farmworker housing could involve the use of heavy equipment for earthmoving, materials processing, vehicle trips during construction/equipment replacement/monitoring activities, possible changes in landform and views, and construction of housing. These activities could result in the exposure of nearby sensitive receptors to noise generated from the use of construction equipment for the construction of farmer housing and the planting of trees. However, because of the scale and nature of the possible projects, which are generally small, localized, and would require relatively little use of heavy-duty construction equipment for short periods of time, construction-related noise is not anticipated to be excessive to the point that it would significantly impact sensitive receptors. Additionally, all projects would be required to

comply with Section 36.408 of the County's Noise Ordinance, which sets limits on hours of operation for construction equipment, and Section 36.409 of the County's Noise Ordinance sets sound level limits on construction equipment. Therefore, temporary construction noise impacts would be less than significant.

Excessive Noise Levels (Permanent Operational Noise)

Under Section 36.417 of the Noise Ordinance, agricultural operations are generally exempt from the noise standards, provided that each piece of equipment and machinery powered by an internal-combustion engine is equipped with an appropriate muffler and air intake silencer in good working order and one of the following applies: operations do not take place between 7:00 p.m. and 7:00 a.m.; the operations and equipment are utilized for the preparation, planting, harvesting, protection, or salvage of agricultural crops during adverse weather conditions; or the operations and equipment are used for agricultural pest control in accordance with regulations and procedures administered by the County Department of Agriculture. Therefore, agricultural operations would not result in a potentially significant impact to noise-sensitive land uses, specifically residential and commercial land uses. Operations associated with tree planting are not likely to cause noise related impacts to sensitive receptors because trees do not typically require prolonged maintenance that would generate excessive noise.

Projects associated with the implementation of the CAP Update would be required to conform with applicable adopted General Plan policies and the 2011 GPU PEIR mitigation measures. Additionally, as stated above, agricultural operations are typically considered exempt from noise standards and operations associated with tree planting are not expected to generate excessive noise levels for prolonged periods of time such that sensitive receptors would be significantly impacted. Thus, implementation of the agriculture and conservation measures and actions would result in less-than-significant impacts related to the exposure of sensitive receptors to excessive permanent noise levels over the existing environment.

Energy Measures and Actions

Excessive Noise Levels (Temporary Construction Noise)

Implementation of CAP Update energy measures and associated implementing actions would involve implementation of policies, programs, and other mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in the development of various renewable energy projects.

Implementation of CAP Update Measure E-3, Action E-3.2, and Action E-3.3 could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. These retrofits could include rooftop or ground-mounted photovoltaic (PV) solar arrays or small wind turbines, upgraded mechanical systems, energy storage, and other similar improvements. While the location of improvements associated with

potential future projects is unknown it is likely that retrofits would occur in areas of existing development. Renewable energy projects, including on-site renewable energy generation supported through proposed CAP Update Action E-3.2.b, would be regulated by existing County ordinances and policies. The placement of small-scale PV solar renewable energy equipment on new and existing buildings is regulated by the existing County Renewable Energy Zoning Ordinance Section 6954(a). Small-scale wind turbines would be regulated by the County's Wind Energy Ordinance Sections 6950 through 6952.

Implementation of CAP Update Action E-3.3 could result in large-scale wind turbines and solar energy generation systems such as PV and concentrator solar. Large-scale renewable energy infrastructure requires large, undeveloped land that is productive for generating the renewable energy source. Specific locations that may be chosen for these facilities are unknown; however, it is likely that suitable locations would be in undeveloped areas due to the scale of the potential renewable energy systems. The large-scale production of energy from PV solar systems generally include a variety of infrastructure components such as arrays, substation sites, battery storage, collection systems, and overhead and underground transmission facilities. Large-scale wind turbine infrastructure generally includes wind turbines (300–500 feet to the topmost blade tip), a substation site, meteorological towers, overhead and underground collector cable systems, and overhead transmission lines. All future large-scale renewable energy projects would be subject to discretionary review and would be evaluated under CEQA, and would be required to mitigate significant impacts as needed.

Excessive noise could result from construction of projects associated with implementation of CAP Update energy measures. Activities such as site grading, truck/construction equipment movement, and engine noise would have the potential to result in the exposure of on- or off-site areas to noise in excess of the standards listed in the County Zoning Code Sections 36.408 and 36.409. However, construction activities would be required to comply with Section 36.408 of the County's Noise Ordinance, which sets limits on hours of operation for construction equipment, and Section 36.409 of the County's Noise Ordinance, which sets sound level limits on construction equipment. Adopted General Plan Policy N-6.4 would require non-emergency construction to be limited near noise-sensitive land uses. In addition, 2011 GPU PEIR Mitigation Measures Noi-1.1, Noi-1.3, and Noi-2.4 would require an acoustical study for projects that may result in excessive noise.

With implementation of adopted 2011 GPU PEIR mitigation measures and compliance with adopted General Plan policies and existing regulations, temporary construction noise impacts would remain less than significant.

Excessive Noise Levels (Permanent Operational Noise)

Operation of upgraded mechanical systems, small-scale solar arrays, and small wind turbine systems do not typically generate significant levels of noise during regular operation. Noise would be generated during maintenance activities for these systems but these activities would likely involve small crews (one to two light-duty trucks) and any noise generated would likely be less than the ambient noise of the surrounding developed

area. Operational noise from large-scale solar and wind turbine projects include equipment noise from the motors of the wind turbines, substations, maintenance activities, worker vehicle trips to and from the sites, battery storage HVAC systems, and transformers and substation transformers. Emergency generators may be used in the event of power loss from the electricity distribution grid and, therefore, would be limited. Maintenance activities would also occur intermittently for short durations at one location at a time. However, as described above, large-scale renewable systems are typically located in undeveloped areas and therefore are not likely to expose sensitive receptors to significant levels of noise.

In addition to the requirements described above, the County's Wind Energy Ordinance also establishes low-frequency (C-weighted) sound limits for large wind turbine projects. In some cases, a higher C-weighted sound level may potentially create an annoyance; however, there is no published scientific evidence to conclude wind turbine noise could cause adverse health effects (page 2.8-19 of the 2012 Wind Energy Ordinance EIR). All large wind turbine projects would be required to obtain a Major Use Permit (MUP) and be evaluated under CEQA, and the implementation of mitigation would be required if significant impacts are identified (County of San Diego 2012). This is the same process that would be required for other large-scale renewable energy projects. As part of the MUP process, large-scale renewable energy projects would be required to perform an acoustical analysis, as required by 2011 GPU PEIR Mitigation Measures Noi-1.1, Noi-1.3, and Noi-2.4, and would be required to be determined consistent with land use compatibility guidelines as described in Zoning Ordinance Section 6952(f) to proceed with development. However, while large-scale wind energy projects would be required to meet the low-frequency sound limit established in the County's Wind Energy Ordinance, it is possible for a noise waiver to be granted that could result in a higher C-weighted sound limit being approved. The 2012 Wind Energy Ordinance EIR considered mitigation to eliminate the noise waiver; however, this was rejected as infeasible because it would reduce the amount of viable wind projects within the county. Therefore, consistent with the conclusions of the 2012 Wind Energy EIR, implementation of large-scale renewable wind energy projects could result in significant impacts related to annoyance from low-frequency noise from large wind turbines operation.

Built Environment and Transportation Measures and Actions

Excessive Noise Levels (Temporary Construction Noise)

Built environment and transportation measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Action T-1.1) and Active Transportation Program (Action T-5.1). Measure T-6.2 would implement transit-supportive roadway treatments, such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Action T-3.1 would result in the installation of publicly available electric vehicle charging stations. Action T-3.1.a would support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts that could facilitate future infrastructure construction.

Construction activities associated with the implementation of these measures would be similar to those analyzed in the 2011 GPU PEIR and discussed in "Solid Waste Measures and Actions" above. As explained in the 2011 GPU PEIR, implementation of the General Plan policies listed in Section 2.12.2, "Regulatory Framework," and 2011 GPU PEIR Mitigation Measures Noi-1.1, Noi-1.3, and Noi-2.4, which require acoustical analysis for projects may result in excessive noise, would reduce noise levels from these activities. Because of the scale and nature of proposed improvements, which are generally small, localized, and would require little use of heavy-duty construction equipment, construction-related noise is not anticipated to be excessive. Additionally, all projects would be required to comply with Section 36.408 of the County's Noise Ordinance which sets limits on hours of operation for construction equipment, and Section 36.409 of the County's Noise Ordinance sets sound level limits on construction equipment. With implementation of adopted 2011 GPU PEIR mitigation measures and compliance with adopted General Plan policies and existing regulations, impacts related to temporary construction noise would be less than significant.

Excessive Noise Levels (Permanent Operational Noise)

The operation of transportation infrastructure improvements (e.g., pedestrian and bicycle paths) would have the potential to result in the reduction of traffic on local roadways. Consequently, these improvements would reduce traffic-generated noise levels and associated exposure to nearby sensitive receptors. The operation of transit-supportive roadway treatments would not be likely to generate excessive levels of noise because the improvements would only act to improve traffic efficiency on existing roadways and would not result in new sources of noise. Measures and actions such as promoting the use of alternative fuels, increasing the County's Green Fleet, and implementation of anti-idling policies, would not increase noise during operation. As stated above, construction activities associated with the implementation of these measures would be similar to those analyzed in the 2011 GPU PEIR and would therefore be subject to the adopted General Plan policies and 2011 GPU PEIR mitigation measures that would further reduce noise levels from these activities. Therefore, implementation of built environment and transportation actions and measures would not result in significant impacts related to excessive noise.

Summary

The CAP Update would further existing programs and provide new and modified infrastructure in new and established communities to reduce GHG emissions. Implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the project impacts associated with excessive noise. Consistent with the 2011 GPU PEIR, impacts related to excessive noise from construction associated with implementation of the solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions in the CAP Update would be less than significant with mitigation. Impacts related to excessive noise from operation of projects associated with implementation of the solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions in the CAP Update would remain significant and

unavoidable, consistent with the conclusions in the 2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.12.3.4 Issue 2: Excessive Groundborne Vibration

This section describes potential project impacts on excessive groundborne vibration with implementation of the proposed CAP Update measures and actions.

Guidelines for Determination of Significance

Appendix G of the State CEQA Guidelines established the following guideline for determining significance of effects related to excessive groundborne vibration:

- result in generation of excessive groundborne vibration or groundborne noise levels.

The CEQA thresholds provided by the *County of San Diego Guidelines for Determining Significance: Noise* (County of San Diego 2009) state that a significant impact would occur if the project would result in the exposure of vibration sensitive uses to groundborne vibration and noise equal to or in excess of the levels shown in Table 4 of the Guidelines, Groundborne Vibration and Noise Standards, or if new sensitive land uses would be located in the vicinity of groundborne vibration inducing land uses such as railroads or mining operations. The groundborne vibration and noise standards identify the following three land use categories with increasing sensitivity to groundborne vibration and noise impacts:

- Category 1: Buildings where low-ambient vibration is essential for interior operations (research & manufacturing facilities with special vibration constraints).
- Category 2: Residences and buildings where people normally sleep (hotels, hospitals, residences, & other sleeping facilities).
- Category 3: Institutional land uses with primarily daytime use (schools, churches, libraries, other institutions, & quiet offices).

A project would result in a significant impact if frequent events would exceed 0.0018 inches per second (in/sec) root mean square (RMS) for Category 1 land uses, 0.004 in/sec RMS for Category 2, and 0.0056 in/sec RMS for Category 3. Occasional or infrequent events (fewer than 70 vibration events per day) would be considered a significant impact if they would exceed 0.0018 in/sec RMS for Category 1 land uses, 0.010 in/sec RMS for Category 2, and 0.014 in/sec RMS for Category 3.

These thresholds are consistent with the guidelines for determination of significance for Issue 2 applied in the 2011 GPU PEIR.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated groundborne vibration at noise-sensitive uses. It was determined that future development under the General Plan would have the potential to expose sensitive land uses to excessive groundborne vibration. The 2011 GPU PEIR concluded that these impacts would be reduced to below a level of significance through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; the adopted General Plan goals and policies; and specific mitigation measures/implementation programs identified in the 2011 GPU PEIR. Specific policies related to vibration and noise are listed above under Section 2.12.2, "Regulatory Framework." Specific mitigation measures identified in the 2011 GPU PEIR include Mitigation Measure Noi-2.1 (requiring groundborne vibration study for applicable land use designations), Mitigation Measure Noi-2.2 (reviewing the Guidelines for Determining Significance to incorporate standards to minimize groundborne vibration), Mitigation Measure Noi-2.3 (ensuing industrial facilities are located in areas that would minimize impacts to noise-sensitive land uses), and Mitigation Measure Noi-2.4 (requiring an acoustical study for projects that may result in a significant noise impact). With implementation of mitigation measures and compliance with adopted General Plan policies and existing regulations, the 2011 GPU PEIR concluded that this impact would be reduced to a less-than-significant level. The discussion of this impact can be found in Section 2.11.3.2 (pages 2.11-19 through 2.11-23 and 2.11-35 to 2.11-36) and it is herein incorporated by reference.

CAP Impact Analysis

Solid Waste Measures and Actions

Implementation of CAP Update Measures SW-1 through SW-4 and associated implementing actions have the potential to result in the construction of new or expanded solid waste facilities. Construction of new or expanded solid waste facilities would have the potential to result in excessive vibration levels. These activities may result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and activities involved. Groundborne vibration levels caused by various types of construction equipment and activities (e.g., bulldozers, blasting) range from 58 to 109 vibration decibels (VdB) and from 0.003 to 0.089 in/sec peak particle velocity (PPV) at 25 feet. While large-scale construction is not expected, it is possible that a variety of heavy-duty construction equipment, including bulldozers and trucks, would be used. Blasting or pile driving would not be anticipated to be needed. Per the FTA, levels associated with the use of a large bulldozer and trucks are 0.089 and 0.076 in/sec PPV (87 and 86 VdB) at 25 feet, respectively. These facilities could be located in rural areas or in proximity to developed communities, near roadways or commercial areas, or in remote areas. All development projects would be required to perform an acoustical analysis as required by 2011 GPU PEIR Mitigation Measures Noi-2.1 and Noi-2.4 and would be required to be determined consistent with land use compatibility guidelines to proceed with development and conduct acoustical studies for projects that may result in

significant noise impact. Adopted General Plan Policy N-3.1 would require the use of appropriate guidelines to limit the extent of exposure that sensitive uses may have to groundborne vibration from construction equipment and other sources. Further, these projects would be regulated by the County Noise Ordinance and would be required to comply with all applicable noise guidelines.

With implementation of adopted 2011 GPU PEIR mitigation measures and compliance with adopted General Plan policies and existing regulations, implementation of the CAP Update measures and actions would result in less-than-significant vibrational noise impacts.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Implementation of CAP Update Measures W-1 and W-2 would have the potential to result in installation of water efficient appliances, smart irrigation systems, and stormwater and greywater capture systems. Implementation of CAP Update Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on site, so that the stormwater and greywater would be treated and reused for landscaping.

Installation of water efficient appliances, irrigation systems, and stormwater and greywater capture systems would result in no or minimal ground disturbance and would generally not require the use of heavy equipment that would result in vibration impacts. Construction of stormwater and wastewater treatment systems on-site may require the use of heavy-duty construction equipment including bulldozers and trucks. Blasting or pile driving would not be anticipated to be needed. Per the FTA, levels associated with the use of a large bulldozer and trucks are 0.089 and 0.076 in/sec PPV (87 and 86 VdB) at 25 feet, respectively. The stormwater and wastewater treatment systems would likely be located within developed communities or within proposed development. All development projects would be required to perform an acoustical analysis as required by 2011 GPU PEIR Mitigation Measures Noi-2.1 and Noi-2.4 would be required to be determined consistent with land use compatibility guidelines to proceed with development and conduct acoustical studies for projects that may result in significant noise impact. Adopted General Plan Policy N-3.1 would require the use of appropriate guidelines to limit the extent of exposure that sensitive uses may have to groundborne vibration from construction equipment and other sources. In addition, these projects would be regulated by the County Noise Ordinance and would be required to comply with all applicable noise guidelines.

With implementation of 2011 GPU PEIR mitigation measures and compliance with adopted General Plan policies and existing regulations, implementation of the water and wastewater projects associated with the CAP Update would result in less-than-significant vibrational noise impacts.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, planting and protecting trees, providing incentive to encourage carbon farming, and developing a program to incentivize transition to cleaner fuels. These measures would result in new conservation lands, preservation of existing natural and agricultural lands, new trees, and the use of cleaner fuels in the unincorporated county. These projects would not require the use of heavy equipment that would result in vibration impacts.

Implementation of Action A-4.1.b would result in evaluation of opportunities to increase affordable farmworker housing in the unincorporated county. If development of new farmworker housing results from opportunities identified through implementation of this action, such development would require construction and the use of heavy-duty construction equipment that may result in vibration impacts. Similar to development of new or expanded solid waste facilities, development of farmworker housing would be required to perform an acoustical analysis as required by 2011 GPU PEIR Mitigation Measures Noi-2.1 and Noi-2.4 would be required to be determined consistent with land use compatibility guidelines to proceed with development and conduct acoustical studies for projects that may result in significant noise impact. The adopted General Plan Policy N-3.1 would require the use of appropriate guidelines to limit the extent of exposure that sensitive uses may have to groundborne vibration from construction equipment and other sources. In addition, these projects would be regulated by the County Noise Ordinance and would be required to comply with all applicable noise guidelines. As part of the County's discretionary review process, all projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to groundborne vibration and groundborne noise levels.

With implementation of 2011 GPU PEIR mitigation measures and compliance with adopted General Plan policies and existing regulations, implementation of the water and wastewater projects associated with the CAP Update would result in less-than-significant vibrational noise impacts.

Energy Measures and Actions

Implementation of the CAP Update would generally result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. Through Action E-3.2.b, the County would work with partners to promote and support renewable energy generation and storage (microgrids, site-specific and/or community scale, and large-scale) to increase renewable energy generation and use in the unincorporated area.

Implementation of renewable energy projects associated with the CAP Update may require the use of heavy-duty construction equipment including drills, bulldozers and trucks, which would have the potential to result in temporary groundborne vibration. Future development associated with the CAP Update would be required to perform an acoustical analysis as required by 2011 GPU PEIR Mitigation Measures Noi-2.1 and Noi-2.4 would be required to be determined consistent with land use compatibility guidelines

to proceed with development and conduct acoustical studies for projects that may result in significant noise impact. The adopted General Plan Policy N-3.1 would require the use of appropriate guidelines to limit the extent of exposure that sensitive uses may have to groundborne vibration from construction equipment and other sources. In addition, these projects would be regulated by the County Noise Ordinance and would be required to comply with all applicable noise guidelines. With implementation of the identified 2011 GPU PEIR mitigation measures and compliance with existing regulations.

With implementation of 2011 GPU PEIR mitigation measures and compliance with adopted General Plan policies and existing regulations, implementation of the energy projects associated with the CAP Update would result in less-than-significant vibrational noise impacts.

Built Environment and Transportation Measures and Actions

The built environment and transportation measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Action T-1.1) and Active Transportation Program (Action T-5.1). Other measures and actions would affect the design of existing and planned roadways. Action T-6.2 would implement transit-supportive roadway treatments such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Action T-3.1 would result in the installation of publicly available electric vehicle charging stations. Action T-3.1.a would support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts that could facilitate future infrastructure construction.

Installation of signal communication, curb extension, and electric vehicle charging stations would not require blasting or pile driving. However, other types of construction equipment that would result in groundborne vibration may be required to install signals and curb extensions, such as loaded trucks, drills, or bulldozers. All development projects would be required to perform an acoustical analysis as required by 2011 GPU PEIR Mitigation Measures Noi-2.1 and Noi-2.4 would be required to be determined consistent with land use compatibility guidelines to proceed with development and conduct acoustical studies for projects that may result in significant noise impact. The adopted General Plan Policy N-3.1 would require the use of appropriate guidelines to limit the extent of exposure that sensitive uses may have to groundborne vibration from construction equipment and other sources. Further, these projects would be regulated by the County Noise Ordinance and would be required to comply with all applicable noise guidelines. As part of the County's discretionary review process, all projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to groundborne vibration and groundborne noise levels.

With implementation of 2011 GPU PEIR mitigation measures and compliance with adopted General Plan policies and existing regulations, implementation of the built environment and transportation projects associated with the CAP Update would result in less-than-significant vibrational noise impacts.

Summary

Implementation of the CAP Update would result in development of new or modified facilities and structures (e.g., new or expanded solid waste facilities, water and wastewater infrastructure and efficiency improvements, and small-scale renewable energy infrastructure). Development of new or modified facilities and structures could involve the use of limited heavy-duty equipment that would result in groundborne vibration. However, the 2011 GPU PEIR Mitigation Measures Noi-2.1 and Noi-2.4 would be required to be determined consistent with land use compatibility guidelines to proceed with development and conduct acoustical studies for projects that may result in significant noise impacts. Adopted General Plan Policy N-3.1 would limit the extent of exposure that sensitive uses may have to groundborne vibration from construction equipment and other sources. Therefore, consistent with the 2011 GPU PEIR, impacts related to excessive groundborne vibration associated with implementation of the solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions in the CAP Update would remain less than significant with mitigation, consistent with the conclusions in the 2011 GPU PEIR. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.12.3.5 Issue 3: Excessive Noise Exposure from a Public or Private Airport

This section describes potential project impacts related to exposing people to excessive noise levels from a public or private airport.

Guidelines for Determination of Significance

Appendix G of the State CEQA Guidelines establishes the following guideline for determining significance of effects related to excessive noise exposure from a public or private airport:

- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would expose people residing or working in the project area to excessive noise level.

The County does not have specific guidelines for determining the significance of impacts related to aircraft noise; therefore, the above threshold from Appendix G of the State CEQA Guidelines is applied for the following analysis. Based on Appendix G of the State CEQA Guidelines and the California Airport Land Use Planning Handbook, the CAP Update would have a significant impact if it would expose people residing or working in the project area to excessive noise levels from a public airport. The level of noise acceptable to new development in the vicinity of proposed new airports, active military airports being converted to civilian use, and existing civilian airports is established as an annual CNEL of 60 dBA.

Impact Analysis

2011 GPU PEIR Determination

The 2011 GPU PEIR evaluated excessive noise exposure from a public or private airport associated with the implementation of the General Plan. The 2011 GPU PEIR concluded that the General Plan includes land use designations that would potentially result in the development of noise-sensitive land uses near a public or private airstrip, which would result in the exposure of persons to excessive noise levels. However, the impacts would be reduced to less than significant with implementation of adopted General Plan Policies N-4.9 (Airport Compatibility), S-15.1 (Land Use Compatibility), S-15.2 (Airport Operation Plans), and S-15.4 (Private Airstrip and Heliport Location) and implementation of Adopted Mitigation Measure Noi-5.1 (submitting projects that are within the AIA to the SDCRAA for review) and Adopted Mitigation Measure Noi-5.3 (assessing noise impacts from private airports and helipads).

CAP Impact Analysis

As discussed in Section 2.12.1.2, "Transportation Noise Generators," there are seven public airports and 29 small private airstrips scattered throughout the unincorporated county. Public airports and private airstrips have the potential to result in excessive noise impacts to people residing or working in the project area from activities such as aircraft takeoffs and landings. The CAP Update does not propose any new public airports or private airstrips. However, projects associated with the CAP Update would have the potential to expose people residing or working in the project area to excessive noise impacts from an existing public airport or private airstrip. Specific locations for potential projects have not been identified. Therefore, the following sections provide a programmatic level analysis for potential impacts resulting from implementation of various types of the CAP Update measures and associated implementing actions.

Solid Waste Measures and Actions

The CAP Update includes zero waste policies that exceed the state's diversion targets (Actions SW-1.1 and SW-2.1) and implementation of landfill gas capture systems that exceed State requirements (Actions SW-3.1 and SW-4.1). In addition, Action SW-4.1.a would incentivize the development of new composting/anaerobic digestion facilities and on-farm digesters. Implementation of the measures and actions in this group may result in the need for new or expanded facilities to process the waste and result in the development of new or expanded solid waste facilities.

The specific locations for the new or expanded solid waste facilities have not been determined. If the new or expanded solid waste facilities are located within the vicinity of a private airstrip or an airport land use plan, 2 miles of a public airport, or the 60 dBA annual CNEL noise contour of a public airport, impacts to people at these facilities could occur. Future projects associated with implementation of the CAP Update would be required to comply with adopted General Plan Policy N-4.9, which requires noise compatibility of any projects that may be affected by noise from public or private airports,

and Policy S-15.1, which requires land uses surrounding airports to be compatible with the operation of each airport. In addition, future development associated with CAP Update would be required to implement 2011 GPU PEIR Mitigation Measure Noi-5.1, which requires any projects within the AIA be submitted to the SDCRAA for review, and Mitigation Measure Noi-5.3, which requires consultation with the FAA standards and the County Noise Ordinance for assessing noise impacts. Compliance with the adopted General Plan policies and implementing 2011 GPU PEIR mitigation measures would ensure that future development would not result in excessive noise exposure from a public or private airport. Impacts would be less than significant.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Implementation of Measures W-1 and W-2 would generally result in installation of water efficient appliance, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping.

Installation of water efficient appliances, irrigation systems, stormwater and grey water capture systems, and on-site stormwater and wastewater treatment systems would require additional employees to be present temporarily to install related improvements. However, such facilities likely would not require additional short- or long-term employees that could be exposed to airport noise. Further, existing and proposed development would be covered by ALUCPs which are intended to minimize the public's exposure to excessive noise within areas around public airports and designate compatible and incompatible land uses surrounding the airport. As such, potential water and wastewater projects would result in less-than-significant impacts related to exposing people to excessive noise levels from a public or private airport.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and incentivizing carbon farming. Implementation of Action A-4.1.b would have the potential to identify opportunities for increased farmworker housing in the unincorporated county. Acquiring and preserving conservation, natural, and agricultural lands, protecting and planting trees, and incentivizing carbon farming would not result in people residing or working in the area on a long-term basis. Therefore, no impact related to excessive noise levels from a public or private airport would occur.

Development of farmworker housing (if opportunities to increase farmworker housing in the unincorporated area are identified) would have the potential to expose people residing or working in the area to excessive noise from a public or private airport if the housing is located within the vicinity of a private airstrip or an airport land use plan, 2 miles of a public airport, or the 60 dBA annual CNEL noise contour of a public airport. Development of new

farmworker housing associated with CAP Update would be required to comply with adopted General Plan Policy N-4.9, which reduces potential noise impacts to noise-sensitive land uses, and Policies S-15.1, S-15.2, and S-15.4, which require land uses surrounding airports to be compatible with airport operations. In addition, new farmworker housing projects that result from implementation of CAP Update Action 4.1.b would be required to implement 2011 GPU PEIR Mitigation Measure Noi-5.1, which requires any projects that are within an AIA to be submitted to the SDCRAA for review. Compliance with the adopted General Plan policies and implementing 2011 GPU PEIR mitigation measures would result in less-than-significant noise exposure from a public or private airport.

Energy Measures and Actions

Implementation of CAP Update Measure E-2 could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. These retrofits could include rooftop or ground-mounted PV solar arrays or small wind turbines, upgraded mechanical systems, large-scale renewable energy projects (e.g., solar and wind energy systems), and other similar improvements.

Implementation of the energy measures and actions does not include the development of noise-sensitive land uses and would not expose people to excessive noise levels due to the proximity of a public or private airport. Therefore, no impacts related to exposing people to excessive noise levels from a public or private airport would occur.

Built Environment and Transportation Measures and Actions

Built environment and transportation measures and actions would implement existing County programs, such as the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan (Action T-1.1) and Active Transportation Program (Action T-5.1). Other measures and actions would affect the design of existing and planned roadways. Measure T-6.2 would implement transit-supportive roadway treatments, such as signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians. Action T-3.1 would result in the installation of publicly available electric vehicle charging stations. Action T-3.1.a would support the transition to hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts that could facilitate future infrastructure construction.

Because of the nature of proposed transportation infrastructure improvements (i.e., limited size, along existing roadways, and within existing parking structures), it is likely that most infrastructure improvements would occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. Residential and commercial centers have the low potential for noise impacts from airports because these land uses have been developed or would be developed to comply with noise standards from applicable ALUCPs to minimize the public’s exposure to excessive noise within areas around public airports. In addition, as explained in the 2011 GPU PEIR, implementation of the General Plan policies listed above in Section

2.12.2, “Regulatory Framework,” and implementation of 2011 GPU PEIR Mitigation Measure Noi-5.1 (using applicable ALUCP as guidance for project located in an AIA) and Mitigation Measure Noi-5.3 (assessing noise impacts from private airports and helipads) would ensure that new development would not expose people to excessive noise levels from a public or private airport. This impact would be less than significant with mitigation.

Summary

The CAP Update would further existing programs and provide new and modified infrastructure in new and established communities to reduce GHG emissions. Implementation of 2011 GPU PEIR mitigation measures and adopted General Plan policies would reduce the potential impacts associated with excessive noise levels from a public and private airport. Although the locations of most projects that would be constructed to achieve the targets of the CAP Update are unknown, it is reasonable to assume that development would be consistent with applicable ALUCPs, would be subject to compliance with adopted General Plan Policies N-4.9, S-15.1, S-15.2, and S-15.4, and would be required to implement 2011 GPU PEIR Mitigation Measures Noi-5.1 through Noi-5.3. Consistent with the 2011 GPU PEIR, impacts related to excessive noise levels from a public or private airport associated with implementation of the solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions in the CAP Update would be less than significant with mitigation. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.12.3.6 Cumulative Impact Analysis

The cumulative impact analysis study area for noise in the 2011 GPU PEIR was identified as the areas surrounding noise-generating sources, such as roadways and agricultural or industrial uses (as described on page 2.11-34 of the 2011 GPU PEIR). This analysis uses the same scope identified in the 2011 GPU PEIR. The scope and approach to the cumulative impact analysis are described in the “Cumulative Impact Assessment Overview” section in the introduction to this chapter.

Issue 1: Excessive Noise Levels

Cumulative impacts could result if the physical improvements that result from implementation of the CAP Update interact with development associated with buildout of the County’s General Plan or other regional development, as anticipated in the 2021 Regional Plan, and increase those impacts.

The 2011 GPU PEIR concludes that buildout of the General Plan would result in significant cumulative impacts associated with excessive noise levels and permanent increases in ambient noise levels and would not result in significant cumulative impacts related to temporary increases in ambient noise levels. 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 and significant and unavoidable cumulative impacts related to permanent increases in ambient noise levels.

Implementation of the CAP Update would have the potential to result in construction of new or expanded solid waste facilities, renewable energy infrastructure, and transportation facilities in the unincorporated county. As discussed in Section 2.12.3.3, "Issue 1: Excessive Noise Levels," all new development would be required to implement 2011 GPU PEIR Mitigation Measures Noi-1.1, Noi-1.3, and Noi-2.4, which would ensure that new development would be consistent with land use compatibility guidelines. With implementation of the identified 2011 GPU PEIR mitigation measures, the project would result in less-than-significant impacts related to noise resulting from operation of the potential new development.

However, as discussed above, 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 for large wind turbines subject to specific conditions. The noise associated with operation of large wind turbines could combine with other low-frequency noise in the environment to result in cumulative increases above ambient noise levels. Thus, this action could result in excessive noise levels over the existing condition.

The CAP Update 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, 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.

Issue 2: Excessive Groundborne Vibration

The 2011 GPU PEIR concluded cumulative impacts associated with groundborne vibration would be potentially significant because the General Plan would result in the exposure of sensitive receptors to major vibrational sources (i.e., roadways and railways). With implementation of mitigation from the 2011 GPU PEIR, the buildout of the General Plan would result in less-than-significant cumulative impacts related to excessive groundborne vibration.

As discussed in Section 2.12.3.4, "Issue 2: Excessive Groundborne Vibration," above, vibrational noise associated with implementation of the project would not be significant with 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. Given the nature of the improvements that would occur with implementation of the CAP Update (e.g., new or expanded solid waste facilities, water and wastewater infrastructure and efficiency improvements, renewable energy infrastructure, and transportation infrastructure improvements), implementation of the CAP Update measures and actions would not result in significant impacts related to excessive groundborne vibration. Similar to the conclusions of the 2011 GPU PEIR, the project would not result in an incremental effect that would result in a significant cumulative impact. The impact would be less than significant. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

Issue 3: Excessive Noise from a Public or Private Airport

The 2011 GPU PEIR concludes that development associated with buildout of the General Plan would result in a potentially significant cumulative impact related to aircraft noise. However, with implementation of mitigation from the 2011 GPU PEIR and adopted General Plan policies, buildout of the General Plan would result in a less-than-significant cumulative impact related to excessive noise exposure from airports.

As discussed in Section 2.12.3.5, "Issue 3: Excessive Noise Exposure from a Public or Private Airport," above, excessive noise from a public or a private airport associated with implementation of the project would not be 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. In addition, future development that has the potential to be exposed to excessive noise from airports (i.e., farmworker housing) would be required to be consistent with applicable ALUCPs, which minimize the public's exposure to excessive noise within areas around public airports. Given the nature of the projects that would be implemented as part of the CAP Update and the fact that impacts resulting from the proposed CAP Update measures and actions would not result in significant impacts related to excessive noise from a public or private airport, the project would not result in a substantial incremental effect that would result in a significant cumulative impact. The impact would be less than significant. This **would not be a new or more severe impact** than disclosed in the 2011 GPU PEIR.

2.12.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would not result in new or more severe significant impacts related to construction and operational noise, groundborne vibration, or airport noise exposure.

2.12.5 Mitigation Measures

The following section lists the mitigation measures from the 2011 GPU PEIR that are applicable to the proposed project. No new mitigation measures have been proposed to avoid or minimize noise impacts resulting from the proposed project.

2.12.5.1 Issue 1: Excessive Noise Levels

The mitigation measures addressing noise that were adopted as part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Noi-1.1: Require an acoustical analysis whenever a new development may result in any existing or future noise sensitive land uses being subject to on-site noise levels of 60 dBA (CNEL) or greater, or other land uses that may result in noise levels exceeding the "Acceptable" standard in the Noise Compatibility Guidelines (Table N-1 in the Noise Element).

Adopted Mitigation Measure Noi-1.3: Require an acoustical study for projects proposing amendments to the County General Plan Land Use Element and/or Mobility Element that propose a significant increase to the average daily traffic due to trips associated with the project beyond those anticipated in the General Plan.

Adopted Mitigation Measure Noi-2.4: Require an acoustical study whenever a proposed extractive land use facility may result in a significant noise impact to existing noise sensitive land uses, or when a proposed noise sensitive land use may be significantly affected by an existing extractive land use facility. The results of the acoustical study may require a "buffer zone" to be identified on all Major Use Permit applications for extractive facilities whenever a potential for a noise impact to noise sensitive land uses may occur.

As described above in Section 2.12.3.3, even with implementation of the General Plan policies and 2011 GPU PEIR mitigation measures, and compliance with County's Noise Compatibility Guidelines, General Plan Noise Element noise standards, and the County's Noise Ordinance, project-level and cumulative impacts related to excessive noise from large-scale wind turbines could occur because noise waivers could be provided under certain circumstances. Additional mitigation was considered that would eliminate the noise waiver, but it was rejected because it would conflict with the County's goal to expand renewable energy.

Additional mitigation was considered as part of this draft SEIR that would implement a development cap on large-scale wind turbine projects. However, this mitigation was rejected as infeasible because it may reduce the effectiveness of CAP Update Action E-3.3 and achievement of the County's 2030 GHG emissions reduction target. The number and types of renewable large-scale wind energy facilities that would be required to meet the GHG reduction goals of the CAP is unknown because the design, siting, and economic feasibility characteristics of the options under consideration vary widely. No other additional feasible mitigation beyond compliance with the County's adopted General Plan policies, 2011 GPU PEIR mitigation measures, Noise Compatibility Guidelines, General Plan Noise Element noise standards, and the Noise Ordinance is available.

2.12.5.2 Issue 2: Excessive Groundborne Vibration

The mitigation measures addressing groundborne vibration that were adopted as part of the 2011 GPU PEIR and are applicable to the project include the following:

Adopted Mitigation Measure Noi-2.1: For Land Use Designations defined in Table 2.11-14, a groundborne vibration technical study shall be required for proposed land uses within the following distances from the Sprinter Rail Line right-of-way and the property line: 600 feet of a Category 1 Land Use, 200 feet of a Category 2 Land Use, and 120 feet of a Category 3 Land Use. If necessary, mitigation shall be required for land uses in compliance with the standards listed in Tables 2 and 3 of the County of San Diego Guidelines for Determining Significance - Noise.

Adopted Mitigation Measure Noi-2.4: Require an acoustical study whenever a proposed extractive land use facility may result in a significant noise impact to existing noise sensitive land uses, or when a proposed noise sensitive land use may be significantly affected by an existing extractive land use facility. The results of the acoustical study may require a "buffer zone" to be identified on all Major Use Permit applications for extractive facilities whenever a potential for a noise impact to noise sensitive land uses may occur.

2.12.5.3 Issue 3: Excessive Noise from a Public or Private Airport

The mitigation measures addressing airport noise that were adopted as part of the 2011 GPU PEIR and are applicable to the project include the following:

Adopted Mitigation Measure Noi-5.1: Use the applicable Airport Land Use Compatibility Plan's (ALUCP) as guidance/reference during development review of projects that are planned within an Airport Influence Area (AIA). Any projects that are within the AIA shall be submitted to the SDCRAA for review.

Adopted Mitigation Measure Noi-5.3: Consult with the FAA standards and the County Noise Ordinance as a guide for assessing noise impacts from private airports and helipads.

2.12.6 Significance Conclusions

2.12.6.1 Issue 1: Excessive Noise Levels

The CAP Update would further existing programs and provide new and modified infrastructure in new and established communities to reduce GHG emissions. Implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the project impacts associated with the excessive noise levels. However, it is possible for a noise waiver to be granted for a large-scale wind turbine project within the designated Noise Waiver Area on the Wind Resources Map, subject to specific conditions. Consistent with the Wind Energy EIR, the development of large wind turbines under the proposed project would result in a significant and unavoidable impact related to low-frequency noise. Therefore, the development of large wind turbines associated with the CAP Update could combine with existing low-frequency noise in the environment to result cumulative increases above ambient for low-frequency noise levels. As such, the project would contribute to a cumulatively considerable impact. The project's impact related to excessive noise levels would be **significant and unavoidable** and the project **would result in a considerable contribution** to a significant cumulative impact. This **would not be a new or more severe impact** compared to the 2011 GPU PEIR.

2.12.6.2 Issue 2: Excessive Groundborne Vibration

Implementation of the CAP Update may result in development with the potential to generate groundborne vibration during construction. Implementation of these projects would be within the scope of proposed development und the build out of the General Plan

evaluated in the 2011 GPU PEIR. Based on the type of subsequent projects anticipated, implementation of the CAP Update is not expected to generate excessive groundborne vibration. Implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the project impacts associated with excessive groundborne vibration. The project's impacts related to excessive groundborne vibration from development would remain **less than significant with mitigation** and the project **would not result in a considerable contribution** to a significant cumulative impact. Implementation of the CAP Update would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect. This **would not be a new or more severe impact** compared to the 2011 GPU PEIR.

2.12.6.3 Issue 3: Excessive Noise from a Public or Private Airport

The CAP Update would further existing programs and provide new and modified infrastructure in new and established communities to reduce GHG emissions. Implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the project impacts associated with excessive noise from a public or private airport. The project's impacts related to excessive noise from a public or private airport would remain **less than significant with mitigation** and the project **would not result in a considerable contribution** to a significant and unavoidable cumulative impact. Implementation of the CAP Update would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect. This **would not be a new or more severe impact** compared to the 2011 GPU PEIR.

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2.13 Transportation

This section describes existing conditions related to transportation and evaluates the potential effects that implementation of the CAP Update may have on this issue. Because this analysis is subsequent to the certified 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the transportation setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the GPU PEIR. Senate Bill (SB) 743, passed in 2013, required the Governor's Office of Planning and Research (OPR) to develop new State CEQA Guidelines that address transportation metrics under CEQA. In 2018, Appendix G of the State CEQA Guidelines was amended to include additional significance criteria to evaluate a project's potential impact on vehicle miles traveled (VMT). Because the amended significance criteria addressing VMT was not yet adopted in 2008, when the Notice of Preparation (NOP) for the 2011 GPU PEIR was released, an evaluation of potential impacts on VMT was not included in the 2011 GPU PEIR. Additionally, SB 743 discusses impacts from parking, stating that "the adequacy of parking for a project shall not support a finding of significance." (See Public Resources Code Section 21099(b)(3).) Therefore, parking capacity is not considered in this analysis.

Table 2.13-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. As indicated in Table 2.13-1, implementation of the CAP Update would not result in new or more severe significant impacts on transportation.

Comments received in response to the NOP related to transportation included suggestions to encourage telecommuting; increase development near transit; implement complete streets strategies to reduce VMT; and coordinate between the County and other partner agencies to ensure consistency between policies, projects, and plans. Copies of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

Table 2.13-1 Summary of Transportation-Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			Potential New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System	General Plan Only: Less Than Significant with Mitigation Incorporated	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Not Cumulatively Considerable	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
2	Exceed Threshold for Vehicle Miles Traveled	Not Applicable[1]	CAP Update Only: No	CAP Update Only: No
		Not Applicable[1]	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
3	Increase Hazards Due to a Design Features[2]	General Plan Only: Significant and Unavoidable	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Cumulatively Considerable	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
4	Result in Inadequate Emergency Access	General Plan Only: Less Than Significant with Mitigation Incorporated	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Not Cumulatively Considerable	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

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

[1] The 2011 GPU PEIR determined significance based on level of service (LOS). However, Section 15064.3 of the State CEQA Guidelines was adopted in December 2018 and provides that vehicle miles traveled (VMT) is the "most appropriate measure of transportation impacts" and mandated analysis of VMT impacts effective July 1, 2020. LOS, or other measures of automobile delay, are no longer considered significant environmental impacts under CEQA (Public Resources Code Section 21009[b][2]). Therefore, LOS is no longer considered an appropriate metric for analyzing transportation impacts on the environment; and thus, is not considered in this analysis.

[2] The 2011 GPU PEIR determined transportation hazard significance based on rural road safety. The transportation hazards analysis contained herein incorporates rural road safety. The 2011 GPU PEIR findings related to rural road safety are summarized in Section 2.15.3.5, Issue 3.

Source: Compiled by Ascent Environmental in 2023.

2.13.1 Existing Conditions

This section describes the existing roadway network, transit services, and bicycle and pedestrian facilities in the unincorporated county. Section 2.15.1 of the 2011 GPU PEIR includes a discussion of the existing conditions related to transportation and traffic in the unincorporated county based on level of service (LOS). In 2013, SB 743 was enacted, with

an implementation date of July 1, 2020, requiring public agencies to no longer use LOS for traffic analysis and instead use VMT.

2.13.1.1 Roadway Network

The County Roadway Register Report classifies the existing roadway network in the unincorporated county by seven categories: interstates, freeways or expressways, principal arterials, minor arterials, major collectors, minor collectors, and local roads (County of San Diego 2023). The General Plan groups roadways by similar types, the four groups being state highways, Mobility Element roadways, local public roads, and private roads. “Mobility Element roadways” refers to the portion of the County Mobility Element roadway system that have been constructed. The County of San Diego Department of Public Works Road Section is responsible for maintaining nearly 2,000 miles of County Mobility Element roadways and other transportation facilities, such as bridges and guardrails, signs, traffic signals and crosswalks. Within the unincorporated county, there are approximately 5 miles of principal arterial roads, 146 miles of minor arterials roads, 481 major collector roads, 198 minor collector roads, and 1,117 local roads (County of San Diego 2023).

2.13.1.2 Transit Services

The San Diego Metropolitan Transit System (MTS) and the North County Transit District (NCTD) are the two agencies responsible for providing bus, rail, and paratransit services within the San Diego region. Additionally, the Amtrak Pacific Surfliner provides intercity rail service along the Los Angeles–San Diego–San Luis Obispo Rail Corridor. Other specialized transit services are offered through the Consolidated Transportation Service Agency (CTSA) for the San Diego region.

Bus Service

MTS offers over 100 fixed bus routes throughout its service area, including traditional urban shuttle-type routes, express routes, and bus rapid transit routes, as well as paratransit services. Bus services are provided in the unincorporated county by the San Diego Transit Corporation (SDTC), which is owned by MTS. SDTC serves the Cities of San Diego, El Cajon, La Mesa, and National City, in addition to the unincorporated communities of Julian, Desert, Central Mountain, Lakeside, Alpine, Mountain Empire, Crest, Valle de Oro, Spring Valley, Sweetwater, and Otay. SDTC bus service provides connections to light and heavy rail services and offers local service and express service (MTS 2020).

NCTD operates a bus system referred to as the BREEZE, which serves the unincorporated north county. BREEZE serves eight north county cities, in addition to the unincorporated communities of Pendleton/De Luz, Fallbrook, Ramona, Pala/Pauma Valley, Valley Center, North County Metro, and San Dieguito. BREEZE operates approximately 30 different bus routes, many of which provide connections to light rail systems and tourist attractions (NCTD 2022).

Rail Service

There are five railroad providers that operate on two railroad corridors within the San Diego region. Many of these rail lines are located within the incorporated areas of the county; however, some unincorporated residents use these systems. Railroad providers for San Diego County include NCTD, MTS, BNSF, Carrizo Gorge Railway, and San Diego and Imperial Valley Railroad. The two railroad corridors that cross the county are the Los Angeles–San Diego–San Luis Obispo Rail Corridor and the San Diego & Arizona Eastern Railway Corridor.

MTS operates the San Diego Trolley, which runs along the San Diego & Arizona Eastern Railroad Corridor. The entire system encompasses 54.3 total miles (107.6 total track miles) of light rail transit on three routes serving 53 transit centers. Although the entire trolley line is located within the incorporated areas of the county, many residents from the unincorporated areas of the county use its service. Fiscal Year 2022 ridership for the MTS trolley system reached approximately 30 million trips, and bus ridership totaled approximately 28 million trips (MTS 2022).

NCTD operates the SPRINTER Light Rail system between Oceanside and Escondido on a rail line that runs approximately parallel to State Route 78. The Buena Creek SPRINTER Station is the only site in the unincorporated county that is served by high-frequency light rail transit. The SPRINTER rail line is 22 miles long and runs 455 trains every week. The NCTD COASTER rail line is 41 miles long. More than 190 COASTER trains operate each week along the coastal corridor between Oceanside and downtown San Diego.

Paratransit and Other Specialized Transit Services

MTS Access is an origin-to-destination, shared ride, advanced reservation public transit service provided in accordance with the Americans with Disabilities Act. Consistent with the Americans with Disabilities Act, MTS Access is comparable to MTS's fixed-route bus system including in terms of service characteristics (such as on-time performance and travel time) and service area (providing service within three-quarters of a mile of a regular MTS fixed bus route). The service is intended to complement the fixed bus and trolley routes and times. Similarly, NCTD LIFT provides paratransit services at a level that is comparable to NCTD's fixed-route bus service. The NCTD LIFT service is provided to areas that are within three-quarters of a mile of an NCTD BREEZE bus route and/or SPRINTER rail station.

Facilitating Access to Coordinated Transportation, operated by CTSA, provides access to transportation for seniors, persons with disabilities, veterans, and the income disadvantaged and fills gaps in existing transit services, acting as a mobility manager by referring individuals to the most appropriate transportation mode. Transportation referrals are provided in person, over the phone, and through a web-based trip planner (511 San Diego Region).

2.13.1.3 Bicycle and Pedestrian Systems

Of the roughly 2,000 miles of County-maintained roadways, less than half include sidewalks, and less than 1 percent include a bicycle route or lane.

The County of San Diego Active Transportation Plan (ATP) classifies bike lanes in the following four types:

- Class I Bike Path: A completely separated right-of-way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.
- Class II Bike Lanes: A striped lane for one-way bike travel on a street or highway.
- Class III Bike Route: Provides for shared use with vehicular traffic within the travel lane.
- Class IV Separated Bikeway: A physically separated bikeway for the exclusive use of bicycles. The separation may include, but is not limited to, grade separation, flexible posts, inflexible posts, inflexible barriers, or on-street parking.

As of 2018, the unincorporated county had 1 mile of Class I, 145 miles of Class II, and 9 miles of Class III bicycle facilities, totaling 155 miles of existing bicycle facilities. There are currently no Class IV bicycle facilities in the unincorporated county (County of San Diego 2018: 3-3).

Pedestrian facilities in the unincorporated county include sidewalks, pathways, and trails. Results from a County Pedestrian Gap Analysis and evaluation of existing facilities revealed that roughly 53 percent, or 401 miles, of the assessment roadways have no sidewalk or pedestrian facility (County of San Diego 2018: 3-3).

2.13.2 Regulatory Framework

Section 2.15.2 of the 2011 GPU PEIR describes the regulatory framework related to transportation and is incorporated herein by reference. SB 743 was signed into effect in 2013 with an implementation date set for July 1, 2020. While the 2011 GPU PEIR included VMT numbers for the unincorporated county, it did not include analysis for VMT as currently required under SB 743. Therefore, a discussion of SB 743 is provided below. The majority of the local regulatory discussion in the 2011 GPU PEIR regarding transportation remains applicable to the proposed project; however, several legislative regulations, policy guidance documents, and funding mechanisms related to transportation have been authorized or updated since the adoption of the 2011 GPU PEIR. Therefore, a discussion of each is provided below.

2.13.2.1 Federal

Specific regulations discussed in the 2011 GPU PEIR and applicable to the CAP Update include the following:

- Americans with Disabilities Act
- Title 23, Code of Federal Regulations, Section 450.220

In addition to the above, the following regulation related to transportation has been adopted and/or updated since certification of the 2011 GPU PEIR.

Highway Capacity Manual, 7th Edition (2022)

The Highway Capacity Manual is the fundamental reference for concepts, performance measures, and analysis techniques for evaluating the multimodal operation of streets, highways, freeways, and off-street paths. The 7th edition was published in 2022 and contains new information, including new planning-level methods for connected and automated vehicles; a completely revised procedure for analyzing two-lane highways; a new procedure for evaluating systems of freeways and arterials with queue spillback; and updated methodologies for pedestrian operations at uncontrolled and signalized crossings.

2.13.2.2 State

Specific regulations discussed in the 2011 GPU PEIR and applicable to the CAP Update include the following:

- California Department of Transportation (Caltrans) Standards
- Statewide Transportation Improvement Program
- Transportation Development Act

In addition to the above, the following regulations related to transportation have been adopted and/or updated since certification of the 2011 GPU PEIR.

Senate Bill 375

Governor Arnold Schwarzenegger signed SB 375, the 2008 Sustainable Communities and Climate Protection Act, on September 30, 2008, with the purpose of reducing greenhouse gas (GHG) emissions from passenger vehicles through coordinated transportation and land use planning strategies. The legislation is two-fold requiring the California Air Resources Board (CARB) to set and regularly update per capita was a metric used extensively in the transportation industry at the time the 2011 GPU PEIR was prepared for a variety of purposes including, but not limited to highway cost allocation, determining user fee structures, and estimating air quality and GHG emissions; thus, VMT related to the build out of the general plan was a known concept at the time.

For the purpose of forecasting GHG emissions from growth anticipated under the adopted General Plan, VMT GHG emissions reduction targets by region as well as mandating each of California's 18 metropolitan planning organizations to include a Sustainable Communities Strategy in their federally mandated long-range Regional Transportation Plan to demonstrate how the region plans to meet CARB's GHG emission reduction targets.

Senate Bill 743

SB 743, passed in 2013, required OPR to develop new State CEQA Guidelines that address transportation metrics under CEQA. As stated in the legislation, upon adoption of the new guidelines, "automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any."

OPR published its proposal for the comprehensive updates to the State CEQA Guidelines in November 2017, which included proposed updates related to analyzing transportation impacts pursuant to SB 743. These updates indicated that VMT would be the primary metric used to identify transportation impacts. In December of 2018, OPR published the most recent version of the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR Technical Advisory) which provides guidance for VMT analysis (OPR 2018). The OPR Technical Advisory recommends that a per capita or per employee VMT that is fifteen percent below that of existing development, measured against the region or city, may indicate a less-than-significant transportation impact. As used in the OPR Technical Advisory, "regional" refers to the full geography within the jurisdictional borders of a metropolitan planning organization or a regional transportation planning agency. Comparing a project's VMT per capita or VMT per employee to that of the entire region or entire city allows a lead agency to better align with the state's climate commitments. Comparison to only a portion of the region or city could result in a less environmentally protective significance threshold, potentially disconnecting significance determinations from those commitments (OPR 2023). In December 2018, OPR and the state Natural Resources Agency submitted the updated State CEQA Guidelines to the Office of Administrative Law for final approval to implement SB 743. The Office of Administrative Law subsequently approved the updated State CEQA Guidelines, and local agencies had an opt-in period until July 1, 2020, to implement the updated guidelines. As of July 1, 2020, implementation of Section 15064.3 of the updated State CEQA Guidelines applies statewide.

Vehicle Miles Traveled-Focused Transportation Impact Study Guide

The Vehicle Miles Traveled-Focused Transportation Impact Study Guide was prepared by Caltrans to provide guidance to Caltrans districts, lead agencies, tribal governments, developers, and consultants regarding Caltrans's review of a land use project or plan's transportation analysis using the VMT metric for evaluating transportation impacts. It replaces the *Guide for the Preparation of Traffic Impact Studies* (2002) and is for use with local land use projects.

Interim Local Development and Intergovernmental Review Safety Review Practitioners Guidance

The Interim Local Development and Intergovernmental Review Safety Review Practitioners Guidance was released by Caltrans in December 2020 to provide instruction to Caltrans staff, lead agencies, and consultants regarding safety impact review expectations under CEQA and can be used as a guide at the local review level for assessing safety impacts of projects and plans on local right-of-way. It supports the implementation of SB 743 which uses VMT as a measure for transportation impact analyses over LOS with special consideration of vulnerable users and communities.

Transportation Analysis Framework: Evaluating Transportation Impacts of State Highway System Projects and Transportation Analysis under CEQA

Caltrans released the Transportation Analysis Framework: Evaluating Transportation Impacts of State Highway System Projects and Transportation Analysis under CEQA in September 2020 to serve as additional guidance in the implementation of SB 743. The Transportation Analysis Framework establishes changes to Caltrans procedures for the analysis of transportation impacts of projects on the State Highway System, primarily induced demand and provides direction for the preferred approach for analyzing the VMT attributable to proposed projects in various project settings. Transportation Analysis under CEQA provides information to support Caltrans's CEQA practitioners in making CEQA significance determinations for transportation impacts of projects on the State Highway System.

Mobile Source Strategy

The Mobile Source Strategy, updated by CARB every 5 years, demonstrates how the state can simultaneously meet air quality standards, achieve GHG emissions reduction targets, decrease health risk from transportation emissions, and reduce petroleum consumption. Statewide, the concepts in the 2020 Strategy could achieve criteria pollutant NO_x reductions of over 590 tons per day in 2037 and reduce mobile source fuel consumption by 9.5 billion gallons of gasoline and 3.0 billion gallons of diesel equivalent in 2045. This equates to a well-to-wheel GHG emissions reduction of approximately 94 million metric tons of carbon dioxide equivalent in 2045 (CARB 2021: 4).

California Transportation Plan

The 2050 California Transportation Plan, approved in February 2021, is a federal and state-mandated state transportation plan that ties several internal and external inter-related plans and programs and "provides a common framework for guiding transportation decisions and investments by all levels of government and the private sector" (Caltrans 2016). It is updated every 5 years and demonstrates how the state will achieve state targets for GHG reductions.

Active Transportation Program

Governor Jerry Brown signed legislation on September 26, 2013, creating the Active Transportation Program. The program consolidated several federal and state programs in an effort to promote biking and walking across California. The Active Transportation Program encourages increased use of active transportation through the promotion of environmental, equitable, economic, and public health-related goals. An amount of $100,000,000 of SB 1 funding is dedicated to the Active Transportation Program annually.

Solutions of Congested Corridors Program

The Solutions of Congested Corridors Program makes $250 million available annually to projects that implement specific transportation performance improvements and are part of a comprehensive corridor plan, by providing more transportation choices while preserving the character of local communities and creating opportunities for neighborhood enhancement. Eligible projects may include improvements to state highways, local streets, rail facilities, public transit facilities, bicycle and pedestrian facilities, and preservation of critical local habitat and open spaces.

Local Partnership Program

The Local Partnership Program supports investment by local communities by providing matching funds for voter-approved transportation tax measures. Projects under the program include road maintenance and rehabilitation efforts as well as other infrastructure improvements. Funds are allocated on both a formula and competitive basis, which helps ensure smaller jurisdictions receive funding through the program. This program is intended to balance the need to direct increased revenue to the highest transportation needs while distributing the impact of increased funding.

2.13.2.3 Local

Specific regulations discussed in the 2011 GPU PEIR and applicable to the CAP Update include the following:

- Community Plans
- County Zoning Ordinance, Parking Regulations, Sections 6750–6799
- San Diego County Public Road Standards
- San Diego County Private Road Standards
- County of San Diego Consolidated Fire Code
- County of San Diego Regulatory Ordinances, Sections 77.201–77.220, Transportation Impact Fee
- County Community Right-of-Way Development Standards

Discussed below in *County of San Diego Transportation Study Guidelines*, to comply with SB 743, the County of San Diego adopted the updated Transportation Study Guidelines

(TSG) on September 24, 2022, that identifies VMT analysis methodologies, establishes VMT thresholds for CEQA transportation impacts, and identifies initial mitigation strategies. The TSG provides guidance for the methodology and thresholds utilized to evaluate transportation-related impacts.

In addition to the above, the following regulations related to transportation have been adopted and/or updated since certification of the 2011 GPU PEIR.

San Diego Forward: The 2021 Regional Plan

The San Diego Association of Governments (SANDAG) Board of Directors adopted San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) in December 2021. The 2021 Regional Plan combines the Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan. It anticipates the growth that will occur in the region and provides a blueprint for a regional transportation system, while also establishing the region's sustainable community strategy with the overarching vision of promoting sustainability and offering more mobility options for people and goods. The 2021 Regional Plan strategies are organized around the 5 Big Moves: Next Operating System, Complete Corridors, Transit Leap, Mobility Hubs, and Flexible Streets. The three primary goals guiding the 2021 Regional Plan are the efficient movement of people and goods; access to affordable, reliable, and safe mobility options; and healthier air and reduced GHG emissions.

2023 Regional Transportation Improvement Program

The 2023 Regional Transportation Improvement Program (2023 RTIP) is a multi-billion-dollar 5-year program of major transportation projects funded by federal, state, TransNet local sales tax, and other local and private funding covering fiscal year 2023 to fiscal year 2027. The program development process, which includes the air quality emissions analysis for all regionally significant projects, requires approval by the Federal Highway Administration and the Federal Transit Administration.

The 2023 RTIP is a prioritized program designed to implement the region's overall strategy for providing mobility and improving the efficiency and safety of the transportation system, while reducing transportation-related air pollution in support of efforts to attain federal and state air quality standards for the region. The program also incrementally implements the 2021 Regional Plan, which is the long-range transportation plan for the San Diego region. The final 2023 RTIP was adopted by the SANDAG Board of Directors on September 12, 2022, and approved by the Federal Highway Administration and the Federal Transit Administration in December 2022.

County of San Diego Transportation Study Guidelines

The County Board of Supervisors approved the updated TSG in September 2022. The TSG was developed as a guide for analyzing the transportation impacts of proposed projects in the unincorporated county addressing the manner in which transportation impacts under CEQA are measured due to SB 743, which shifts the focus from LOS to VMT. VMT is the total number of miles traveled by motor vehicles, including trips to/from

and within the planning area. The TSG provides CEQA VMT Screening Criteria for projects that are presumed to result in a less-than-significant VMT impact and are, thus, not required to perform a VMT analysis. Projects that do not meet the screening criteria are subject to a detailed evaluation of the VMT produced by the project. Typically, transportation VMT analysis for CEQA should be conducted using the SANDAG Regional Travel Demand Model; however, other tools for conducting VMT analysis may be preferred depending on the project characteristics and the sensitivity of the SANDAG model in the project location and for the project type.

The TSG provides metrics to determine whether a project surpasses the County's VMT Thresholds of Significance. The VMT generated under the current General Plan establishes the baseline in which planned development is compared to identify cumulative transportation-related impacts. The current General Plan conditions represent buildout of the land uses and mobility network assumed within the County's current General Plan.

The TSG establishes thresholds for large land use plans and states that land use plans should be compared to the region overall. Comparison to the region is appropriate because large land use plans can have an effect on regional VMT (County of San Diego 2022). The thresholds apply to large land use plans:

- Residential: Aggregate all residential land uses for the build-out year of the plan and compare the resulting build-out year VMT per resident to the existing regional average. The threshold is 15 percent below the existing regional average VMT per resident.
- Employment: Aggregate all employment land uses for the build-out year of the plan and compare the resulting build-out year VMT per employee to the existing regional average. The threshold is 15 percent below the existing regional average VMT per employee.
- Retail/Service: Evaluate the effect that adding these land uses has on regional VMT. The threshold is any increase in regional VMT.

County of San Diego Regulatory Ordinances, Sections 77.201–77.220, Transportation Impact Fee

The County of San Diego Regulatory Ordinances, Sections 77.201–77.220, Transportation Impact Fee program provides funding for mitigation of cumulative impacts and for proportional construction of transportation facilities needed to support traffic generated by new development to meet state law requirements. Per the County Board of Supervisors ordinance, effective December 31, 2012, the County will collect the fee at or before building permit issuance for projects that generate new trips.

County of San Diego 2020 Consolidated Fire Code

The 2020 Consolidated Fire Code (County Fire Code) includes the County amendments to the 2019 California Fire Code and the ordinances of the 13 unincorporated county fire protection districts. The County Fire Code is adopted for the protection of public health

and safety and applies to both ministerial and discretionary projects. It includes definitions, requirements for permits and inspection for installing or altering systems, regulations for the erection, construction, enlargement, alteration, repair, moving, removal, conversion, demolition, equipment use and maintenance of buildings, structures, and premises, including the installation, alteration or repair of new and existing fire protection systems and their inspection and provides penalties for violation of this code. It applies to new construction and to any alterations, repairs, or reconstruction. Section 503 of the County Fire Code includes provisions and regulations applicable to roadway design and emergency vehicle access.

San Diego County Fire Authority Emergency Vehicle Turnaround, Section 503

The San Diego County Fire Authority provides regulatory standards and design guidance regarding emergency vehicle turnaround. Fire apparatus access roads, except private residential driveways, shall be provided and maintained for purposes of rapid and reliable fire apparatus access and for unobstructed traffic circulation for evacuation or relocation of civilians during a wildfire or other emergency (San Diego County Fire Authority 2016).

County of San Diego Department of Public Works Traffic Control Permit

After obtaining an encroachment, excavation, and/or construction permit from the County, a traffic control permit is necessary for any work on a County-maintained roadway or in the County right-of-way. It is the responsibility of those performing work on or adjacent to a public road in the unincorporated area of the county to install and maintain appropriate traffic control in accordance with an approved traffic control plan. An approved traffic control plan is necessary to provide the motoring public safe passage through the construction zone, as well as to safeguard construction workers (County of San Diego Department of Public Works n.d.).

County of San Diego Active Transportation Plan

The ATP promotes active transportation through pedestrian and bicycle improvements throughout the unincorporated county. The ATP consists of an update to the County's Bicycle Transportation Plan (dated 2008) and the Pedestrian Area Plans (prepared for Alpine, Borrego Springs, Fallbrook Town Center, Lakeside Town Center and Spring Valley) into one combined ATP. The ATP was approved by the Board of Supervisors on October 31, 2018. The ATP identifies goals, objectives, and actions related to improving safety to reduce auto collisions with cyclists and pedestrians, increasing accessibility and connectivity with an active transportation network, and improving public health by encouraging walking and biking.

2011 San Diego County General Plan

The General Plan policies related to transportation that are applicable to the CAP Update include the following:

> Policy LU-2.8: Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that

cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.

Policy LU-5.1: Reduction of Vehicle Trips within Communities. Incorporate a mixture of uses within Villages and Rural Villages and plan residential densities at a level that support multi-modal transportation, including walking, bicycling, and the use of public transit, when appropriate.

Policy LU-5.4: Planning Support. Undertake planning efforts that promote infill and redevelopment of uses that accommodate walking and biking within communities.

Policy LU-5.5: Projects That Impede Non-Motorized Travel. Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts to existing planned routes would occur, ensure that impacts are mitigated and acceptable alternative routes are implemented.

Policy LU-6.9: Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.

Policy LU-6.10: Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.

Policy LU-9.8: Village Connectivity and Compatibility with Adjoining Areas. Require new development within Villages to include road networks, pedestrian routes, and amenities that create or maintain connectivity; and site, building, and landscape design that is compatible with surrounding areas. *[See applicable community plan for possible relevant policies.]*

Policy LU-10.4: Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

Policy LU-11.6: Office Development. Locate new office development complexes within Village areas where services are available, in proximity to housing, and along primary vehicular arterials (ideally with transit access) with internal vehicular and pedestrian linkages that integrate the new development into the multi-modal transportation network where feasible.

Policy LU-11.8: Permitted Secondary Uses. Provide a process where secondary land uses may be permitted when appropriate and compatible with the primary commercial, office, and light industrial uses, in order to better serve the daily needs of employees and to reduce the frequency of related automobile trips. This policy is not intended for high impact industrial uses.

Policy M-1.1: Prioritized Travel within Community Planning Areas. Provide a public road network that accommodates travel between and within community planning areas rather than accommodating overflow traffic from State highways and freeways that are unable to meet regional travel demands.

Policy M-1.2: Interconnected Road Network. Provide an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies.

Policy M-1.3: Treatment of High-Volume Roadways. Consider narrower rights-of-way, flexibility in design standards, and lower design speeds in areas planned for substantial development in order to avoid bisecting communities or town centers. Reduce noise, air, and visual impacts of new freeways, regional arterials, and Mobility Element roads, through landscaping, design, and/or careful location of facilities.

Policy M-2.2: Access to Mobility Element Designated Roads. Minimize direct access points to Mobility Element roads from driveways and other non-through roads to maintain the capacity and improve traffic operations.

Policy M-3.1: Public Road Rights-of-Way. Require development to dedicate right-of-way for public roads and other transportation routes identified in the Mobility Element roadway network (see Mobility Element Network Appendix), Community Plans, or Road Master Plans. Require the provision of sufficient right-of-way width, as specified in the County Public Road Standards and Community Trails Master Plan, to adequately accommodate all users, including transit riders, pedestrians, bicyclists, and equestrians.

Policy M-3.2: Traffic Impact Mitigation. Require development to contribute its fair share toward financing transportation facilities, including mitigating the associated direct and cumulative traffic impacts caused by their project on both the local and regional road networks. Transportation facilities include road networks and related transit, pedestrian and bicycle facilities, and equestrian.

Policy M-3.3: Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes in conformance with state law and local regulations.

Policy M-4.1: Walkable Village Roads. Encourage multi-modal roads in Villages and compact residential areas with pedestrian-oriented development patterns that enhance pedestrian safety and walkability, along with other non-motorized modes of travel, such as designing narrower but slower speed roads that increase pedestrian safety.

Policy M-4.2: Interconnected Local Roads. Provide an interconnected and appropriately scaled local public road network in Village and Rural Villages that reinforces the compact development patterns promoted by the Land Use Element and individual community plans.

Policy M-4.3: Rural Roads Compatible with Rural Character. Design and construct public roads to meet travel demands in Semi-Rural and Rural Lands that are consistent with rural character while safely accommodating transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Where feasible, utilize rural road design features (e.g., no curb and gutter improvements) to maintain community character. [*See applicable community plan for possible relevant policies.*]

Policy M-4.4: Accommodate Emergency Vehicles. Design and construct public and private roads to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.

Policy M-4.5: Context Sensitive Road Design. Design and construct roads that are compatible with the local terrain and the uses, scale and pattern of the surrounding development. Provide wildlife crossings in road design and construction where it would minimize impacts in wildlife corridors.

Policy M-4.6: Interjurisdictional Coordination. Coordinate with adjacent jurisdictions so that roads within Spheres of Influence (SOIs) or that cross jurisdictional boundaries are designed to provide a consistent cross-section and capacity. To the extent practical, coordinate with adjacent jurisdictions to construct road improvements concurrently or sequentially to optimize and maintain road capacity.

Policy M-5.1: Regional Coordination. Coordinate with regional planning agencies, transit agencies, and adjacent jurisdictions to provide a transportation system with the following:

- Sufficient capacity consistent with the County General Plan Land Use Map;
- Travel choices, including multiple routes and modes of travel to provide the opportunity for reducing vehicle miles traveled;
- Facilities sited and designed to be compatible with the differing scales, intensities, and characteristics of the unincorporated communities while still accommodating regional, community, and neighborhood travel demands; and
- Maximized efficiency to enhance connectivity between different modes of travel.

Policy M-5.1 Regional Coordination. Coordinate with regional planning agencies, transit agencies, and adjacent jurisdictions to provide a transportation system with the following:

- Sufficient capacity consistent with the County General Plan Land Use Map
- Travel choices, including multiple routes and modes of travel to provide the opportunity for reducing vehicle miles traveled
- Facilities sited and designed to be compatible with the differing scales, intensities, and characteristics of the unincorporated communities while still accommodating regional, community, and neighborhood travel demands
- Maximized efficiency to enhance connectivity between different modes of travel

Policy M-5.2: Impact Mitigation for New Roadways and Improvements. Coordinate with Caltrans to mitigate negative impacts from existing, expanded, or new state freeways or highways and to reduce impacts of road improvements and/or design modifications to state facilities on adjacent communities.

Policy M-8.1: Maximize Transit Service Opportunities. Coordinate with San Diego Association of Governments (SANDAG), the CTSA, NCTD, and MTS to provide capital facilities and funding, where appropriate, to:

- Maximize opportunities for transit services in unincorporated communities;
- Maximize the speed and efficiency of transit service through the development of transit priority treatments such as transit signal priority, transit queue jump lanes, and dedicated transit only lanes;
- Provide for transit-dependent segments of the population, such as the disabled, seniors, low income, and children, where possible; and
- Reserve adequate rights-of-way to accommodate existing and planned transit facilities including bus stops.

Policy M-8.2: Transit Service to Key Community Facilities and Services. Locate key County facilities, healthcare services, educational institutions, and other civic facilities so that they are accessible by transit in areas where transit is available. Require those facilities to be designed so that they are easily accessible by transit, whenever possible.

Policy M-8.3: Transit Stops That Facilitate Ridership. Coordinate with SANDAG, NCTD, and MTS to locate transit stops and facilities in areas that facilitate transit ridership, and designate such locations as part of planning efforts for Town Centers, transit nodes, and large-scale commercial or residential development projects. Ensure that the planning of Town Centers and Village Cores incorporates uses that support the use of transit, including multi-family residential and mixed-use transit–oriented development, when appropriate.

Policy M-8.4: Transit Amenities. Require transit stops that are accessible to pedestrians and bicyclists; and provide amenities for these users' convenience.

Policy M-8.5: Improved Transit Facilities. Require development projects, when appropriate, to improve existing nearby transit and/or park and ride facilities, including the provision of bicycle and pedestrian facilities, provisions for bus transit in coordination with NCTD and MTS as appropriate including, but not limited to, shelters, benches, boarding pads, and/or trash cans, and to provide safe, convenient, and attractive pedestrian connections.

Policy M-8.7: Inter-Regional Travel Modes. Coordinate with SANDAG, Caltrans, and the California High-Speed Rail Authority, where appropriate, to identify alternative methods for inter-regional travel to serve the unincorporated county residents.

Policy M-8.8: Shuttles. Coordinate with Tribal governments, the Reservation Transportation Authority, and other large employers to provide shuttles and other means of connecting transit stops with job locations, civic, and commercial uses, where appropriate.

Policy M-9.1: Transportation Systems Management. Explore the provision of operational improvements (i.e. adding turn lanes, acceleration lanes, intersection improvements, etc.) that increase the effective vehicular capacity of the public road network prior to increasing the number of road lanes. Ensure operational improvements do not adversely impact the transit, bicycle, and pedestrian networks.

Policy M-9.2: Transportation Demand Management. Require large commercial and office development to use TDM programs to reduce single-occupant vehicle traffic generation, particularly during peak periods to maximize the capacity of existing or improved road facilities.

Policy M-9.3: Preferred Parking. Encourage and provide incentives for commercial, office, and industrial development to provide preferred parking for carpools, vanpools, electric vehicles and flex cars. [Refer also to Policy COS-16.3 (Low-Emission Vehicles) in the Conservation and Open Space Element.] Encourage parking cash out programs to reimburse employees for the cost of "free" on-site parking to provide incentives to use alternate modes of travel and to reduce parking requirements (see also Policy M-10.5).

Policy M-9.4: Park-and-Ride Facilities. Require developers of large projects to provide, or to contribute to, park-and-ride facilities near freeway interchanges and other appropriate locations that provide convenient access to congested regional arterials. Require park-and-ride facilities that are accessible to pedestrians and bicyclists, and include bicycle lockers and transit stops whenever feasible.

Policy M-10.1: Parking Capacity. Require new development to:

- Provide sufficient parking capacity for motor vehicles consistent with the project's location, use, and intensity;
- Provide parking facilities for motorcycles and bicycles; and
- Provide staging areas for regional and community trails.

Policy M-10.2: Parking for Pedestrian Activity. Parking in a commercial area in Fallbrook Require the design and placement of on-site automobile, motorcycle, and bicycle parking in Villages and Rural Villages that encourages pedestrian activity by providing a clear separation between vehicle and pedestrian areas and prohibit parking areas from restricting pedestrian circulation patterns.

Policy M-10.3: Maximize On-street Parking. Encourage the use of on-street parking in commercial and/or high-density residential town center areas to calm traffic and improve pedestrian interaction. Traffic operations and pedestrian safety must not be compromised.

Policy M-10.4: Shared Parking. Support town center plans, when desired by the community, that incorporate on-street and/or shared vehicular parking facilities to reduce on-site parking requirements.

Policy M-10.5: Reduced Parking. Accommodate appropriate reductions in on-site parking requirements in situations such as:

- Development of low-income and senior housing
- Development located near transit nodes
- Employment centers that institute Transportation Demand Management programs
- Development that integrates other parking demand reductions techniques such as parking cash out, when ensured by ongoing permit conditions

Policy M-11.1: Bicycle Facility Design. Support regional and community-scaled planning of pedestrian and bicycle networks.

Policy M-11.2: Bicycle and Pedestrian Facilities in Development. Require development and Town Center plans in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation, such as comprehensive bicycle and pedestrian networks and facilities, including both on-street facilities as well as off-street bikeways, to safely serve the full range of intended users, along with areas for transit facilities, where appropriate and coordinated with the transit service provider.

Policy M-11.3: Bicycle Facilities on Roads Designated in the Mobility Element. Maximize the provision of bicycle facilities on County Mobility Element roads in

Semi-Rural and Rural Lands to provide a safe and continuous bicycle network in rural areas that can be used for recreation or transportation purposes, while retaining rural character.

Policy M-11.4: Pedestrian and Bicycle Network Connectivity. Require development in Villages and Rural Villages to provide comprehensive internal pedestrian and bicycle networks that connect to existing or planned adjacent community and countywide networks.

Policy M-11.5: Funding for Bicycle Network Improvements. Seek outside funding opportunities for bicycle and pedestrian network improvement projects, particularly those that provide safe and continuous pedestrian and bicycle routes to schools, town centers, parks, park-and-ride facilities, and major transit stops.

Policy M-11.6: Coordination for Bicycle and Pedestrian Facility Connectivity. Coordinate with Caltrans to provide alternate connections for past, existing, or planned bicycle and pedestrian routes that were or would be severed by state freeway and highway projects that intersect pathways or divide communities.

Policy M-11.7: Bicycle and Pedestrian Facility Design. Promote pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village.

Policy S-2.7: Evacuation Access. All development proposals are required to identify evacuation routes at the Community Plan level and identify and facilitate the establishment of new routes needed to ensure effective evacuation. Evacuation routes should be incorporated into existing Community Wildfire Protection Plans where available.

Policy S-4.5: Access Roads. Require development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently. The width, surface, grade, radius, turnarounds, turnouts, bridge construction, vegetative management and brush clearance around roadways, and lengths of fire apparatus access roads shall meet the requirements of the State and San Diego County Consolidated Fire Codes. All requirements and any deviations will be at the discretion of the Fire Code Official.

Policy S-4.6: Fire Protection Plans. Ensure that development located within fire hazard areas implement measures in a Fire Protection Plan that reduce the risk of structural and human loss due to wildfire.

Policy S-12.6: Resilient Transportation Systems. Increase the resilience of transportation systems and protect critical transportation infrastructure from climate change.

Policy S-16.1: Vehicular Access to Development. Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Tra-1.3: Implement the County Public Road Standards during review of new development projects. Also revise the Public Road Standards to include a range of road types according to Regional Category context.

Adopted Mitigation Measure Tra-1.4: Implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Adopted Mitigation Measure Tra-4.4: Implement and revise as necessary the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards.

2.13.3 Analysis of Effects and Significance Determinations

2.13.3.1 Significance Criteria

The significance criteria used to evaluate the project impacts to transportation under CEQA are based on Appendix G of the State CEQA Guidelines, the County of San Diego TSG, and State CEQA Guidelines Section 15064.3. Impacts to the transportation system would be significant if implementation of the project would:

- conflict with a program, plan, ordinance or policy addressing the circulation system;
- exceed threshold for VMT;
- substantially increase hazards due to a design feature;
- result in inadequate emergency access.

2.13.3.2 Approach to Analysis

Impacts related to transportation are analyzed based on a review of the CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area is analyzed in the context of existing laws and regulations as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant 2011 GPU PEIR mitigation

measures are applicable to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update.

Scope of SEIR Impact Analysis

The impact analysis contained within this draft SEIR focuses on whether approval and implementation of the CAP Update would result in new or more severe impacts than what were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward the established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impact of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unincorporated county) and its role as a planning document designed to guide future decision-making related to the reduction of GHG emissions within the unincorporated county, the study area for the CAP Update is the unincorporated area of the county within the County's jurisdiction (i.e., all unincorporated lands excluding tribal lands, state and federally owned lands, and military installations).

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

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies and associated measures and actions proposed in the CAP Update (see Table 1-2) have been grouped into categories for the purpose of analysis, based on the sector they target (e.g., solid waste, water/wastewater). CAP Update actions and measures with the potential result in effects to transportation are summarized below. CAP Update measures and actions that would involve development of policies and programs that would not result in direct physical effects or those that would result in limited physical improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to all transportation impact analyses except for VMT. The analysis of VMT consistent with State CEQA Guidelines Section 15064.3 considers all policies and programs that could affect VMT.

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

Water and Wastewater Measures and Actions. This category includes strategies to decrease potable water consumption and increase stormwater collection and reuse. Key actions with potential to result in new or more severe impacts related to transportation include those that would result in the construction of new stormwater capture and reuse infrastructure (Actions W-1.1, W-2.2, W-2.3, and W-2.4).

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. Key actions with potential to result in new or more severe impacts related to transportation include those that would result in the construction and maintenance of restoration and conservation projects (Action A-1.2). This category also includes an action that would evaluate opportunities for the construction of farmworker housing (Action A-4.1.b).

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

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more severe impacts related to transportation include those that would result in the construction of new electric vehicle charging stations (EVCSs) (Action T-3.1), hydrogen fueling infrastructure (Action T-3.1.a), active transportation facilities (Action T-5.1), and transit-supportive roadway treatments (Action T-6.2).

2.13.3.3 Issue 1: Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System

This section describes potential project impacts on programs, plans, ordinances, or policies addressing the circulation system with implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* (County of San Diego 2011), the project would result in a significant impact if it would:

- conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Impact Analysis

2011 GPU PEIR Determination

As discussed in Section 2.15, "Transportation and Traffic," the 2011 GPU PEIR evaluated impacts related to transit, roadway, bicycle, and pedestrian facilities with the adoption of the goals and policies contained within the General Plan and buildout of the unincorporated county at the planning horizon. The discussion of impacts can be found in Section 2.15, "Transportation and Traffic" (pages 2.15-36 through 2.15-39) and is hereby incorporated by reference. The 2011 GPU PEIR determined that there would be inconsistencies between the General Plan and existing alternative transportation plans and policies at that time, thus resulting in potentially significant impacts.

The 2011 GPU PEIR determined that the impacts to alternative transportation would be reduced through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; and adopted General Plan policies. The General Plan Policies LU-5.1, LU-6.3, LU-5.4, LU-5.5, LU-9.8, LU-11.6, M-3.1. M-3.3. M-4.3, M-8.1, M-8.2, M-8.3, M-8.4, M-8.5, M-8.6, M-8.7, M-9.2, M-9.4, M-11.2, M-11.3, M-11.4, M-11.5. M-11.6, and M-11.7 would promote provisions for alternative modes of transportation, including bike lanes, bus stops, trails, and sidewalks. Additionally, the 2011 GPU PEIR determined that the impacts to alternative transportation would be further reduced with the implementation of Mitigation Measures Tra-6.1, Tra-6.2, Tra-6.3, Tra-6.4, Tra-6.5, Tra-6.6, Tra-6.7, Tra-6.8, and Tra-6.9. Impacts to alternative transportation were determined to be less than significant with implementation of adopted General Plan policies and the 2011 GPU PEIR mitigation measures referenced above.

CAP Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures and actions to result in impacts to alternative transportation.

As noted above, SANDAG's *2021 Regional Plan* combines the Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan. The 2021 Regional Plan anticipates the growth that will occur in the region and provides a blueprint for a regional transportation system, while also establishing the region's sustainable community strategy with the overarching vision of promoting sustainability and offering more mobility options for people and goods. The Regional Plan provides a framework for coordinated land use and transportation planning strategies by identifying policies and

programs developed to achieve the goals of efficiently moving people and goods; providing access to affordable, reliable, and safe mobility options for everyone; and providing healthier air and reduced GHG emissions regionwide. The Regional Plan also includes recommendations for funding and implementation of transit, roadway, bicycle, and pedestrian facilities that would improve the transportation circulation system countywide. The measures and actions proposed under the CAP Update and described below are intended to further statewide and regional goals, including those of the Regional Plan, by promoting policies and actions that reduce GHG emissions by improving solid waste and water/wastewater use and management, increasing the availability of renewable sources of energy, promoting sustainable agricultural practices, and promoting transportation and built environment improvements that encourage the development of multi-modal transportation options - including bicycle and pedestrian facilities - and associated vehicular emissions reductions.

An important goal of the Regional Plan is to promote healthier air, including reduced GHG emissions, through reductions in local and regional VMT. A number of CAP Update measures and actions in support of the overall strategy of supporting active transportation and reducing single-occupancy vehicle trips would support this goal by promoting programs and policies to support alternative modes of transportation within the unincorporated county, consistent with the goal of the Regional Plan of improving the transportation circulation system countywide. The degree to which CAP Update implementation not only does not conflict with the Regional Plan but would reduce VMT-related GHG emissions, such that it would be substantially consistent with the GHG reduction strategies of the Regional Plan, is further discussed below under “Issue 2: Exceed Threshold for VMT.”

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and within the unincorporated county. Implementing CAP Update measures and actions (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b) could result in potential construction of new or expanded solid waste facilities. Specific locations for new and expanded facilities have not been identified.

Construction of solid waste facilities would be localized and temporary. Although construction of solid waste facilities and associated off-site improvements could occur within the roadway or along pedestrian and bicycle facilities potentially resulting in lane closures, minor detours, and/or delays due to the movement of construction vehicles and equipment, all projects within County right-of-way would be required to develop and implement a traffic control plan during construction to maintain a safe environment for all modes of transportation.

Once constructed, these projects would not have an impact on the operation of the circulation system. Implementation of CAP Update Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b would not damage or alter any existing bicycle, pedestrian, or transit facilities resulting in an adverse effect to existing or planned facility usage and/or service. All

projects would be subject to review by County staff to ensure all applicable regulations are met, and individual new or expanded solid waste infrastructure projects would need to remain consistent with County policies, plans, and ordinances related to alternative transportation. Therefore, implementation of these projects would not result in conflicts with programs, plans, policies, or ordinances addressing the circulation system.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded solid waste facilities would be required to implement adopted General Plan goals and policies related to alternative transportation. Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that if impacts to planned routes would occur, any such impacts would be mitigated. Policy LU-9.8 requires that development within Villages include connected pedestrian routes and amenities. Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists. Policy M-4.3 calls for the design and construction in Semi-Rural and Rural Lands to safely accommodate transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Policies M-11.2 through M-11.4 require development in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks. Implementation of these policies would minimize impacts related to alternative transportation by ensuring that proposed improvements prioritize connectivity, safety, compatibility with surrounding uses. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Therefore, potential impacts to alternative transportation would be less than significant through implementation of the applicable General Plan policies and completion of subsequent project-level planning and environmental review.

Water and Wastewater Measures and Actions

The CAP Update includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Implementation of CAP Update Actions W-1.1, W-2.2, W-2.3, and W-2.4 would involve construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

Construction of water and wastewater facilities would be localized and temporary. Although construction of water and wastewater facilities and associated off-site improvements could occur within the roadway or along pedestrian and bicycle facilities potentially resulting in lane closures, minor detours, and/or delays due to the movement of construction vehicles and equipment, all projects within County right-of-way would be

required to develop and implement a traffic control plan during construction to maintain a safe environment for all modes of transportation.

Once constructed, these projects would not have an impact on the operation of the circulation system. Implementation of CAP Update Actions W-1.1, W-2.2, W-2.3, and W-2.4 would not damage or alter any existing bicycle, pedestrian, or transit facilities resulting in an adverse effect to existing or planned facility usage and/or service. All projects would be subject to review by County staff to ensure all applicable regulations are met, and individual new or expanded water and wastewater infrastructure projects would need to remain consistent with County policies, plans, and ordinances related to alternative transportation. Therefore, implementation of these projects would not result in conflicts with programs, plans, policies, or ordinances addressing the circulation system.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded water and wastewater facilities would be required to implement adopted and applicable General Plan goals and policies related to alternative transportation. The implementation of Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that if impacts to planned routes would occur, ensures that they are mitigated. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Therefore, potential impacts to alternative transportation would be less than significant through implementation of the applicable General Plan policies and completion of subsequent project-level planning and environmental review.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-4 would preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices in the unincorporated county.

Implementation of these actions, other than Action A-4.1.b, would not result in impacts to alternative transportation because no new or expanded development would be anticipated from their associated agriculture and conservation activities. However, implementation of Action A-4.1.b would have the potential to result in the construction of new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. It is anticipated that new farmworker housing would be low density and in proximity to existing agricultural operations, which are generally in more rural areas of the unincorporated county. The development of new farmworker housing would have the potential to result in the construction of new roadways or improvements to existing roadways, which would be required to meet local design standards. All projects would be subject to review by County staff to ensure all applicable regulations are met, and individual new or expanded roadway projects would need to remain consistent with County policies, plans, and ordinances related to alternative transportation. Therefore, implementation of these projects would not result in conflicts with programs, plans, policies, or ordinances addressing the circulation system.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded roadway projects associated with increased farmworker housing would be required to implement adopted General Plan goals and policies related to alternative transportation. Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that impacts to planned routes would occur, ensures that they are mitigated. Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists. Policy M-4.3 calls for the design and construction in Semi-Rural and Rural Lands to safely accommodate transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Policies M-8.3 through M-8.5 promotes the use of public transit including requiring development projects to improve existing nearby transit and/or park and ride facilities. Policy M-9.1 ensures that operational roadway improvements do not adversely impact transit, bicycle, and pedestrian networks. Policy M-11.2 through M-11.4 requires development in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Therefore, potential impacts to alternative transportation would be less than significant through implementation of the applicable General Plan policies and completion of subsequent project-level planning and environmental review.

Energy Measures and Actions

Implementation of the CAP Update would involve strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Implementing CAP Update Actions E-1.1 and E-3.3 would have the potential to result in construction of new infrastructure to promote renewable energy use and electrification.

Specifically, implementation of proposed CAP Update Action E-3.3 could result in the construction of new large-scale renewable energy systems, including large-scale photovoltaic (PV) solar, concentrated solar, and wind turbines. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level. Specific locations for projects have not been identified. While the potential for the construction of large-scale renewable energy infrastructure was not evaluated in the 2011 GPU PEIR, potential wind energy impacts were evaluated in the 2012 Wind Energy EIR, and a summary of that analysis is provided below and is hereby incorporated by reference.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating renewable energy source. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure which relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Solar fields and wind turbines typically

require large swaths of land and may require multiple access points and/or new access roads.

Construction of energy related infrastructure would be localized and temporary. Although construction of energy infrastructure facilities and associated off-site improvements could occur within the roadway or along pedestrian and bicycle facilities potentially resulting in lane closures, minor detours, and/or delays due to the movement of construction vehicles and equipment, all projects within County right-of-way would be required to develop and implement a traffic control plan during construction to maintain a safe environment for all modes of transportation.

Once constructed, these projects would not have an impact on the operation of the circulation system. Implementation of CAP Update Actions E-1.1 and E-3.3 would not damage or alter any existing bicycle, pedestrian, or transit facilities resulting in an adverse effect to existing or planned facility usage and/or service. All projects would be subject to review by County staff to ensure all applicable regulations are met, and individual energy infrastructure projects would need to remain consistent with County policies, plans, and ordinances related to alternative transportation.

Future discretionary large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to conflicts with plans, policies, and regulations intended to manage circulation and the functionality of pedestrian and bicycle infrastructure to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Additionally, all large-scale renewable energy projects are required to obtain a Major Use Permit (MUP) which requires projects to undergo the County's discretionary review process. Therefore, implementation of these projects would not result in conflicts with programs, plans, policies, or ordinances addressing the circulation system.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded energy infrastructure projects, including large-scale renewable energy projects, would be required to implement adopted General Plan goals and policies related to alternative transportation. Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that impacts to planned routes would occur, ensures that they are mitigated. Policy LU-9.8 requires that development within Villages include connected pedestrian routes and amenities. Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists. Policy M-4.1 encourages multi-modal roads in Villages and residential areas to enhance pedestrian safety and walkability, along with other non-motorized modes of travel. Policy M-4.3 calls for the design and construction in Semi-Rural and Rural Lands to safely accommodate transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Policies M-8.3 through M-8.5 promotes the use of public transit including requiring development projects to improve existing nearby transit and/or park and ride facilities. Policy M-9.1 ensures that operational roadway improvements do not adversely impact transit, bicycle, and pedestrian networks. Policy M-10.1 requires development to provide bicycle parking facilities. Policy M-11.2 through M-11.4 requires development in

Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Therefore, potential impacts to alternative transportation would be less than significant through implementation of the applicable General Plan policies and completion of subsequent project-level planning and environmental review.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update would involve policies and programs to increase the use of alternative forms of transportation in the unincorporated county. Implementing CAP Update Actions T-3.1, T-5.1, and T-6.2 could result in the construction of new EVCSs, transit-supportive roadway treatments, and bicycle and pedestrian facilities.

Construction of roadway infrastructure projects such as bicycle, pedestrian, and transit improvement projects would be localized and temporary. Although construction within the roadway or along pedestrian and bicycle facilities could result in lane closures, minor detours, and/or hinder the movement of bicyclists and pedestrians, all projects within County right-of-way would be required to develop and implement a traffic control plan during construction to maintain a safe environment for all modes of transportation.

Once constructed, these projects would only enhance the environment for pedestrians and bicyclists by expanding facilities for alternative modes of transportation encouraging use and increasing safety. Additionally, implementation of CAP Update Actions T-3.1, T-5.1, and T-6.2 would not damage or alter any existing bicycle, pedestrian, or transit facilities resulting in an adverse effect to existing or planned facility usage and/or service. Alternatively, the implementation of CAP Update built environment and transportation measures and actions would benefit alternative transportation. 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 these projects would not result in conflicts with programs, plans, policies, or ordinances addressing the circulation system.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded EVCSs, transit-supportive roadway treatments, and bicycle and pedestrian facilities would be required to implement adopted General Plan goals and policies related to alternative transportation. Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that impacts to planned routes would occur, ensures that they are mitigated. Policy LU-9.8 requires that development within Villages include connected pedestrian routes and amenities. Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists. Policy M-4.1 encourages multi-modal roads in Villages and residential areas to enhance pedestrian safety and walkability, along with other non-motorized modes of travel. Policy M-4.3 calls for the design and construction in Semi-Rural and Rural Lands to safely accommodate transit stops when deemed necessary, along with bicyclists,

pedestrians, and equestrians. Policies M-8.3 through M-8.5 promotes the use of public transit including requiring development projects to improve existing nearby transit and/or park and ride facilities. Policy M-9.1 ensures that operational roadway improvements do not adversely impact transit, bicycle, and pedestrian networks. Policy M-9.4 requires developers of large development projects to provide, or to contribute to, park-and-ride facilities that are accessible to pedestrians and bicyclists and include bicycle lockers and transit stops whenever feasible. Policy M-10.1 requires development to provide bicycle parking facilities. Policy M-11.2 through M-11.4 requires development in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Implementation of Policy LU-5.5 of the General Plan ensures development does not impede bicycle or pedestrian facilities and that if impacts to planned routes would occur, ensures that they are mitigated. Additionally, the implementation of transit-supportive roadway treatments and bicycle and pedestrian facilities would enhance the availability, efficiency, and safety of alternative transportation facilities while increasing the comfort of users. Therefore, potential impacts to alternative transportation would be beneficial through implementation of the applicable General Plan policies and completion of subsequent project-level planning and environmental review.

Summary

Based on the discussion above, implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions would result in a less-than-significant impact related to alternative transportation and the circulation system. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.3.4 Issue 2: Exceed Threshold for VMT

This section describes the effect of the CAP Update on countywide VMT.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, the County TSG, and the OPR Technical Advisory, the project would result in a significant impact if it would:

- conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Impact Analysis

2011 GPU PEIR Determination

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 mandates 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 2011 GPU PEIR

did not evaluate impacts to VMT. VMT was a metric used extensively in the transportation industry at the time the 2011 GPU PEIR was prepared, but its use was generally limited to highway cost allocation, determining user fee structures, and estimating air quality and GHG emissions; thus, VMT related to the build out of the General Plan was a known concept at the time. However, it was not the metric used to assess transportation impacts.

Because VMT was not estimated for the growth in the unincorporated county under the General Plan in the 2011 GPU PEIR, the VMT modeling of anticipated growth under the adopted General Plan prepared as part of the forecasting for the CAP Update is used in this analysis to understand anticipated VMT without the proposed project. VMT was modeled using an origin-destination method of modeling that was established by a CARB-appointed Regional Targets Advisory Committee to evaluate transportation plan consistency with SB 375 requirements and is based on the premise that each jurisdiction is responsible for the air emissions within its boundaries. This methodology is used throughout California and is the ICLEI (ICLEI-Local Governments for Sustainability) recommended methodology. Total VMT produced using this methodology includes all internal VMT, half of internal to external VMT, and half of external to internal VMT. For example, all VMT originating from trips that start and end in the unincorporated area are included. One half of the VMT that originates in the unincorporated county but ends in one of the region's cities is included and one half of the VMT that originates in one of the cities but ends in the unincorporated area is included.[1] No revisions to model outputs were made to reflect potential VMT reductions that would result from implementation of policies and actions in the adopted General Plan. In addition, adjustments were made to account for military and tribal land, which is not within the County's jurisdiction.

The most recent version of the SANDAG activity-based model (SANDAG ABM 2+) was used to calculate VMT associated with anticipated growth under the General Plan for the years 2035 and 2050. Table 2.13-2 provides the forecast VMT per resident and VMT per employee in comparison to the regional average VMT per resident and VMT per employee. The VMT per population metric is a transportation efficiency metric that is used to identify potential impacts associated with implementation of the General Plan and is consistent with CARB guidance. This metric helps depict whether people are traveling more or less by vehicle over time, across different areas, or across different planning scenarios.

As detailed in the Regulatory Setting, the TSG establishes VMT thresholds for large land use plans as 15 percent below the existing regional average VMT per resident and 15 percent below the existing regional average VMT per employee for residential and employment uses, respectively. As shown in Table 2.13-2, an increase in both unincorporated county VMT per employee and VMT per resident is anticipated under the General Plan; therefore, growth consistent with the General Plan would exceed the TSG thresholds for land use plans, and would result in a significant VMT impact.

[1] Note that this methodology differs from the VMT modeling typically applied to VMT analyses based on the *Technical Advisory on Evaluating Transportation Impacts in CEQA* released by the Governor's Office of Planning and Research in December 2018. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household, and whether a qualitative or quantitative analysis is appropriate.

CAP Update Impact Analysis

The following sections describe the effects to VMT that could result from the implementation of the proposed GHG reduction measures and actions.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and within the unincorporated county. Implementing CAP Update measures and actions (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b) could result in potential construction of new or expanded solid waste facilities. Specific locations for new and expanded facilities have not been identified.

As noted above, VMT is a metric used to evaluate the amount of driving that would occur in a region, either in total or on a per capita basis. The types of projects with potential to increase VMT are those that establish a regional attractant, make driving single-occupancy vehicles more convenient (i.e., roadway widening), or increase total population. Implementation of the CAP Update Solid Waste Measures and Actions would not increase the number of residents or visitors in the unincorporated county. Operations and maintenance of expanded solid waste facilities may result in some additional employment opportunities; however, the increase would be minimal and, therefore, is not expected to result in a substantial increase in employee commute VMT.

Therefore, given the nature of the CAP Update Solid Waste Measures and Actions which would not increase residential or commercial uses and only result in minimal numbers of employees, potential impacts to VMT would be less than significant.

Water and Wastewater Measures and Actions

The CAP Update includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Implementation of CAP Update Actions W-1.1, W-2.2, W-2.3, and W-2.4 would involve construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

Implementation of the CAP Update Water and Wastewater Measures and Actions would not increase the number of residents or visitors in the unincorporated county. Operations and maintenance of expanded water and wastewater facilities may result in some additional employment opportunities; however, the increase would be minimal and, therefore, is not expected to result in a substantial increase in employee commute VMT.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded water and wastewater facilities would be required to implement adopted and applicable General Plan goals and policies related to alternative transportation. The implementation of Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities.

Therefore, given the nature of the CAP Update Water and Wastewater Measures and Actions which would not increase residential or commercial uses and only result in minimal numbers of employees, potential impacts to VMT would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-4 would preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices in the unincorporated county.

With the exception of Action A-4.1.b, implementation of these measures and actions, would not result in impacts to VMT because no new or expanded development would be anticipated from their associated agriculture and conservation activities. However, implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. Implementation of new farmworker housing would be expected to reduce VMT by locating housing on-site or near agricultural lands where those residents would work, therefore reducing the distance farmworkers commute.

Modeling was conducted to evaluate VMT reductions from the implementation of CAP Update Measures and Actions that have the potential to affect VMT within the unincorporated county. Table 2.13-3 shows the potential VMT reductions associated with the implementation of the CAP Update agriculture and conservation measures and actions over time.

New or expanded roadways may be required to accommodate future farmworker housing. Consistent with the General Plan, development of new or expanded roadway projects associated with farmworker housing would be required to implement adopted General Plan goals and policies related to alternative transportation. Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that impacts to planned routes would occur, ensures that they are mitigated. Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists. Policy M-4.3 calls for the design and construction in Semi-Rural and Rural Lands to safely accommodate transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Policies M-8.3 through M-8.5 promote the use of public transit including requiring development projects to improve existing nearby transit and/or park and ride facilities. Policy M-9.1 ensures that operational roadway improvements do not adversely impact transit, bicycle, and pedestrian networks. Policy M-11.2 through M-11.4 requires development in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Overall, CAP Update agriculture and conservation measures and actions would reduce VMT in the unincorporated county by locating farmworker housing on or near worksites and reducing commute distance. Any new or expanded roadways to accommodate such housing would be required to implement applicable General Plan policies and develop mitigation as necessary to minimize any related impacts. Therefore, potential impacts related to VMT would be less than significant.

Energy Measures and Actions

Implementation of the CAP Update would involve strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Implementing CAP Update Actions E-1.1 and E-3.3 would have the potential to result in construction of new infrastructure to promote renewable energy use and electrification.

Implementation of the CAP Update Energy Measures and Actions would not increase the number of residents or visitors in the unincorporated county. New roadways may be necessary to access large-scale renewable energy facilities, and operations and maintenance of these systems may result in some additional employment opportunities; however, the increase would be minimal and, therefore, is not expected to result in a substantial increase in employee commute VMT.

Therefore, given the nature of the CAP Update Energy Measures and Actions which would not increase residential or commercial uses and only result in minimal numbers of employees, potential impacts to VMT would be less than significant.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update would involve policies and programs to increase the use of alternative forms of transportation in the unincorporated county. Implementing CAP Update Actions T-3.1, T-4.1, T-4.1a, T-4.2, T-5.1, T-5.1a, T-5.1b, T-5.2, T-6.1, T-6.2, T-6.2a, T-6.2b, and T-6.3 could result in the construction of new transit-supportive roadway treatments and bicycle and pedestrian facilities, the implementation of transportation demand management programs to reduce the use of single occupancy vehicles, and educational initiatives to encourage increased alternative transportation in the unincorporated county.

Once implemented, these projects and efforts would increase the use of pedestrian and bicycle facilities as well as transit service by expanding facilities for alternative modes of transportation, increasing roadway safety, and providing incentives. The benefits these measures and actions would provide to alternative transportation would result in decreased vehicular use and, thus, reduced VMT.

Modeling was conducted to evaluate VMT reductions from the implementation of the Built Environment and Transportation Measures and Actions. Table 2.13-4 shows the potential reductions associated with implementation of the CAP Update built environment and transportation measures and actions over time.

Therefore, CAP Update built environment and transportation measures and actions would help reduce VMT in the unincorporated county by constructing new transit-supportive roadway treatments and bicycle and pedestrian facilities and implementing transportation demand management programs and educational initiatives to encourage increased alternative transportation use in the unincorporated county. Thus, potential impacts related to VMT would be less than significant.

Summary

Implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions under the CAP Update would result in a less-than-significant impact related to VMT. Therefore, implementation of the CAP Update **would not result in any new or substantially more severe impacts** beyond what was disclosed in the 2011 GPU PEIR.

2.13.3.5 Issue 3: Substantially Increase Hazards due to a Design Feature

This section describes impacts related to hazards because of a design feature with implementation of the project.

Guidelines for Determination of Significance

Appendix G of the State CEQA Guidelines establishes the following guidelines for determining significance of effects related to transportation hazards:

- substantially increase hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

In addition, the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* (County of San Diego 2011) establishes the following guidelines for determining significance of effects related to transportation hazards:

- Design features/physical configurations of access roads may adversely affect the safe movement of all users along the roadway.
- The percentage or magnitude of increased traffic on the road due to the proposed project may affect the safety of the roadway.
- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, may result in conflicts with other users or stationary objects.
- Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable.

- Design features/physical configurations on a road segment or at an intersection that may adversely affect the visibility of pedestrians or bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The amount of pedestrian activity at the project access points that may adversely affect pedestrian safety.
- The preclusion or substantial hindrance of the provision of a planned bike lane or pedestrian facility on a roadway adjacent to the project site.
- The percentage or magnitude of increased traffic on the road due to the proposed project that may adversely affect pedestrian and bicycle safety.
- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers that may result in vehicle/pedestrian, vehicle/bicycle conflicts.
- Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable.
- The potential for a substantial increase in pedestrian or bicycle activity without the presence of adequate facilities.

Impact Analysis

2011 GPU PEIR Determination

As discussed in Section 2.15, “Transportation and Traffic,” the 2011 GPU PEIR evaluated impacts related to transportation design hazards with the adoption of the goals and policies contained within the General Plan and buildout of the unincorporated county at the planning horizon. The discussion of impacts, including those related to rural road safety, can be found in Section 2.15, “Transportation and Traffic” (pages 2.15-30 through 2.15-32), and is hereby incorporated by reference.

The 2011 GPU PEIR determined that the General Plan would result in the adoption of a Mobility Element network that includes existing roadways with horizontal and vertical curves that are sharper than existing standards. Additionally, it was determined that the General Plan could pose an increased risk to pedestrians and bicyclists by increasing and/or redistributing traffic patterns and would also have the potential to result in hazards from at-grade rail crossings. Thus, 2011 GPU PEIR determined that implementation of the General Plan would result in potentially significant impacts.

The 2011 GPU PEIR determined that the impacts to transportation hazards and rural road safety would be reduced through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; and adopted General Plan policies. The General Plan includes Policies LU-2.8, LU-6.10, M-4.3. M-4.4. M-4.5, and M-9.1, which are intended to reduce hazards associated with rural roadways. Additionally, the 2011 GPU PEIR determined that the impacts to transportation hazards would be further reduced with the implementation of Mitigation Measures Tra-1.3, Tra-1.4, Tra-1.6, and Tra-3.1. However, even with these programs in place, the impacts would not be

reduced to a less-than-significant level. The 2011 GPU PEIR identified additional mitigation measures that would reduce impacts to below a level of significance; however, the County determined that their implementation would be infeasible. These infeasible mitigation measures included requiring all roadway facilities with horizontal and vertical curves that are sharper than existing standards undergo construction improvements to be brought into compliance with existing safety standards and retrofitting all transportation facilities within the unincorporated county to provide safe bicycle and pedestrian movement corridors. Mitigation rejected as infeasible within the 2011 GPU PEIR is described in detail in Section 2.15, "Transportation and Traffic," on page 2.15-49.

CAP Impact Analysis

The following sections describe the effects of transportation hazards that could result from the implementation of the proposed CAP Update measures and actions.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and in the unincorporated county. Implementing CAP Update measures and actions (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b) could result in potential construction of new or expanded solid waste facilities and associated roadway improvements.

The CAP Update would apply to the entire unincorporated county. Construction transportation impacts would be localized and temporary; however, during construction of each project, traffic operations could be degraded. For this reason, the project would be required to follow all 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. Additionally, future discretionary projects would be subject to review by County staff to ensure hazards during construction are minimized and that all safety standards are met.

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 these projects would not result in increased design hazards across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded solid waste facilities would be required to implement adopted General Plan goals and policies related to transportation hazards. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-5.5 would ensure that development projects would not impede non-motorized forms of travel. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Within the Mobility Element, Goal M-4 encourages roads designed to be safe for all users and compatible with their context.

Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access. Goal M-9 encourages the effective use of the existing transportation network. Policy M-9.1 supports this goal by encouraging operational improvements that do not adversely impact the transit, bicycle, and pedestrian networks. Policy M-11.7 promotes pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village.

Development associated with the County CAP also would be required to implement the following applicable mitigation measure identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Therefore, potential impacts to transportation hazards would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Water and Wastewater Measures and Actions

The CAP Update includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Implementation of CAP Update Actions W-1.1, W-2.2, W-2.3, and W-2.4 would involve construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The CAP Update would apply to the entire unincorporated county. Construction transportation impacts would be localized and temporary; however, during construction of each project, traffic operations could be degraded. For this reason, the project would be required to follow all 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. Additionally, future discretionary projects would be subject to review by County staff to ensure hazards during construction are minimized and that all safety standards are met.

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 these projects would not result in increased design hazards across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, construction of new recycled water and stormwater capture and reuse infrastructure also would be required to implement adopted General Plan goals and policies related to transportation hazards. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Within the Mobility Element, Goal M-4 encourages roads designed to be safe for all users and compatible with their context. Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access.

Additionally, development associated with the County CAP would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Therefore, potential impacts to transportation hazards would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-4 would preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices in the unincorporated county.

Implementation of these actions, other than Action A-4.1.b, would not result in impacts to alternative transportation because no new or expanded development would be anticipated from their associated agriculture and conservation activities. However, implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. It is anticipated that new farmworker housing would be low density and in proximity to existing agricultural operations, which are generally in more rural areas of the unincorporated county. The development of new farmworker housing would have the potential to result in the construction of new roadways which would be required to meet local design standards. Additionally, all projects would be subject to review by County staff to ensure all applicable regulations are met.

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 these projects would not result in increased design hazards across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded transportation facilities would be required to implement adopted General Plan goals and policies related to transportation hazards. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-5.5 would ensure that development projects would not impede non-motorized forms of travel. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Within the Mobility Element, Goal M-4 encourages roads designed to be safe for all users and compatible with their context. Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access. Goal M-9 encourages the effective use of the existing transportation network. Policy M-9.1 supports this goal by encouraging operational improvements that do not adversely impact the transit, bicycle, and pedestrian networks. Policy M-11.7 promotes pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village. Additionally, all construction projects occurring within County right-of-way would be required to obtain an encroachment and traffic control permit from the County Department of Public Works to ensure proper precautions are implemented during construction to maintain safety in and around each project site for all modes of transportation.

Construction and development associated with the County CAP would also be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Therefore, potential impacts to transportation hazards would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Energy Measures and Actions

Implementation of the CAP Update would involve strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the

unincorporated county. Implementing CAP Update Actions E-1.1 and E-3.3 would have the potential to result in construction of new infrastructure to promote renewable energy use and electrification.

The implementation of new infrastructure related to energy including associated infrastructure such as roads and accessory uses could result in transportation hazards during construction. Typical construction activities would require the use of trucks, staging areas for supplies and equipment, parking for workers, and signage and grading. Construction transportation impacts would be localized and temporary; however, during construction of each project, traffic operations could be degraded.

For this reason, the project would be required to follow all local protocols to ensure safety and minimize disturbance to the transportation system 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. Additionally, future discretionary projects would be subject to review by County staff to ensure hazards during construction are minimized and that all safety standards are met.

As described above, implementation of CAP Update Action E-3.3 could indirectly result in the construction of new large-scale renewable energy systems, including large-scale PV solar, concentrated solar, and wind turbines. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating the renewable energy source. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure which relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Solar fields and wind turbines typically require large swaths of land and may require multiple access points and/or new access roads. Depending on the location of future projects, it is possible that road improvements would be required, however, all roadway improvements would be implemented in accordance with existing County regulations. The projects would be prohibited from placing any incompatible uses near roadways.

As described on pages 2.9-12 through 2.9-14 of the 2012 Wind Energy EIR, construction and operation of large turbine projects would result in less-than-significant impacts with regard to roadway design hazards because projects would be mitigated through the discretionary review process.

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. Future discretionary large-scale renewable energy

projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to emergency access to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Additionally, all large-scale renewable energy projects are required to obtain an MUP, which requires projects to undergo the County's discretionary review process.

Consistent with the 2011 GPU PEIR determinations, development of new infrastructure to promote renewable energy use and electrification would be required to implement adopted General Plan goals and policies related to transportation hazards. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-5.5 would ensure that development projects would not impede non-motorized forms of travel. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Within the Mobility Element, Goal M-4 encourages roads designed to be safe for all users and compatible with their context. Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access.

Construction and development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Therefore, potential impacts to transportation hazards would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update would involve policies and programs to increase the use of alternative forms of transportation in the unincorporated county. Implementing CAP Update Actions T-3.1, T-5.1, and T-6.2 could result in the construction of new EVCSs, transit-supportive roadway treatments, and bicycle and pedestrian facilities.

Construction of roadway infrastructure projects such as bicycle, pedestrian, and transit improvement projects would be localized and temporary; however, travel for all modes of transportation could be degraded due to vehicular lane closures, minor detours, and/or the movement of construction equipment. All projects within County right-of-way would be required to develop and implement a traffic control plan during construction to maintain a safe environment for all modes of transportation.

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 these projects would not result in increased design hazards across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded transportation facilities would be required to implement adopted General Plan goals and policies related to transportation hazards. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-5.5 would ensure that development projects would not impede non-motorized forms of travel. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Within the Mobility Element, Goal M-4 encourages roads designed to be safe for all users and compatible with their context. Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access. Goal M-9 encourages the effective use of the existing transportation network. Policy M-9.1 supports this goal by encouraging operational improvements that do not adversely impact the transit, bicycle, and pedestrian networks. Policy M-11.7 promotes pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village. Additionally, all construction projects occurring within County right-of-way would be required to obtain an encroachment and traffic control permit from the County Department of Public Works to ensure proper precautions are implemented during construction to maintain safety in and around each project site for all modes of transportation.

Construction and development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Therefore, potential impacts to transportation hazards would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Summary

Based on the discussion above, implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures

and actions under the CAP Update would result in a less-than-significant impact with mitigation incorporated related to transportation hazards. The 2011 GPU PEIR concluded that the impact related to transportation hazards would be significant and unavoidable. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.3.6 Issue 4: Result in Inadequate Emergency Access

This section describes potential project impacts related to emergency access with implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* (County of San Diego 2011), the project would result in a significant impact if it would:

- result in inadequate emergency access.

Impact Analysis

2011 GPU PEIR Determination

As discussed in Section 2.15, "Transportation and Traffic," the 2011 GPU PEIR evaluated impacts related to emergency access with the adoption of the goals and policies contained within the General Plan and buildout of the unincorporated county at the planning horizon. The discussion of impacts can be found in Section 2.15, "Transportation and Traffic" (pages 2.15-32 through 2.15-34) and is hereby incorporated by reference.

The 2011 GPU PEIR determined that the under the General Plan, existing inadequate roadway widths, dead end roads, one-way roads, and gated communities would continue to occur in the unincorporated county, all of which have the potential to impair emergency access. Thus, 2011 GPU PEIR determined that implementation of the General Plan would result in a potentially significant impact to emergency access.

The 2011 GPU PEIR determined that the impacts to emergency access would be reduced through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; and adopted General Plan policies. The General Plan includes Policies LU-2.8, LU-6.10, LU-12.2, M-1.2, M-3.3, M-4.4. S-3.4, S-3.5, and S-14.1, which are intended to reduce impacts associated with the provision of emergency access. Additionally, the 2011 GPU PEIR determined that the impacts to emergency access would be further reduced with the implementation of Mitigation Measures Tra-4.1, Tra-4.2, Tra-4.3, and Tra-4.4. Impacts to emergency access were determined to be less than significant with implementation of adopted General Plan policies and the 2011 GPU PEIR mitigation measures referenced above.

CAP Impact Analysis

The following sections describe the effects to emergency access that could result from the implementation of the proposed CAP Update measures and action.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and in the unincorporated county. Implementing CAP Update Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b could result in potential construction of new or expanded solid waste facilities.

The CAP Update would apply to the entire unincorporated county. Construction transportation impacts would be localized and temporary; however, during construction of each project, traffic operations could be degraded including emergency vehicle access. For this reason, the project would be required to follow all 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. Additionally, future discretionary projects would be subject to review by County and emergency service staff to ensure emergency access is maintained.

All projects would be required to meet County design standards and would be subject to review by County staff and applicable emergency service agencies to ensure all applicable regulations related to emergency access are met. Therefore, implementation of these projects would not result in inadequate emergency access across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded solid waste facilities would be required to implement adopted General Plan goals and policies related to emergency access. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Policy M-1.2 calls for an interconnected road network that provides both primary and secondary access/egress routes that support emergency services during fire and other emergencies. Policy M-4.4 requires that the design and construction of public and private roads allows for access of fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents. Policy S-4.5 requires development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently to meet state and San Diego County Consolidated Fire Codes. Policy S-16.1 requires development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

Development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3, Tra-1.4, and Tra-4.4. Mitigation Measure Tra-1.3 requires the implementation of

County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. Mitigation Measure Tra-4.4 requires the implementation and revisions as necessary of the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards.

Therefore, potential impacts to emergency access would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Water and Wastewater Measures and Actions

The CAP Update includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Implementation of CAP Update Actions W-1.1, W-2.2, W-2.3, and W-2.4 would involve construction of new recycled water and stormwater capture and reuse infrastructure within the unincorporated county. Specifically, these actions would require existing and new development to meet water efficiency and conservation requirements through small-scale improvements with limited physical footprints, such as installing greywater capture systems for irrigation, installing recycled water pipelines, replacing existing landscaping with water-efficient landscaping, and installing rain barrels to collect stormwater.

The CAP Update would apply to the entire unincorporated county. Construction transportation impacts would be localized and temporary; however, during construction of each project, emergency access could be degraded due to the obstruction of roadways if not adequately planned for. For this reason, the project would be required to follow all 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. Additionally, future discretionary projects would be subject to review by County staff to ensure emergency access is maintained during construction and that all safety standards are met.

Additionally, all projects would be required to meet County design standards and would be subject to review by County staff and applicable emergency service agencies to ensure all applicable regulations related to emergency access are met. Therefore, implementation of these projects would not result in inadequate emergency access across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded water and wastewater facilities would be required to implement adopted General Plan goals and policies related to emergency access. Policy LU-2.8 requires measures that

minimize impacts that are detrimental to human health and safety. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Policy M-1.2 calls for an interconnected road network that provides both primary and secondary access/egress routes that support emergency services during fire and other emergencies. Policy M-4.4 requires that the design and construction of public and private roads allows for access of fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents. Policy S-4.5 requires development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently to meet state and San Diego County Consolidated Fire Codes. Policy S-16.1 requires development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

Development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. Implementation of these policies and mitigation measures would ensure that emergency access is maintained during construction and operation of future required to implement the CAP Update. Therefore, potential impacts to emergency access would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-4 would involve acquiring and managing conservation lands, planting and protecting trees, and providing incentives to encourage carbon farming. These measures would result in the preservation of natural and agricultural lands in the unincorporated county. Implementation of these measures would not result in impacts to emergency access because no new or expanded development would be anticipated from those agriculture and conservation activities. However, implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. It is anticipated that new farmworker housing would be low density and in proximity to existing agricultural operations, which are generally in more rural areas of the unincorporated county. The development of new farmworker housing would have the potential to result in the construction of new roadways which would be required to meet local design standards. All projects would be subject to review by County staff to ensure all applicable regulations are met.

Thus, there would be no change to the existing roadway network as a result of implementing CAP Update Measures A-1 through A-4. Therefore, no impacts to emergency access would occur.

Energy Measures and Actions

Implementation of the CAP Update would involve development of policies and programs to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. Implementing CAP Update Actions E-1.1 and E-3.3 would have the potential to result in development of various renewable energy projects including energy efficiency retrofits on existing residential and non-residential structures and County facilities as well as new large-scale renewable energy systems including solar PV, solar concentrator, and wind turbines.

The CAP Update would apply to the entire unincorporated county. Construction transportation impacts would be localized and temporary; however, during construction of each project, traffic operations could be degraded including emergency vehicle access. For this reason, the project would be required to follow all 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. Additionally, future discretionary projects would be subject to review by County and emergency service staff to ensure emergency access is maintained.

As described in detail above in Section 2.13.3.3, implementation of CAP Update Action E-3.3 could result in the construction of new large-scale renewable energy systems, including large-scale PV solar, concentrated solar, and wind turbines. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this draft SEIR evaluates the potential for impacts at the program level.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating renewable energy sources. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure which relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Solar fields and wind turbines typically require large swaths of land and may require multiple access points and/or new access roads.

As described on pages 2.9-14 through 2.9-15 of the 2012 Wind Energy EIR, construction and operation of large turbine projects would result in less-than-significant impacts regarding emergency access because projects would be mitigated through the discretionary review process.

Future discretionary large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to emergency access to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Additionally, all large-scale renewable energy projects are required to obtain an MUP which requires projects to undergo the County's discretionary review process. Therefore, implementation of these projects would not result in inadequate emergency access across the county's roadway network.

Consistent with the 2011 GPU PEIR determinations, development of new infrastructure to promote renewable energy use and electrification would be required to implement adopted General Plan goals and policies related to emergency access. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Policy M-1.2 calls for an interconnected road network that provides both primary and secondary access/egress routes that support emergency services during fire and other emergencies. Policy M-4.4 requires that the design and construction of public and private roads allows for access of fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents. Policy S-4.5 requires development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently to meet state and San Diego County Consolidated Fire Codes. Policy S-16.1 requires development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

Development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Implementation of these policies and mitigation measures would ensure that emergency access is maintained during construction and operation of future projects required to implement the CAP Update.

Therefore, potential impacts to emergency access would be less than significant with implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update would involve policies and programs to increase the use of alternative forms of transportation in the unincorporated county. Implementing CAP Update Actions T-3.1, T-5.1, and T-6.2 could result in the construction of new EVCSs, transit-supportive roadway treatments, and bicycle and pedestrian facilities. Implementation of roadway infrastructure projects such as bicycle, pedestrian, EVCS, and transit projects may result in temporary construction-related impacts or minor detours but would not result in conflicts or impediments to emergency access within the county. These projects would also not exacerbate inadequate road widths, result in dead-end roads, one-way roads, or gated communities, nor would they result in any other obstruction to emergency access. The intent of the projects would be to provide expanded or new multi-modal transportation infrastructure that would accommodate non-automotive forms of transportation and reduce the number of vehicles on the road; therefore, fewer vehicles traveling along the roadway network may be beneficial to emergency access.

Additionally, all construction projects occurring withing County right-of-way would be required to obtain an encroachment and traffic control permit from the County Department of Public Works to ensure proper precautions are implemented during construction to maintain emergency access in and around each project site. Furthermore, all development projects and associated off-site improvements would be required to meet the standards and regulations identified in the County Fire Code pertaining to the design of roadways and emergency access. All projects would be required to meet County design standards and would be subject to review by County staff and applicable emergency service agencies to ensure all applicable regulations related to emergency access are met. Therefore, implementation of these projects would not result in inadequate emergency access across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new transportation infrastructure would be required to implement adopted General Plan goals and policies related to emergency access. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Policy M-1.2 calls for an interconnected road network that provides both primary and secondary access/egress routes that support emergency services during fire and other emergencies. Policy M-4.4 requires that the design and construction of public and private roads allows for access of fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents. Policy S-4.5 requires development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently to meet state and San Diego County Consolidated Fire Codes. Policy S-16.1 requires development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

Development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public

Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. Implementation of these policies and mitigation measures would ensure that emergency access is maintained during construction and operation of future projects that implement the CAP Update.

Therefore, potential impacts to emergency access would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Summary

Based on the discussion above, implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions that would be implemented under the CAP Update would result in a less-than-significant impact with mitigation incorporated related to emergency access. The 2011 GPU PEIR concluded that the impact related to emergency access would be less than significant. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.3.7 Cumulative Impact Analysis

The cumulative impact analysis study area for transportation in the 2011 GPU PEIR includes traffic from projects on tribal land and in adjacent cities, as well as projects proposed in the general plans of surrounding jurisdictions. The cumulative environmental setting has been updated from the 2011 GPU PEIR and is based on the development forecasts in SANDAG's 2021 Regional Plan (SANDAG 2021). Therefore, the study area for this cumulative transportation impact analysis is the SANDAG region, which encompasses the unincorporated areas and 18 incorporated cities that make up the entire County of San Diego. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

Impacts would be cumulative in nature if construction or operational impacts associated with cumulative regional land use projects combined with the CAP Update measures and actions to conflict with plans, ordinances, or policies related to alternative transportation. The 2011 GPU PEIR concluded that cumulative development would result in less than significant cumulative impacts related to conflict with plans, ordinances, or policies related to alternative transportation.

Implementation of the projects associated with CAP Update measures and actions related to solid waste, water and wastewater, and energy would not have an impact on operation of the circulation system because they would not substantially alter or damage the existing roadway network. CAP Update measures and actions within the built environment and transportation category would enhance alternative transportation facilities; and would therefore, be beneficial to alternative transportation including bicyclists, pedestrians, and transit riders. However, during construction of each project, traffic operations could be degraded. For this reason, all projects 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. Large-scale energy projects also could result in the need for new access roadways; however, design and construction of such new or expanded roadways would be compliant with relevant General Plan policies and other local regulations. Additionally, individual projects associated with the CAP Update would be required to be evaluated for project-specific impacts under CEQA at the time of application and would be required to comply with existing federal, state, and local regulations.

Further, with implementation of the applicable 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, cumulative impacts related to alternative transportation plans, ordinances, and policies would be less than significant.

Similar to the conclusions of the 2011 GPU PEIR, implementation of the CAP Update would not result in a substantial incremental effect that would result in a new significant cumulative impact related to conflicts with plans, ordinances, or policies addressing the circulation system**.** The CAP Update **would not result in new or more severe impacts** compared to the 2011 GPU PEIR.

Issue 2: Exceed Threshold for VMT

Cumulative VMT was not evaluated in the 2011 GPU PEIR. As detailed in Section 2.13.3.4, although the 2011 GPU PEIR did not evaluate VMT as a CEQA impact, VMT was a known metric that was used for a variety of purposes including forecasting GHG emissions from growth anticipated under the adopted General Plan. As shown in Table 2.13-2, under cumulative conditions (2050), build out of the General Plan exceeds the County's threshold for cumulative VMT which is 15 percent below existing regional VMT per capita and per employee (County of San Diego 2022: 27).

VMT is inherently a cumulative issue; thus, if an impact is not expected to substantially affect VMT at the project level, it can be presumed to result in a less than cumulatively considerable impact. As detailed in the OPR Technical Advisory, "a project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa" (OPR 2018: 6). Although the general plan

modeling indicates the per capita and per employee VMT would exceed thresholds established by the County (Table 2.13-2), the CAP Update measures and actions would not contribute to regional VMT. CAP Update agriculture and conservation and built environment and transportation measures and actions would result in quantifiable reductions in VMT in the unincorporated county. Therefore, the CAP Update **would not result in new or more severe impacts** compared to the 2011 GPU PEIR.

Issue 3: Substantially Increase Hazards Due to a Design Feature

The 2011 GPU PEIR concluded that cumulative development would result in significant cumulative impacts related to transportation hazards. The 2011 GPU PEIR concluded transportation impacts related to design hazards would be significant and unavoidable even with implementation of General Plan policies and 2011 GPU PEIR mitigation measures because the county's roadway network contains roads that do not meet existing roadway standards.

As discussed above, CAP Update measures and actions would result in new or expanded development of solid waste, wastewater, energy, and transportation infrastructure. Additionally, alternative transportation projects such as bicycle, pedestrian, and transit-supportive roadway improvements would result in some construction-related impacts but would enhance the overall functionality of the transportation network. Further, with implementation of the applicable 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 from CAP Update implementation related to transportation hazards would be less than significant. Accordingly, implementation of the CAP Update would not result in a considerable contribution to cumulative transportation hazards impacts and **would not result in new or more severe impacts** compared to the 2011 GPU PEIR.

Issue 4: Result in Inadequate Emergency Access

Impacts would occur if the CAP Update, in combination with cumulative development, combined to create multiple obstructions to emergency access along the same road. The 2011 GPU PEIR concluded that cumulative impacts related to emergency access resulting from buildout of the General Plan would be less than significant with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures listed above.

As discussed above, CAP Update measures and actions would result in new or expanded development of solid waste, wastewater, energy, and transportation infrastructure. However, all projects related to the CAP would be required to meet state and local regulations related to emergency access and design. Additionally, all development projects would be subject to review by applicable emergency service agencies to ensure emergency access is maintained during construction and operations. Further, with implementation of the applicable 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 conclusions of the 2011 GPU PEIR, implementation of the CAP Update would not result in a substantial incremental effect that would result in a new significant cumulative impact related to emergency access. The impact **would not result in new or more severe impacts** compared to the 2011 GPU PEIR.

2.13.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would not result in new or more severe significant impacts related to transportation.

2.13.5 Mitigation Measures

2.13.5.1 Issue 1: Conflict with a Program, plan, Ordinance or Policy Addressing the Circulation System

Implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions would result in a less-than-significant impact related to alternative transportation and the circulation system. No mitigation measures are required.

2.13.5.2 Issue 2: Exceed Threshold for VMT

Implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions under the CAP Update would result in a less-than-significant impact related to VMT. No mitigation measures are required.

2.13.5.3 Issue 3: Substantially Increase Hazards due to a Design Feature

The following adopted 2011 GPU PEIR mitigation measures are applicable to the project:

> Adopted Mitigation Measure Tra-1.3: Implement the County Public Road Standards during review of new development projects. Also revise the Public Road Standards to include a range of road types according to Regional Category context.
>
> Adopted Mitigation Measure Tra-1.4: Implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

2.13.5.4 Issue 4: Result in Inadequate Emergency Access

The following adopted 2011 GPU PEIR mitigation measures are applicable to the project:

> Adopted Mitigation Measure Tra-1.3: Implement the County Public Road Standards during review of new development projects. Also revise the Public Road Standards to include a range of road types according to Regional Category context.
>
> Adopted Mitigation Measure Tra-1.4: Implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.
>
> Adopted Mitigation Measure Tra-4.4: Implement and revise as necessary the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards.

2.13.6 Significance Conclusions

2.13.6.1 Issue 1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

As described above in Sections 2.13.3.3 and 2.13.3.7, measures and actions that would be implemented under the CAP Update would result in a **less-than-significant impact** related to conflict with programs, plans, ordinances, or policies addressing the circulation system and **would not result in a considerable contribution** to a significant cumulative impact on programs, plans, ordinances, or policies addressing the circulation system. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.6.2 Issue 2: Exceed Threshold for VMT

As described above in Sections 2.13.3.4 and 2.13.3.7, measures and actions that would be implemented under the CAP Update would result in a **less-than-significant impact** related to the VMT and **would not result in a considerable contribution** such that a new significant cumulative impact related to VMT would occur. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.6.3 Issue 3: Substantially Increase Hazards Due to a Design Feature

As described above in Sections 2.13.3.5 and 2.13.3.7, measures and actions that would be implemented under the CAP Update would result in a **less-than-significant impact** related to transportation hazards and **would not result in a considerable contribution** to a significant cumulative impact related to transportation hazards. Implementation of the

CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.6.4 Issue 4: Result in Inadequate Emergency Access

As described above in Sections 2.13.3.6 and 2.13.3.7, measures and actions that would be implemented under the CAP Update would result in a **less-than-significant impact** related to emergency access and **would not result in a considerable contribution** to a significant cumulative impact related to emergency access. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

Table 2.13-2 VMT for County General Plan

	Regional VMT per Employee	Unincorporated County VMT per Employee	Threshold (15% below Regional Average VMT)
2035	19.6	23.9	16.66
2050	19.8	24.5	16.83
	Regional VMT per Resident	**Unincorporated County VMT per Resident**	**Threshold (15% below Regional Average VMT)**
2035	19.7	27.4	16.75
2050	19.9	27.7	16.91

Source: Fehr & Peers 2023.

Table 2.13-3 VMT Reductions from Agriculture and Conservation Measures and Actions

	2030	2035	2040	2045	2050
General Plan Annual Total VMT	3,242,995,681	3,331,743,367	3,398,247,707	3,464,752,048	3,531,256,388
Annual VMT Reduction (total)	134,416,666	163,896,520	193,376,374	222,856,228	252,336,082
Annual reduction in VMT (percent change)	4%	5%	6%	6%	7%

Source: Modeling conducted by Ascent Environmental in 2023.

Table 2.13-4 VMT Reductions from Built Environment and Transportation Measures and Actions

	2030	2035	2040	2045	2050
General Plan Annual Total VMT	3,242,995,681	3,331,743,367	3,398,247,707	3,464,752,048	3,531,256,388
Annual VMT Reduction (total)	117,535,092	204,275,888	311,228,625	506,208,029	671,007,320
Annual VMT Reduction (percent change)	4%	6%	9%	15%	19%

Source: modeling conducted by Ascent Environmental in 2023

2.14 Tribal Cultural Resources

This section provides a discussion of existing conditions for tribal cultural resources (TCRs) located within the county, and the potential effects that implementation of the project may have on these resources. TCRs were established as a new class of resources under CEQA with the passage of Assembly Bill (AB) 52 in September 2014 and were added to the list of resources that require analysis under CEQA on July 1, 2015. The 2011 GPU PEIR did not evaluate TCRs, because there was no requirement to consult with tribes to identify TCRs at that time. Nevertheless, because this analysis is subsequent to the adopted 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since certification of the GPU PEIR.

Table 2.14-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the proposed project. As indicated below, implementation of the proposed project would result in new or more severe significant impacts related to TCRs.

Table 2.14-1 Summary of Tribal Cultural Resources–Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Tribal Cultural Resources	General Plan Only: Not Analyzed	CAP Update Only: Yes	CAP Update Only: Yes
		General Plan Cumulative Contribution: Not Analyzed	CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: Yes

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

Source: Compiled by Ascent Environmental in 2023.

Two comment letters regarding cultural resources were received in response to the Notice of Preparation (NOP). The San Pasqual Band of Mission Indians and the Rincon Band of Luiseño Indians requested tribal monitoring for activities in traditional use areas. Copies of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

2.14.1 Existing Conditions

The definition of “tribal cultural resources” in the CEQA statute (Section 21074) includes sites, features, places, cultural landscapes, sacred places, and objects of cultural value that are either included in or eligible for listing on the California Register of Historical

Resources (CRHR), included in a local register of historical resources, or determined by the lead agency to be significant based on substantial evidence. They may include:

- **Resource Collection Location:** This is a location where Native Americans have historically gone, and are known or believed to go today, to collect resources in accordance with traditional cultural rules of practice.
- **Spiritual Location:** This is a location where Native American religious practitioners have historically gone, and are known or believed to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice.
- **Traditional Location:** This is a location associated with the traditional beliefs of a Native American group about its origins, its cultural history, or the nature of the world.
- **Cemetery:** A cemetery is a location that has been selected for human burial or interment.

Additionally, different types of archaeological resources may also be TCRs; they include the following features:

- **Village Site:** Village sites are locations of continuous and concentrated habitation that typically have a large, well-developed midden deposit containing abundant artifactual evidence. They may also contain burials, rock art, bedrock milling stations, or other features.
- **Burial Site:** A burial site or cemetery is a location where intentional human interments may be found in large numbers and close concentration. These locations typically lack evidence of other prehistoric activities.
- **Milling Site:** This is a boulder or group of boulders or bedrock outcrops that contain at least one modified surface (mortar, slick, or metate) caused by the processing of food or other natural resources.
- **Lithic Workshop:** A lithic workshop is a distribution of stone flakes and tool fragments reflecting purposeful modification of parent stone through percussion and/or pressure detachment.
- **Shell Middens:** Shell middens are locations with large amounts of marine shell that extend to an appreciable depth below ground surface. They are normally found in coastal contexts but have been found in the interior.
- **Rock Art:** Rock art consists of designs or design elements on rock surfaces created by surface applications (pictographs) or by etching (petroglyphs).
- **Rock Shelters:** These are natural caves or crevices in rock outcrops in which human use has left artifactual remains.

California Native American tribes culturally affiliated with the unincorporated county that had previously requested to be notified of projects subject to AB 52 consultation have been contacted for input regarding the potential impacts the project would have on TCRs.

The following tribal representatives were contacted on June 21, 2021, by email and/or on June 23, 2021, by certified mail:

- Barona Group of the Capitan Grande, Art Bunce
- Campo Kumeyaay Nation, Jonathan Meza
- Jamul Indian Village, Lisa Cumper, Tribal Historic Preservation Officer
- Kwaaymii Band of Mission Indians, Carmen Lucas
- Manzanita Band of the Kumeyaay Nation, Angela Elliott-Santos, Chairperson, and Lisa Haws
- Pala Band of Mission Indians, Shasta Gaughen, Tribal Historic Preservation Officer
- Pechanga Band of Mission Indians, Juan Ochoa, Assistant Tribal Historic Preservation Officer; Michele Fahley, Counsel; and Ebru Ozdil
- Rincon San Luiseno Band of Mission Indians, Cheryl Madrigal
- San Luis Rey Band of Mission Indians, Cami Mojado
- San Pasqual Band of Mission Indians, Angelina Guitierrez
- Iipay Nation of Santa Ysabel, Virgil Perez, Chairperson
- Soboba Band of Mission Indians, Joseph Ontiveros
- Sycuan Band of the Kumeyaay Nation, Cody Martinez, Chairperson; Adam Day, Chief Administrative Officer; and Kristie Orosco
- Viejas Band of Kumeyaay Indians, Ernest Pingleton, and Ray Teran

The Viejas Band of Kumeyaay Indians and the Rincon Band of Luiseño Indians have requested consultation. Meetings with the Viejas Band of Kumeyaay Indians took place on July 28, 2021; October 27, 2021; and September 21, 2022. Meetings with the Rincon Band of Luiseño Indians took place on September 2, 2021; December 2, 2021; March 15, 2022; October 12, 2022; March 20, 2023; April 24, 2023; June 20, 2023; and August 7, 2023. Consultation has been concluded with both tribes.

Although the region is known to contain sensitive TCRs, the consultation did not result in the identification of any known TCRs.

2.14.2 Regulatory Framework

Since the certification of the 2011 GPU PEIR in August 2011, new regulations pertaining to TCRs have been adopted and are described below.

2.14.2.1 Federal

No federal regulations pertain to TCRs.

2.14.2.2 State

California Register of Historical Resources

The CRHR is a listing of State of California resources that are significant in the context of California's history. It is a statewide program with a scope and with criteria for inclusion similar to those used for the National Register of Historic Places (NRHP). In addition, properties designated under municipal or county ordinances are also eligible for listing in the CRHR.

A historical resource must be significant at the local, state, or national level under one or more of the criteria defined in the California Code of Regulations Title 15, Chapter 11.5, Section 4850 to be included in the CRHR. The CRHR criteria are tied to CEQA because any resource that meets the criteria below is considered a significant historical resource under CEQA. As noted above, all resources listed in or formally determined eligible for listing in the NRHP are automatically listed in the CRHR.

The CRHR uses four evaluation criteria:

Criterion 1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Criterion 2. Is associated with the lives of persons important to local, California, or national history.

Criterion 3. Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.

Criterion 4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Similar to the NRHP, a historical resource must meet one of the above criteria and retain integrity to be listed in the CRHR. The CRHR uses the same seven aspects of integrity used by the NRHP: location, design, setting, materials, workmanship, feeling, and associations.

California Environmental Quality Act

CEQA requires public agencies to consider the effects of their actions on "tribal cultural resources." CEQA Section 21084.2 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." AB 52, signed by the California Governor in September of 2014, established a new class of resources under CEQA: "tribal cultural resources," defined in CEQA Section 21074.

CEQA Section 21074 states:

a) "Tribal cultural resources" are either of the following:

   1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

      A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

      B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

   2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

Pursuant to CEQA Sections 21080.3.1, 21080.3.2, and 21082.3, lead agencies undertaking CEQA review must, upon written request of a California Native American tribe, begin consultation before the release of an EIR, negative declaration, or mitigated negative declaration. CEQA Sections 21080.3.1 and 21080.3.2 state that within 14 days of determining that a project application is complete, or to undertake a project, the lead agency must provide formal notification, in writing, to the tribes that have requested notification of proposed projects in the lead agency's jurisdiction. If it wishes to engage in consultation on the project, the tribe must respond to the lead agency within 30 days of receipt of the formal notification. The lead agency must begin the consultation process with the tribes that have requested consultation within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a TCR, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

If the lead agency determines that a project may cause a substantial adverse change to a TCR, and measures are not otherwise identified in the consultation process, provisions under CEQA Section 21084.3(b) describe mitigation measures that may avoid or minimize the significant adverse impacts. Examples include:

(1) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

(2) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

(A) Protecting the cultural character and integrity of the resource.

(B) Protecting the traditional use of the resource.

(C) Protecting the confidentiality of the resource.

(3) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

(4) Protecting the resource.

Health and Safety Code Section 7050.5

Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If they are determined to be those of a Native American, the coroner must contact Native American Heritage Commission (NAHC).

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act (Public Resources Code Section 5097.9) applies to both state and private lands. The act requires, upon discovery of human remains, that construction or excavation activity cease and that the county coroner be notified. If the remains are those of a Native American, the coroner must notify the NAHC, which notifies (and has the authority to designate) the most likely descendants of the deceased. The act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.

Public Resources Code Section 5097

Public Resources Code Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. The disposition of Native American human burials falls within the jurisdiction of the NAHC. Section 5097.5 of the code states:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

2.14.2.3 Local

2011 San Diego County General Plan

TCRs were added to CEQA as an environmental topic in 2015; therefore, the General Plan does not contain policies that are specific to TCRs. The following cultural resources policies that were adopted as part of the General Plan are generally related to TCRs and are applicable to the CAP Update:

Policy COS-7.4: Consultation with Affected Communities. Require consultation with affected communities, including local tribes to determine the appropriate treatment of cultural resources.

Policy COS-7.6: Cultural Resource Data Management. Coordinate with public agencies, tribes, and institutions in order to build and maintain a central database that includes a notation whether collections from each site are being curated, and if so, where, along with the nature and location of cultural resources throughout the County of San Diego.

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Cul-2.2: Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information.

Adopted Mitigation Measure Cul-2.4: Protect significant cultural resources through regional coordination and consultation with the NAHC and local tribal governments, including SB-18 review.

Adopted Mitigation Measure Cul-2.5: Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys.

Adopted Mitigation Measure Cul-2.6: Protect significant cultural resources by facilitating the identification and acquisition of important resources through

regional coordination with agencies, and institutions, such as the South Coast Information Center (SCIC) and consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review, while maintaining the confidentiality of sensitive cultural information.

Adopted Mitigation Measure Cul-4.1: Include regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant.

2.14.3 Analysis of Effects and Significance Determinations

2.14.3.1 Significance Criteria

Based on Appendix G of the State CEQA Guidelines, the project would result in a significant impact on TCRs if it would:

- cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

  i. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

  ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

2.14.3.2 Approach to Analysis

Impacts related to TCRs are analyzed qualitatively based on a review of the CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP Update. Because this SEIR tiers from the 2011 GPU PEIR, all relevant 2011 GPU PEIR mitigation measures are applicable to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update.

Scope of SEIR Impact Analysis

The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impact of their implementation. The project and cumulative impact analysis study area for TCRs was not addressed in the 2011 GPU PEIR because TCRs were not identified as an environmental resource topic until 2015. For this project, the cumulative area would be the county because TCRs could be located throughout the county outside the traditionally affiliated land of the tribes requested consultation.

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

Proposed CAP Update Strategies

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

Solid Waste Measures and Actions. This category includes strategies to increase solid waste diversion and availability of sustainable solid waste facilities in County operations and within the unincorporated county. Key actions with potential to result in new or more severe impacts related to TCRs include those that could indirectly result in the development of new or expanded recycling and composting facilities (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b).

Water and Wastewater Measures and Actions. This category includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Key

actions with potential to result in new or more severe impacts related to TCRs include those that would result in the construction of new water efficiency and stormwater capture and reuse infrastructure (Actions W-1.1, W-2.2, W-2.3, and W-2.4).

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. These measures and actions are not expected to result in new or more severe impacts related to TCRs. Rather, actions that would result in the acquisition and management of conservation lands (Actions A-1.1, A-1.2, A-1.2a, A-3.1, and A-4.1) would have potential to benefit TCRs. This category also includes an action that would evaluate opportunities for the construction of farmworker housing (Action A-4.1.b).

Energy Measures and Actions. This category includes strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Key actions with potential to result in new or more severe impacts related to TCRs include those that could result in the construction of new infrastructure to meet the renewable energy use and electrification objectives of the CAP Update (Actions E-1.1 and E-3.3). Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more severe impacts related to TCRs include those that would result in the construction of new electric vehicle charging stations (Action T-3.1) and hydrogen fueling infrastructure (Action T-3.1.a).

2.14.3.3 Issue 1: Substantial Adverse Change in the Significance of Tribal Cultural Resources

Guidelines for Determination of Significance

TCRs are nonrenewable and, therefore, cannot be replaced. The project would have a significant effect if it would cause a substantial adverse change in the significance of a TCR, defined in CEQA Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is:

- listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
- a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code Section 5024.1(c). In applying the criteria set forth in Public Resources Code

Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis

2011 GPU PEIR Determination

TCRs were added through AB 52 as a resource subject to review under CEQA, effective July 1, 2015. The 2011 GPU PEIR did not evaluate impacts to these resources because it was adopted before this requirement. Nevertheless, specific General Plan policies that are related to tribes and TCRs are listed above under Section 2.14.2, "Regulatory Framework." 2011 GPU PEIR mitigation measures that are protective of TCRs are listed below in Section 2.14.5, "Mitigation Measures."

CAP Update Impact Analysis

Solid Waste Measures and Actions

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

No known TCRs have been identified during consultation with affiliated tribes. Implementation of GHG reduction measures and supporting efforts listed above would result in the implementation of a variety of measures and actions to reduce GHG emissions. Some of these measures and actions would result in the construction of new facilities and infrastructure, the placement of structures, and the excavation of earthen materials. While no TCRs have been identified through consultation with affiliated tribes, it is possible that unknown TCRs may be present and could be adversely affected by implementation of measures and strategies associated with the project. While adopted General Plan policies and mitigation measures identified in the 2011 GPU PEIR do not specifically address TCRs, they do include identification efforts, Native American monitoring, and coordination with the NAHC and local tribes (see Adopted Mitigation Measures Cul-2.2, Cul-2.4, Cul-2.5, Cul-2.6, and Cul-4.1). Additionally, tribal consultation has resulted in CAP Update Mitigation Measure TCR-1 which requires development to avoid tribal cultural resources or to mitigate impacts to tribal cultural resources pursuant to CEQA Sections 21080.3.1 and 21084.3. These mitigation measures would be applied to future projects associated with the CAP Update to avoid or minimize impacts on TCRs.

Furthermore, California law recognizes the need to identify and protect TCRs; the procedures for the treatment of Native American resources are contained in CEQA Sections 21080.3.1 and 21084.3, which states the following:

- Within 14 days of determining that a project application is complete, or to undertake a project, the lead agency must provide formal notification, in writing, to the tribes that have requested notification of proposed projects in the lead agency's jurisdiction. If it

wishes to engage in consultation on the project, the tribe must respond to the lead agency within 30 days of receipt of the formal notification. The lead agency must begin the consultation process with the tribes that have requested consultation within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a TCR, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

- Public agencies shall, when feasible, avoid damaging effects to any TCR (CEQA Section 21084.3[a]). If the lead agency determines that a project may cause a substantial adverse change to a TCR, and measures are not otherwise identified in the consultation process, new provisions in the CEQA describe mitigation measures that, if determined by the lead agency to be feasible, may avoid or minimize the significant adverse impacts (CEQA Section 21084.3[b]). Examples include:

    (1) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

    (2) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

        (A) Protecting the cultural character and integrity of the resource
        (B) Protecting the traditional use of the resource
        (C) Protecting the confidentiality of the resource.

    (3) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

    (4) Protecting the resource.

Compliance with California CEQA Sections 21080.3.1 and 21084.3 would provide an opportunity to avoid or minimize the disturbance of TCRs through tribal consultation and CEQA review procedures. Additionally, future discretionary projects would be required to be evaluated to determine if they are within the scope of this SEIR, or if project-specific impacts would require subsequent CEQA documentation; this could also include subsequent tribal consultation under AB 52. If a determination is made during subsequent CEQA analysis that potentially significant impacts would result from the implementation of projects implemented consistent with the CAP Update, then all feasible mitigation would be required to be implemented in accordance with State CEQA Guidelines Section 15126.4. While mitigation would be recommended to reduce or avoid a project's impacts to TCRs, it may be infeasible to fully mitigate the impact to a less-than-significant level because of the location, size, and magnitude of the development associated with required measures and supporting efforts. Impacts would be potentially significant.

Water and Wastewater Measures and Actions

This category includes strategies to decrease potable water consumption and increase stormwater collection, water pumping, and wastewater treatment in County operations and the unincorporated county. Key actions with potential to result in new or more severe impacts related to TCRs include those that would result in the construction of new recycled water and stormwater capture and reuse infrastructure (Actions W-1.1, W-2.2, W-2.3, and W-2.4).

As described above, compliance with CEQA Sections 21080.3.1 and 21084.3 would provide an opportunity to avoid or minimize the disturbance of TCRs through tribal consultation and CEQA review procedures. While mitigation would be recommended to reduce or avoid a project's impacts to TCRs, it may be infeasible to fully mitigate the impact to a less-than-significant level because of the location, size, and magnitude of the development associated with required measures and supporting efforts. Impacts would be potentially significant.

Agriculture and Conservation Measures and Actions

This category includes strategies to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. Therefore, the measures and actions are not expected to result in new or more severe impacts related to TCRs. Rather, actions that would result in the acquisition and management of conservation lands (Actions A-1.1, A-1.2, A-1.2a, A-3.1, and A-4.1) would have potential to benefit TCRs. Implementation of Action A-4.1b would have the potential to indirectly result in new farmworker housing in the unincorporated county; this has the potential to result in new or more severe impacts related to TCRs.

As described above, compliance with CEQA Sections 21080.3.1 and 21084.3 would provide an opportunity to avoid or minimize the disturbance of TCRs through tribal consultation and CEQA review procedures. While mitigation would be recommended to reduce or avoid a project's impacts to TCRs, it may be infeasible to fully mitigate the impact to a less-than-significant level because of the location, size, and magnitude of the development associated with required measures and supporting efforts. Impacts would be potentially significant.

Energy Measures and Actions

This category includes strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Key actions with potential to result in new or more severe impacts related to TCRs include those that would result in the construction of new infrastructure to promote renewable energy use and electrification (Actions E-1.1 and E-3.3).

As described above, compliance with CEQA Sections 21080.3.1 and 21084.3 would provide an opportunity to avoid or minimize the disturbance of TCRs through tribal consultation and CEQA review procedures. While mitigation would be recommended to reduce or avoid a project's impacts to TCRs, it may be infeasible to fully mitigate the

impact to a less-than-significant level because of the location, size, and magnitude of the development associated with required measures and supporting efforts. Impacts would be potentially significant.

Built Environment and Transportation Measures and Actions

This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more severe impacts related to TCRs include those that would result in the construction of new electric vehicle charging stations (Actions T-3.1) and hydrogen fueling infrastructure (Action T-3.1.a). Some of these measures and actions would result in the construction of new facilities and infrastructure, the placement of structures, and the excavation of earthen materials.

As described above, compliance with CEQA Sections 21080.3.1 and 21084.3 would provide an opportunity to avoid or minimize the disturbance of TCRs through tribal consultation and CEQA review procedures. While mitigation would be recommended to reduce or avoid a project's impacts to TCRs, it may be infeasible to fully mitigate the impact to a less-than-significant level because of the location, size, and magnitude of the development associated with required measures and supporting efforts. Impacts would be potentially significant.

Summary

Adopted 2011 GUP PEIR Mitigation Measures Cul-2.2, Cul-2.4, Cul-2.5, Cul-2.6, and Cul-4.1 include identification efforts, Native American monitoring, and coordination with the NAHC and local tribes. Additionally, tribal consultation has resulted in CAP Update Mitigation Measure TCR-1 which requires development to avoid tribal cultural resources or to mitigate impacts to tribal cultural resources pursuant to CEQA Sections 21080.3.1 and 21084.3. Compliance with CEQA Sections 21080.3.1 and 21084.3 would require tribal consultation and provide an opportunity to avoid or minimize project impacts to TCRs. However, because the specific location of projects associated with CAP Update implementation are not known and because they could be implemented in areas where TCRs are present; project impacts would be **significant (Impact TCR-1)**. Implementation of the CAP Update **would result in a new impact** not disclosed in the 2011 GPU PEIR.

2.14.3.4 Cumulative Impact Analysis

The cumulative impact analysis study area for TCRs was not addressed in the 2011 GPU PEIR because TCRs were not identified as an environmental resource topic until 2015. The cumulative study area for TCRs is the traditionally affiliated land for any tribe requesting consultation. For this project, the cumulative area would be the county because TCRs could have the potential to occur throughout the county outside trial lands. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Substantial Adverse Change in the Significance of Tribal Cultural Resources

The cumulative context for TCRs is the county. Past development in the county has resulted in the conversion of undeveloped land to urban land uses, thereby changing the landscape and context in which TCRs exist and resulting in an overall reduction in TCRs. This is a significant cumulative impact in the cumulative condition.

The project in combination with cumulative development could result in new development that could result in adverse impacts to known and unknown TCRs. As described above, while 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, because of the location, size, and magnitude of the development associated with the proposed measures and supporting efforts, it may be infeasible to fully mitigate the impact to a less-than-significant level. The project would result in a considerable contribution to an existing cumulative effect. There would be a new **significant** impact **(Impact C-TCR-1).** Implementation of the CAP Update **would result in a new impact** not disclosed in the 2011 GPU PEIR.

2.14.4 Summary of New or More Severe Significant Impacts

The proposed project and the cumulative effects of the proposed project in conjunction with subsequent projects in the county would result in potentially significant direct and cumulative impacts to TCRs.

Impact-TCR-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource. Implementation of the CAP Update could include measures and strategies located in areas where TCRs may be present. It may be infeasible to fully mitigate the impact to a less-than-significant level because of the location, size, and magnitude of the development associated with the proposed measures and supporting efforts. This would be considered a significant impact.

Impact-C-TCR-1: Result in a Cumulatively Considerable Contribution to a Substantial Adverse Change in the Significance of a Tribal Cultural Resource. The project would have potentially significant impacts related to TCRs. Therefore, the proposed project's contribution to this impact would be cumulatively considerable.

2.14.5 Mitigation Measures

2.14.5.1 Issue 1: Substantial Adverse Change in the Significance of Tribal Cultural Resources

The following mitigation measures applicable to TCRs that were adopted as part of the 2011 GPU PEIR and are applicable to the project include the following:

> Adopted Mitigation Measure Cul-2.2: Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions,

such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information.

Adopted Mitigation Measure Cul-2.4: Protect significant cultural resources through regional coordination and consultation with the NAHC and local tribal governments, including SB-18 review.

Adopted Mitigation Measure Cul-2.5: Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys.

Adopted Mitigation Measure Cul-2.6: Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the South Coast Information Center (SCIC) and consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review, while maintaining the confidentiality of sensitive cultural information.

Adopted Mitigation Measure Cul-4.1: Include regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant.

The County shall incorporate the following measures into the CAP SEIR Mitigation Monitoring and Reporting Program:

CAP Update Mitigation Measure TCR-1: Require development to avoid tribal cultural resources, if feasible. If complete avoidance is not possible, require development to mitigate impacts to tribal cultural resources pursuant to Assembly Bill 52 and CEQA Sections 21080.3.1 and 21084.3.

2.14.6 Significance Conclusions

2.14.6.1 Issue 1: Substantial Adverse Change in the Significance of Tribal Cultural Resources

No other feasible project-related mitigation beyond existing federal and state permitting requirements and compliance with the above 2011 GPU PEIR mitigation is available and could be applied to individual projects under the CAP Update. Where a project complies with existing regulations and above mitigation, it would reduce its project-specific impacts to a less-than-significant level and would reduce its contribution to cumulative impacts such that it would not be considerable. However, because the reduction of impacts to a less-than-significant level cannot be guaranteed, the project would have a **significant and unavoidable impact** and **would result in a considerable contribution** to a significant cumulative impact related to TCRs.

2.15 Wildfire

This section describes the existing conditions for wildfire in the unincorporated county and evaluates the potential effects that implementation of the project may have on wildfire. Specifically, this section evaluates the potential for the CAP Update to result in impacts regarding the project's potential to interfere with emergency response/evacuation, exacerbate wildfire risks, or expose people or structures to post-fire risks. Because this analysis is subsequent to the adopted 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the wildfire setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the 2011 GPU PEIR. In 2018, Appendix G of the State CEQA Guidelines was updated to include a separate section with new questions associated with evaluating a project's potential impact related to wildfire. Because the Notice of Preparation (NOP) for the 2011 GPU PEIR was released prior to the 2018 update, the PEIR does not include a separate section for wildfire. Rather, wildland fire hazards and emergency evacuation and response plans are discussed in Section 2.7, "Hazards and Hazardous Materials," of the 2011 GPU PEIR. Topics that were added to the State CEQA Guidelines in 2018 and, therefore, not addressed in the 2011 GPU PEIR include the project's potential to expose occupants to pollutants or spread of wildfire, install infrastructure that exacerbates fire risk, and expose people or structures to risks from post-wildfire hazards in or near State Responsibility Areas (SRAs) or land classified as Very High Fire Hazard Severity Zones (FHSZs).

Table 2.15-1 summarizes the wildfire impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the proposed project. As indicated, implementation of the proposed project would not result in new or more severe significant impacts on wildfire.

During the NOP scoping process, the County received comments regarding wildfire. The commenters recommended that the County consider wildfire and brush management strategies, quantify and identify measures to reduce carbon emissions from wildfires, and collaborate with transportation agencies regarding evacuation routes during wildfire events. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

Table 2.15-1. Summary of Wildfire-Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Exacerbate Wildfire Risks	Not evaluated[1]	CAP Update Only: Yes	CAP Update Only: No
			CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: No
2	Install Infrastructure That Exacerbates Fire Risk	Not evaluated[1]	CAP Update Only: Yes	CAP Update Only: No
			CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: No
3	Expose People or Structures to Post-Fire Risks	Not evaluated[1]	CAP Update Only: Yes	CAP Update Only: No
			CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: No

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

[1] Issues reflect updated sample questions in Appendix G of the State CEQA Guidelines.

Source: Compiled by Ascent Environmental in 2023.

2.15.1 Existing Conditions

The 2011 GPU PEIR includes a discussion of existing conditions within the unincorporated county related to wildland fire hazards and emergency response and evacuation plans in Section 2.7, "Hazards and Hazardous Materials," on pages 2.7-14 through 2.7-16 and 2.7-18 through 2.7-20. No substantial changes have occurred to the existing conditions described in the 2011 GPU PEIR. Therefore, the existing conditions in the 2011 GPU PEIR remain applicable and are incorporated by reference. The following discussion summarizes the information in the 2011 GPU PEIR and provides supplemental discussion of recent wildfire events.

As described in the 2011 GPU PEIR, the majority of the unincorporated county is within an SRA, as identified by the California Department of Forestry and Fire Protection (CAL FIRE). Most lands within the unincorporated county are classified as High and Very High FHSZs (CAL FIRE 2007). CAL FIRE released updated maps of FHSZs within SRAs for public comment in 2022. These maps show an overall reduction in lands within High FHSZs and an increase in lands within the Very High FHSZ designation in the unincorporated county. However, these designations are proposed and have yet to be adopted; the 2007 maps remain the most current adopted maps at this time.

The unincorporated county also includes many wildland-urban interface (WUI) areas, which are areas where development is located close to lands prone to brush fires. The unincorporated county has a long history of wildland fires. The 2018 West Fire burned 505 acres within the county and the 2020 Valley Fire burned 76,067 acres of land within the county. There were 11 wildfire incidents that occurred in the county in 2021 (totaling 9,082 acres) and 10 wildfire incidents in 2022 (totaling 5,609 acres) (CAL FIRE 2023a, 2023b). Table S-2 of the General Plan Safety Element lists the relevant fire incidents in San Diego County, including the unincorporated county.

2.15.2 Regulatory Framework

The County of San Diego General Plan Safety Element addresses natural hazards and human activities that may pose a threat to public safety, including fire protection and emergency response. The Safety Element also provides policy direction that supports laws and regulations related to safety hazards, such as wildfires. The 2011 GPU PEIR includes a summary of the regulatory framework related to hazards and hazardous materials in Section 2.7, "Hazards and Hazardous Materials," pages 2.7-20 through 2.7-28, that is incorporated by reference. Specific regulations discussed in the 2011 GPU PEIR and the General Plan Safety Element that are applicable to the project include the following:

2.15.2.1 Federal

- International Fire Code

2.15.2.2 State

- Title 14 Division 1.5 of the California Code of Regulations (CCR)
- California Fire Code
- State fire regulations
- California Emergency Services Act

The above regulatory framework discussed in the 2011 GPU PEIR continues to apply to the unincorporated county and is incorporated into this section by reference. Additional regulations that apply to the CAP Update but were not included in the 2011 GPU PEIR are described below.

California Public Utilities Commission General Order 95: Rules for Overhead Transmission Line Construction

California Public Utilities Commission General Order 95 was initially adopted in 1941 and was most recently updated in 2009 for Southern California. General Order 95 governs the design, construction, and maintenance of overhead electrical lines. Rule 31.1 generally states that design, construction, and maintenance of overhead electrical lines should be done in accordance with accepted good practices for the given location conditions known at the time by the persons responsible for the design, construction, and maintenance of the overhead electrical lines and equipment. Rule 35 of General Order 95 (Tree Trimming) requires the following:

- four feet radial clearance for any conductor of a line operating at 2,400 volts or more, but less than 72,000 volts
- six feet radial clearance for any conductor of a line operating at 72,000 volts or more, but less than 110,000 volts

- 10 feet radial clearance for any conductors of a line operating at 110,000 volts or more, but less than 300,000 volts
- 15 feet radial clearances for any conductor of a line operating at 300,000 volts or more

California Department of Forestry and Fire Protection

CAL FIRE is responsible for enforcing State of California fire safety codes included in the CCR and California Public Resources Code. Public Resources Code Section 4291 states generally that any person operating any structure located on brush-covered lands or land covered with flammable material is required to maintain defensible space around the structure. CCR Title 14 Section 1254 identifies minimum clearance requirements required around utility poles. In SRAs within the jurisdiction of CAL FIRE, the Fire Safety Inspection Program is an important tool for community outreach and enforcement of state fire codes.

CAL FIRE also inspects utility facilities and makes recommendations regarding improvements in facility design and infrastructure. Joint inspections of facilities by CAL FIRE and the utility owner are recommended by CAL FIRE so that each entity may assess the current state of the facility and successfully implement fire prevention techniques and policies. Violations of state fire codes discovered during inspections are required to be brought into compliance with the established codes. If a CAL FIRE investigation reveals that a wildfire occurred as a result of a violation of a law or negligence, the responsible party could face criminal and/or misdemeanor charges. In cases where a violation of a law or negligence has occurred, CAL FIRE has established the Civil Cost Recovery Program, which requires parties liable for wildfires to pay for wildfire-related damages.

In the CAL FIRE SRAs, the requirement for clearances around poles and towers is contained in Public Resources Code Section 4292. This section requires clearing of flammable fuels for a minimum 10-foot radius from the outer circumference of certain poles and towers (non-exempt or subject poles and towers). The distances for clearance requirements must be measured horizontally, not along the surface of the sloping ground. More detailed descriptions of the applicable codes and regulations and images of exempt and non-exempt power line structures may be found in CAL FIRE's *California Power Line Fire Prevention Field Guide* (CAL FIRE 2021).

2.15.2.3 Local

Operational Area Emergency Operations Plan

The Operational Area Emergency Operations Plan (OA EOP), also known as the San Diego County Emergency Operations Plan, is a comprehensive emergency plan in the county. The OA EOP was updated and approved by the County Board of Supervisors in August 2022 (Unified San Diego County Emergency Services Organization and County of San Diego 2022). The OA EOP contains 16 annexes (as listed in Section 2.9.14, "Emergency Response and Evacuation Plans"). The OA EOP is used by San Diego County and all the cities within the county to respond to major emergencies and disasters. Specifically, the OA EOP describes a comprehensive emergency management system that provides for a planned response to disaster situations associated with technological

incidents, terrorism, nuclear-related incidents, and natural disasters, such as wildland fires. The OA EOP has the following five objectives:

1. To provide a system for the effective management of emergency situations.
2. To identify lines of authority and relationships.
3. To assign tasks and responsibilities.
4. To ensure adequate maintenance of facilities, services and resources.
5. To provide a framework for adequate resources for recovery operations.

The stand-alone emergency plans for the OA in the county include the following:

- San Diego County Nuclear Power Plant Emergency Response Plan
- San Diego County OA Oil Spill Contingency Element of the Area Hazardous Materials Plan
- San Diego County OA Emergency Water Contingencies Plan
- Unified San Diego County Emergency Services Organization OA Energy Shortage Response Plan
- Unified San Diego County Emergency Services Organization Recovery Plan
- San Diego County Multi-Jurisdictional Hazard Mitigation Plan
- San Diego Urban Area Tactical Interoperable Communications Plan
- San Diego County Draft Terrorist Incident Emergency Response Protocol

The OA EOP and San Diego County Multi-Jurisdictional Hazard Mitigation Plan are the primary emergency response and evacuation plans for the county. Ground transportation is the primary means of evacuation in the county. Primary evacuation routes include major ground transportation corridors.

Regulatory requirements applicable to fire protection are as follows:

- County of San Diego General Plan Safety Element policies related to wildlife hazards and Exhibit S-3: Potential Evacuation Routes
- County of San Diego Code of Regulatory Ordinances Sections 68.401-68.406, Combustible Vegetation and Other Flammable Materials Ordinance
- County of San Diego Code of Regulatory Ordinances Sections 96.1.005 and 96.1.202, Removal of Fire Hazards
- County of San Diego Consolidated Fire Code
- County Department of Planning and Land Use Fire Prevention in Project Design Standards

The regulatory framework discussed in the 2011 GPU PEIR continues to apply to the unincorporated county and is incorporated into this section by reference. Regulations that

have been updated or introduced since adoption of the General Plan in August 2011 are described in the following sections.

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The Multi-Jurisdictional Hazard Plan is a countywide plan that identifies risk and ways to minimize damage by natural and human-caused disasters. The plan has been incorporated into the General Plan Safety Element. Safety Element Policy S-1.4 identifies the County's intent to review and update this plan every five years. This plan was last revised in February 2023 to reflect changes to both the hazards threatening San Diego County, as well as the programs in place to minimize or eliminate those hazards. The 2023 plan combined wildfire and structure fire as one hazard category and determined that it is highly likely for future wildfire events to occur in 75–100 percent of the planning area.

2023 Consolidated Fire Code

Effective April 13, 2023, the Consolidated Fire Code includes the County amendments to the 2022 California Fire Code and the ordinances of the 12 unincorporated county fire protection districts (County of San Diego 2023). Because of the county's changing climatic, geological, and topographical conditions, the County Fire Code is amended every 3 years when the State of California repeals, revises, and republishes the California Building Standards Code. The County Fire Code is contained in Title 24, Part 9 of the CCR. It is adopted for the protection of public health and safety and applies to both ministerial and discretionary projects. It includes definitions; requirements for permits and inspection for installing or altering systems; regulations for the erection, construction, enlargement, alteration, repair, moving, removal, conversion, demolition, equipment use, and maintenance of buildings, structures, and premises (including the installation, alteration, or repair of new and existing fire protection systems and their inspection); and provides penalties for violation of this code. The County Fire Code applies to all new construction and to any alterations, repairs, or reconstruction, except as otherwise provided for in Title 9, Division 6, Chapter 1 of the County Code.

San Diego County Fire Authority Water Tank Standards for Fire Protection

The San Diego County Fire Authority Water Tank Standards for Fire Protection provides standards for the minimum water storage needed to provide protection for dwellings and other structures where adequate public and private water supply is not available. The standards specify minimum water flow and capacity requirements based on building square footage, as well as requirements for water tank location (San Diego County Fire Authority 2018).

2011 San Diego County General Plan

The General Plan policies addressing wildfire that are applicable to the CAP Update include the following:

Policy LU-6.10: Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.

Policy LU-6.11: Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

Policy LU-10.2: Development—Environmental Resource Relationship. Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.

Policy S-1.3: Risk Reduction Programs. Support efforts and programs that reduce the risk of natural and manmade hazards and that reduce the time for responding to these hazards.

Policy S-4.1: Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.

Policy S-4.2: Development in Hillsides and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.

Policy S-4.3: Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.

Policy S-4.4: Service Availability. Plan for development where fire and emergency services are available or planned.

Policy S-4.5: Access Roads. Require development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently. The width, surface, grade, radius, turnarounds, turnouts, bridge construction, and lengths of fire apparatus access roads shall meet the requirements of the State Fire Code and the San Diego County Consolidated Fire Codes. All requirements and any deviations will be at the discretion of the Fire Code Official.

Policy S-4.6: Fire Protection Plans. Ensure that development located within fire threat areas implement measures in a Fire Plan that reduce the risk of structural and human loss due to wildfire.

Policy S-4.7: Fire Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire hazards areas.

Policy S-5.1: Fuel Management Programs. Support programs and plans, such as Strategic Fire Plans, consistent with state law that require fuel management/modification within established defensible space boundaries and when strategic fuel modification is necessary outside of defensible space, balance fuel management needs to protect structures with the preservation of native vegetation and sensitive habitats.

Policy S-9.1: Landslide Risks. Direct development away from areas with high landslide, mudslide, or rock fall potential when engineering solutions have been determined by the County to be infeasible.

Policy S-9.2: Risk of Slope Instability. Prohibit development from causing or contributing to slope instability.

Policy S-10.3: Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal floodproofing standards and siting criteria to prevent flow obstruction.

Policy S-10.4: Development in Flood Hazard Areas. Require development within mapped flood hazard areas to be sited and designed to minimize on and off-site hazards to health, safety, and property due to flooding.

Policy S-10.6: Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single-family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

Policy M-1.2: Interconnected Road Network. Provide an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies.

Policy M-3.3: Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes in conformance with state law and local regulations.

In addition, the General Plan Safety Element identifies major freeways and state routes (SRs) as potential evacuation routes within the county, including Interstate 5 (I-5), I-15, I-8, I-805, SR-52, SR-54, SR-56, SR-67, SR-75, SR-76, SR-78, SR-84, SR-125, SR-163, and SR-905.

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Haz-3.1: Facilitate coordination between DPLU and the Office of Emergency services to implement and periodically update the Hazard Mitigation Plan.

Adopted Mitigation Measure Haz-3.2: Implement the CEQA Guidelines for Determining Significance to ensure that discretionary projects do not adversely impact emergency response or evacuation plans. Also implement the County Public Road Standards and County Private Road Standards during these reviews and ensure that road improvements are consistent with Emergency Response and Evacuation Plans. Apply appropriate mitigation when impacts are significant.

Adopted Mitigation Measure Haz-3.3: Prepare Fire Access Road network plans and include in Community Plans or other document as appropriate. Also implement the County Fire Code and require fire apparatus access roads and secondary access for projects.

Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

2.15.3 Analysis of Effects and Significance Determinations

2.15.3.1 Significance Criteria

Based on guidance provided in Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection* (County of San Diego 2022), if located in or near SRAs or lands classified as Very High FHSZ, the proposed project would result in a significant impact if it would:

- substantially impair an adopted emergency response plan or emergency evacuation plan;
- due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
- require the installation or maintenance of associated infrastructure (such as roads, fuel break, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment;
- expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Impacts related to impairing an adopted emergency response plan or emergency evacuation plan are discussed in Section 2.9.3.5, “Issue 3: Impair or Interfere with Emergency Response and Evacuation Plans,” of this SEIR.

2.15.3.2 Approach to Analysis

Appendix G of the State CEQA Guidelines requires that wildfire impacts be evaluated for projects that are located in or near SRAs or lands classified as Very High FHSZ. As discussed in Section 2.15.1, “Existing Conditions,” the majority of the unincorporated county is within an SRA, and most lands within the unincorporated county are classified as High and Very High FHSZs in SRAs (CAL FIRE 2007).

Impacts related to wildfire were analyzed qualitatively based on a review of the CAP Update measures and actions and their potential to result in physical changes to the environment if the CAP Update is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with the implementation of the CAP Update. Because this SEIR tiers

from the 2011 GPU PEIR, all relevant 2011 GPU PEIR mitigation measures are applicable to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update.

Scope of SEIR Impact Analysis

The impact analysis contained within this draft SEIR focuses on whether approval and implementation of the CAP Update would result in new or more severe impacts than were disclosed in the 2011 GPU PEIR, which is herein incorporated by reference. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward established greenhouse gas (GHG) reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impacts of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unincorporated county) and its role as a planning document designed to guide future decision-making related to the reduction of GHG emissions within the unincorporated county, the study area for the following analysis is the unincorporated area of the county within the County's jurisdiction (i.e., excluding tribal lands, state and federally owned lands, and military installations).

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

Impacts related to future development of wind turbine projects as a result of renewable energy demand generated by Action E-3.3 also are examined in light of the conclusions in the 2013 Wind Energy Ordinance Amendment Final EIR, which analyzes the effects of wind energy infrastructure within the unincorporated county (County of San Diego 2013). The Wind Energy Ordinance exempts small scale wind turbine projects, which could occur in Very High FHSZs within the unincorporated county, from discretionary review.

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies and associated measures and actions proposed in the CAP Update (see Table 1-2) have been grouped into categories for the purpose of analysis, based on the sector they target (e.g., solid waste, water/wastewater). CAP Update measures and actions with the potential to affect wildfire risks are summarized below.

Solid Waste Measures and Actions. This category includes strategies to achieve zero solid waste in County operations and within the unincorporated county. These measures and actions would not typically increase wildfire risks. Measures and actions with potential to result in new or expanded solid waste facilities (e.g., SW-4.1) may result in new or more severe impacts related to wildfire.

Water and Wastewater Measures and Actions. This category includes strategies to decrease water consumption and increase wastewater and stormwater treatments. Measures W-1, W-2, and W-3 could result in new or more severe impacts related to wildfire.

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural land and agricultural land. This category also includes an action that would evaluate opportunities for the construction of farmworker housing (Action A-4.1b). Through Measure A-1, the County would acquire and manage conservation lands to preserve natural lands and maximize carbon storage potential in the unincorporated area. Through Measure A-2, the County would develop a tree planting program that expands canopy across the unincorporated area. These measures and actions could result in new or more severe impacts related to wildfire.

Energy Measures and Actions. This category includes a strategy to develop policies and programs to increase energy efficiency and renewable energy use. Key measures and actions with potential to result in new or more severe impacts related to wildfire include Actions E-3, E-3.2, and E-3.3. Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure.

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the vehicle fleet, install electric vehicle charging stations, incentivize the use of alternative fuels and landscaping practices, and support transit and ridesharing. Generally, a shift from gas powered cars to electric engines and alternative modes of transportation would not result in increased wildfire hazard. However, actions with the potential to result in construction of new or improved facilities (e.g., Actions T-5.1 and T-6.2) may result in new or more severe impacts related to wildfire.

2.15.3.3 Issue 1: Exacerbate Wildfire Risks

This section describes potential project impacts related to exposing occupants to pollutants or spread of wildfire with implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection* (County of San Diego 2022), the project would have a significant impact if it would be located in or near an SRA or Very High FHSZ and:

- Exacerbate wildfire risks due to slope, prevailing winds, and other factors and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Impact Analysis

2011 GPU PEIR Determination

Impacts related to the exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold is derived from the State CEQA Guidelines Appendix G checklist, which was amended to include new questions related to wildfire subsequent to the General Plan's adoption. However, Section 2.7, "Hazards and Hazardous Materials," of the 2011 GPU PEIR addresses impact associated with wildland fire risk and is incorporated by reference. Implementation of the General Plan could result in future development in areas susceptible to wildfires, which could exacerbate wildfire risks leading to the exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. However, the General Plan policies listed in Section 2.15.2, "Regulatory Framework," would reduce these potential impacts by locating development in areas with adequate emergency services and outside of areas with higher susceptibility to wildfire hazard or spread. In addition, development would be designed and constructed to provide adequate defensibility to wildfires. Furthermore, wildfire risk and risk of pollutant exposure would be minimized by adherence to the International Fire Code, California Fire Code, the County Consolidated Fire Code, and other regulations listed in Section 2.15.2, "Regulatory Framework."

CAP Update Impact Analysis

The following sections describe the potential for implementation of CAP Update measures and actions to exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Solid Waste Measures and Actions

Implementation of CAP Update solid waste measures and associated implementing actions (e.g., Action SW-4.1) could result in potential construction of new or expanded solid waste facilities in unincorporated county. These new or expanded facilities would not be intended for occupancy. During construction and operation, there would be increased human activities and ignition sources in the new or expanded solid waste facilities, including equipment that could create a spark or be a source of heat.

As noted in Section 2.15.1, "Existing Conditions," the unincorporated county contains lands that are classified as Very High FHSZs and in SRAs. Heat or sparks have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low humidity and high wind speeds that are typically experienced in the summer and fall but could also occur year-around in the unincorporated county. However,

development of new or expanded facilities would be required to obtain an approval on a Fire Serve Availability form for fire services and would be required to conform to the adopted General Plan policies related to fire risk reduction, including the following: Policy LU-6.10 requiring development to be protected from hazards; Policy LU-6.11 minimizing development in high fire threat areas; Policy S-4.1 requiring adequate defensible development; Policy S-4.2 requiring development to be designed to account for topography to reduce fire risk; Policy S-4.3 requiring development to be designed to minimize wildfire spreading; Policy S-4.6 requiring implementation of measures to reduce wildfire risk if development is proposed within fire threat areas; and Policy S-4.7 requiring all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes. Additionally, development of new or expanded facilities would be required to implement 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7, which require compliance with the Building and Fire Code and require site and/or building designs to include features that reduce fire hazards; Mitigation Measure Pub-1.5, which requires discretionary project applications to include commitments from available fire protection districts; and Mitigation Measure Pub-1.6, which identifies fire prone areas and ensures that development proposals meet the applicable fire authority's requirements. Furthermore, future discretionary projects would be subject to an environmental review process to evaluate potential fire hazards and would be required to comply with the County's Consolidated Fire Code, along with any project specific mitigation measures proposed to avoid or minimize impacts related to the exacerbation of wildfire risks. Therefore, development of new or expanded solid waste facilities would not exacerbate wildfire risks. The impact would be less than significant with implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency, which would not include development of structures for human occupancy. Measures W-1 and W-2 include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. Development of the proposed water and wastewater infrastructure improvements is not likely to introduce new uses in areas of high fire risk, including uses that would bring increased population into areas of high fire risk. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, planting and protecting trees, and providing incentive to encourage carbon farming. As noted above, the

unincorporated county contains lands that are classified as Very High FHSZs or in SRAs that could be affected by implementation of these measures and actions.

Implementation of Actions A-2.1 and A-2.2 would involve planting drought tolerant and low-fire potential trees on County-owned lands and on private property. Planting trees would result in increased fuel load in WUI areas and Very High FHSZs, which could exacerbate wildfire risks in the unincorporated county. Adopted General Plan Goal S-4 aims to create managed vegetation fuel loads in WUI areas and Policy S-4.1 supports programs consistent with state law that require fuel management/modification within established defensible space boundaries. Compliance with the adopted General Plan goals and policies would ensure that newly planted trees would not become unmanageable fuel loads in WUI areas and Very High FHSZs.

Implementation of Action A-4.1.b could result in the identification of opportunities for new farmworker housing. Humans cause the majority of wildfires, either directly or through failure of transmission lines. Introducing a new population to the WUI or in Very High FHSZs has the potential to exacerbate wildfire risk. The impact would be potentially significant. However, future development of farmworker housing would be required to conform with the adopted General Plan Policy S-4.1 to include adequate defensible space for new development, Policy S-4.2 to account for topography for development near hillsides and canyons, Policy S-4.3 to minimize flammable vegetation around development, Policy S-4.4 to locate development in areas where fire and emergency services are available, Policy S-4.5 to provide additional access roads for safe access of emergency equipment and civilian evacuation concurrently, Policy S-4.6 to implement measures to mitigate fire risk, and Policy S-4.7 to meet current ignition resistance construction codes. In addition, development of new farmworker housing would be required to implement 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 to comply with Building and Fire Code and to require incorporation of building features into design to reduce fire hazards, Mitigation Measure Pub-1.5 to require discretionary project applications to include commitments from available fire protection districts, and Mitigation Measure Pub-1.6 to identify fire prone areas and ensure that development proposals meet applicable fire authority’s requirements.

Planting trees or future development of farmworker housing within or adjacent to areas designed as Very High FHSZ or WUI areas would have the potential to exacerbate wildfire risk, particularly if these actions occur in areas with steep topography and/or prevailing winds as these conditions contribute to the spread of wildfires and make it more difficult to contain wildfires. With compliance with applicable adopted General Plan policies and implementation of applicable 2011 GPU PEIR mitigation measures, the agriculture and conservation measures and actions would not exacerbate wildfire risk due to slope, prevailing winds, and other factors or expose project occupants to pollutant concentrations from a wildfire. This impact would be less than significant with implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve development of policies and programs to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in development of various renewable energy projects, which would not include structures for human occupancy.

Implementation of renewable energy projects have the potential to result in vegetation ignitions and wildfires from equipment failure during construction and operation. Construction activities that may result in ignition sources would include vegetation clearing and piling, grading, site preparation, soil disturbances, concrete pouring and preparation, pole and turbine placement, and construction and refueling. These construction activities may include presence of vehicles, heavy equipment, heat-generating equipment and activities, and sparks from various sources, as well as use of fuels and combustible materials during construction and infrastructure installation. Implementation of CAP Update Measures E-2 and E-3 and Actions E-2.2, E-3.2, and E-3.3 could result in small-scale energy efficiency retrofits on existing residential and non-residential structures and County facilities and large-scale renewable energy systems. The small-scale retrofits could include rooftop or ground-mounted photovoltaic (PV) solar arrays or small wind turbines, upgraded mechanical systems, energy storage systems, and other similar development. Large-scale renewable energy systems could include PV solar, concentrated solar, and wind turbines. However, based on industry standards, it is assumed that future renewable energy development would mainly involve the use of steel, aluminum, or glass, which are materials that have low potential to result in vegetation ignitions and wildfires. Additionally, compliance with adopted General Plan policies would ensure that the proposed development would not exacerbate wildfire risk and would not expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. These policies include Policy S-4.1, which requires development to be located, designed, and constructed to provide adequate defensibility; Policy S-4.7, which requires all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes; and Policy S-5.1, which requires fuel management within established defensible space boundaries. In addition, the 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 require compliance with Building and Fire Code and require site designs to incorporate features to reduce fire hazards; Mitigation Measure Pub-1.5 requires discretionary project applications to include commitments from available fire protection districts; and Mitigation Measure Pub-1.6 identifies fire prone areas and ensures that development proposals meet the applicable fire authority's requirements. Compliance with applicable adopted General Plan policies and implementation of 2011 GPU PEIR mitigation measure would reduce the potential for development of small-scale energy efficiency retrofits to exacerbate wildfire risks. The impact would be less than significant with mitigation.

Built Environment and Transportation Measures and Actions

Implementation of CAP Update Measures T-3 and T-5 would result in new or expanded pedestrian and bicycle improvements and electric vehicle charging stations. Future projects that implement these measures and actions would not involve the construction of new structures intended for human occupancy. Accordingly, the construction of these projects would not result in the exacerbation of wildfire risks that could expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire that were not explicitly evaluated in the 2011 GPU PEIR. The impact would be less than significant.

Summary

The CAP Update may result in development of small-scale infrastructure, large-scale renewable energy systems, and other improvements to reduce countywide GHG emissions. It is assumed that most of the new and improved structures would be small in scale and generally would not be intended for extended occupancy, except for potential farmworker housing and large-scale renewable energy systems. There is limited potential for implementation of the CAP Update to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Where habitable structures and large-scale renewable energy systems are constructed, they would be unlikely to exacerbate wildfire risk due to slope, prevailing winds, and other factors because all development would be consistent with adopted General Plan policies and would implement 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7 to address the potential for development to exacerbate wildfire hazards. In addition, the CAP Update would create co-benefits that reduce wildfire risk, thereby helping to make the county more adaptive and resilient to the impacts of climate change. For these reasons, the CAP Update is not expected to expose project occupants to pollutant concentrations due to exacerbation of wildfire risk. Impacts would remain less than significant with mitigation incorporated. This conclusion is consistent with the conclusions in the 2011 GPU EIR to the extent that it evaluated wildfire risk. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.15.3.4 Issue 2: Install Infrastructure That Exacerbates Fire Risk

This section describes potential project impacts related to installation or maintenance of infrastructure that could exacerbate wildfire risk.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines and the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection (County of San Diego 2022), the project would have a significant impact if it would be located in or near an SRA or Very High FHSZ and:

- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

Impact Analysis

2011 GPU PEIR Determination

Impacts related to the exacerbation of fire risk from the installation or maintenance of infrastructure resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold is derived from the State CEQA Guidelines Appendix G checklist, which was amended to include new questions related to wildfire subsequent to the General Plan's adoption. However, infrastructure necessary to support buildout of the General Plan was within the scope of development evaluated in the 2011 GPU PEIR. Section 2.7, "Hazards and Hazardous Materials," of the 2011 GPU PEIR addresses impacts associated with wildland fire risk and is incorporated by reference. The General Plan could result in future development that would require the installation or maintenance of infrastructure in areas susceptible to wildfires. However, the General Plan policies listed in Section 2.15.2, "Regulatory Framework," reduce the potential impacts by ensuring that future development is located in areas with adequate emergency services and infrastructure and outside of areas with higher susceptibility to wildfire hazard or spread. Furthermore, all development would comply with applicable regulations listed in Section 2.15.2, "Regulatory Framework," including the International Fire Code, California Fire Code, State fire regulations, County of San Diego Consolidated Fire Code, and applicable County of San Diego ordinances.

CAP Update Impact Analysis

Solid Waste Measures and Actions

Implementation of the CAP Update solid waste measures and actions would result in potential development of new or expanded solid waste facilities, including expanded biogas capture and composting. The new or expanded facilities would likely be located within or near existing solid waste facilities and landfills with existing infrastructure and utilities services. It is unlikely that infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities would be required for the construction and operation of new or expanded solid waste facilities. If such infrastructure is required, General Plan policies would be implemented to avoid or minimize impacts. These polices include Policy LU-10.2, which ensures development avoids hazard areas; Policy S-4.4, which ensures development occurs in areas with fire and emergency services; Policy S-4.6, which ensures development located within fire threat areas includes measures to reduce risk of structural and human loss due to wildfire; and Policy S-4.7, which requires all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes. 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7, which would enforce Building and Fire Code compliance, would also be implemented to reduce wildfire risk. Adopted Mitigation Measure Pub-1.5, which requires discretionary project applications to include commitments from the applicable fire protection district, and Adopted Mitigation

Measure Pub-1.6, which identifies fire prone areas and ensures that development proposals meet applicable fire authority's requirements, would ensure adequate fire services are available to serve the project area. Therefore, implementation of solid waste measures and associated implementation actions would not require construction or maintenance of infrastructure that might exacerbate fire risk. The impact would be less than significant.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Implementation of CAP Update Measures W-1 and W-2 would have the potential to result in installation of water efficient appliances, smart irrigation systems, and stormwater and greywater capture systems. Implementation of CAP Update Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. However, no infrastructure related to roads, fuel breaks, emergency water sources, power lines, or other utilities would be anticipated for the construction and operation of water efficient appliances, smart irrigation systems, stormwater and greywater capture systems, and stormwater and wastewater treatment systems. Therefore, no infrastructure that might exacerbate fire risk would need to be operated or maintained because of the implementation of water and wastewater measures and actions. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, planting and protecting trees, and providing incentives to encourage carbon farming and transition to cleaner fuels. These measures would result in new conservation lands, preservation of existing natural and agricultural lands, new trees, identification of opportunities for new farmworker housing, and the use of cleaner fuels in the unincorporated county. No infrastructure or other substantial new structural development would be anticipated for preserving or managing conservation, natural, and agricultural lands; carbon farming; preserving trees; or the use of cleaner fuels. New trees would be planted within County-owned lands, right-of-way, and residential areas and would not require installation of roads, fuel breaks, emergency water sources, power lines, or other utilities.

Implementation of Action A-4.1.b would evaluate opportunities to increase farmworker housing, and thus may result in future development of new farmworker housing in the unincorporated county. New farmworker housing development would be required to conform to the adopted General Plan policies. These polices include Policy LU-6.10, which requires new development to be located and designed to protect property and residents from hazards; Policy LU-10.2, which requires development to avoid hazard areas; Policy S-4.1, which requires development to be located, designed, and constructed to provide adequate defensibility; Policy S-4.2, which requires development to account for topography that would affect its susceptibility to wildfires; Policy S-4.3, which requires

site and design development to minimize the likelihood of a wildfire spreading to structures; Policy S-4.4, which requires development to be planned in areas where fire and emergency serves are available or planned; Policy S-4.6, which requires implementation of measures to reduce wildfire risk to structural and human loss; and Policy S-4.7, which requires all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes. In addition, 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 require compliance with Building and Fire Code to ensure adequate fire protection in place; Mitigation Measure Pub-1.5 requires discretionary project applications to include commitment from applicable fire protection districts; and Mitigation Measure Pub-1.6 requires compliance with applicable requirements from local fire authority. Compliance with applicable adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that the farmworker housing and associated infrastructure would be located, designed, and constructed to avoid hazard areas and to minimize wildfire risk to structural and human loss. Therefore, the farmworker housing and associated infrastructure would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. The impact would be less than significant.

Energy Measures and Actions

Implementation of the CAP Update could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities, and the project could include rooftop or ground-mounted solar arrays or small wind turbines, modern mechanical systems, energy storage systems, large-scale PV solar, concentrated solar, and wind turbines that have potential to result in direct and indirect impacts related to wildland fire that were not explicitly evaluated within the 2011 GPU PEIR.

Energy efficiency retrofits and associated improvements would occur on existing structures and County facilities and would not require installation or maintenance of roads, fuel breaks, and emergency water sources. However, implementation of CAP Update Measure E-3, Action E-3.2, and Action E-3.3 would have the potential to result in development of new renewable energy systems, such as small-scale PV solar arrays and wind turbines and large-scale PV solar, concentrated solar, and wind turbines. These new renewable energy systems would also require connection to power lines and/or construction of new substations. Specific locations for the potential renewable energy system projects are unknown; however, they could result in placement of structures adjacent to wildland vegetation. Construction activities that may result in ignition sources would include vegetation clearing and piling, grading, site preparation, soil disturbances, concrete pouring and preparation, pole and turbine placement, and refueling. These construction activities may include presence of vehicles, heavy equipment, heat-generating equipment and activities, and sparks from various sources, as well as use of fuels and combustible materials during construction and infrastructure installation. Additionally, the projects would result in the generation and transmission of electric current which would be potentially susceptible to equipment failure. Maintenance activities also could result in additional presence of humans and equipment. Large-scale solar systems would include the use of lithium-ion batteries (typically enclosed to reduce fire risk), which would pose a risk for overheating and potential ignition of nearby vegetation. Therefore, implementation of renewable energy system project infrastructure could exacerbate fire risk.

In accordance with the County's Zoning Ordinance, small-scale solar PV systems (under 500 square feet) and up to three small wind turbines are permitted without a discretionary permit if specific zoning criteria are met in accordance with the ordinance. Even though there is a lack of discretionary oversight for small-scale renewable energy projects, all projects would be required to comply with federal, state, and local regulations to minimize or prevent wildfire. The small-scale renewable energy projects would also be required to implement the adopted General Plan policies listed in Section 2.15.2, "Regulatory Framework," which would aid in the efforts to prevent wildfire in the county by managing vegetation, preparing for the threat of wildfire based on weather conditions, and staffing fire service providers appropriately. Furthermore, implementation of 2011 GPU PEIR mitigation measures would reduce impact related to infrastructure development. These measures include Mitigation Measures Haz-4.3 and Pub-1.7, which would require compliance with the Building and Fire Code to ensure there are adequate fire service levels and would require site designs to incorporate features that reduce fire hazards, and Mitigation Measure Pub-1.6, which requires compliance with applicable requirements from the local fire authority. Compliance with existing regulations and the adopted 2011 GPU PEIR policies and implementation of Mitigation Measures Haz-4.3, Pub-1.6, and Pub-1.7 would ensure that future small-scale renewable energy projects would not exacerbate fire risk or result in temporary or ongoing impacts to the environment.

Future large-scale renewable energy projects and associated infrastructure (e.g., power lines, power poles, and battery storage systems) would result in potential ignition sources during construction and operation activities. Potential ignition sources during construction could include heat sources or sparks from power tools, heated exhaust from worker vehicles, and improper electrical connections. During operation, the primary wildfire ignition risks could include 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. Implementation of large-scale renewable energy projects could exacerbate fire risk due to installation of renewable energy systems and associated infrastructure. However, future large-scale renewable energy projects would be designed to prevent this infrastructure from exacerbating fire risk to the extent feasible. The large-scale renewable energy projects and associated infrastructure would be required to be designed and constructed in accordance with current fire codes. Defensible space and fuel management required by the California Public Utilities Commission and CAL FIRE for utilities infrastructure development would also be implemented as discussed in Section 2.15.2.2, above.

In addition, future large-scale renewable energy projects would be subject to discretionary review and would be evaluated for project-specific impacts under CEQA at the time of application. Project-specific mitigation would reduce and minimize impacts related to the exacerbation of fire risk to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Adopted General Plan Policy S-4.1, which requires development to be located, designed, and constructed to provide adequate defensibility; Policy S-4.7, which requires all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes; and Policy S-5.1, which requires fuel management within established defensible space boundaries, would reduce wildfire risk. Implementation of 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 would ensure that the Building and Fire

Code is implemented to provide adequate fire protection, Mitigation Measure Pub-1.5 would ensure that discretionary projects include commitments from the applicable fire protection district, and Mitigation Measure Pub-1.6 would ensure compliance with applicable requirements from the local fire authority. Even through implementation of large-scale renewable energy projects would introduce potential ignition sources and additional electrical equipment that do not currently exist in the county, compliance with the adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce fire risk to a less-than-significant level. The impact would be less than significant.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update built environment and transportation measures and actions could result in future infrastructure development that would result in wildfire-related impacts in the unincorporated county. More specifically, implementation of CAP Update Measures T-3 and T-5 would result in new or expanded pedestrian and bicycle improvements, electric vehicle charging stations, and other measures and actions to promote sustainable transportation options. Development of pedestrian and bicycle improvements would occur on existing roadways and electric vehicle charging stations would be installed in existing parking lots and garages. Implementation of the proposed transportation infrastructure projects would be connected to existing roadways and located within existing facilities, which would not require installation or maintenance of new infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk. Compliance with the adopted General Plan Policy S-4.1, which requires development to be located, designed, and constructed to provide adequate defensibility; Policy S-4.7, which requires all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes; and Policy S-5.1, which requires fuel management within established defensible space boundaries, would ensure that the potential development would not exacerbate wildfire risk. Further, 2011 GPU EIR Mitigation Measures Haz-4.3 and Pub-1.7, which would enforce Building and Fire Code compliance, would be implemented to reduce wildfire risk. Therefore, implementation of CAP Update built environment and transportation measures and actions would not substantially increase wildfire risk associated with infrastructure development. The impact would be less than significant.

Summary

Federal, state, and local regulations exist to minimize or prevent wildfire. In addition, implementation of the adopted General Plan policies listed in Section 2.15.2, “Regulatory Framework,” would aid in the efforts to prevent wildfire in the county by managing vegetation, preparing for the threat of wildfire based on weather conditions, and staffing fire service providers appropriately. Implementation of the 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7 would require compliance with the Building and Fire Code, require site designs to incorporate features to reduce fire hazards, and ensure there are adequate fire service providers available to serve potential development. Therefore, impacts related to small-scale renewable energy systems would be reduced to less than significant with mitigation incorporated. This conclusion is consistent with the conclusions in the 2011 GPU PEIR to the extent that it evaluated wildfire

risk. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.15.3.5 Issue 3: Expose People or Structures to Post-Fire Risks

This section describes potential project impacts related to exposing people to post-fire risks, such as flooding or landslides, with implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection* (County of San Diego 2022), the project, if located in or near an SRA or lands classified as Very High FHSZ, would have a significant impact if it would:

- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Impact Analysis

2011 GPU PEIR Determination

Impacts related to the exposure of people or structures to post-fire risks resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold is derived from the State CEQA Guidelines Appendix G checklist, which was amended to include new questions related to wildfire subsequent to the General Plan's adoption. However, Section 2.7, "Hazards and Hazardous Materials," of the 2011 GPU PEIR addresses impact associated with wildland fire risk and is incorporated by reference. The General Plan would result in development in areas susceptible to wildfires. However, several General Plan policies listed in Section 2.15.2, "Regulatory Framework," would reduce the potential impacts by limiting development in hillsides and canyons where flooding or slope instability could occur. Furthermore, post-wildfire hazard risk is also mitigated by adherence to the County of San Diego OA EP, the County Consolidated Fire Code, and other regulations listed in Section 2.15.2, "Regulatory Framework."

CAP Update Impact Analysis

Implementation of the CAP Update measures and associated implementing actions has the potential to result in future development, such as expansion of facilities, identification of opportunities for farmworker housing, and development of small-scale and large-scale renewable energy projects. These potential developments could expose people or structures to significant risks. The following sections describe the potential wildfire-related impacts that could result from implementation of CAP Update measures and actions.

Solid Waste Measures and Actions

Implementation of CAP Update solid waste measures and actions (e.g., Action SW-4.1) could result in potential construction of new or expanded solid waste facilities in the unincorporated county. Specific locations for these facilities have not been identified, though gas capture at existing landfills likely would occur at the Borrego and Otay landfills. As discussed in Sections 2.15.3.3 and 2.15.3.4, above, construction of new or expanded solid waste facilities would increase human activities and ignition sources in the area, which would have the potential to create a spark to cause fire and expose people or structures to wildfire risks and flooding or landslides resulting from post-fire slope instability or drainage changes. However, future development would be required to conform with the adopted General Plan policies related to wildfire protection. These policies include Policy LU-6.11 to direct development away from hazardous wildfire areas; Policy S-4.1 to locate, site, design, and construct new development to enhance defensibility and to minimize the risk of structural loss and life safety resulting from wildfire; Policy S-4.3 to site and design new developments to minimize the likelihood of a wildfire spreading to structures; Policy S-4.4 to locate new developments to where fire and emergency services are available; Policy S-4.6 to implement measures to mitigate wildfire risks to structures and humans; and Policy S-4.7 to require new development to meet current ignition resistance construction codes. Complying with these adopted General Plan policies would minimize wildfire risk to new development. In addition, complying with Policy LU-6.10, which protects property and residents from natural and human-induced hazards; Policy S-4.2, which requires development located on ridgelines, top of slopes, saddles or other topographic areas to be sited and designed to account for topography in wildland areas that pose a greater fire risk; Policy S-9.1, which directs development away from areas with high landslide potential; Policy S-9.2, which prohibits development from causing or contributing to slope instability; and Policies S-10.3, S-10.4, and S-10.6, which limit development in flood hazard areas, would minimize wildfire risk and reduce landslide or flooding hazards from post-fire associated with slope destabilization and drainage changes. In addition, future development would be required to implement the 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7, which require compliance with the Building and Fire Code and requires site and building designs to incorporate features that reduce fire hazards. Compliance with these policies and implementation of Adopted Mitigation Measures Haz-4.3 and Pub-1.7 would reduce the potential for projects constructed as part of CAP Update implementation to expose people or structures at new or expanded facilities to significant post-fire risks, including downslope or downstream flooding or landslides due to post-fire slope instability or drainage changes. The impact would be less than significant.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Measures W-1 and W-2 include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water

capture systems. Implementation of Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site so that the stormwater and greywater would be treated and reused for landscaping. Implementation of these measures would not result in new population growth or construction of new structures; therefore, implementation of CAP Update water and wastewater measures and actions would not expose people or structures to significant risks, including downslope or downstream flooding or landslides due to post-fire slope instability or drainage changes. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. No new population growth would occur as a result of these measures and actions, and it is assumed that construction of new structures would not be required for managing and preserving conservation, natural, and agricultural lands; promoting carbon farming; and protecting and planting trees. However, implementation of Action A-4.1.b could result in the identification of opportunities to increase farmworker housing in the unincorporated county. The unincorporated county contains many WUI areas, areas classified as Very High FHSZs, and areas in SRAs. Construction of new farmworker housing in WUI areas or a Very High FHSZ would have the potential to expose people and structures to significant risks during and after a wildfire event. Specific locations for potential farmworker housing have not been identified. Future farmworker housing development that results from evaluations conducted through implementation of the CAP Update would be required to conform to the adopted General Plan policies related to wildfire protection, including Policy LU-6.11 to direct development away from hazardous wildfire areas; Policy S-4.1 to locate, site, design, and construct new development to enhance defensibility and to minimize the risk of structural loss and life safety resulting from wildfire; Policy S-4.2 to require new development located on ridgelines, top of slopes, saddles or other topographic areas to be sited and designed to account for topography in areas that pose a greater fire risk; Policy S-4.3 to site and design new developments to minimize the likelihood of a wildfire spreading to structures; Policy S-4.4 to locate new developments in areas where fire and emergency services are available; Policy S-4.6 to implement measures to mitigate wildfire risks to structures and humans; and Policy S-4.7 to require new development to meet current ignition resistance construction codes. Compliance with these adopted policies would limit risks associated with the construction of new farmworker housing in areas prone to wildfire.

Post-wildfire risks to new development would also be minimized through adherence to the General Plan Safety Element policies, which include Policy S-9.1 to direct development away from areas with high landslide potential; Policy S-9.2 to prohibit development from causing or contributing to slope instability; and Policies S-10.3, S-10.4, and S-10.6 to limit development in flood hazard areas. New development would also adhere to the following: the County's OA EOP, which includes strategies, procedures, recommendations, and organizational structures to respond to natural disasters; the Multi-Jurisdictional Hazard Mitigation Plan, which includes goals, objectives, and actions

to reduce the possibility of damage and loss due to wildfire; and other existing regulations related to wildfire protection listed in Section 2.15.2, "Regulatory Framework." Compliance with the adopted General Plan policies and existing regulations would ensure development in or near SRAs and Very High FHSZs would not expose people or structures to substantial post-fire risks. The impact would be less than significant.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in development of various renewable energy projects, such as new small-scale PV solar arrays and wind turbine projects and large-scale PV solar, concentrated solar, and wind turbines that could be located in downslope or downstream flood or landslide areas within the county. Impacts related to the exposure of people or structures due to post-fire slope instability were not explicitly evaluated within the 2011 GPU PEIR.

Implementation of the CAP Update would result in new small-scale PV solar arrays and small-scale wind turbine projects that could include ground-mounted infrastructure. If new renewable energy equipment is installed in areas subject to flooding or landslides within the county, there is a potential to result in the exposure of people or structures to post-wildfire risk. However, given the nature and small scale of renewable energy projects that would be implemented consistent with the CAP Update, it is unlikely that occupied structures or a substantial increase in people would be introduced into the project area. Small-scale wind and solar projects generally do not include the development of new structures and maintenance of these facilities requires limited presence of employees that could be affected by post-fire risks.

Furthermore, future wind and solar projects would be required to be constructed according to applicable fire code requirements and County ordinances that govern grading, flammable materials, and fire hazards. Additionally, small-scale wind and solar projects would be required to comply with the adopted General Plan policies listed in Section 2.15.2, "Regulatory Framework," including Policy 4-3.1, which requires that development in areas susceptible to wildfires be designed with adequate defensibility and emergency access to minimize the risks to people and structures; Policy S-4.2, which requires development in hillsides and canyons where flooding or slope instability could occur to be designed to account for topography; and Policy S-4.4, which restricts development in areas with a high fire threat and in areas where emergency services are unavailable. In addition, the 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 would require compliance with the Building and Fire Code and would require site designs to incorporate features to reduce fire hazards. Compliance with adopted General Plan policies and implementation of Adopted Mitigation Measures Haz-4.3 and Pub-1.7 would ensure that future small-scale wind and solar projects would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes.

Large-scale renewable energy infrastructure would generally be constructed in primarily undeveloped locations that are productive for generating renewable energy. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure that relies on large amounts of land unencumbered by buildings or shadowed by buildings or trees. If the large-scale renewable energy projects are located in flood zones, landslide susceptible areas, or unstable slopes, the impacts related to exposing people or structures to post-fire landslides, slope instability, or flooding could be significant. However, future large-scale renewable energy projects would be subject to discretionary review and would be evaluated for project-specific impacts under CEQA at the time of application. Project-specific mitigation would be proposed to reduce and minimize post-fire risks to the extent feasible in compliance with State CEQA Guidelines Section 15126.4.

Future large-scale renewable energy projects would also conform to design requirements associated with proper site preparation and grading practices to address erosion and runoff. In addition, future large-scale renewable energy projects would be required to comply with adopted General Plan Policy S-9.1, which directs development away from areas with high landslide, mudslide, or rock fall potential; Policy S-10.3, which requires development to conform to federal floodproofing standards; Policy S-9.2, which prohibits development from causing or contributing to slope instability; Policy S-10.4, which requires development within mapped flood hazard areas be sited and designed to minimize on-site and off-site hazards; Policy S-10.6, which allows new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. Implementation of 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 would ensure that the Building and Fire Code is enforced to provide adequate fire protection; Mitigation Measure Pub-1.5 would ensure that discretionary project applications would include commitment from available fire protection districts; and Mitigation Measure Pub-1.6 would identify fire prone areas and ensure development proposals meet the requirements set forth by the applicable fire jurisdiction. Compliance with State CEQA Guidelines Section 15126.4, adopted General Plan policies, and 2011 GPU PEIR mitigation measures would ensure that future large-scale renewable energy projects would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes. The impact would be less than significant.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update built environment and transportation measures and associated implementing actions could result in future development that would result in wildfire-related impacts in the unincorporated county.

Implementation of CAP Update Measures T-3 and T-5 would result in new or expanded pedestrian and bicycle improvements and electric vehicle charging stations. Park-and-ride facilities would be located in existing parking lots or vacant lots near existing

roadways; pedestrian and bicycle infrastructure improvements would be located on or near existing roadways; and electric vehicle charging stations would be installed in existing parking lots or parking garages. Development of pedestrian and bicycle improvements and installation of electric vehicle charging stations would not increase wildfire risk or alter slopes or drainage patterns in a manner that would increase the risk of post-fire downslopes or downstream flooding or landslides. The impact would be less than significant.

Summary

Post-wildfire risks to new development would be minimized through adherence to the County's OA EOP, which includes strategies, procedures, recommendations, and organizational structures to respond to natural disasters; the Multi-Jurisdictional Hazard Mitigation Plan, which includes goals, objectives, and actions to reduce the possibility of damage and loss due to wildfire; and other existing regulations related to wildfire protection listed in Section 2.15.2, "Regulatory Framework." Additionally, compliance with the adopted General Plan policies and existing regulations would ensure development in or near SRAs and Very High FHSZs would not expose people or structures to substantial post-fire risks. This impact would be less than significant with mitigation incorporated. This conclusion is consistent with the conclusions in the 2011 GPU PEIR to the extent that it evaluated wildfire risk. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.15.3.6 Cumulative Impact Analysis

The cumulative impact analysis study area for the wildfire-related risks is the San Diego Association of Governments (SANDAG) region. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Exacerbate Wildfire Risks

Impacts related to the exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold was introduced to the State CEQA Guidelines subsequent to the General Plan's adoption. As discussed in Section 2.15.3.3, "Issue 1: Exacerbate Wildfire Risks," future development associated with the CAP Update would be evaluated to determine whether it is within the scope of this SEIR or if it would require subsequent CEQA review; would be required to conform with adopted General Plan policies; and would be required to implement applicable 2011 GPU PEIR mitigation measures. As indicated 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 is a significant cumulative impact related to the exacerbation of wildfire risks. However, implementation of the CAP Update would not result in the exacerbation of wildfire risks with compliance with adopted General Plan

policies and implementation of 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7.

While a significant cumulative impact related to the exacerbation of wildfire risk may result from cumulative development within the SANDAG region, it is foreseeable that future projects proposed in the unincorporated county would be required to comply with adopted General Plan policies and 2011 GPU PEIR mitigation measures, resulting in the mitigation of impacts associated with General Plan buildout; therefore, future projects would not result in a considerable contribution to an existing significant cumulative impact. Further, implementation of the CAP Update would not result in the exacerbation of wildfire risks that could expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, the project would not result in a substantial incremental effect that would result in a new significant impact related to the exacerbation of wildfire risk. The impact would be less than significant. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

Issue 2: Install Infrastructure That Exacerbates Fire Risk

Impacts related to the exacerbation of fire risk from the installation or maintenance of infrastructure resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold was introduced to the State CEQA Guidelines subsequent to the General Plan's adoption. As discussed in Section 2.15.3.4, "Issue 2: Install Infrastructure That Exacerbates Fire Risk," impacts would be less than significant with implementation of appliable 2011 GPU PEIR mitigation measures and compliance with the General Plan policies and other applicable regulations included in Section 2.15.2, "Regulatory Framework."

Similar to Issue 1, discussed above, a significant cumulative impact related to exacerbation of wildfire risk from installation and maintenance of infrastructure would occur in the cumulative context due to the large amount of Very High FHSZs in the unincorporated county. However, while a significant cumulative impact related to the exacerbation of wildfire risk may result from cumulative development within the unincorporated county, it is foreseeable that future projects proposed in the unincorporated county would be required to comply with the same General Plan policies and 2011 GPU PEIR mitigation measures, resulting in the mitigation of impacts associated with General Plan buildout.

Further, given the nature of the projects that would be implemented consistent with the CAP Update, and the fact that impacts resulting from the proposed CAP Update measures and actions would not result in the exacerbation of wildfire risk associated with the installation of infrastructure, the project would not result in a substantial incremental effect that would result in considerable contribution to a new significant cumulative impact. The impact would be less than significant. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

Issue 3: Expose People or Structures to Post-Fire Risks

Impacts related to exposing people or structures to post-fire risks from the installation or maintenance of infrastructure resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold was introduced to the State CEQA Guidelines subsequent to the General Plan's adoption. As discussed in Section 2.15.3.5, "Issue 3: Expose People or Structures to Post-Fire Risks," impacts would be less than significant with implementation of applicable 2011 GPU PEIR mitigation measures and with compliance with the General Plan policies and other applicable regulations included in Section 2.15.2, "Regulatory Framework."

Similar to Issue 1, discussed above, a significant cumulative impact related to exposing people or structures to post-fire risks is anticipated to occur as a result of General Plan buildout due to the large amount of Very High FHSZs in the unincorporated county. However, while a potentially significant cumulative impact related to the exposure of people or structures to post-fire risks may result from cumulative development within the unincorporated county, it is foreseeable that future projects proposed in the unincorporated county would be required to comply with adopted General Plan policies and 2011 GPU PEIR mitigation measures, resulting in the mitigation of impacts associated with General Plan buildout. Further, given the nature of the projects required to implement the CAP Update, and the fact that impacts resulting from the proposed CAP Update measures and actions would not result in a significant impact related to exposing people or structures to post-fire risks, the project would not result in a substantial incremental effect that would result in a new significant cumulative impact. The impact would be less than significant. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.15.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would not result in new or more severe impacts related to emergency response or evacuation plans, exacerbation of fire risk, or exposure of people or structures to post-fire risks.

2.15.5 Mitigation Measures

2.15.5.1 Issue 1: Exacerbate Wildfire Risks

The following mitigation measures adopted as a part of the 2011 GPU PEIR would reduce potential impacts related to the exacerbation of wildfire risk to less than significant. Therefore, no new mitigation measures would be required.

> Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

2.15.5.2 Issue 2: Install Infrastructure That Exacerbates Fire Risk

The following mitigation measures adopted as a part of the 2011 GPU PEIR would reduce potential impacts related to the installation of infrastructure that exacerbates fire risk to less than significant. Therefore, no new mitigation measures would be required.

Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the

construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

2.15.5.3 Issue 3: Expose People or Structures to Post-Fire Risks

The following mitigation measures adopted as a part of the 2011 GPU PEIR would reduce potential impacts related to the exposure of people or structures to post-fire risks to less than significant. Therefore, no new mitigation measures would be required.

Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas**.**

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

2.15.6 Significance Conclusions

2.15.6.1 Issue 1: Exacerbate Wildfire Risks

Compliance with existing regulations related to wildfire protection and implementation of 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 project and cumulative impacts associated with exacerbation of wildfire risks would be **less than significant** and **would not result in a considerable contribution** such that no new significant cumulative impact would occur. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.15.6.2 Issue 2: Install Infrastructure That Exacerbates Fire Risk

Compliance with existing regulations related to wildfire protection and implementation of 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 project and cumulative impacts associated with exacerbation of wildfire risks from installation and maintenance of new infrastructure would be **less than significant** and **would not result in a considerable contribution** such that no new significant cumulative impact would occur. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.15.6.3 Issue 3: Expose People or Structures to Post-Fire Risks

Compliance with existing regulations related to wildfire protection and implementation of 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 project and cumulative impacts associated with exposing people or structures to post-fire risks would be **less than significant** and **would not result in a considerable contribution** such that no new significant cumulative impact would occur. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

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CHAPTER 3 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

The County reviewed the environmental impacts and mitigation measures for each issue area addressed in the 2011 GPU PEIR to determine whether impacts associated with implementation of the proposed General Plan Amendment, CAP Update, Greenhouse Gas (GHG) Threshold, and the *County of San Diego Guidelines for Determining Significance: Climate Change* (Guidelines) (collectively referred to as the project) would fall within the scope of the General Plan, are addressed in the certified 2011 GPU PEIR, and incorporate all applicable performance standards and mitigation measures identified therein. Where any of these conditions may not occur, the resource is fully evaluated in Chapter 2, "Environmental Effects of the Project," of this draft SEIR. Where the County concluded that implementation of the GHG reduction measures and actions in the CAP Update would not have potential to affect the conclusions of the 2011 GPU PEIR for certain topics, these topics are not analyzed further in this SEIR. Where issues will not be discussed in detail in an EIR, Section 15128 of the State CEQA Guidelines requires that an EIR "contain a statement briefly indicating the reasons that various potentially significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR."

This chapter includes a discussion of the reasons that various possible effects of the project were determined not to be significant and were therefore not discussed in detail in this SEIR (pursuant to State CEQA Guidelines Section 15128). As discussed below, the project would not change the conclusions relative to the analyses of geology and soils, mineral resources, population and housing, public services, recreation, and utilities and service systems, and no further detailed analysis is warranted.

3.1 Geology and Soils

In Section 2.6, "Geology and Soils," the 2011 GPU PEIR did not identify potentially significant direct and cumulative impacts related to geology and soils. Therefore, no mitigation measures were required. As described therein, development as a matter of standard process and conditions of approval would be required to comply with all relevant federal, state, and local regulations and building standards, including the California Building Code (CBC) and County-required geotechnical reconnaissance reports and investigations which would minimize the risk of seismic, soil stability, and expansive soils hazards. Compliance with the National Pollutant Discharge Elimination System, CBC, and County Grading Ordinance would prevent potential impacts to soil erosion. Development would be required to comply with all applicable federal, state, and local regulations related to septic tanks and wastewater disposal, including County Department of Environmental Health and Quality standards to prevent water quality issues because of ineffective septic and wastewater systems. Development would also be required to follow all applicable regulatory processes, including compliance with the *County of San Diego Guidelines for Determining Significance: Geologic Hazards* (County of San Diego 2007). Therefore, potential impacts related to geology and soils would be less than significant, and no mitigation measures were required.

Existing conditions related to geology and soils have not changed substantially since certification of the 2011 GPU PEIR. Implementation of the project would require that development projects be consistent with the CAP Update and its GHG reduction measures and supporting actions. Implementation of the CAP Update is intended to reduce GHG emissions by improving multimodal transportation and ridesharing options and fuel efficiency; increasing building energy efficiency, renewable energy use and access, waste diversion, and water conservation; and reducing emissions from agriculture. Implementation of the project would not expose people or structures to adverse effects resulting from geologic hazards because the CAP Update's GHG reduction measures and supporting efforts would not amend, revise, or be inconsistent with any existing regulations related to geology and soils for development projects. These activities would be required to comply with provisions for geological stability established by the Uniform Building Code and CBC.

Any development or expansion of facilities associated with subsequent projects implemented consistent with the CAP Update would be required to comply with existing regulations intended to protect people and structures from seismic hazards, soil instability and expansive soils, and would not expose people or structures to potential substantial adverse effects involving risks related to these hazards. The project would not amend or revise any regulations in place to prevent soil erosion, water quality impacts from septic tanks and wastewater disposal, or impacts to unique geologic features or expose more people and structures to these hazards. Therefore, the project would not result in impacts not analyzed in the 2011 GPU PEIR, nor would it result in impacts that are more severe than discussed in the 2011 GPU PEIR. Therefore, the findings of the certified 2011 GPU PEIR regarding geology and soils remain valid, and no further analysis is required.

3.2 Mineral Resources

In Section 2.10, "Mineral Resources," the 2011 GPU PEIR identified potentially significant direct and cumulative impacts related to mineral resources due to the loss of availability of mineral resources that would be valuable to local and state entities.

General Plan Policies COS-10.1 through COS-10.4, COS-10.6, COS-10.8, and COS-10.9 and 2011 GPU PEIR Mitigation Measures Min-1.1 through Min-1.3 facilitate protection of mineral resource areas from incompatible land uses, require that road access to mining facilities be maintained, and provide for streamlined permitting of mining operations. The policies and measures were identified to reduce impacts but not to a less-than-significant level. Therefore, development associated with the General Plan was identified to result in direct and cumulatively significant impacts related to mineral resources availability and impacts to mineral recovery sites.

Existing conditions related to mineral resources have not changed substantially since certification of the 2011 GPU PEIR. Implementation of the project is intended to reduce GHG emissions by improving multimodal transportation and ridesharing options, improving fuel efficiency, increasing building energy efficiency, increasing renewable energy use and access, increasing waste diversion, increasing water conservation, and reducing emissions from agriculture. Potential impacts to mineral resources generally

occur when a development project permanently precludes the potential to mine the resource located within a site.

The 2011 GPU PEIR evaluated the effect of General Plan buildout on the availability of mineral resources and identified a significant impact. The activities anticipated with implementation of the CAP Update would be consistent with COS-10.1 through COS-10.4, COS-10.6, COS-10.8, and COS-10.9, as well as 2011 GPU PEIR Mitigation Measures Min-1.1 through Min-1.3, which facilitate protection of mineral resource areas from incompatible land uses.

Because of the limited footprint associated with most projects that would result from CAP Update implementation, the project would not result in new or more significant impacts related to mineral resources beyond that identified in the 2011 GPU PEIR. In addition, the CAP Update would not amend, revise, or be inconsistent with any existing regulations related to mineral resources. Further, as described above, General Plan policies related to mineral resource extraction and protection discourage development would preclude future development of mining facilities and require that development, including housing, be designed to minimize conflicts with existing and potential future mining facilities.

Smaller renewable energy projects associated with the CAP Update would not involve major grading or dredging activities that would result in the loss of a significant mineral resource. Some smaller projects would be roof mounted and would not result in any ground disturbance. Other smaller facilities may require earthwork activities consisting of minor grading at ground surface for the construction of towers and concrete foundations, which would not result in the loss of availability of a known mineral resource of value to the region. Future large-scale renewable energy projects (including solar and wind projects) would be subject to discretionary review. As part of the County's discretionary review process, all future projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to mineral resources, as necessary. Potential future farmworker housing also would be subject to CEQA compliance and would be required to implement General Plan policies governing development within a mineral resource zone. As necessary, such projects would be required to implement applicable GPU PEIR mitigation measure or recommend new mitigation measures to reduce impacts on mineral resources.

The CAP Update would not result in new or more severe project or cumulative impacts not analyzed in the 2011 GPU PEIR, Therefore, the findings of the certified 2011 GPU PEIR regarding mineral resources remain valid, and no further analysis is required.

3.3 Population and Housing

In Section 2.12, "Population and Housing," the 2011 GPU PEIR did not identify any potentially significant direct or cumulative impacts related to population growth, displacement of housing, or displacement of people. Therefore, no mitigation measures were required. While implementation of the land use plans adopted as part of the General Plan would result in population growth, the General Plan includes a framework for land use and development that is intended to discourage unanticipated and inappropriate

growth within the unincorporated county. Similarly, the General Plan complies with state policies regarding the provision of housing and does not displace substantial numbers of people. Therefore, impacts related to population and housing were identified as less than significant.

Existing conditions related to population and housing have not changed substantially since the certification of the 2011 GPU PEIR. In fact, projected development is lower than anticipated in the 2011 GPU PEIR. Implementation of the CAP Update would not induce population growth directly or indirectly, because the GHG reduction measures do not propose new housing, other than potential future farmworker housing to serve the needs of existing workers by providing housing that is more proximate to work sites, nor do they propose changes to policies or regulations related to land use or residential zoning. Implementation of the project is intended to reduce GHG emissions by improving multimodal transportation and ridesharing options, improving fuel efficiency, increasing building energy efficiency, increasing renewable energy use and access, increasing waste diversion, increasing water conservation, and reducing emissions from agriculture.

GHG reduction measures that would facilitate the construction of future electric vehicle infrastructure (Action E-3.1), transit access improvements (Action T-6.2), multimodal transportation improvements (Action T-5.1), and roof- or ground-mounted solar (Action E-3.2) could require a temporary increase in the number of construction workers. These types of projects are small construction projects, which would not require a large construction crew. Furthermore, construction workers would likely be from the San Diego County area, and permanent, substantial relocation of workers would not be required.

Implementation of the project also could result in the implementation of the Purchase of Agricultural Conservation Easement Program, which could result in additional land being permanently set aside for agriculture, consistent with goals and policies of the General Plan. This could result in a small decrease in the amount of existing acreage designated for residential land use. However, it is not likely that land developed with existing housing or designated for higher densities would be converted because the land value for property that is designated for residential is higher than property designated for agricultural. Therefore, the potential loss of existing/future residential units would be nominal. Similarly, potential large-scale renewable energy projects would not induce substantial unplanned population growth or displace a substantial number of housing units or people. Typically, large-scale renewable energy development would not employ substantial numbers of people beyond project construction, and the construction activities would be temporary. Construction workers would generally be from the region and are generally not expected to relocate for temporary employment. Implementation of the project would not displace residents or induce population growth in the county.

Implementation of the CAP Update measures and actions would not induce unplanned population growth or displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the project would not result in impacts not analyzed in the 2011 GPU PEIR, and there is no substantial new information indicating that an impact would be more severe than

discussed in the 2011 GPU PEIR. The findings of the certified 2011 GPU PEIR pertaining to population growth remain valid, and no further analysis is required.

3.4 Public Services

In Section 2.13, "Public Services," the 2011 GPU PEIR identified potentially significant direct and cumulative impacts related to the provision of fire, police, school, and other public services because of growth accommodated by buildout of the General Plan.

General Plan Policies LU-1.4, LU-6.4, LU-6.11, LU-12.3, LU-12.4, S-3.4, S-5.1, S-5.2, and S-6.1 through S-6.5 and 2011 GPU PEIR Mitigation Measures Pub-1.1 through Pub-1.9, as well as other measures listed in Sections 2.1 through 2.17 of the 2011 GPU PEIR related to specific resources, were identified to reduce direct and cumulative impacts related to the construction of new fire protection facilities to a less-than-significant level.

General Plan Policies LU-1.4, LU-12.3, and LU-12.4 and 2011 GPU PEIR Mitigation Measures Pub-1.1 through Pub-1.3, as well as other measures listed in Sections 2.1 through 2.17 of the 2011 GPU PEIR related to specific resources, were identified to reduce direct and cumulative impacts related to the construction of new police protection facilities to a less-than-significant level .

General Plan Policies LU-1.4, LU-9.7, LU-12.3, LU-12.4, LU-17.1 through LU-17.4, and LU-18.2 and 2011 GPU PEIR Mitigation Measures Pub-1.1 through Pub-1.3, Pub-3.1, and Pub-3.2 were identified to minimize impacts related to the construction or expansion of new school facilities. The construction of these facilities would have the potential to result in significant environmental impacts. However, the planning, design, approval, and construction of school facilities is not within the County's jurisdiction; it is the responsibility of the individual school districts. Therefore, although the individual school districts are required to prepare plans for the accommodation of future growth in their district service areas, the County cannot guarantee that impacts associated with the development of new school facilities would not have a significant impact on the environment. Therefore, the 2011 GPU PEIR concludes that direct and cumulative impacts would remain significant and unavoidable because of the County's limited authority to control the construction of facilities.

General Plan Policies LU-1.4, LU-9.4, LU-9.7, LU-12.3, LU-12.4, LU-18.1, and LU-18.2 and 2011 GPU PEIR Mitigation Measures Pub-1.1 through Pub-1.3, as well as other measures listed in Sections 2.1 through 2.17 of the 2011 GPU PEIR related to specific resources, were identified to reduce direct and cumulative impacts related to the construction/expansion of public libraries facilities to a less-than-significant level.

Existing conditions related to the provision of public services have not changed substantially since certification of the 2011 GPU PEIR. Implementation of the project would require that development projects be consistent with the CAP Update and its GHG reduction measures. Implementation of the project is intended to reduce GHG emissions by improving multimodal transportation and ridesharing options, improving fuel efficiency, increasing building energy efficiency, increasing renewable energy use and access,

increasing waste diversion, increasing water conservation, and reducing emissions from agriculture. Implementation of subsequent projects, such as traffic-calming measures and small-scale renewable energy projects, would not directly affect the provision of public services, nor contribute to population growth that could result in an increase for demand for public services. Similarly, large-scale renewable energy projects would not involve uses that would result in the need for significantly altered services or facilities. Furthermore, future large-scale renewable projects (including solar and wind projects) will be subject to discretionary review. As part of the County's discretionary review process, all future projects would be evaluated under CEQA and would be required to implement measures to minimize impacts to public services, as necessary. Other than the exploration of potential opportunities for the future development of farmworker housing, which would be intended to serve the needs of existing workers, these types of projects would not have a population-generating component and, therefore, no increase in demand for public services is expected.

Implementation of the CAP Update would not directly affect the provision of public services, nor contribute to population growth that could result in an increase in demand for public services. Therefore, the project would not result in impacts not analyzed in the 2011 GPU PEIR, nor would it result in impacts that are more severe than discussed in the 2011 GPU PEIR. The findings of the certified 2011 GPU PEIR pertaining to public services remain valid, and no further analysis is required.

3.5 Recreation

In Section 2.14, "Recreation," the 2011 GPU PEIR identified potentially significant direct and cumulative impacts related to the provision of parks and recreation facilities because of the growth accommodated by buildout of the General Plan. General Plan Policies LU 12.1, LU 12.2, M 12.1 through M 12.8, M 12.10, H 2.2, COS 21.1, COS 21.2, COS 22.1, COS 23.1, COS 23.2, COS 24.1, and COS 24.2 and 2011 GPU PEIR Mitigation Measures Rec-1.1 through Rec-1.12 were identified to reduce impacts associated with increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would not occur or be accelerated. Further, General Plan Policies LU 6.4, LU 9.7, LU 18.2, M 12.5, M 12.9, M 12.10, H 2.2, COS 21.2, COS 21.3, COS 21.4, COS 23.1, and COS 23.3 and 2011 GPU PEIR Mitigation Measures Rec-1.1 through Rec-1.4, Rec-1.8, Rec-1.9, Rec-1.11, and Rec-2.1 through Rec-2.6 were identified to reduce impacts associated with the construction and operation of new parks and recreation facilities. The 2011 GPU PEIR determined that adherence to these policies and implementation of identified mitigation measures would reduce direct and cumulative impacts to less than significant.

Existing conditions related to the provision of recreational facilities have not changed substantially since the certification of the 2011 GPU PEIR. Implementation of the project is intended to reduce GHG emissions by improving multimodal transportation and ridesharing options, improving fuel efficiency, increasing building energy efficiency, increasing renewable energy use and access, increasing waste diversion, increasing water conservation, and reducing emissions from agriculture.

Implementation of the CAP Update would not directly affect the provision of park and recreation facilities, nor contribute to population growth that could increase the use of existing park and recreation facilities resulting in the physical deterioration of such facilities. While exploration of future opportunities for the development of farmworker housing would occur with the CAP Update, this housing would be constructed to serve existing demand for housing closer to worksite locations. Such housing, along with other future projects, would be required to comply with General Plan policies and 2011 GPU PEIR mitigation measures that would effectively reduce potential impacts to less than significant, as described for buildout of the General Plan in the 2011 GPU PEIR. Therefore, the project would not result in impacts not analyzed in the 2011 GPU PEIR, nor would it result in impacts that are more severe than discussed in the 2011 GPU PEIR. Therefore, the findings of the certified 2011 GPU PEIR pertaining to park and recreation facilities remain valid, and no further analysis is required.

3.6 Utilities and Service Systems

In Section 2.16, "Utilities and Service Systems," the 2011 GPU PEIR identified potentially significant direct and cumulative impacts related to the construction/expansion of water, wastewater, stormwater, and landfill facilities because of the growth accommodated by buildout of the General Plan. As described below, the 2011 GPU PEIR concludes that most effects on provision of utilities are adequately addressed though adherence to General Plan policies and mitigation measures identified in the 2011 GPU PEIR. Impacts related to provision of water and potential for effects on the groundwater table were determined to be significant and unavoidable.

Specifically, the 2011 GPU PEIR made the following determinations:

- Direct and cumulative impacts of General Plan implementation related to the potential for exceedance of Regional Water Quality Control Board's wastewater treatment requirements would be reduced to less than significant through compliance with General Plan Policies LU 9.4, LU 12.1, LU 12.2, and LU 14.1 through LU 14.4 and 2011 GPU PEIR Mitigation Measures USS-1.1 through USS-1.3.
- Direct and cumulative impacts of General Plan implementation related to provision of new water or wastewater treatment facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects would be reduced to less than significant through compliance with General Plan Policies LU 1.2, LU 4.3, and H 1.3 and 2011 GPU PEIR Mitigation Measures USS-2.1 through USS-2.3.
- Direct and cumulative impacts of General Plan implementation related to provision of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, would be reduced to less than significant through compliance with General Plan Policies LU 6.5, LU 6.9, and COS 4.3 and 2011 GPU PEIR Mitigation Measures USS-3.1 through USS-3.5.

- Direct and cumulative impacts of General Plan implementation related to provision of adequate wastewater capacity to service projected demand in addition to a provider's existing commitments would be reduced to less than significant through compliance with General Plan Policy LU 4.3 and 2011 GPU PEIR Mitigation Measures USS-1.1 through USS-1.3.
- Direct and cumulative impacts of General Plan implementation would result in significant and unavoidable impacts related to demand for water that exceeds existing entitlements and resources, or necessitates new or expanded entitlements; and substantial depletion of groundwater supplies or interference with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level despite compliance with General Plan Policies LU 8.1, LU 8.2, LU 13.1, LU 13.2, COS 4.1 through COS 4.4, COS 5.2, and COS 5.5 and 2011 GPU PEIR Mitigation Measures USS-4.1 through USS-4.7.
- Direct and cumulative impacts of General Plan implementation would result in significant and unavoidable impacts related to landfill capacity despite compliance with General Plan Policies LU 12.1, LU 12.2, LU 16.1, LU 16.2, LU 16.3, COS 17.1 through COS 17.4, COS 17.6, COS 17.7, and COS 17.8 and 2011 GPU PEIR Mitigation Measures USS-6.1 through USS-6.8.

Existing conditions related to utilities have not changed substantially since the certification of the 2011 GPU PEIR. Implementation of the project would require that development projects be consistent with the CAP Update and its GHG reduction measures and supporting efforts. The CAP Update would not result in development proposals with a population-generating component. While the potential for future development of farmworker housing would be explored as a result of the CAP Update, such housing would be constructed to serve existing farmworker populations by providing housing closer to worksite locations. Any associated impacts related to utilities or service systems would not be new or more significant as compared to the findings of the 2011 GPU PEIR. Therefore, the CAP Update would not increase long-term demand for utilities or services.

Construction activities associated with subsequent projects required to implement the CAP Update may require temporary water, wastewater, and solid waste services. For example, a minimal amount of water may be required for dust control during construction and grading activities, portable restrooms may be required for work crews, and construction and demolition materials may be disposed of in a landfill. Depending on conditions, water use for dust control and soil stabilization could be obtained via existing on-site supplies or trucked from an alternative source. This minor, short-term use would be arranged between the contractor and water supplier and would not contribute to an exceedance of available water supplies. Similarly, portable restrooms are self-contained, and the waste would be hauled off-site to a wastewater treatment facility for disposal. This service is typically provided by an independent contractor permitted to handle, haul, and dispose of sanitary sewage. Pursuant to 40 CFR Part 403.5, hauled waste must be disposed of at a designated publicly owned treatment facility. Typically, publicly owned treatment facilities are responsible for implementing permit programs for hauled waste and ensure that adequate treatment capacity exists. Construction and demolition

materials are required to be transported to a permitted solid waste facility and therefore will comply with federal, state, and local statutes and related to solid waste. An increase in operational water use also could occur if future development of farmworker housing occurs. However, the CAP Update recommends exploring opportunities for the development of such housing and does not prescribe specific sites or project sizes. Any future housing development would be required to comply with CEQA and to mitigate any potential impacts to the extent feasible. Any related impacts with respect to water use would not be new or more severe as compared to the conclusions of the 2011 GPU PEIR.

In addition, implementation of the CAP Update would promote clean energy and sustainable resource management by supporting future electric vehicle infrastructure, transit access improvements, and small-scale and large-scale renewable energy development. Development of large-scale renewable energy generation infrastructure, including energy transmission and storage infrastructure, could result in physical impacts during construction and operation. However, these projects would be required to comply with CEQA on a project level, and these impacts, such as air quality and water quality impacts that could occur during construction and operational impacts on aesthetics and biological resources are analyzed at a programmatic level in other sections of this draft SEIR.

Other measures and actions would improve water efficiency by formally adopting a water reduction target for new and existing buildings and replacing water-wasting equipment. Measures and actions related to solid waste disposal may have a positive impact on utilities because of implementation of measures to enhance the County's diversion rate and integrate organics into the collection process. This would result in advances in waste diversion goals and reductions in GHG emissions associated with landfill and other waste management practices. Any new facilities or programs would be required to comply with existing federal, state, and local statutes and regulations related to solid waste permitting. In addition, the County's waste diversion goals would continue to be consistent with Assembly Bill (AB) 939, which requires a 50 percent waste diversion goal, and AB 341, which requires a statewide 75 percent waste diversion for businesses.

Therefore, the project would not result in impacts not analyzed in the 2011 GPU PEIR, nor would it result in impacts that are more severe than discussed in the 2011 GPU PEIR. The findings of the certified 2011 GPU PEIR pertaining to utilities and service systems remain valid, and no further analysis is required.

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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

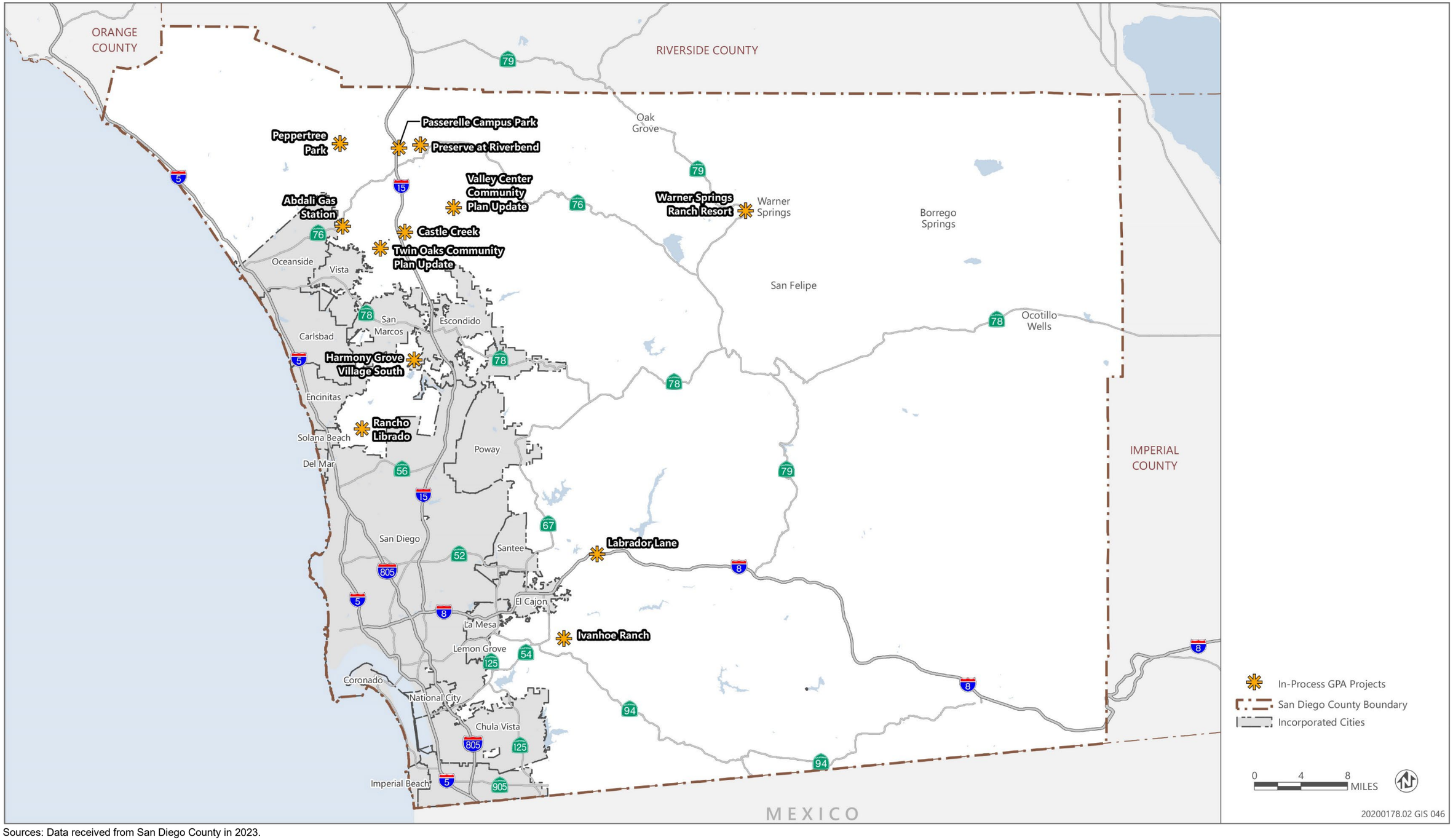
Source: data compiled by San Diego County in 2023.

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

CHAPTER 5 ALTERNATIVES

5.1 Introduction

Title 14 of the California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "… a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the "no project" alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR "…shall also identify an environmentally superior alternative among the other alternatives." (CCR Section 15126[e][2]).

In defining "feasibility" (e.g., "… feasibly attain most of the basic objectives of the project…"), CCR Section 15126.6(f) (1) states, in part:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure,

general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

5.2 Rationale for Selection of Alternatives

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, here San Diego County Board of Supervisors. (See PRC Sections 21081.5, 21081[a] [3].)

The project is the CAP Update, prepared as a requirement of mitigation in the adopted County General Plan. This SEIR includes evaluation of project alternatives that identify changes to the proposed GHG reduction strategy in the CAP Update that would reduce the potential for significant environmental impacts to result from implementation. In addition, an analysis is included of "smart growth" alternatives, which would propose modifications to zoning and/or the land use map in the adopted General Plan[1] to reduce the potential for development to generate GHG emissions associated with vehicle miles traveled (VMT). As discussed further below, these alternatives were developed through a 2-year process of extensive stakeholder engagement that included numerous stakeholder meetings, geospatial mapping efforts, and coordination of various planning departments.

5.2.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of an alternative to attain most of the objectives of the Project (State CEQA Guidelines Section 15126.6[a]). Chapter 2, "Project Description," articulates the following objectives.

- Reduce community-related GHG emissions within the unincorporated county and County operations-related GHG emissions to meet and exceed the County's GHG reduction targets for 2030 and 2045, as aligned with state reduction targets (as set forth in Senate Bill (SB) 32 [2016] and Assembly Bill (AB) 1279 [2022]), that does not rely on the purchase of carbon offsets to meet emission reduction targets.

[1] Because these alternatives extend beyond the scope of the CAP Update, which is a program of measures and actions to address GHG emissions from development under the adopted General Plan and government operations, implementation of the smart growth alternatives would require subsequent planning and comprehensive stakeholder engagement, as well as subsequent CEQA analysis. For example, if the Board directs staff to implement a smart growth alternative PDS would engage stakeholders, including outreach to property owners throughout the unincorporated county.

- Incorporate feasible and effective GHG reduction strategies, measures, and actions that reduce GHG emissions from community-wide activities in the unincorporated county and from County operations to establish actions to meet a goal of net zero carbon emissions by 2045 as aligned with AB 1279.

- Implement 2011 GPU PEIR Mitigation Measure CC-1.2 to prepare a CAP to reduce GHG impacts from implementation of the General Plan, and update Mitigation Measure CC-1.2 to be consistent with changes in state law, and the State CEQA Guidelines.

- Develop a CAP that supports the sustainability principles found in the County of San Diego General Plan Guiding Principles by doing the following: support a reasonable share of projected regional growth; promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in compact development patterns to the extent feasible; promote environmental stewardship that protects and/or enhances natural resources and habitats; ensure development that accounts for physical constraints and natural hazards; provide and support a multi-modal transportation network that enhances connectivity; maintain environmentally sustainable communities and reduce GHG emissions; and preserve agriculture as an integral component of the region's economy, character, and open space network.

- Develop a CAP that sets clear goals and identifies metrics (i.e., co-benefits and equity-based outcomes) to guide implementation to make substantial progress toward attaining environmental justice and equity.

- Develop a CAP that includes sufficiently adaptable long-term strategies that will consider and incorporate, as feasible, additional GHG reduction strategies that embrace continued innovation, technological advances, and the creation of high-quality jobs in the County.

- Accomplish the foregoing objectives in a manner that minimizes undue and unnecessary economic impacts on businesses and property owners, and that avoids regulatory takings under the federal and state constitutions.

5.2.2 Significant Environmental Impacts

5.2.2.1 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)
- Light and Glare (Project)

Agriculture and Forestry Resources

- Direct or Indirect Conversion of Agricultural Resources (Project)

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

- Substantially Increase Hazards Due to a Design Feature (Project and Cumulative)

5.2.2.2 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)
- Visual Character or Quality (Cumulative)
- Light and Glare (Cumulative)

Agriculture and Forestry Resources

- Direct or Indirect Conversion of Agricultural Resources (Cumulative)

- 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)

5.3 Alternatives Considered but Rejected

5.3.1 Alternative Locations

State CEQA Guidelines Section 15126.6(f)(2) states that the "key question and first step" in analysis of alternatives is whether any significant impacts would be avoided or substantially lessened by moving the project to an alternative location. This alternative would implement the measures and actions in the CAP Update in an alternative location.

5.3.1.1 Reasons for Rejection

The CAP Update is a programmatic approach to reduce GHG emissions within the unincorporated county in accordance with state GHG emissions reduction targets. The CAP Update accomplishes this by adopting strategies, measures, and actions that reduce GHG emissions. While these strategies, measures, and supporting actions would apply to all areas of the unincorporated county and County operations and would not be limited to one area or property, they would all be implemented within the unincorporated county. The CAP Update is required as mitigation to reduce GHG impacts of the General Plan that were identified in the 2011 GPU PEIR. Because the mitigation measure (Mitigation Measure CC-1.2 of the 2011 GPU PEIR) sets out to reduce GHG emissions from community-wide sources and County local government operations (County operations) that are consistent with the General Plan, an alternative site where the project could be implemented would not be feasible or appropriate. The County only has jurisdiction over lands within its legal boundaries. As such, consideration of an alternative location has been eliminated from further analysis in this draft SEIR.

5.3.2 Prohibition on Growth in Unincorporated County Alternative

Forecast GHG emissions include both the continued operation of existing structures and associated resident behavior and emissions associated with anticipated population growth and development. This alternative would prohibit all new development in the unincorporated county (with the exception of previously approved or entitled development); all existing residential, commercial, office, industrial, public facilities, agriculture and open space, along with utilities and roadways would generally remain in their current condition. A prohibition on new development would be adopted by the County Board of Supervisors (Board) as a separate action in conjunction with the CAP Update. An alternative that prohibits all new development and does not implement the proposed CAP Update would not meet project objectives related to SB 32 and AB 1279 compliance.

5.3.2.1 Reasons for Rejection

This alternative would not accommodate the County's Regional Housing Needs Allocation (RHNA), which is the amount of new housing that the state has assigned as the fair share of new housing units to build over the next 8 years. Government Code Section 65863 (the No Net Loss Law) requires that cities and counties ensure that their general plans provide for regional housing needs. Due to inconsistency with state regulations, this alternative would be infeasible. Halting all development in the unincorporated county would impair the County's ability to grow, adapt, and remain economically viable.

A prohibition on growth in the unincorporated county may reduce some environmental impacts associated with growth under the adopted General Plan, as disclosed in the 2011 GPU PEIR, but would not affect the environmental impacts of implementing the CAP Update. This alternative would not reduce the new and more severe impacts related to aesthetics, agriculture, cultural resources, land use, and tribal cultural resources associated with CAP Update implementation. This alternative would achieve project objectives related to development of a CAP, with the exception of the project objective to accomplish the foregoing objectives in a manner that minimizes undue and unnecessary economic impacts on businesses and property owners, and that avoids regulatory takings under the federal and state constitutions. This alternative was rejected from detailed consideration because it would not meet the County's state-mandated obligations to provide its fair share of housing, making it infeasible.

5.3.3 Prohibition on Changes to the General Plan Land Use Map Alternative

This alternative would prohibit general plan amendments (GPAs) that affect the density and intensity of land uses to preserve the accuracy of the GHG forecasts in the CAP Update. Some changes in density (e.g., higher density in rural areas and lower density near urban centers) can be associated with higher VMT, which is a factor in calculations of the GHG emissions of the unincorporated community. The CAP Update would be implemented as proposed and the prohibition of GPAs that change land use density would be adopted by the BOS as a separate action.

5.3.3.1 Reasons for Rejection

General Plans, and corresponding GHG reduction plans, are prepared to express the vision of a jurisdiction and establish goals and policies that reflect community values. As a practical matter, these are living documents that are monitored and refined in response to changing conditions. Additionally, under state law, the Board of Supervisors cannot prohibit future Boards of Supervisors from revising, modifying, or amending the County's General Plan and corresponding GHG reduction plans in the future.

GPAs that increase density are outside the scope of the CAP Update, which has been developed as mitigation for the adopted General Plan and covers only the type and level of growth that is within the scope of the General Plan. As discussed in further detail in Section 4.4 of Chapter 4, "Other CEQA Sections," any in-process or future GPAs would conduct a stand-alone CEQA analysis, including an analysis of project specific GHG emissions to determine the project's alignment with County plans and applicable state and local programs adopted to reduce GHG emissions. Moreover, this alternative would result in the same suite of measures and actions, with the same potential for new or substantially severe impacts, as the proposed CAP Update alone and would not improve alignment with the project objectives. For these reasons, this alternative has not been carried forward for detailed analysis.

5.3.4 Carbon Offset Alternative

Stakeholders suggested consideration of an alternative that allows for carbon offsets to reduce GHG emissions associated with development that is within the scope of the General Plan. Under this alternative, a carbon offset mitigation that provides objective standards to determine which carbon offset programs qualify as producing sufficiently real, permanent, quantifiable, verifiable, enforceable, and additional reductions in GHG emissions and includes quantifiable measurements such as compliance with the offset protocols approved by the California Air Resources Board (CARB) or a qualified registry could be considered on a project-specific basis.

5.3.4.1 Reasons for Rejection

As proposed, the CAP Update achieves state GHG reduction targets for forecast growth in the unincorporated county and County operations without the use of carbon offsets; therefore, incorporating the purchase of carbon offset credits to reduce GHG emissions under the General Plan is not required. The CAP Update does not prohibit the use of carbon offsets where appropriate to address the GHG emissions of projects that would require amendments to the General Plan and that would not rely on the CAP Update for GHG reductions (i.e., projects that would be outside of the scope of the General Plan and would conduct project-level GHG emissions modeling and recommend project-specific mitigation, and would not attempt to streamline evaluation of GHG emissions using the tiering and streamlining provisions of State CEQA Guidelines Section 15183.5). CEQA Guidelines Section 15126.4(c)(3) allows mitigation through "off-site measures, including offsets that are not otherwise required, to mitigate a project's emissions." Offsets are expressly allowed in CEQA and are available as a suite of mitigation measures for the

reduction of GHG emissions. This alternative was rejected from further consideration both because carbon offsets would not be required for the County to achieve GHG reductions pursuant to applicable state targets under the General Plan and because the Board directed staff to develop a CAP that achieves state targets without the purchase of carbon offsets. This direction is included in the objectives of the project and is, in fact, a key defining objective of the CAP Update. For the foregoing reasons and, because projects can still use carbon offsets if appropriate, this alternative is rejected from further consideration in this SEIR.

5.3.5 Net Negative by 2035 Alternative

Comments were received during the NOP scoping process that the County should consider an alternative that would achieve net negative emissions by 2035. This alternative would establish a target of net negative GHG emissions by 2035. To achieve this target, all measures and actions in the CAP would be revisited to ensure that all technologically feasible reductions are achieved. Because the CAP Update already includes all feasible measures and actions that would reasonably reduce emissions, this alternative would likely increase environmental impacts and the fiscal cost of CAP Update implementation. Furthermore, because the available reductions are small and not expected to achieve the target alone, this alternative is assumed to require the purchase of carbon offsets.

5.3.5.1 Reasons for Rejection

The CAP Update is aligned with the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) prepared by CARB. The Scoping Plan development process included evaluation of the technological feasibility, cost-effectiveness, and equity-focused pathways for the state to achieve statewide carbon neutrality prior to 2045. In the process, CARB modeled scenarios for economic GHG emission sectors and in four alternatives, including two alternatives for reaching carbon neutrality prior to 2035. The ability for natural working lands to sequester carbon was also evaluated in four separate alternatives to maximize effectiveness of natural carbon dioxide removal. Based on this information and a thorough stakeholder engagement process, CARB decided on a preferred “Scoping Plan Scenario” of achieving net zero emissions by 2045.

CARB ultimately concluded that the Scoping Plan Scenario for 2045 carbon neutrality is more cost effective and technologically feasible than the 2035 carbon neutrality alternatives and identified “several feasibility concerns” with 2035 carbon neutrality. CARB performed analysis demonstrating that 2035 carbon neutrality alternatives would have the following outcomes relative to the 2045 timeline of the Scoping Plan Scenario:

- 5 to 3 times slower job growth in 2035,
- 7 to 6 times higher direct costs in 2035, and
- 6 to 5 times slower economic growth in 2035.

The Scoping Plan Scenario shows that it is economically and technologically feasible to reduce emission to at least 85 percent below 1990 levels by 2045 as called for by AB 1279. It also shows that mitigation of 100 percent of anthropogenic emissions by 2045 is not economically and technologically feasible and that carbon dioxide removal should be utilized to achieve California's carbon neutrality target. In addition, the Scoping Plan scenario shows that natural and working lands are projected to be a net emissions source of approximately 7 million metric tons of carbon dioxide equivalent per year ($MMTCO_2e$/year) in 2030 and 2040, even with actions to preserve carbon sequestration potential. The Scoping Plan compensates for residual anthropogenic emissions and net emissions from natural working lands with additional mechanical carbon dioxide removal and carbon capture and sequestration strategies, including technologies such as direct air capture with sequestration. The County does not have infrastructure to construct new facilities to capture ambient CO_2 or pipelines, wells, and other surface facilities to enable the transport and injection of CO_2 into a geologic formation for sequestration.

This alternative would have to include the purchase of carbon offsets to close the gap between the emissions reductions that can be achieved in the county and the net negative goal. As described above, the use of carbon offsets contradicts the Board's direction. Additionally, there is not an established carbon offset program in the county, and stakeholders have expressed a desire to avoid out-of-county offsets. Therefore, the Net Negative by 2035 Alternative was dismissed from detailed analysis due to infeasibility.

5.3.6 Enhanced Biological Preserve Alternative

During scoping, commenters identified open space as a source of carbon sequestration and a method of reducing development potential in the unincorporated county. The CAP Update assumes full implementation of a Carbon Farming Program by 2026 and acquisition of 11,000 acres of conservation land by 2030 (and 1,000 acres per year thereafter), as well as agriculture and conservation measures that would preserve natural lands and improve land management practices to protect habitat and increase carbon storage. These assumptions maximize the potential for land preservation under the County's current acquisition mechanisms.

There are several open space preservation tools the county could explore to implement this alternative, including further clustering development, transfer of development rights, and land acquisition. Clustering development allows for development to occur in a way that maximizes the preservation of open space without reducing a property owner's development rights. A transfer of development rights allows a developer to essentially purchase the rights from the property that the community wants to preserve and transfer those rights to another property. However, this is a complex program that is highly dependent on market dynamics and only works if there is a suitable "receiver site" that can receive density for hundreds of additional housing units and property owners or developers willing to purchase development rights for that increased density. The purchase of property by a land trust allows land to be placed under a conservation easement. Alternatively, a bond measure could allow the community to essentially tax

itself to purchase the land for public open space. Each of these options present challenges requiring additional investigation.

5.3.6.1 Reasons for Rejection

The Enhanced Biological Preserve Alternative has the potential to meet all established project objectives if the legal and practical constraints discussed above could be overcome. Additionally, an alternative with increased open space may reduce environmental impacts compared to the proposed CAP Update if it would decrease the need for other measures and actions that result in environmental effects (e.g., new renewable energy infrastructure). However, implementation of this alternative would face legal and practical constraints, as explained above. Programs to transfer development rights or purchase property are outside the scope of the planning framework in the proposed CAP Update. As a result, this alternative has been rejected from further consideration.

5.3.7 Nuclear Power Alternative

Comments were received during the NOP scoping process that the County should consider an alternative that would include purchase of San Onofre Nuclear Generating Station. Under this alternative, the County would buy San Onofre Nuclear Generating Station from Southern California Edison and supply the unincorporated county with nuclear power to reduce GHG emissions associated with building energy consumption. The San Onofre Nuclear Generating Station is a permanently closed nuclear power plant located south of San Clemente. The plant was shut down in 2013 after defects were found in replacement steam generators; it is currently in the process of decommissioning.

The Nuclear Power Alternative would include a measure for the acquisition and operation of San Onofre Nuclear Generating Station in addition to the other measures and actions in the CAP Update. All other measures and actions would be included as proposed in the CAP Update.

5.3.7.1 Reasons for Rejection

Because this alternative would reduce reliance on the utility providers for renewable energy, the alternative could result in the reduction of environmental impacts anticipated to indirectly result from the development of large-scale renewable energy infrastructure. However, acquisition and operation of San Onofre nuclear power plant is not a feasible option for the County to explore. The plant is actively being decommissioned by the current owner, Southern California Edison, due to the defective status of the facility. There are technological limitations with the safe operation of the facility and the County does not have the governmental resources with the expertise or capacity to manage the operation of the plant. For these reasons, this alternative has been rejected from further consideration.

5.4 CAP Update Alternatives

5.4.1 Evaluation of CAP Update Alternatives Selected for Detailed Analysis

5.4.1.1 No Project Alternative

The No Project Alternative assumes the CAP Update would not be adopted and implemented. As a result, the County would not adopt strategies, measures, and supporting efforts to reduce GHG emissions in accordance with state-mandated reduction targets. New developments would continue to be reviewed under CEQA. This alternative would not meet any of the project objectives.

Comparison to the Effects of the CAP Update

As described above, under the No Project Alternative the CAP Update would not be implemented. As a result, the County would not have a mechanism by which to meet legislative requirements for GHG emissions. The No Project Alternative would not satisfy the County's obligation under Mitigation Measure CC-1.2 of the 2011 GPU PEIR, which requires the preparation of a CAP to achieve reduction targets. Further, the County would still be obligated to ensure that development under the General Plan would comply with legislative requirements for GHG emissions. Compliance with these requirements would be achieved through individual project-level analysis for all development projects subject to discretionary review. While GHG impacts would be assessed on a project-by-project basis, without the CAP Update in place, it may be more difficult for the County to achieve compliance and could result in inconsistencies with legislative requirements. Therefore, this alternative could result in greater GHG impacts. Transportation impacts related to VMT would also increase under the No Project Alternative. As described in Section 2.13, "Transportation," the CAP Update includes programs designed to reduce GHG emissions from the transportation sector through VMT reduction.

The environmental impacts of CAP Update implementation, and in particular those related to the construction and operation of the large-scale renewable energy infrastructure anticipated necessary to achieve the GHG reductions in the CAP Update that could affect the integrity of agricultural, biological, cultural, aesthetic, water, and tribal cultural resources, would be reduced or similar under the No Project Alternative. However, as described above, individual projects would continue to evaluate and mitigate GHG emissions on a project-by-project basis. The cumulative effect of these individual GHG reduction programs is not known at this time but may result in similar or greater effects on the environment due to a similar demand for renewable energy and infrastructure to support GHG reduction in accordance with state regulations and the absence of coordinated programs to address the necessary mitigation.

5.4.1.2 Distributed Generation Only Alternative

Comments were received during the NOP scoping process that the County should consider an alternative that would limit renewable energy generation to distributed

generation systems (i.e., a variety of small, grid-connected systems that efficiently deliver electricity near its place of origin, such as solar and wind energy generation sited on top of or adjacent to buildings and connected to a micro-grid) and that large, utility-scale energy systems should not be considered. As described in this draft SEIR, many of the project's significant impacts are associated with the large, utility-scale components that would be induced through implementation of CAP Update actions. Specifically, under Action E-3.3 the County would develop a program to provide 100 percent renewable energy to residents and businesses participating in San Diego Community Power by 2030. The County anticipates that private developers and utility companies would implement large-scale renewable infrastructure projects to meet the energy demand generated by this action; development of this infrastructure would require compliance with CEQA and regulatory requirements.

Under the Distributed Energy Only Alternative, Action E-3.3 would be modified to develop a program to provide 100 percent renewable energy to residents and businesses through distributed generation. The first step in establishing this program would be to prepare a feasibility study that assesses the distributed energy generation potential of the unincorporated county to determine how much energy could be generated without the need for large-scale renewable energy projects. Based on the results of the feasibility study and the types of distributed generation systems appropriate for various geographies and land uses, incentives would be identified to promote construction of these renewable energy systems. Distributed generation systems are currently allowed within the county and would be encouraged through mechanisms such as permit process improvements, and zoning and code updates, potentially including a renewable energy zoning overlay. For example, the County's Solar and EV Ready Ordinance, adopted in 2015, requires newly constructed residential dwelling to include solar-ready electrical equipment and roof space for easy installation of future solar photovoltaics. In addition, the County has offered a streamlined web-based permitting platform since 2013 which served as an example for the State permit streamlining law passed in 2014. From 2014 to 2022, 408,954 kilowatts of distributed generation solar photovoltaic systems have been installed since this platform was put into place.

The County currently allows construction of large-scale renewable energy systems (e.g., solar, wind, geothermal) subject to its ordinances, policies, and standards. This would not change under this alternative. However, this alternative would modify the County's commitment to providing renewable energy under Action E-3.3 to promote the construction of distributed generation systems. Large-scale renewable energy systems could still be developed, and their associated impacts could occur. However, this alternative would eliminate the demand for these systems induced by the CAP Update, thereby reducing the total number of systems that would be anticipated within the county. Therefore, overall impacts that are specific to the construction and operation of large-scale renewable energy projects, such as conversion of undeveloped open space to energy infrastructure, would be reduced compared to the project.

The feasibility study would determine how much renewable energy could be feasibly provided to county residents by 2030 using distributed energy infrastructure. The County anticipates that it would be more complicated and time-intensive to produce energy in this

manner than through large scale renewable projects because of the volume of projects required to establish the systems and the inherent potential for site-specific design challenges associated with the establishment of distributed energy systems that would both meet electricity demands in the unincorporated county and achieve emissions reductions equivalent to Action E-3.3 in the proposed CAP. Such challenges could add substantial time and complexity to the generation of distributed energy within the unincorporated county. For this reason, it is anticipated that the Distributed Generation Only Alternative may not meet the project objectives related to meeting the SB 32 target in 2030. However, this alternative would support the objectives of the sustainability principles in the General Plan, contribute to progress toward environmental justice and equity, include other adaptable measures and actions, and minimize undue and unnecessary economic impacts on businesses and property owners.

The CAP requires annual reporting, inventory updates at least every 2 years, and an update to the CAP at least every 5 years to track progress towards attainment of the 2030 and 2045 targets. If this alternative is selected, the County would monitor its efficacy and progress towards achieving the stated reductions under Action E-3.3. The County would be able to adapt if the Distributed Generation Only Alternative is selected and anticipated reductions are not being met.

Comparison to the Effects of the CAP Update

Aesthetics

Large-scale renewable energy infrastructure is anticipated to potentially alter the landscape of undeveloped areas in the county to accommodate renewable energy infrastructure such as PV solar arrays and wind turbines. The distributed energy only alternative would reduce or eliminate the potential for the CAP Update to induce the construction of large-scale renewable energy infrastructure. Distributed energy systems would include similar infrastructure requirements (e.g., solar panels and powerlines), but their smaller scale and proximity to development are anticipated to substantially reduce impacts related to changes or obstruction of scenic vistas and scenic resources, and degradation of visual character or quality. Impacts would be reduced compared to the proposed CAP Update.

The aesthetic impacts from implementing the Distributed Generation Only Alternative would be less than significant with mitigation and the project would not result in a considerable contribution to a significant cumulative impact. Implementation of the Distributed Generation Only Alternative would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Agriculture and Forestry Resources

The scale and magnitude of the renewable energy projects that could be constructed by utilities to meet the demand generated by the CAP Update is anticipated to result in potential conflicts with agricultural zoning and Williamson Act contracts. The Distributed

Generation Only Alternative would result in dispersed, discrete energy projects throughout the county. The additional flexibility in siting these smaller systems and their inherent proximity to areas of development is anticipated to reduce impacts to agricultural and forest resource. Impacts would be reduced compared to the proposed CAP Update.

The Distributed Generation Only Alternative would result in a less-than-significant impact related to conversion of agricultural land, conflicts with agricultural and forest zoning, and Williamson Act contracts and would not result in a new significant cumulative impact. Implementation of the Distributed Generation Only Alternative would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Air Quality

Large scale renewable energy infrastructure would not generate substantial emissions that would affect consistency with air quality plans or standards, pollution concentrations, or emission of odors. For this reason, the Distributed Generation Only Alternative would have similar impacts to the proposed CAP Update. Impacts would remain significant and unavoidable. Like the project, this alternative would result in a considerable contribution to a significant cumulative impact. This would not be a new or more severe impact than disclosed in the 2011 GPU PEIR.

Biological Resources

The Distributed Energy Generation Only Alternative would locate infrastructure more proximate to development, which may reduce impacts to biological resources. Although the Distributed Energy Only Alternative may result in impacts to biological resources, impacts are expected to be more discrete and localized than solar array fields, geothermal infrastructure, and wind turbines that typically encompass large areas. Large-scale solar and wind energy systems, which could indirectly result from implementation of the CAP Update, could result in impacts to special-status species due to construction activities, implementation of access roads and transmission lines, and conversion of large areas of land to industrial uses, resulting in habitat loss. Wildlife could potentially be displaced within the construction areas and use of access roads around the construction area has the potential to result in the direct mortality of less mobile wildlife and rare plants.

Although impacts to biological resources would be reduced compared to the proposed CAP Update, the alternative would have a significant and unavoidable impact and a considerable contribution to significant cumulative impacts. This would not be a new or more severe impact than disclosed in the 2011 GPU PEIR.

Cultural and Paleontological Resources

The Distributed Energy Generation Only Alternative would locate infrastructure more proximate to development, which may reduce impacts to cultural resources. Large-scale renewable energy systems, such as PV and wind turbines, would generally be constructed in areas that are not highly developed because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by

buildings or shadowed by buildings or trees. Ground disturbance, including excavation and grading have the potential to alter archaeological and paleontological resources.

Although the Distributed Energy Only Alternative may result in impacts to cultural resources, impacts are expected to be more discrete and localized than solar array fields, geothermal infrastructure, and wind turbines that typically encompass large areas. Impacts would be reduced compared to the proposed CAP Update. However, impacts from GHG reduction measures that would result in the installation of small wind turbines or solar photovoltaic facilities would remain significant and unavoidable and the project would result in a considerable contribution such that new significant cumulative impacts would occur. Under the Distributed Energy Only Alternative, this would remain a new or more severe impact not disclosed in the 2011 GPU PEIR.

Energy

Modification of CAP Update Action E-3.3 under the Distributed Energy Only Alternative to eliminate or reduce the potential to indirectly induce the development of large-scale renewable energy infrastructure would not substantially affect the potential for the CAP Update to result in wasteful, inefficient, or unnecessary consumption of energy resources because changing the source of the energy does not change the manner in which it is used. The shift in the type of renewable energy infrastructure incentivized by the County would not conflict with state and local plans for renewable energy. Therefore, the Distributed Energy Only Alternative would result in similar impacts to the CAP Update.

The Distributed Generation Only Alternative would result in a less-than-significant impact related energy demand and would not result in a new significant cumulative impact. Implementation of the Distributed Generation Only Alternative would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Environmental Justice

Modification of CAP Update Action E-3.3 under the Distributed Energy Only Alternative to eliminate or reduce the potential to indirectly induce the development of large-scale renewable energy infrastructure would not substantially affect the potential for the CAP Update to result in environmental justice impacts. For this reason, the Distributed Generation Only Alternative would have similar impacts to the proposed CAP Update.

The Distributed Generation Only Alternative would result in a less-than-significant impact related to environmental justice and would not result in a new significant cumulative impact. Implementation of the Distributed Generation Only Alternative would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Greenhouse Gas Emissions

Supplying renewable energy to San Diego Community Power customers would be the most efficient and reliable path to reducing GHG emissions associated with electricity use

in the unincorporated county. The Distributed Energy Only Alternative would require further study to determine if equivalent energy can be feasibly generated by distributed energy systems. Further, distributed energy systems to serve individual users or communities would undergo separate design, review, and construction processes. Even with the incentives included in this alternative, it is possible that there is a longer lead time for the development of distributed energy systems. During this period, it is assumed that a greater proportion of the energy demand in the unincorporated county would be met through non-renewable energy sources, which would increase GHG emissions compared to the CAP Update. For this reason, the Distributed Generation Only Alternative would have greater impacts than the proposed CAP Update on GHG emissions.

Impacts would be potentially significant due to the uncertainty regarding whether enough renewable energy could be provided through distributed energy systems to achieve the established targets and consistency with applicable plans and regulations. Implementation of the Distributed Energy Generation Only Alternative could result in new or more severe impacts than disclosed the 2011 GPU PEIR.

Hazards and Hazardous Materials

Large scale renewable energy infrastructure would not create substantial hazards, interfere with emergency response, or expose people to vectors. The Distributed Generation Only Alternative also would not create substantial hazards, interfere with emergency response, or expose people to vectors. For this reason, the Distributed Generation Only Alternative would have similar impacts to the proposed CAP Update.

As described in Section 2.9, “Hazards and Hazardous Materials,” for the CAP Update, the Distributed Generation Only Alternative would result in the development and redevelopment of infrastructure throughout the unincorporated county, including areas susceptible to wildland fires. Compliance with existing regulations related to wildfire protection and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the project-level and cumulative impacts but not to a less-than-significant level. Therefore, impacts associated with exposing people or structures to significant risks of loss, injury, or death involving wildland fires would be significant and unavoidable and would result in a considerable contribution to an existing significant cumulative impact. This alternative would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Hydrology and Water Quality

Large-scale renewable infrastructure would have the potential to impair water quality, groundwater recharge, and surface hydrology. This potential for effects would be addressed through the Major Use Permit process and compliance with County regulations. Because the Distributed Generation Only Alternative does not require as much acreage as large scale renewable solar, geothermal, and wind and would be located closer to where the energy is consumed, it would have less impacts to water quality, groundwater recharge, and surface hydrology. Much of the Distributed Generation

Only Alternative would require PV on rooftops or micro-grids closer to developed areas that would reduce impacts on groundwater. Therefore, the Distributed Generation Only Alternative would have less impacts than the proposed CAP Update.

However, similar to the conclusions for the CAP Update, because of the uncertainty regarding the types, locations, and scale of projects implemented, the Distributed Generation Only Alternative would have a significant and unavoidable impact and would result in a considerable contribution to a significant cumulative impact on groundwater supply and recharge. This would not be a new or more severe impact compared to the 2011 GPU PEIR.

Land Use and Planning

Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects impacts related to division of established communities could be significant. The Distributed Generation Only Alternative would reduce the potential for large-scale renewable energy infrastructure to disrupt existing access and circulation patterns in a manner that would have the potential to divide established communities. As a result, this alternative would have reduced impacts compared to the proposed CAP Update.

The Distributed Generation Only Alternative would result in a less-than-significant impact related to the physical division of established communities and would not result in a new significant cumulative impact related to the physical division of established communities. Under this alternative, there would not be a new or more severe impact than disclosed in the 2011 GPU PEIR.

Noise

The Distributed Energy Generation Only Alternative would result in renewable infrastructure, such as solar PV panels on rooftops and micro-grids, close to communities. This alternative would not induce the same demand for large-scale renewable infrastructure as the proposed CAP Update that, consistent with the Wind Energy EIR, would result in a significant and unavoidable impact related to low-frequency noise. However, the Distributed Energy Generation Only Alternative would result in new infrastructure closer to sensitive receptors.

Overall, the Distributed Energy Generation Only Alternative would result in similar impacts compared to the proposed CAP Update. The alternative's impact related to excessive noise levels would be significant and unavoidable and the alternative would result in a considerable contribution to a significant cumulative impact. This would not be a new or more severe impact compared to the 2011 GPU PEIR.

Transportation

The Distributed Energy Generation Only Alternative would locate infrastructure more proximate to development, which may reduce the construction traffic trip lengths anticipated for the construction of large-scale renewable infrastructure that could be located in relatively remote locations. However, once constructed, large-scale renewable energy projects would not have an impact on operation of the circulation system. Overall, the Distributed Energy Generation Only Alternative would result in similar impacts compared to the proposed CAP Update.

The Distributed Energy Generation Only Alternative would result in a less-than-significant impact related to transportation and would not result in a considerable contribution such that a new significant cumulative impact related to VMT would occur. Implementation of the Distributed Energy Generation Only Alternative would not result in new or more severe impacts than disclosed the 2011 GPU PEIR.

Tribal Cultural Resources

The Distributed Energy Generation Only Alternative would result in renewable infrastructure such as solar PV panels on rooftops and micro-grids close to communities. Construction of this infrastructure would have less potential to adversely affect Tribal Cultural Resources than the CAP Update because large-scale renewable energy projects can require expansive land area in more remote locations.

However, the Distributed Energy Generation Only Alternative would result in similar impacts compared to the proposed CAP Update overall because the specific location of projects associated with CAP Update implementation are not known and because they could be implemented in areas where TCRs are present. Because the reduction of impacts to a less-than-significant level cannot be guaranteed, the alternative would have a significant and unavoidable impact and would result in a considerable contribution to a significant cumulative impact to TCRs.

Wildfire

The Distributed Energy Generation Only Alternative reduces the fire risk associated with indirectly inducing the installation of renewable energy systems and associated infrastructure under the proposed CAP Update. However, future large-scale renewable energy projects would be designed to prevent this infrastructure from exacerbating a fire risk to the extent feasible. The large-scale renewable energy projects and associated infrastructure would be required to be designed and constructed in accordance with current fire codes. Defensible space and fuel management required by the California Public Utilities Commission and CAL FIRE for utilities infrastructure development would also be provided. Although the Distributed Energy Generation Only Alternative may slightly reduce impacts compared to the proposed CAP Update because it would limit the need for powerlines traversing undeveloped open space to deliver power to customers, implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that project and cumulative impacts would remain less than

significant and would not result in a considerable contribution such that no new significant cumulative impact would occur, consistent with the proposed CAP Update. Implementation of the alternative would not result in new or more severe impacts than disclosed in the 2011 GPU PEIR.

5.5 Smart Growth Alternatives

5.5.1 Development of Smart Growth Alternatives

This draft SEIR also includes consideration of smart growth[2] alternatives that are intended to significantly reduce VMT as required by the Court of Appeal for Division One of the Fourth Appellate District (Appellate Court) in *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467. The smart growth alternatives discussed below propose actions that, if adopted in addition to the CAP Update measures and actions, are intended to further reduce GHG emissions by reducing VMT through changes in development patterns. Note, however, that the efficacy of alternatives focused on incentives and disincentives for future development is limited because most forecast VMT in the unincorporated county is associated with existing development. Substantial reductions in countywide VMT would require changes to the travel patterns of the existing population and Board-directed land use and zoning changes. For example, siting mixed-use development and neighborhood serving retail near residential development can bring employment and shopping opportunities closer to existing residents, thus reducing VMT. Moving all household growth to specific areas along with changes to employment and commercial land uses in those areas could both minimize VMT from future growth and potentially reduce VMT associated with existing residents. Land use strategies that promote density and mixed-use development also make transit service more feasible to implement, which could shorten/replace existing vehicle trips. Other strategies to address existing VMT include either disincentivizing driving or incentivizing not driving, such as road user charges or programs that pay employees to work from home or pay residents to not make certain trips.

In addition to reducing VMT and GHG emissions, adopting and implementing a smart growth alternative in the unincorporated area could result in development outcomes aligned with previously directed policy objectives, such as increasing housing diversity and affordability levels near jobs and transit and reducing sprawling land use patterns. The General Plan, for which the CAP Update serves as a mitigation measure, was designed to achieve "smart growth" objectives including concentrating development in designated villages with integrated infrastructure and nonresidential uses. Achieving these goals reduces VMT attributable to new development. See Section 1.3 in Chapter 1, “Project Description,” of this draft SEIR, regarding the County’s efforts through the General Plan to focus development within village areas and closer to services in the western portion of the incorporated county. In addition, please refer to Table I-1 in the General Plan regarding sustainability policies.

[2] ”Smart Growth" is defined in the decision as “compact, efficient, and environmentally sensitive pattern of development that focuses future growth away from rural areas and closer to existing and planned job centers and public facilities, while preserving open space and making more efficient use of existing urban infrastructure.”

Adoption of a smart growth alternative would further focus development in areas close to employment centers, commercial services and amenities, and public facilities such as schools, fire stations, libraries, and parks/recreational opportunities. This approach assists in maximizing the use of existing infrastructure, preserves open space and natural resources, and reduces the distance individuals need to travel to meet their needs. Smart growth tends to create a greater range in housing and transportation options by incentivizing redevelopment of underutilized properties, thereby offering more choices and, potentially, a greater range of prices. Smart growth may also contribute to the economic development potential of existing communities by providing new investment opportunities, providing a framework for capital improvements, and supporting more efficient development patterns that allow for a wider mix of uses. A key component of smart growth as an approach to development and conservation is encouraging all stakeholders to participate in the decision-making process. Involving a broad set of stakeholders in planning for smart growth can help foster distinctive communities with a strong sense of place, resulting in increased access for a wider range of residents while creating new placemaking opportunities through the planning process. Due to each place's unique characteristics and stakeholder desires, development outcomes associated with applying new, focused, smart growth strategies in unincorporated communities would largely depend on the communities themselves and the viability of the strategies, programs, and incentives that would be implemented.

5.5.1.1 Summary of Outreach Related to Smart Growth Alternatives

The County conducted outreach on smart growth alternatives beginning in early 2021 following issuance of the Notice of Preparation for this SEIR. The County posted notification of smart growth development on the CAP Update website (https://www.sandiegocounty.gov/content/sdc/sustainability/climateactionplan/). Any individual or organization with interest in providing input on the development of smart growth alternatives was encouraged to reach out via the provided email link to schedule a meeting.

Following release of the NOP, the County's Department of Planning and Development Services (PDS) held five workshops on smart growth alternatives to solicit input and request involvement on development of the smart growth alternatives. After efforts to engage stakeholders, PDS held approximately 65 separate meetings with Community Planning and Sponsor Groups, environmental organizations, industry organizations, and individuals. Meetings were primarily held throughout 2021 and again in Spring of 2023.

In total, the County participated in over 70 meetings with a variety of stakeholders to better understand the community's vision for smart growth and gather suggestions for development of alternatives. In these meetings, the County asked stakeholders to identify the geographies where they thought smart growth development should occur. Based on requests from various stakeholders, the County prepared an interactive land use overlay mapping application and a series of approximately 90 static smart growth maps to

facilitate discussions with stakeholders and development of alternatives. These maps and other materials are available to the public on the CAP Update website.[3]

After identifying where smart growth should occur, PDS asked for input on how to incentivize growth in smart growth locations and disincentivize growth where it was less desirable (i.e., outside of smart growth locations). PDS explained during outreach that development of an overlay zone would be placed over determined smart growth locations where development could be incentivized, and that outside of that overlay zone development could be disincentivized. The results of outreach and overlay zone are discussed below.

Outreach Results

Possible incentives for smart growth development:

- Develop financial incentives, such as waiver of permit application fees, especially to encourage low-and middle-income housing.
- Create opportunities for ministerial (i.e., not requiring CEQA review) applications and processes.
- Develop a priority review process where smart growth projects get expedited "top of the line" review.
- Update zoning and other ordinances to streamline.
- Develop infrastructure studies and parcel analysis to identify service and infrastructure deficiencies.
- Create special improvement districts and programs that can provide focused funding for capital improvement projects.
- Develop economic and market studies to understand the economics of each community and how best to grow.
- Adopt design standards for streets, sidewalks, and public rights-of-way to ensure safety and mobility for all modes of transportation.
- Develop a land banking, density transfer, transfer of development rights, or similar program to assemble parcels for development.

[3] PDS developed the "Land Use Overlays" mapping application to show land use information (e.g., zoning, VMT areas, fire risk areas, General Plan designations and Villages) so that the public could consider where smart growth should occur. Following extensive engagement in 2021, PDS then created Smart Growth Alternative Maps so that stakeholders could review the spatial results of their input on where smart growth should occur.

Both the Land Use Overlays platform and the Smart Growth Alternative Maps are available on the PDS CAP Update website at the following (accessed October 13, 2023): https://www.sandiegocounty.gov/content/sdc/sustainability/climateactionplan.html

- Provide comprehensive mitigation programs, for example, VMT and wildfire so that development can mitigate their impacts.

Possible disincentives for smart growth development:

- Develop restrictions on General Plan amendments.
- Develop fees to make development outside of smart growth areas more difficult.
- Prohibit development in hazard areas.
- Develop a sliding scale for mitigation, where if located outside a smart growth area it becomes more expensive to develop.
- Continue the current process for development, but without any of the incentives identified above or as developed through public review and hearing processes.

PDS considered all input on the smart growth alternatives and developed a reasonable range of smart growth alternatives for evaluation in this SEIR. Incentives, disincentives, and tools to streamline development in and out of smart growth locations will be considered by the public and decision-makers and developed further through the public review and hearing processes. These lists are not exhaustive. As explained further in this chapter, future implementation would be required if the Board selects an alternative(s) and directs County staff to consider a smart growth location to incentivize and prioritize future development.

5.5.2 Implementation of Smart Growth Strategies

Implementation of smart growth alternatives that result in changes to the adopted General Plan land use map would require subsequent planning by County staff to develop tools to modify the application of the adopted General Plan. State laws facilitating housing streamlining and development (including Senate Bill 330, known as the Housing Crisis Act) also prevent the County from reducing residential capacity on a site zoned for housing without identifying replacement capacity. In addition, it is difficult to downzone higher density housing element sites identified and approved by the State as feasible sites for lower-income development. Government Code Section 65863 requires that cities and counties ensure that their general plans provide for regional housing needs. In addition, cities and counties are required to have no “net loss” of lower and moderate-income dwelling units. The County cannot take action that would reduce identified affordable housing sites for these income categories.

Because these alternatives extend beyond the scope of the CAP Update, which is a program of measures and actions to address GHG emissions from development under the adopted General Plan and government operations, implementation of the smart growth alternatives would require subsequent planning and comprehensive stakeholder engagement, as well as subsequent CEQA analysis. If the Board directs staff to prepare a smart growth alternative for adoption, potential strategies that could be employed

include mapping revisions or overlays and tools to facilitate approvals of "smart growth" projects, as described below.

- **Smart Growth Overlay**: A land use overlay is a designation added to the underlying zoning of parcels. Areas subject to the overlay would be subject to a special set of policies and/or rules for development, similar to the County's Forest Conservation Initiative overlay. Parcels within the Smart Growth Overlay would have a designator assigned that would govern the rules, policies, and procedures (e.g., incentives) for development. Parcels outside of the Smart Growth Overlay would have a different set of rules, policies, and procedures (e.g., disincentives) for development. Possible incentives are listed above.

- **Zoning Changes:** The County may also make changes to the underlying zoning of land within the unincorporated county. This may include up-zoning parcels, establishing minimum densities, implementing duplex and lot splits, and identifying mixed use and residential designations in underutilized commercial areas. Zoning changes would require future implementing actions if the Board directs changes.

- **Tools to Make Smart Growth Development Easier:** Dense development in key locations that concentrates growth can support smart growth and implement mapping revisions. The County may develop tools that facilitate the planning application process (e.g., zone box simplification) for certain project types. Streamlining approvals with reduced costs and expedited process may encourage smart growth development patterns.

  The County may also perform infrastructure studies to find deficiencies and develop public/private partnerships to address infrastructure limitations on selected development.

- **Limit General Plan Amendments.** Based on the understanding that the General Plan already embodies "smart growth" principles as adopted, the County could explore feasible limitations on the GPAs that include changes to the General Plan land use map or density that are not aligned with the County's smart growth goals.

- **Transfer of Development Rights Program.** A transfer of development rights program allows a developer to essentially purchase the rights from a property that the community wants to preserve and transfer those rights to another property. However, this is a complex program that is highly dependent on market dynamics and only works if there is a suitable "receiver site" that can receive density for additional housing units and property owners or developers willing to purchase development rights for that increased density. The purchase of property by a land trust allows land to be placed under a conservation easement. Alternatively, a bond measure could allow the community to essentially tax itself to purchase the land for public open space. Each of these options present challenges requiring additional investigation. Such a program could help the County limit development in areas disfavored under a smart growth analysis.

Certification of the SEIR is a necessary step in the adoption of the CAP Update. Adoption of a smart growth alternative is optional, and the Board can both certify this SEIR and adopt the CAP Update while also directing staff to prepare a smart growth alternative for Board consideration at a later date.

If the Board adopts a smart growth alternative, additional actions would be necessary during the CAP Update hearings and beyond. During the CAP Update hearings, the Board would be asked to identify a community, or communities within which to focus smart growth programs and incentives. The selection of smart growth alternatives requires the identification of areas within the unincorporated communities that could be considered "smart" places for new development for reasons including, but not limited to, compact, efficient, and environmentally friendly design that is achievable; proximity to job centers, services, amenities and infrastructure (e.g., roads, water, sewer); and/or presence of existing or plans for future transit infrastructure (e.g., sidewalks, bike lanes, bus service, new transit service). Upon the selection of one or more smart growth communities, the Board would be asked to direct staff to prepare a Smart Growth Zoning Overlay Ordinance, which would place a smart growth zoning designation on properties within the selected smart growth areas. An overlay is a new zone or "layer" that could be added on top of existing zoning. The overlay zone would identify those properties that would be eligible for future programs or process improvements that would incentivize residential, commercial, and mixed-use growth within the smart growth boundary. Depending upon the nature and extent of the regulatory framework within the Smart Growth Overlay Ordinance, additional environmental analysis may be required prior to implementation. After adopting the CAP Update and Smart Growth Zoning Overlay Ordinance, staff would conduct existing conditions analyses within the selected communities to better understand the barriers to smart growth and the opportunities that each community presents. Barriers to smart growth could include lack of critical infrastructure such as fire stations, or schools, or result from land uses or zoning not aligning with the highest-and-best use for individual parcels which may cause extra processing time and costs. The existing conditions analysis would also consider how to incentivize and create opportunities for smart growth, including a focus on identification of opportunity sites for redevelopment, market and economic incentives (e.g., fee waivers, streamlining) to encourage new mixed uses and housing diversity, and a consideration of fee structures (i.e., reduction in development fees) to support new development and supportive capital improvements. The analysis would describe where land use changes should be made, how to support future transportation infrastructure, how to incentivize diverse housing types and redevelopment of underutilized sites that support the development of low-and-middle-income housing, and how to support mixed-uses. Within the communities that were selected for smart growth, staff would align existing programs to streamline new housing at low- to middle-income levels by ensuring that smart growth areas were included in the work program. In future phases of outreach, staff would begin to concurrently advance conversations with community residents, businesses, and other interested stakeholders to better identify how they would like to see smart growth strategies implemented in their community. This would form the foundation of future policies that would guide resulting growth and future outcomes including locations for new housing, transit investments, and expanded accessibility and locations for locally serving amenities or commercial spaces and public spaces. Individual community needs and

development outcomes would vary based on the existing conditions and community identity, and programs could be considered and brought back for the Board's consideration.

In some communities, a smart growth alternative could result in proposed increases in residential density, known as "up-planning" which may require changes to the General Plan land use map, in order to achieve desired development outcomes. Similarly, subsequent changes to the County's Zoning Ordinance may be required to establish a regulatory framework that can achieve alignment across the General Plan land use map and County Zoning Ordinance which regulates development. Any changes to the General Plan land use map or Zoning Ordinance would require additional environmental analysis prior to implementation. Additionally, changes to the land use map of this extent would likely require changes to other aspects of the General Plan, including the Mobility and Conservation and Open Space Elements in order to bring those elements into conformance.

5.5.3 Evaluation of Alternatives Selected for Analysis

5.5.3.1 Fire Safe and VMT Efficient Alternative

The Fire Safe and VMT Efficient Alternative is a smart growth alternative that the County developed through stakeholder outreach. The smart growth geographies were defined as areas that are both outside of areas mapped by the California Department of Forestry as areas with High or Very High fire risk and within areas mapped by the County as at least 15 percent below the regional average for residential VMT (based on the County of San Diego SB 743 Location-Based Screening Maps developed as part of the County's Transportation Study Guidelines adopted in September of 2022).[4]

Under this alternative, future land development that is consistent with the General Plan and an accompanying proposed Smart Growth Overlay would be focused in currently urbanized areas that are identified as VMT efficient outside of High and Very High Fire Hazard Zones. Figure 5-1 indicates where future development would be encouraged. Generally, fire safe and VMT efficient areas were identified in areas of the unincorporated county that immediately border the incorporated cities of Vista, San Marcos, Escondido, El Cajon, and National City, as well as an area in the northwest of the unincorporated county in the community of Fallbrook. Figures 5-1a through 5-1j provide data considered in alternative development, including Fire Hazard Severity Zones, existing services, and employment centers. As shown, this alternative would focus future growth away from rural areas and closer to existing and planned job centers and public facilities. Because of the limited geography within this area and because the County would not prohibit development of properties outside of the fire safe and VMT efficient overlay, it is assumed for the purpose of this analysis that half of the growth that would have occurred outside

[4] This alternative only includes VMT efficient areas that are 15 percent below the regional average. It does not include other areas or opportunities to screen from VMT analysis available in the County's Transportation Study Guide for other project types (e.g., locally serving retail and small projects).

of the overlay would instead be developed in these areas. Further, it is assumed that all measures and actions in the CAP Update would be implemented.

Comparison to the Effects of the CAP Update

The intent of this alternative is to address the effects of development that is anticipated based on the land use plan in the adopted General Plan and promote a pattern of development that further reduces VMT and resultant GHG emissions. Because this alternative would not affect implementation of the CAP Update measures and actions, the effects of implementing the CAP Update relative to the topics addressed in Sections 2.1 through 2.15 of this draft SEIR would not be affected by implementation of this smart growth alternative, and the analysis of this alternative is focused on transportation (VMT), wildfire hazards, and GHG impacts. While the revised geographic distribution of growth under this alternative would result in other types of impacts not originally anticipated in the 2011 GPU PEIR, such as potential effects related to aesthetics, agriculture, and public services and utilities, these effects are specific to locations where development would be shifted and, other than at a large scale, the new locations of development would need to be determined. Further, the differences in land-based impacts are comparative to the 2011 GPU itself, for which the CAP Update is a mitigation. Practically, the CAP Update is not a land use plan—it imposes measures and actions on the adopted General Plan land use plan; and this alternative requires consideration of the General Plan itself. Consequently, it is speculative to consider the relative impacts of land use plans, for which the CAP Update does not control and are not the subject of the CAP Update. These impacts would need to be assessed under subsequent CEQA analysis addressing amendments to the land use plan for the General Plan. Therefore, the potential for environmental effects would be substantially similar to the proposed CAP Update and these resources are not discussed in detail below.

The proposed CAP Update includes strategies to address climate change and reduce VMT that are anticipated to result in co-benefits of reducing effects on transportation and on wildfire hazards. As described in Section 2.13, “Transportation,” and Section 2.15, “Wildfire,” in this SEIR, the CAP Update would not result in new or more severe impacts than implementation of the General Plan alone. This alternative was developed through stakeholder outreach to address effects of growth under the adopted General Plan.

Most of the VMT anticipated through 2050 in the plan area occurs under existing conditions and would be relatively unchanged by the development pattern of future growth. Only minor decreases in VMT associated with the existing population are expected due to the DS 39 modeling assumptions (see CAP Update Appendix 3). If implemented, this alternative is anticipated to reduce VMT for new development by 6.6 percent in 2035 and 3.0 percent in 2050. However, when viewed in conjunction with existing development, the magnitude of overall VMT reduction is relatively small because the vast majority of unincorporated county VMT under future year alternatives can be attributed to existing land uses. Overall, the Fire Safe and VMT Efficient Alternative would result in a 0.53 percent reduction in unincorporated county VMT for 2035 and a 0.41 percent reduction in unincorporated county VMT for 2050 (see Appendix C for detailed

modeling results). Associated minor reductions in air and GHG emissions are also expected to occur under this alternative.

Under this alternative, VMT per employee is anticipated to be the same as forecast for development without the alternative; 23.9 in 2035 and 24.5 in 2050. VMT per resident in the unincorporated county would decrease slightly in the 2035 forecast from 27.4 to 27.2 but would be the same in 2050 (27.7). Overall, this would be a 0.53 percent reduction in VMT compared to the adopted General Plan in 2035 and a 0.41 percent reduction in VMT compared to the adopted General Plan in 2050. Therefore, this alternative is not expected to meaningfully reduce VMT or GHG emissions in the unincorporated county.

5.5.3.2 Village Support Areas Alternative

Smart growth concepts focus growth in compact areas close to jobs, services, and public facilities to maximize the use of existing infrastructure and preserve open space and natural resources. This alternative builds on the Villages established in the adopted General Plan. The Village regional category, which allows the most intensive land uses in the unincorporated county under the adopted General Plan, facilitates the use of compact development patterns. Villages that contain a mix of land uses encourage strong neighborhoods and contribute to meeting a community's daily commercial, civic, and social needs.

Through implementation of the adopted General Plan, the County has identified unforeseen barriers to redevelopment of the Villages. To spur redevelopment in the Villages and create a synergy for smart growth, this alternative would establish 0.5-mile buffers around the established Villages, referred to as Village Support Areas, wherein housing development and services to support development in the Villages would be encouraged (see Figure 5-2). New development can facilitate the achievement of these objectives and enhance the vitality and livability of existing Villages. It is important that new development in Villages be compatible with and connect to the surrounding area. The Village Support Areas Alternative would promote compatible and connected growth in the Village Support Areas to realize the planned densities in the Villages. Figures 5-2a through 5-2j illustrate the relationship between the existing Villages Village Support Areas, existing services, and planned employment centers in the county.

Because Village development will occur as infill or redevelopment, compatibility takes on a greater scope, accounting for the immediately surrounding area as well as the overall character of the Village. Connections are also important to support a Village that has vitality and mobility. Goal LU-9 and the supporting policies in the General Plan were established to realize the smart growth vision of the Village concept, and implementation of these policies was evaluated in the 2011 GPU PEIR. This alternative would also be compatible with General Plan Policy LU-1.4, which establishes that a new Village Regional Category may be developed for land that is contiguous with existing or planned Villages where such land uses are compatible with environmental constraints, accommodated by the General Plan roadway network, supported by public facilities and services, and consistent with orderly growth of the Village.

As with the other smart growth alternatives discussed in this SEIR, this alternative would be implemented through a zoning overlay and development incentives. Supporting efforts are also assumed to include transit and connectivity improvements between the Villages and Village Support Areas. Further, it is assumed that all measures and actions in the CAP Update would be implemented as proposed.

Comparison to the Effects of the CAP Update

The intent of this alternative is to address the effects of development that is anticipated based on the land use plan in the adopted General Plan and promote a pattern of development that reduces VMT and resultant GHG emissions. Because this alternative would not affect implementation of the CAP Update measures and actions, the effects of implementing the CAP Update relative to the topics addressed in Sections 2.1 through 2.15 of this draft SEIR would not be affected by implementation of this smart growth alternative, and the analysis of this alternative is focused on transportation (VMT) and GHG impacts. While the revised geographic distribution of growth under this alternative would result in other types of impacts that differ from those disclosed in the 2011 GPU PEIR, such as potential effects related to aesthetics, agriculture, and public services and utilities, these impacts would need to be assessed under subsequent CEQA analysis for the same reasons explained in Section 5.5.3.1. Therefore, the potential for environmental effects would be substantially similar to the proposed CAP Update and these resources are not discussed in detail below.

Most of the VMT anticipated through 2050 in the plan area occurs under existing conditions and would be relatively unchanged by the development pattern of future growth. Only minor decreases in VMT associated with the existing population are expected due to the DS 39 modeling assumptions. For the purpose of analysis, new households assumed in the CAP Update modeling were adjusted to assume location in Village Support Areas within their original Community Plan Area in randomized process weighted to ensure approximately equal growth in density across a Village Support Area. Densities within the Villages were not changed from the established assumptions for growth under the General Plan. Based on this modeling, the Village Support Areas Alternative is anticipated to reduce VMT for new development by 1.0 percent in 2035 and 0.3 percent in 2050. If the modeling were refined to assign growth into specific Village Support Areas closer to incorporated cities, greater VMT reductions would be anticipated; however, because the location of future growth under the Village Support Areas concept would be within 0.5-mile of any Village, redistribution of growth within Community Plan Areas provides a reasonable assumption to inform analysis. Further, while the change in location reduces trip lengths associated with the relocated households, it may not change the likelihood to use transit, to use alternative modes of transportation, or to commute a long distance to work using a personal vehicle. Note also that no employment changes associated with non-residential development were assumed in the modeling. Therefore, the modeling reflects the highest VMT outcomes since it does not capture the typical benefits associated with mixed-use developments and neighborhood serving retail and focuses only on growth in housing units (Fehr & Peers 2023).

When viewed in conjunction with existing development, the magnitude of overall VMT reduction is relatively small because the vast majority of unincorporated county VMT under future year alternatives can be attributed to existing land uses. Overall, the Village Support Areas Alternative would result in a 0.08 percent reduction in unincorporated county VMT for 2035 and a 0.04 percent reduction in unincorporated county VMT for 2050 (Fehr & Peers 2023).

Under this alternative, VMT per employee is anticipated to be 23.9 in 2035 and 24.5 in 2050, and VMT per resident in the unincorporated county would be 27.4 in 2035 and 27.7 in 2050. This is the same as the forecast VMT under the General Plan without implementation of the Village Support Areas Alternative. Overall, this would be a 0.08 percent reduction in VMT compared to the adopted General Plan in 2035 and a 0.04 percent reduction in VMT compared to the adopted General Plan in 2050. Therefore, this alternative is not expected to meaningfully reduce VMT or associated GHG emissions in the unincorporated county.

5.5.3.3 Sustainable Communities Strategy Alternative

In the Regional Plan, SANDAG has identified strategies that generally align with and encourage smart growth development. The Regional Plan incorporates smart growth planning concepts into a regional growth pattern focused around “Mobility Hubs.” Mobility Hubs are envisioned as places of activity where capital transportation investment will support future housing and jobs, and encompass areas that are both within incorporated city boundaries and within the unincorporated county. Future capital investment in Mobility Hubs, as identified by the Regional Plan, would include: “transit leap” (i.e., improvements on transit accessibility an efficiency); “complete corridors” (i.e., network investments to improve efficiency of all transportation types); investment in alternative transportation options that provide last-mile connections to transit centers; and improvements to technology and communication systems. The Sustainable Communities Strategy Alternative would focus growth in the portions of the Mobily Hubs that are in the unincorporated county (see Figure 5-3). The land use map established in the Regional Plan, which is the basis of the Sustainable Communities Strategy Alternative, and other data related to public services and employment are provided as Figures and 5-3a through 5-3j.

The adopted SANDAG 2021 Regional Plan assumes 9,902 new households in the unincorporated County between the base year (2016) and 2050 (with almost all of the growth occurring between the base year and 2035). Additionally, implementation of the Road User Charge is assumed in the transportation modeling currently available from SANDAG and was captured in this analysis because the 2021 Regional Plan version of the model includes the Road User Charge as a funding source for the Regional Plan. The Road User Charge directly affects auto operating costs; therefore, including the Road User Charge results in lower VMT forecasts in the Regional Plan than scenarios without the Road User Charge.

However, the SANDAG Board voted on September 22, 2023 against including the Road User Charge in the 2025 Regional Plan. On September 23, 2022 the SANDAG Board directed SANDAG staff to prepare an amendment to the 2021 Regional Plan without the

Road User Charge. The SANDAG Board of Directors adopted the proposed amendment on October 13, 2023. The 2021 Regional Plan includes other policy and transportation network assumptions beyond the Road User Charge that further result in lower VMT, and many of these assumptions rely upon public vote, funding, or SANDAG Board actions. Therefore, this scenario does not represent reasonably foreseeable land use, transportation policy/network, and VMT under the County's adopted General Plan.

If the Board were to adopt a smart growth alternative that would aspire to achieve development outcomes in alignment with the SANDAG Regional Plan Mobility Hub framework, a broader and more comprehensive set of General Plan land use map and Zoning Ordinance changes would be required that mirrors the program described in the Regional Plan because the incentives described above may not be sufficient to result in conformity. In this case, the Board would likely be considering both up-planning in areas around the SANDAG Mobility Hubs and down-planning in areas outside of those locations. This would require a more comprehensive update to the General Plan due to the large geographic scope of land use map changes and scale of community engagement required. It is assumed that all measures and actions in the CAP Update would be implemented as proposed.

Comparison to the Effects of the CAP Update

The intent of this alternative is to address the effects of development that is anticipated based on the land use plan in the adopted General Plan and promote a pattern of development that reduces VMT and resultant GHG emissions. Because this alternative would not affect implementation of the CAP Update measures and actions, the effects of implementing the CAP Update relative to the topics addressed in Sections 2.1 through 2.15 of this draft SEIR would not be affected by implementation of this smart growth alternative, and the analysis of this alternative is focused on transportation (VMT) and GHG impacts. While the revised geographic distribution of growth under this alternative would result in changes to other types of impacts that differ from those disclosed in the 2011 GPU PEIR, such as potential effects related to aesthetics, agriculture, and public services and utilities, these impacts would need to be assessed under subsequent CEQA analysis for the same reasons explained in Section 5.5.3.1. Therefore, the potential for environmental effects would be substantially similar to the proposed CAP Update and these resources are not discussed in detail below.

The Sustainable Community Strategy Alternative results in a reduction in VMT compared to the proposed CAP Update as a result of a much smaller growth in households in the unincorporated county, inclusion of the Road User Charge, and significant investments and policy changes related to the transportation network (such as SANDAG's 5-Big Moves which are part of the 2021 Regional Plan). The transportation network policies and network changes included in the Sustainable Community Strategy Alternative result in substantial transportation mode shifts to transit, active transportation, and reduced driving in general. Unlike the Fire Safe and VMT Efficient Alternative and the Village Support Areas Alternative, which were modeled using the same DS 39 SANDAG model as the CAP Update, the modeling for the Sustainable Communities Strategy Alternative reflects

policy assumptions that result in large shifts in the existing population's travel choices (Fehr & Peers 2023).

Under this alternative, VMT per employee is anticipated to be 20.8 in 2035 (compared to 23.9 under the General Plan without this alternative) and 20.2 in 2050 (compared to 24.5 under the General Plan without this alternative). VMT per resident in the unincorporated county would decrease from 27.4 under the General Plan without this alternative to 25.7 in 2035 and from 27.7 under the General Plan without this alternative to 25.5 in 2050. Overall, this would be a 7.71 percent reduction in VMT compared to the adopted General Plan in 2035 and a 9.48 percent reduction in VMT compared to the adopted General Plan in 2050.

As noted above, this alternative is assumed to substantially reduce GHG emissions associated with VMT in the unincorporated county compared to the General Plan. However, as discussed above, the total VMT reductions are based on the Regional Plan's premise of a distribution of growth within Mobility Hubs that encompass areas outside of the unincorporated county, which are outside the County's control. Further, the Road User Charge, which results in lower VMT forecasts in the Regional Plan than scenarios without the Road User Charge, has been removed from the Regional Plan. Therefore, the actual VMT reductions achieved under this alternative may be less than modeled for the purposes of this analysis.

5.5.3.4 General Plan Goal and Policy Edits

In addition to, or in lieu of, any of the alternatives described above, County staff have identified potential amendments to General Plan goals and policies from the Land Use, Conservation and Open Space, Mobility, and Safety Elements of the adopted General Plan that would further enhance the smart growth principles described above and embodied in the General Plan. The Board may choose some or all of these additional policy amendments and pair them with the proposed CAP Update or an alternative. These amendments would be in addition to project amendments to Goal COS-20, Policy COS-20.1, and GPU PEIR Mitigation Measures CC-1.2, CC-1.7, and CC-1.8.). See Table 5-1 below for edits to General Plan goals and policies.

Comparison to the Effects of the CAP Update

The intent of this alternative is to address the effects of development that is anticipated based on the land use plan in the adopted General Plan and promote a pattern of development that reduces VMT and resultant GHG emissions. Because this alternative would not affect implementation of the CAP Update measures and actions, the effects of implementing the CAP Update relative to the topics addressed in Sections 2.1 through 2.15 of this draft SEIR would not be affected by the proposed General Plan goal and policy edits, and the analysis of this alternative is focused on transportation (VMT) and GHG impacts, as well as other impacts such as groundwater, biological resources, and wildfire. While the revised goals and policies under this alternative would result in some impacts that differ from those disclosed the 2011 GPU PEIR because goals and policies therein would be amended, the majority of these potential amendments would result in

beneficial outcomes throughout the unincorporated county. However, these impacts would need to be assessed under subsequent CEQA analysis if the Board directs staff to return at a future date with amendments to goals and policies. The potential for environmental effects would be substantially similar to the proposed CAP Update and resources are not discussed in detail below.

In addition, this alternative includes amendments to goals and policies and addition of new goal and policies that would require certain processes and findings in order to limit impacts of General Plan amendments (e.g., Goal LU-19 and Policy LU-19.1 and LU-19.2). These amendments would reduce the potential impacts of General Plan amendments in the future if adopted.

5.6 Alternatives Evaluated in the 2011 GPU PEIR

This SEIR incorporates by reference the prior alternatives analysis in the 2011 GPU PEIR, which are additional land use alternatives aimed at achieving smart growth. Like the other smart growth alternatives evaluated in this SEIR, these alternatives would require subsequent planning efforts to implement because they would substantially change implementation of the adopted General Plan land use map. The 2011 GPU PEIR provides a detailed evaluation of alternative land use maps identified by County staff to further the discussion of smart growth principles and reduce the environmental effects of the General Plan. The Hybrid Map, Draft Land Use Map, and Environmentally Superior Map alternatives were all found to potentially reduce the global climate change-related impacts of the General Plan, although impacts are assumed to remain significant prior to mitigation. These alternatives are summarized below.

Hybrid Map Alternative. The Hybrid Map Alternative, shown in Figure 4-1 of the 2011 GPU PEIR, strikes a balance between the proposed project and the Draft Land Use Map Alternative. It includes RHNA refinements, road network land use changes, and other refinements to the proposed project. It also incorporates the proposed project changes that meet the project objectives and reflects the policy direction of the General Plan Update Elements. The Hybrid Map Alternative would decrease the countywide acreage of the following land uses, as compared to the proposed project: village residential (-487 acres); semi-rural residential (-11,717 acres); specific plan area (-683 acres); commercial (-325 acres); and industrial (-189 acres). When compared to the adopted General Plan, the Hybrid Map Alternative would increase the acreage of the rural land use designations (+13,672). The Hybrid Map Alternative would result in significantly less acres of semi-rural residential land uses and significantly more acres designated for rural lands than the adopted General Plan.

When compared to the adopted General Plan, the Hybrid Map Alternative would accommodate less growth and development in the unincorporated county, which would translate to less GHG emissions from community and government operations. Additionally, the Hybrid Map Alternative would result in less VMT than the adopted General Plan, which would translate into less GHG emissions from transportation.

Draft Land Use Map Alternative. The Draft Land Use Map Alternative, shown in Figure 4-2 of the 2011 GPU PEIR, was initially endorsed by the Board during the residential land use mapping phase in October 2003, and was subsequently endorsed after refinements were made in June 2004, May 2005, and August 2006. County staff included additional land use modifications in this alternative to achieve a road network that would better accommodate the land use map. The Draft Land Use Map Alternative transitions from the Hybrid Map Alternative with further reductions in densities and intensities for certain properties.

This alternative would decrease the acreage of the following land uses, as compared to the adopted General Plan: village residential (-514 acres); semi-rural residential (-15,313 acres); specific plan area (-683 acres); commercial (-344 acres); industrial (-266 acres); and village core mixed use (-12 acres). When compared to the proposed project, the Draft Land Use Map Alternative would increase the acreage of the following land use designations: rural lands (+17,198) and office professional (+18 acres). The Draft Land Use Map Alternative would result in significantly less acres of semi-rural residential and significantly more acres of rural lands designations, than the adopted General Plan.

The Draft Land Use Map Alternative would accommodate less growth and development in the unincorporated county, which would translate to less GHG emissions from community and government operations. Additionally, the Draft Land Use Map Alternative would result in less VMT than the adopted General Plan, which would translate to less GHG emissions from transportation.

Environmentally Superior Map Alternative. The Environmentally Superior Map Alternative, shown in Figure 4-3 of the 2011 GPU PEIR, reflects a more stringent application of the planning concepts that take into account environmental considerations and constraints, and is more aggressive in restricting growth in portions of the semi-rural residential and the rural lands designations. The Environmentally Superior Map Alternative was developed in response to the areas of significant impacts that were identified for the adopted General Plan, where changes in land use designations would have the potential to reduce or alleviate the impact. The Environmentally Superior Map Alternative would result in significantly less acres of semirural residential land uses and significantly more acres of rural lands than the proposed project. the environmental impacts under the Environmentally Superior Map Alternative would be less than Hybrid Map Alternative.

The Environmentally Superior Map Alternative would accommodate less growth and development in the unincorporated County, which would translate to less GHG emissions from community and government operations. Additionally, the Environmentally Superior Map Alternative would result in less VMT than the adopted General Plan, which would translate to less GHG emissions from transportation.

5.7 Environmentally Superior Alternative

Table 5-2 provides a qualitative summary of the environmental effects of the alternatives evaluated above in comparison to the effects of the CAP Update to identify the environmentally superior alternative. As described above, the No Project Alternative would not meet any of the project objectives of the CAP Update and would result in greater GHG emissions. Impacts to other resources are assumed to be similar or reduced for the purpose of this evaluation, but actual impacts of project-specific mitigation, which would continue to be imposed on a project-by-project basis for development consistent with the adopted General Plan to address GHG emissions, may result in impacts beyond the scope of this analysis. Therefore, the reduction in impacts under the No Project Alternative identified in Table 5-2 may not fully reflect the magnitude of cumulative impacts because future development would not be able to rely on the CAP and the County would not have a plan for reduction of GHGs to meet the state targets for 2030 and 2045. Due to this uncertainty, the No Project Alternative may not be environmentally superior to the CAP Update. CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify an environmentally superior alternative other than the No Project Alternative.

Of the smart growth alternatives, the Fire Safe and VMT Efficient Alternative, Village Support Areas Alternative, and General Plan Policy Edits Alternative would not reduce the impacts of CAP Update implementation; as such they are not considered environmentally superior to the CAP Update.

Based on available modeling, the Sustainable Communities Strategy Alternative would result in greater GHG emission reductions and less VMT than the CAP Update alone. However, as described above, this modeling assumes a shift in existing travel behavior based on a Road User Charge. SANDAG is reconsidering the feasibility of such a charge and the benefits of the Sustainable Communities Strategy Alternative may be reduced without this assumption.

Based on review of the other alternatives considered, the County has determined that the Distributed Energy Only Alternative would be environmentally superior to the project because it would reduce significant and unavoidable impacts related to the induced demand for large-scale renewable energy systems while potentially achieving both the primary objective of GHG emissions reductions consistent with SB 32, AB 1279, and all other supporting project objectives.

Table 5-1 Potential Amendments to General Plan Policies

LAND USE ELEMENT GOALS AND POLICIES
Policy LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, ~~and~~ that are designed to meet the LEED-Neighborhood Development Certification or an equivalent~~.~~, and that do not frustrate the County's climate policies implementing General Plan Goals LU-5 (Climate Change and Land Use) and LU-6 (Sustainable Development-Environmental Balance). For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. *[See applicable community plan for possible relevant policies.]*
Policy LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met: • Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding • Potential Village development would be accommodated by the General Plan road network • Public facilities and services can support the expansion without a reduction of services to other County residents • The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area • The expansion would not frustrate the County's climate policies implementing General Plan Goals LU-5 (Climate Change and Land Use) and LU-6 (Sustainable Development-Environmental Balance) • Any expansion within a Very High Fire Hazard Severity Zone would not subject future residents, occupants, and structures to high levels of risk of loss of life or loss of structures
Policy LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands~~.~~, except where such adjustments would result in land use patterns consistent with the County's climate policies implementing General Plan Goals LU-5 (Climate Change and Land Use) and LU-6 (Sustainable Development-Environmental Balance). Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

LAND USE ELEMENT GOALS AND POLICIES
GOAL LU-4. Inter-jurisdictional Coordination. Coordination with the plans and activities of other agencies and tribal governments that relate to issues such as land use, community character, transportation, energy, other infrastructure, public safety, climate policy, and resource conservation and management in the unincorporated County and the region.
Policy LU-4.1 Regional Planning. Participate in regional planning to ensure that the unique communities, assets, and challenges of the unincorporated lands are appropriately addressed with the implementation of the planning principles and land use requirements, including the provisions of SB375~~.~~, (Stats. 2008, ch. 728), SB 743 (Stats. 2013, ch.386, § 5), and SB32 (Stats. 2016, ch. 249).
Policy LU-4.6 Planning for Adequate Energy Facilities. Participate in the planning of regional renewable energy infrastructure with applicable utility providers to ensure plans are consistent with the County's General Plan and Community Plans and minimize adverse impacts to the unincorporated County.
Policy LU-5.1 Reduction of Greenhouse Gas Emissions from Vehicle Trips within Communities~~.~~ and Vehicle Miles Traveled from New and Existing Development. Incorporate a mixture of uses within Villages and Rural Villages and plan residential densities at a level that supports multi-modal transportation, including walking, bicycling, ~~and~~ the use of public transit, when appropriate, and the use of electric vehicles. Develop and implement strategies to avoid, minimize, reduce, and/or compensate for the greenhouse gas emissions associated with vehicle miles traveled from new development, including compensatory strategies that would fund reductions in greenhouse gas emissions from existing development and existing economic activities. Include *in-County* compensatory strategies such as improved energy and water conservation, increased reliance on large- and small-scale renewable energy, enhanced electric vehicle recharging infrastructure, reductions in propane usage in rural areas, replacement of diesel- and gasoline-powered equipment and vehicles, landscape restoration and enhancement (e.g., tree-planting), preservation and enhancement of open space and rural lands to maintain or increase carbon sequestration, and other outcomes that reduce fossil fuel usage, reduce biomass combustion, and/or sequester carbon. In unincorporated areas where new development would lead to comparatively high per capita vehicle miles traveled, maximize to the extent feasible the use of electric vehicles and require construction of electric vehicle recharging infrastructure.
Policy LU-5.2 Sustainable Planning and Design. Incorporate into new development sustainable planning and design~~.~~, including measures that reduce the carbon footprint of new development to the maximum extent feasible on-site and facilitate the use of public transit and/or electric vehicles.
Policy LU-5.3 Rural Land Preservation. Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi Rural Land Use Designations. Consider

LAND USE ELEMENT GOALS AND POLICIES
strategies to use the preservation, restoration, and/or enhancement of open space and rural lands for carbon sequestration purposes. Encourage and support the management of public and private open space and rural lands so as to reduce the risk of uncontrolled wildfires with the potential to release large amounts of greenhouse gases.
Policy LU-5.4 Planning Support. Undertake planning efforts that promote infill and redevelopment of uses that accommodate walking ~~and biking~~, biking, transit usage, and electrical vehicle usage within communities.
Policy LU-5.6 Develop Mechanisms for Avoiding Potential Regulatory Takings Where Development is Restricted to Achieve Greenhouse Gas Emissions Targets. In consultation with SANDAG, cities within the County, the public at large, and key stakeholders such as business leaders, land developers, rural property owners, environmental organizations, and environmental justice advocates, develop and implement strategies for providing economic compensation to private landowners where the County restricts or limits the amount of development pursuant to their existing General Plan and zoning designation in order toto achieve greenhouse gas emissions reductions consistent with State law and County General Plan policy. Explore the use of compensation mechanisms such as transferrable development rights, density transfers, density bonuses beyond those already permitted under State law, property tax reductions, compensated down-zonings, and subsidized permanent land conservation for carbon sequestration purposes.
GOAL LU-6. Sustainable Development-Environmental Balance. A carbon neutral built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities.
Policy LU-6.1 Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment~~.~~, including achieving greenhouse gas emissions reductions consistent with State law and County General Plan policy.
Policy LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources~~.~~; consider strategies to reduce planned density in areas in which new development would lead to comparatively high per capita vehicle miles traveled, and Very High Fire Hazard Severity Zones.
Policy LU-6.3 Conservation-Oriented Project Design. Support conservation-oriented project design~~. This~~that, to the maximum extent feasible, protects sensitive biological resources, reduces on-site greenhouse gas emissions, minimizes water usage, and reduces potential losses of life and property associated with wildfires. These outcomes can be achieved with mechanisms such as, but not limited to, Specific Plans, lot area averaging, and reductions in lot size with corresponding requirements for preserved open space (Planned Residential Developments)~~.~~ and design strategies such as resource buffers, renewable energy, energy efficiency and/or electrification, water conservation, collection and reuse features and fire hardening.

LAND USE ELEMENT GOALS AND POLICIES
Projects that rely on lot size reductions should incorporate specific design techniques, perimeter lot sizes, or buffers, to achieve compatibility with community character. *[See applicable community plan for possible relevant policies.]*
Policy LU-6.4 Sustainable Subdivision Design. Require that residential subdivisions be planned to reduce on-site greenhouse gas emissions to the maximum extent feasible, conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities. *[See applicable community plan for possible relevant policies.]*
Policy LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas. Require construction practices (e.g., "hardened homes") and landscaping strategies in Very High Fire Hazard Severity Zones that minimize the possibility of loss of life and structures from wildfires consistent with the Safety Element.
Policy LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities resulting from new development in groundwater dependent areas ~~to~~ be consistent with the long-term sustainability of groundwater supplies~~, except~~. Prohibit new subdivisions and other new discretionary development approvals in groundwater dependent areas when determined that long-term sustainability of groundwater supplies to the ~~Borrego Valley~~ development is not feasible.
Policy LU-8.2 Groundwater Resources. Require development to identify adequate groundwater resources in groundwater dependent areas, as follows: • In areas dependent on currently identified groundwater overdrafted basins, prohibit new development from exacerbating overdraft conditions. Encourage programs to alleviate overdraft conditions in Borrego Valley. • In areas without current overdraft groundwater conditions, evaluate new groundwater-dependent development to assure a sustainable long-term supply of groundwater is available that will not adversely impact existing groundwater users. • Prior to approving any tentative subdivision map for a residential project or any discretionary regulatory approval such as a use permit for a nonresidential project, require a finding that the resulting development or use will not cause any of the following "undesirable results" as defined in the Sustainable Groundwater Management Act: ◦ Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply if continued over the General Plan planning horizon; ◦ Significant and unreasonable reduction of groundwater storage; ◦ Significant and unreasonable seawater intrusion;

LAND USE ELEMENT GOALS AND POLICIES
○ Significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies; ○ Significant and unreasonable land subsidence that substantially interferes with surface land uses; ○ Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water.
Policy LU-11.6 Office Development. Locate new office development complexes within Village areas where services are available, in proximity to housing, and along primary vehicular arterials (ideally with transit access) with internal vehicular and pedestrian linkages that integrate the new development into the multi-modal transportation network where feasible. Require parking facilities to include electrical vehicle recharging stations commensurate with current and reasonably foreseeable increasing demands over time.
Policy LU-11.8 Permitted Secondary Uses. Provide a process where secondary land uses, including residential uses, may be permitted when appropriate and compatible with the primary commercial, office, and light industrial uses, in order to better serve the daily needs of employees and to reduce the frequency of related automobile trips. This policy is not intended for high impact industrial uses.
Policy LU-11.12 Plan for Mixed Uses. Consider land use designations and zoning standards that allow for the conversion from office and commercial uses to residential uses where office or commercial space has become uncompetitive due to market conditions or other factors and where residential uses would be both compatible with surrounding land uses and consistent with the County's climate policies implementing General Plan Goals LU-5 (Climate Change and Land Use) and LU-6 (Sustainable Development-Environmental Balance).
GOAL LU-12. Infrastructure and Services Supporting Development. Adequate and sustainable infrastructure, public facilities, and essential services that meet community needs and are provided concurrent with growth and development. Facilitate the creation and expansion of electric vehicle recharging infrastructure in response to, and anticipation of, increases in the numbers of electric vehicles being used in the County, consistent with State transportation and climate policies.
Policy LU-12.1 Concurrency of Infrastructure and Services with Development. Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing. Require electric vehicle recharging facilities that meet current and reasonably foreseeable demand over time as the County's vehicle fleet includes greater numbers of electric vehicles, consistent with State transportation and climate policies.
GOAL LU-~~14~~19. Limit the environmental impacts, including greenhouse gas emissions, resulting from General Plan Amendments that would either allow development where it is currently disallowed or increase the density or intensity of use beyond currently

LAND USE ELEMENT GOALS AND POLICIES
planned levels, while ensuring that the County can meet its share of the housing needed on a regional basis, as determined through the Regional Housing Needs Assessment process overseen by the San Diego Association of Governments (SANDAG).
Policy LU-19.1 Environmental Review. The environmental review for any privately-initiated development plan or project proposing a general plan amendment (GPA) that would either allow development where it is currently disallowed or increase the density or intensity of use beyond currently planned levels outside "smart growth" areas designated by the Board shall consist of an Environmental Impact Report (EIR) and shall address the following subjects, in addition to those required by the California Environmental Quality Act (CEQA): (i) How the project would achieve net carbon neutrality compared with a scenario in which the proposed project would be disapproved (i.e., under the CEQA No Project Alternative), including the extent to which the project would: • Minimize energy and water consumption; • Rely on strategies such as enhancing electric vehicle recharging infrastructure, reducing propane usage in rural areas, replacing diesel- and gasoline-powered equipment and vehicles, restoring or enhancing open space or rural lands (e.g., tree-planting), preserving or enhancing open space and rural lands to maintain or increase carbon sequestration, or achieving other outcomes that reduce fossil fuel usage, reduce biomass combustion, and/or sequester carbon; and/or • Eliminate or reduce the development potential of other lands planned for development under the General Plan through the use of conservation easements, similar measures resulting in the permanent preservation, management and enhancement of such lands, and/or compensation mechanisms such as transferrable development rights, density transfers, density bonuses beyond those already permitted under State law, property tax reductions, compensated down-zonings, and/or subsidized permanent land conservation for carbon sequestration purposes; (iv) Whether the affected public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing uses; (vi) Whether the project could cause any of the following "undesirable results" within the meaning of the Sustainable Groundwater Management Act: • Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply if continued over the General Plan planning horizon; • Significant and unreasonable reduction of groundwater storage; • Significant and unreasonable seawater intrusion;

LAND USE ELEMENT GOALS AND POLICIES
• Significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies; • Significant and unreasonable land subsidence that substantially interferes with surface land uses; or • Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water (vii) Whether the project would expose its residents, occupants, or other users or visitors to a risk of potentially life-threatening wildfires; (viii) How the project addresses, either positively or negatively, the County's need for new housing, and particularly affordable housing, consistent with the County's fair share of the housing needed on a regional basis, as determined through the Regional Housing Needs Assessment process overseen by SANDAG; or, for projects that do not produce housing, how the project would create jobs opportunities near existing housing and/ or transit.
Policy LU-19.2 Criteria for Approval. A privately-initiated development project proposing a general plan amendment (GPA) that would either allow development where it is currently disallowed or increase the density or intensity of use beyond currently allowed levels outside of "smart growth" areas designated by the Board requires the Board to make the following findings, which must each be supported by substantial evidence before the Board: (i) Compared with a scenario in which the proposed project would be disapproved (i.e., the CEQA No Project Alternative), the proposed project will achieve net carbon neutrality through mechanisms of the kind set forth in Policy 19.1(i); (ii) Compared with a scenario in which the proposed project would be disapproved (i.e., the CEQA No Project Alternative), the proposed project will contribute positively to meeting the County's housing needs by: (A) Appreciably increasing the overall housing stock in the unincorporated County, consistent with the County's fair share of the housing needed on a regional basis, as determined through the Regional Housing Needs Assessment process overseen by SANDAG; and (B) Providing a component of deed-restricted housing affordable to very low-income, low-income, or moderate-income households for 30 years; or (C) For projects that do not include housing, creating job opportunities near existing residential areas and/ or transit. (iii) Compared with the existing conditions baseline in the EIR for the proposed project, the proposed project will not result in significant, unavoidable effects on endangered or threatened species or on any sensitive natural community identified in a local or regional plan, policy, or regulation or by the California Department of Fish and Wildlife or US Fish and Wildlife Service;

LAND USE ELEMENT GOALS AND POLICIES
(iv) Compared with the existing conditions baseline in the EIR for the proposed project, the proposed project will not result in significant, unavoidable effects on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; (v) Compared with the existing conditions baseline in the EIR for the proposed project, the proposed project will not result in significant, unavoidable effects due to the exposure of people or structures (including project occupants or users), either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires; (vi) If located in or near a state responsibility area or lands classified as very high fire hazard severity zones, the proposed project has been designed to reduce and manage fire risk to the greatest degree feasible; (vii) The project can foreseeably be adequately supplied with water for the foreseeable future from a recognized water agency during normal, single dry, and multiple dry water years without compromising the County's ability to serve other existing and planned future land uses, including agricultural and manufacturing uses; and (viii) To the extent the project would rely in whole or in part on groundwater, the project will not cause an "undesirable result" as defined in the Sustainable Groundwater Management Act.
Policy COS-15.7 Develop Program to Retrofit Existing Buildings. Consistent with General Plan policies LU 5.1 and LU 19.1(i), develop greenhouse gas and vehicle miles traveled mitigation strategies for new development, in cooperation with other local jurisdictions as appropriate, such as programs that create funding for retrofitting existing buildings in order to reduce greenhouse gas emissions by improving their energy efficiency and reducing their water usage.
Policy COS-16.1 Alternative Transportation Modes. Work with SANDAG and local transportation agencies to expand opportunities for transit use~~.~~ and electric vehicle use. Support the development of alternative transportation modes and the creation of new and expanded electric vehicle recharging infrastructure, as provided by Mobility Element policies.
Policy COS-16.2 Single-Occupancy Vehicles. Support transportation management programs that reduce the use of single-occupancy vehicles, especially vehicles powered by fossil fuels.
Policy COS-16.3 Low-Emissions Vehicles and Equipment. Require County operations and encourage private development to provide incentives (such as priority parking) for the use of low- and zero-emission vehicles and equipment, including electric vehicle recharging infrastructure, to improve air quality and reduce GHG emissions. [Refer also to Policy M-9.3 (Preferred Parking) in the Mobility Element.]
Policy COS-16.4 Alternative Fuel Sources. Explore the potential of developing alternative fuel stations and electric vehicle recharging infrastructure at maintenance yards and other County facilities for the municipal fleet and general public.

LAND USE ELEMENT GOALS AND POLICIES
Policy COS-18.4 Implement Community Choice Aggregation. Work with regional partners to implement a Community Choice Aggregation program by which the developed portions of the unincorporated area could be served with electricity made up entirely of carbon free energy resources.
Policy COS-19.3 Rainwater Capture and Reuse. Require rainwater capture and reuse in new development where feasible and consistent with the protection of downstream biological resources pursuant to Policy COS-5.3.
Policy COS-20.3 Regional Collaboration. Coordinate air quality and climate planning efforts with federal and State agencies, SANDAG, and other jurisdictions.
~~**GOAL**~~ **Policy COS-20.5 Carbon Neutrality.** Pursue carbon neutrality from community-wide (i.e., unincorporated County) and County Operations greenhouse gas emissions by 2045, consistent with local, state, and federal law (e.g., Assembly Bill 1279).
COS-20.6 Carbon Neutrality Collaboration. Coordinate efforts to achieve carbon neutrality with regional sustainability planning, universities, federal and State agencies, SANDAG, and other jurisdictions and organizations.
GOAL M-5. Safe and Efficient Multi-Modal Transportation System. A multi-modal transportation system that provides for the safe, accessible, convenient, ~~and~~ efficient, and sustainable movement of people and goods within the unincorporated County.
Policy M-5.1 Regional Coordination. Coordinate with regional planning agencies, transit agencies, and adjacent jurisdictions to provide a transportation system with the following: • Sufficient capacity consistent with the County General Plan Land Use Map • Travel choices, including multiple routes and modes of travel to provide the opportunity for reducing vehicle miles traveled and the use of electric vehicles • Facilities sited and designed to be compatible with the differing scales, intensities, and characteristics of the unincorporated communities while still accommodating regional, community, and neighborhood travel demands • Maximized efficiency to enhance connectivity between different modes of travel
Policy M-9.2 Transportation Demand Management. Require large commercial and office development to use TDM programs to reduce single-occupant vehicle traffic generation~~,~~ (especially vehicles powered by fossil fuels), particularly during peak periods to maximize the capacity of existing or improved road facilities.
Policy M-9.5 Electric Vehicle Recharging Infrastructure. Require new development to include electric vehicle recharging facilities to meet current and reasonably foreseeable increasing demand over time as the County's private vehicle fleet includes greater numbers of electric vehicles, consistent with State transportation and climate policies.

LAND USE ELEMENT GOALS AND POLICIES
GOAL S-3. Minimized Fire Hazards. Minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards, particularly in Very High Fire Hazard Severity Zones, consistent with the Safety Element.
Policy S-3.1 Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires. Require new development in Very High Fire Hazard Severity Zones to employ construction practices (e.g., "hardened homes") and landscaping strategies that minimize the possibility of loss of life and structures from wildfires.
Policy S-3.8 Discourage New Subdivisions in Very High Fire Hazard Severity Zones. Discourage new residential subdivisions in Very High Fire Hazard Severity Zones, except as necessary to avoid regulatory takings and/or to maintain sufficient land to meet the County's fair share of the housing needed on a regional basis, as determined through the Regional Housing Needs Assessment process overseen by SANDAG.
Policy S-4.3 Forest Health. Encourage and support the protection and management of woodlands, forests, and tree resources on public and private lands and limit fire threat through appropriate fuel management such as prescribed burns, herbivory, and the removal of dead, dying, and diseased trees and excessive flammable underbrush.

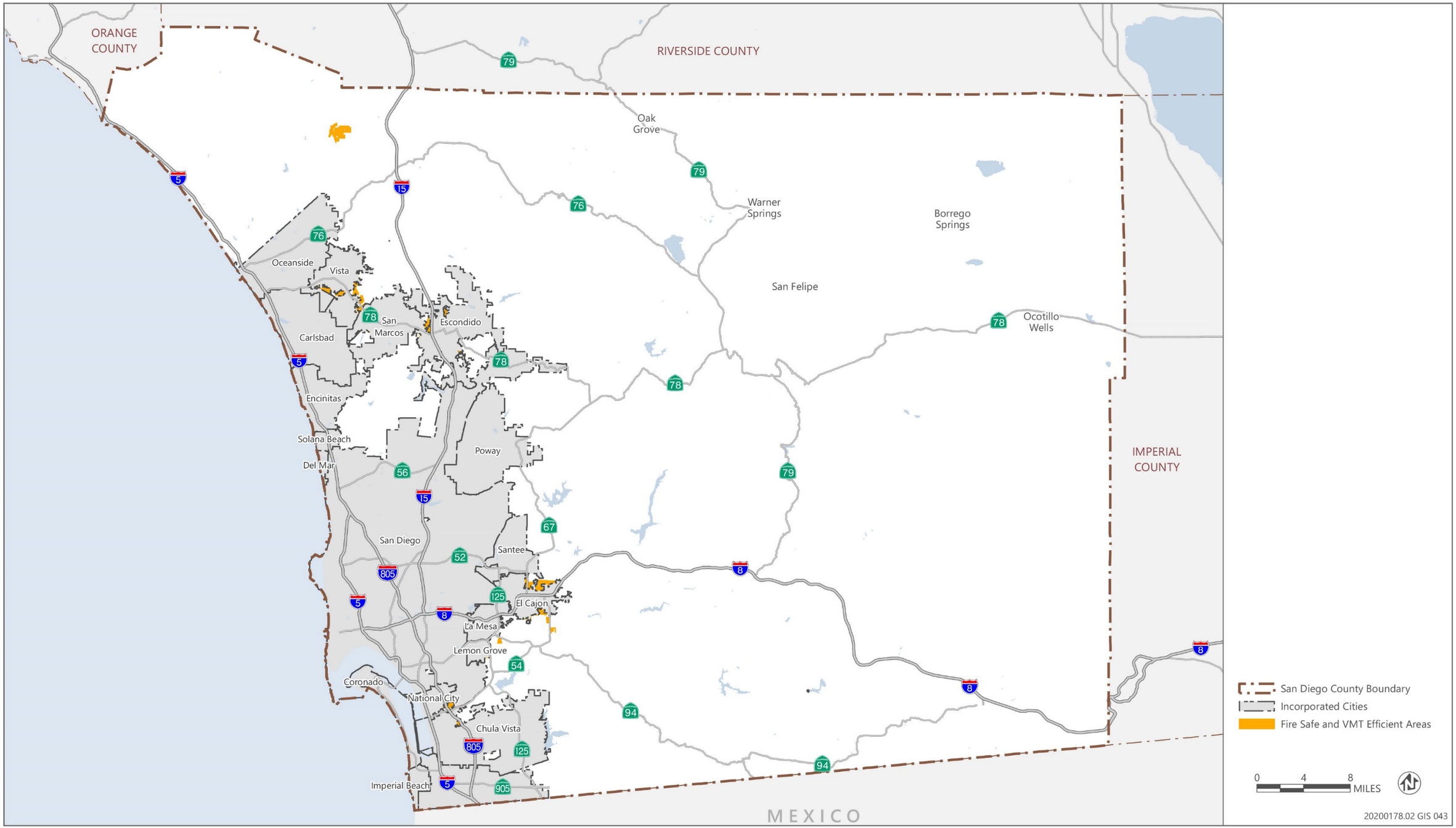
Table 5-2 CAP Alternatives Comparison of Impacts

Issue Areas	CAP Significance Determination	*Alternatives to the Proposed Project*		*Smart Growth Alternatives*			
		No Project	Distributed Energy Only	Fire Safe and VMT Efficient	Village Support Areas	Sustainable Communities Strategy	General Plan Policy Edits
Aesthetics	SU	▼	▼	—	—	—	—
Agriculture and Forestry	SU	▼	▼	—	—	—	—
Air Quality	SU	▼	—	—	—	—	—
Biological Resources	SU	▼	▼	—	—	—	—
Cultural and Paleontological Resources	SU	▼	▼	—	—	—	—
Energy	LTS	▲	—	—	—	—	—
Environmental Justice	SU	▼	▼	—	—	—	—
Greenhouse Gas Emissions	LTS	▲	▲	—	—	▼	—
Hazards and Hazardous Materials	SU	—	—	—	—	—	—
Hydrology and Water Quality	SU	—	—	—	—	—	—
Land Use and Planning	SU	▼	▼	—	—	—	—
Noise	SU	▼	—	—	—	—	—
Transportation	SU	▲	—	—	—	▼	—
Tribal Cultural Resources	SU	▼	—	—	—	—	—
Wildfire	LTS	▼	▼	▼	—	—	—

▲ Alternative is likely to result in greater impacts to issue when compared to proposed project.
— Alternative is likely to result in similar impacts to issue when compared to proposed project.
▼ Alternative is likely to result in reduced impacts to issue when compared to proposed project.

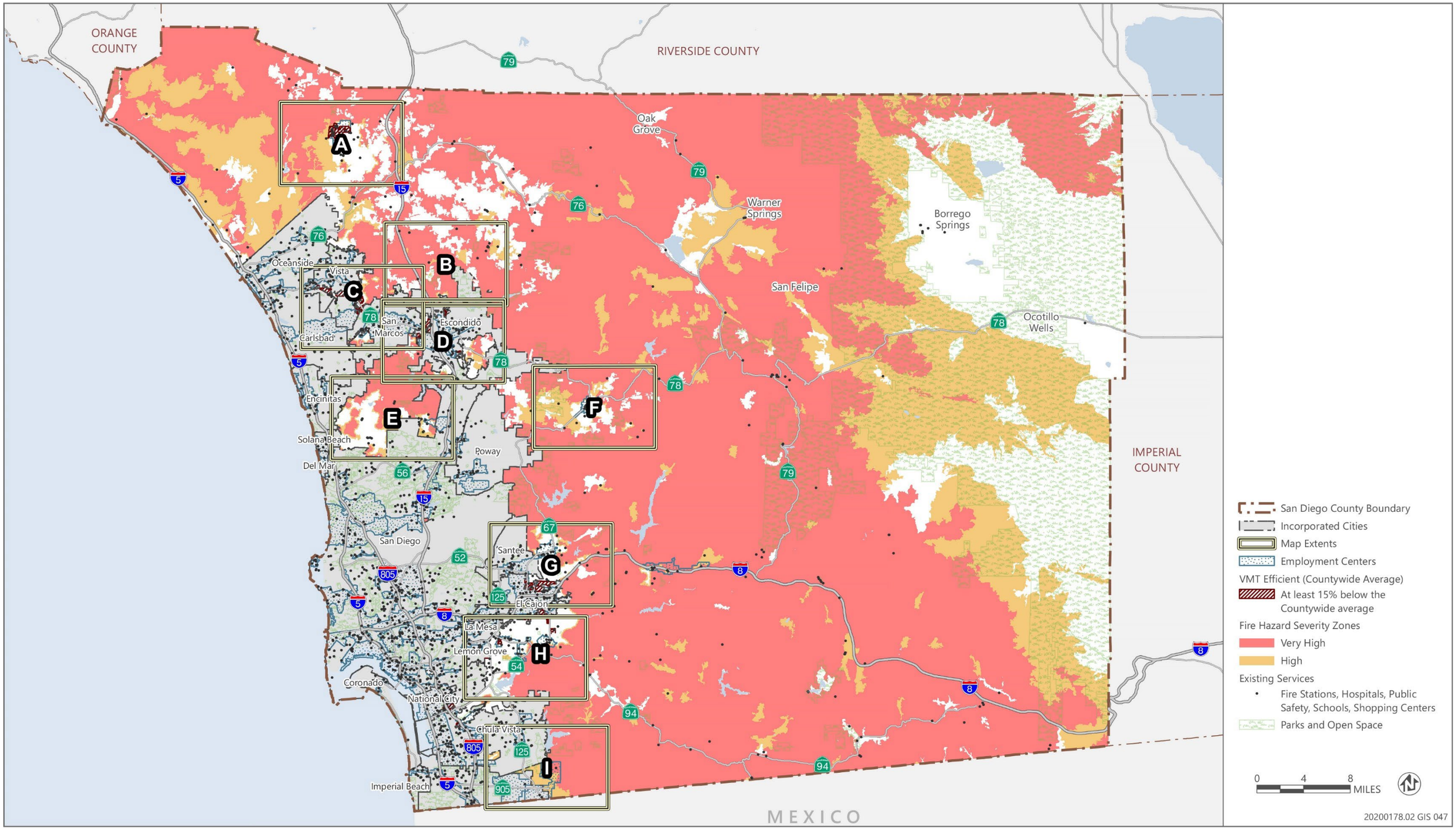
LTS Less than Significant with mitigation measures
SU Potentially significant and unavoidable impact

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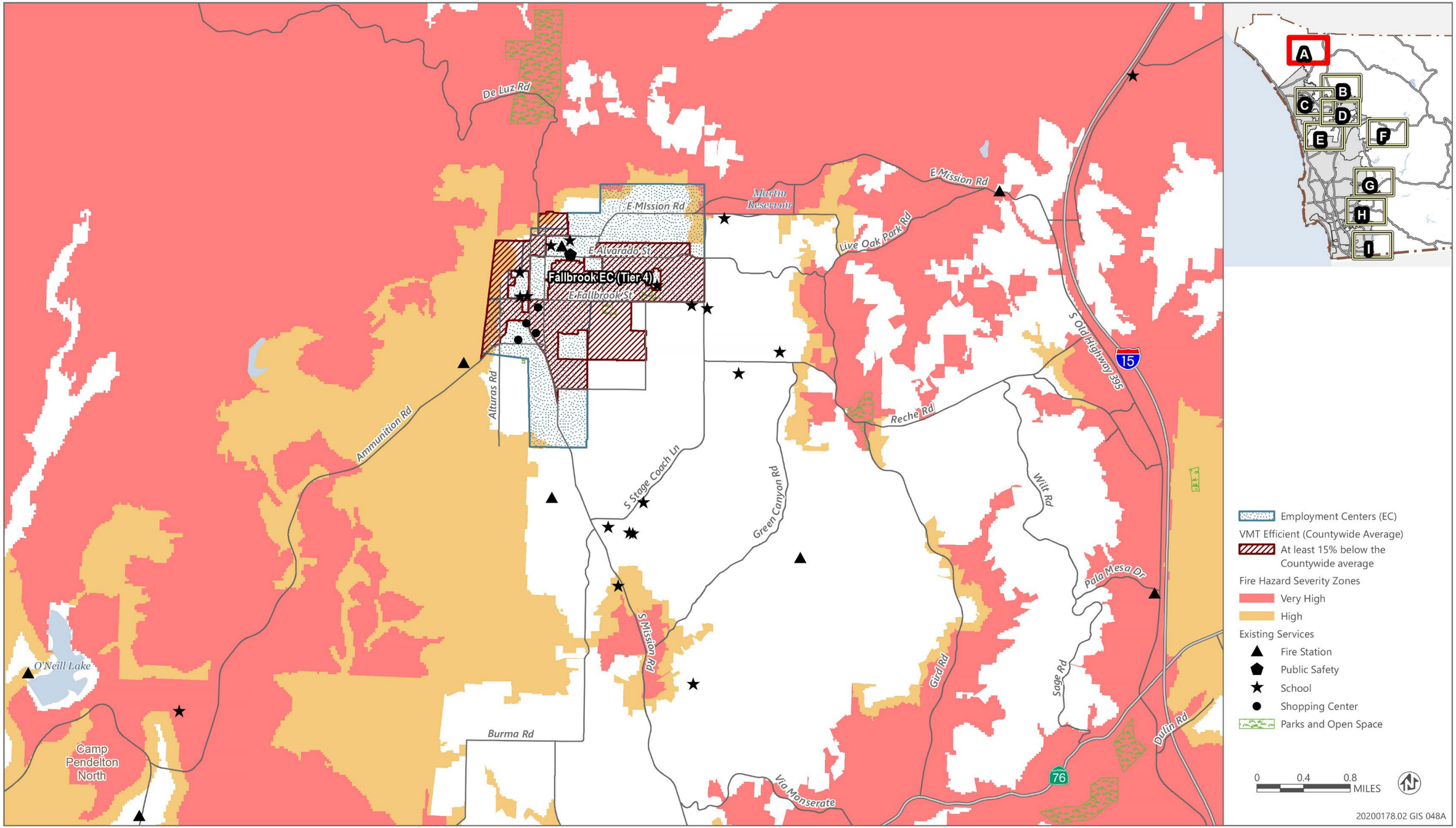
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1 Fire Safe and VMT Efficient Alternative



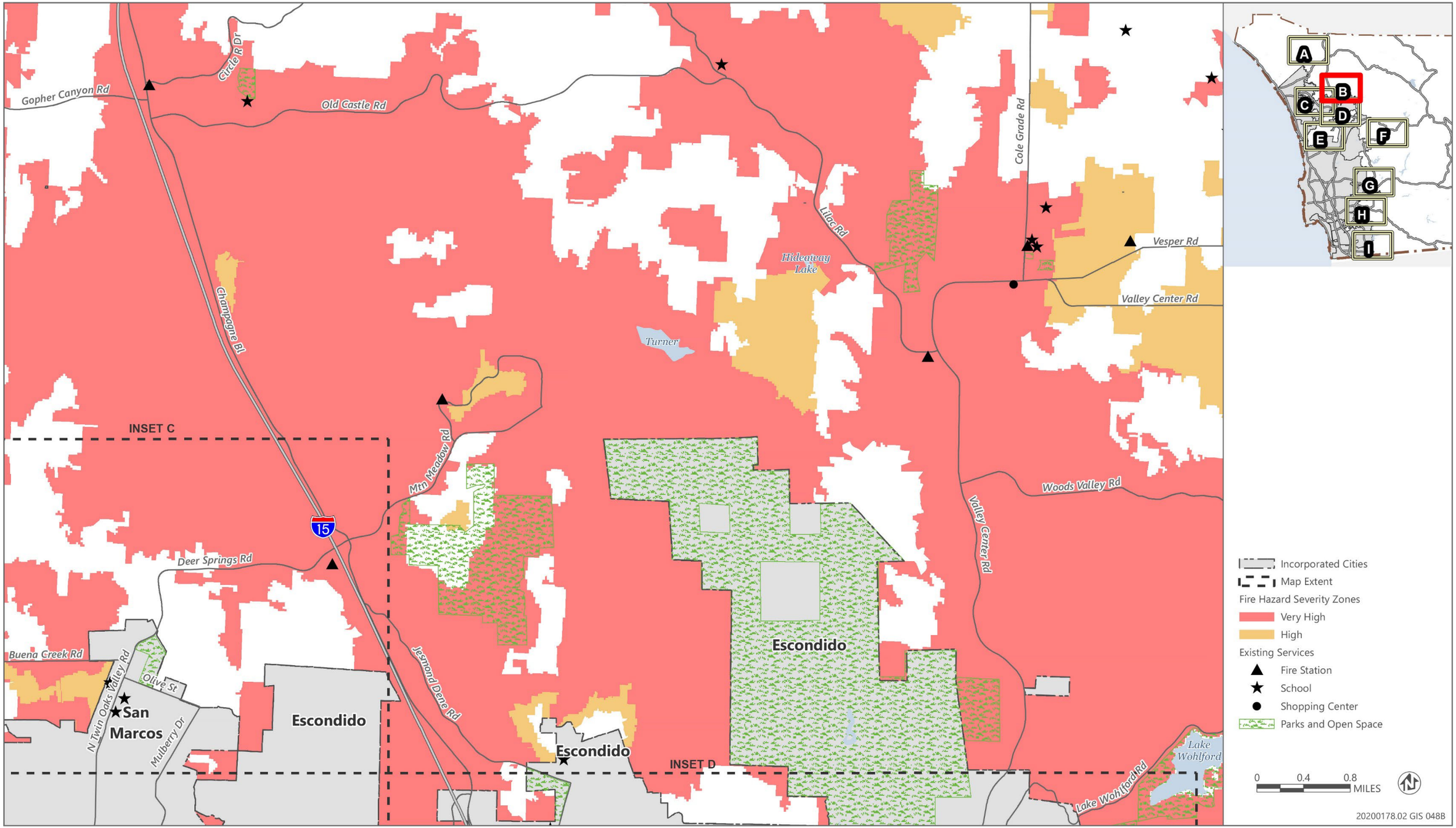
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023

Figure 5-1a Fire Safe and VMT Efficient Smart Growth Locations



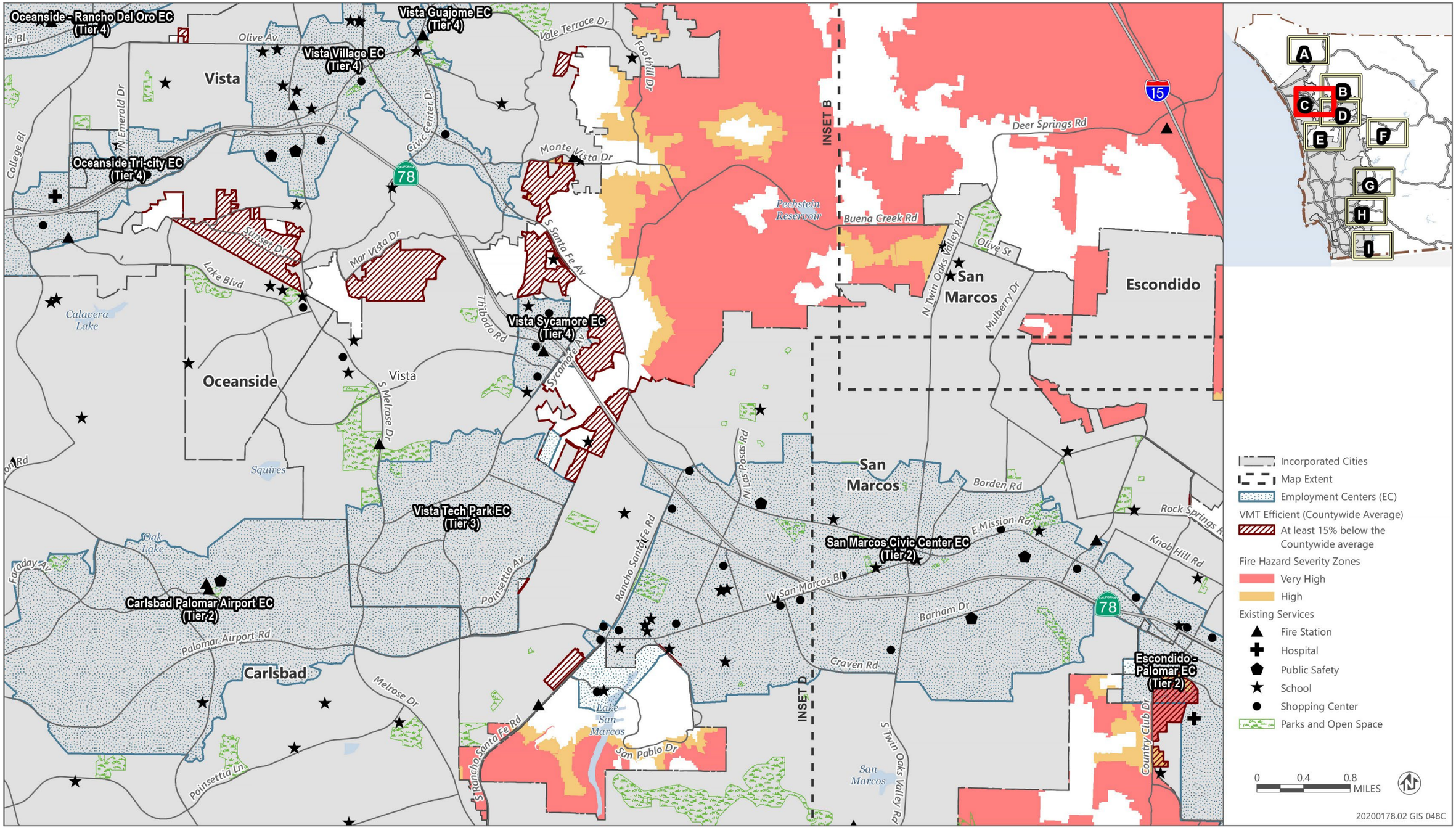
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1b Fire Safe and VMT Efficient Smart Growth Locations - Inset A



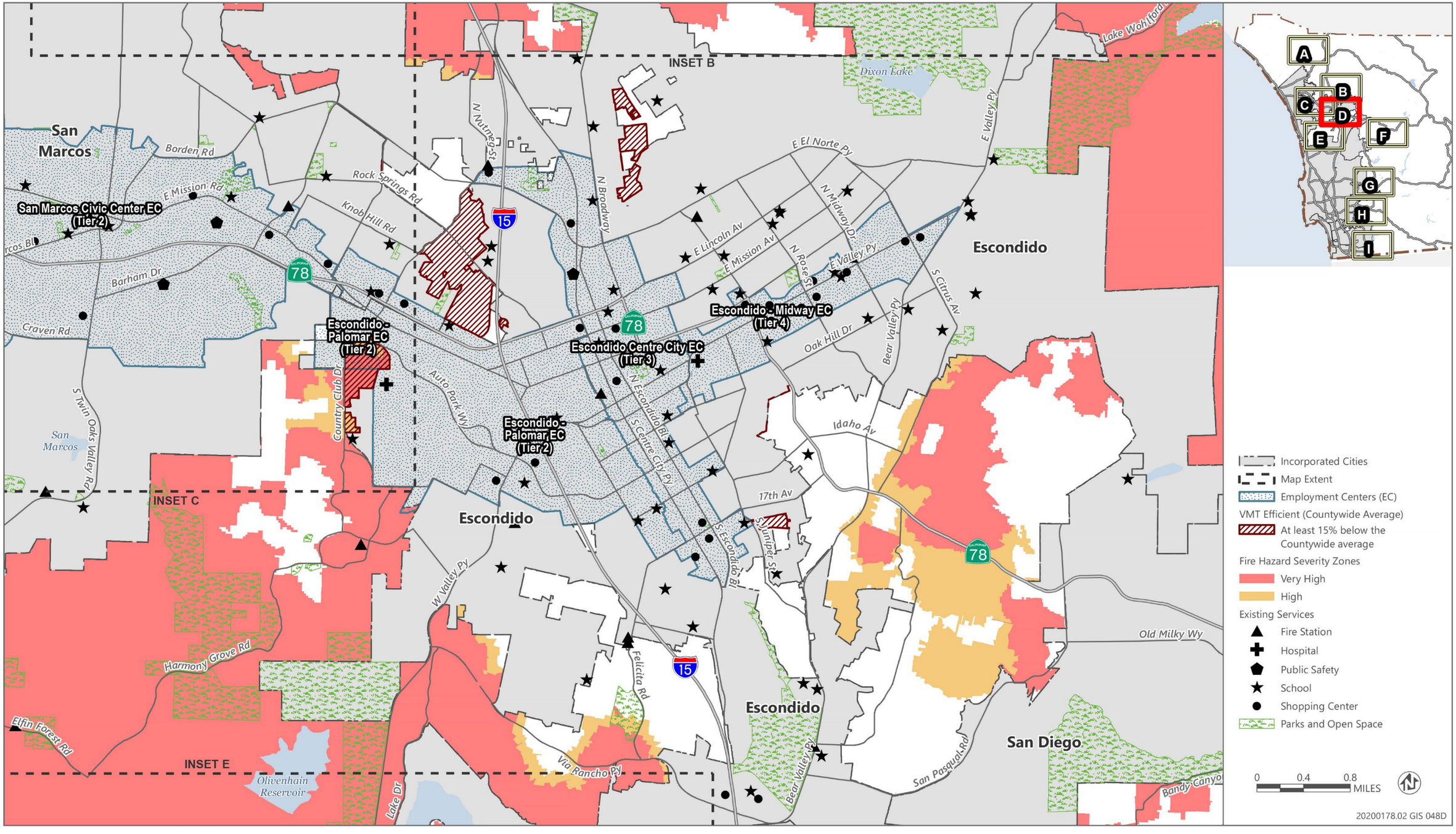
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1c Fire Safe and VMT Efficient Smart Growth Locations - Inset B



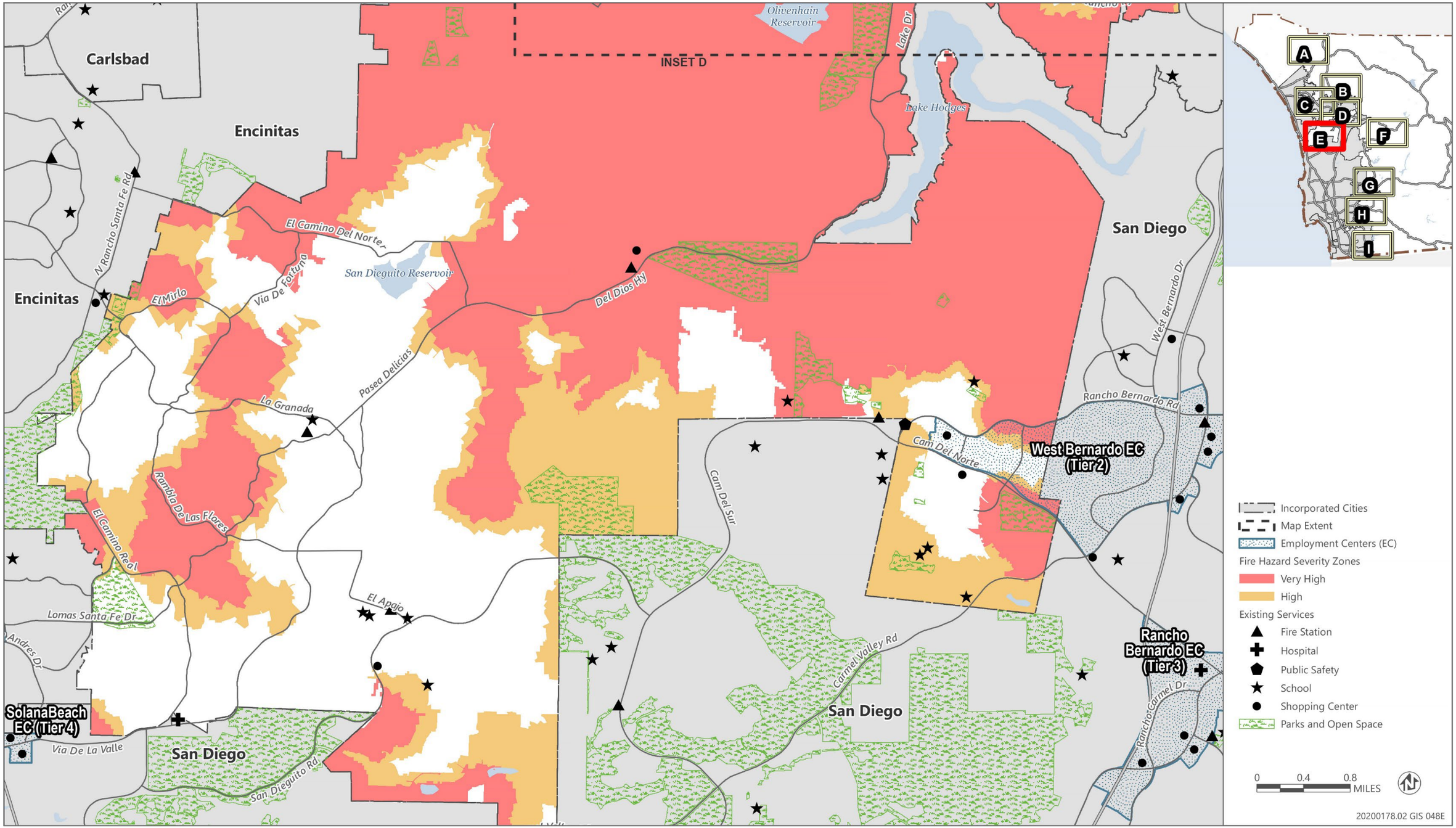
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1d Fire Safe and VMT Efficient Smart Growth Locations - Inset C



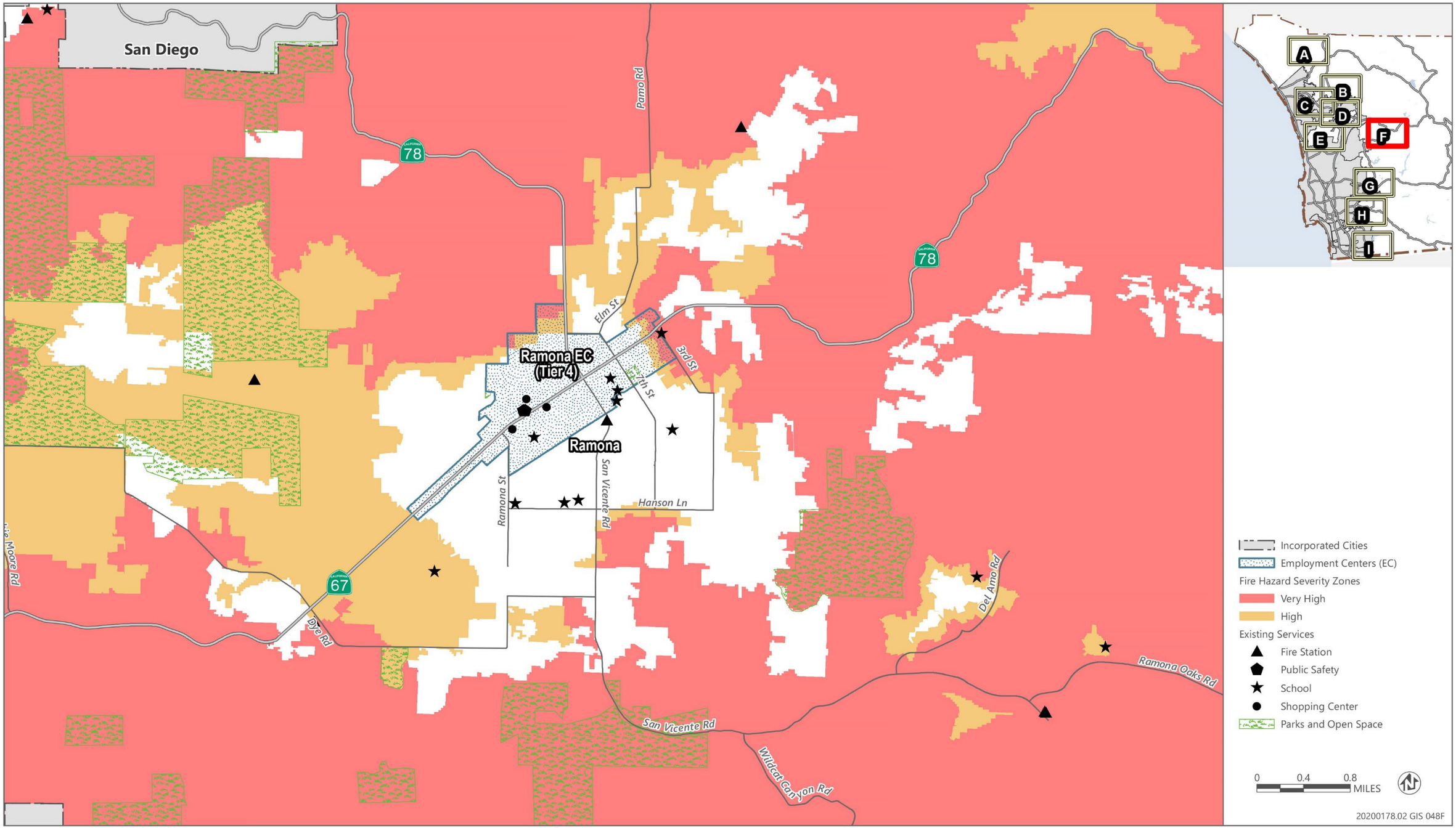
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

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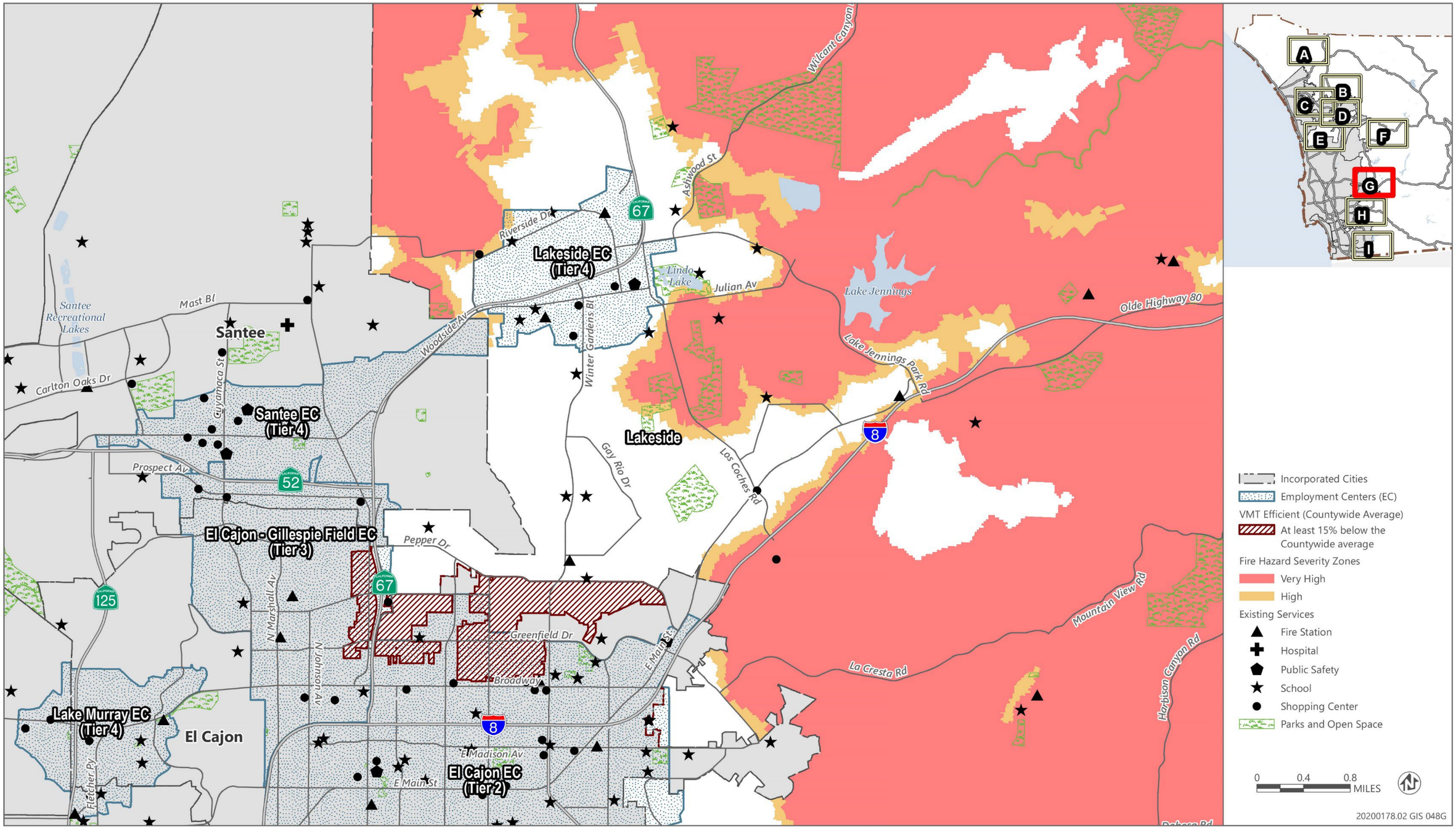
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

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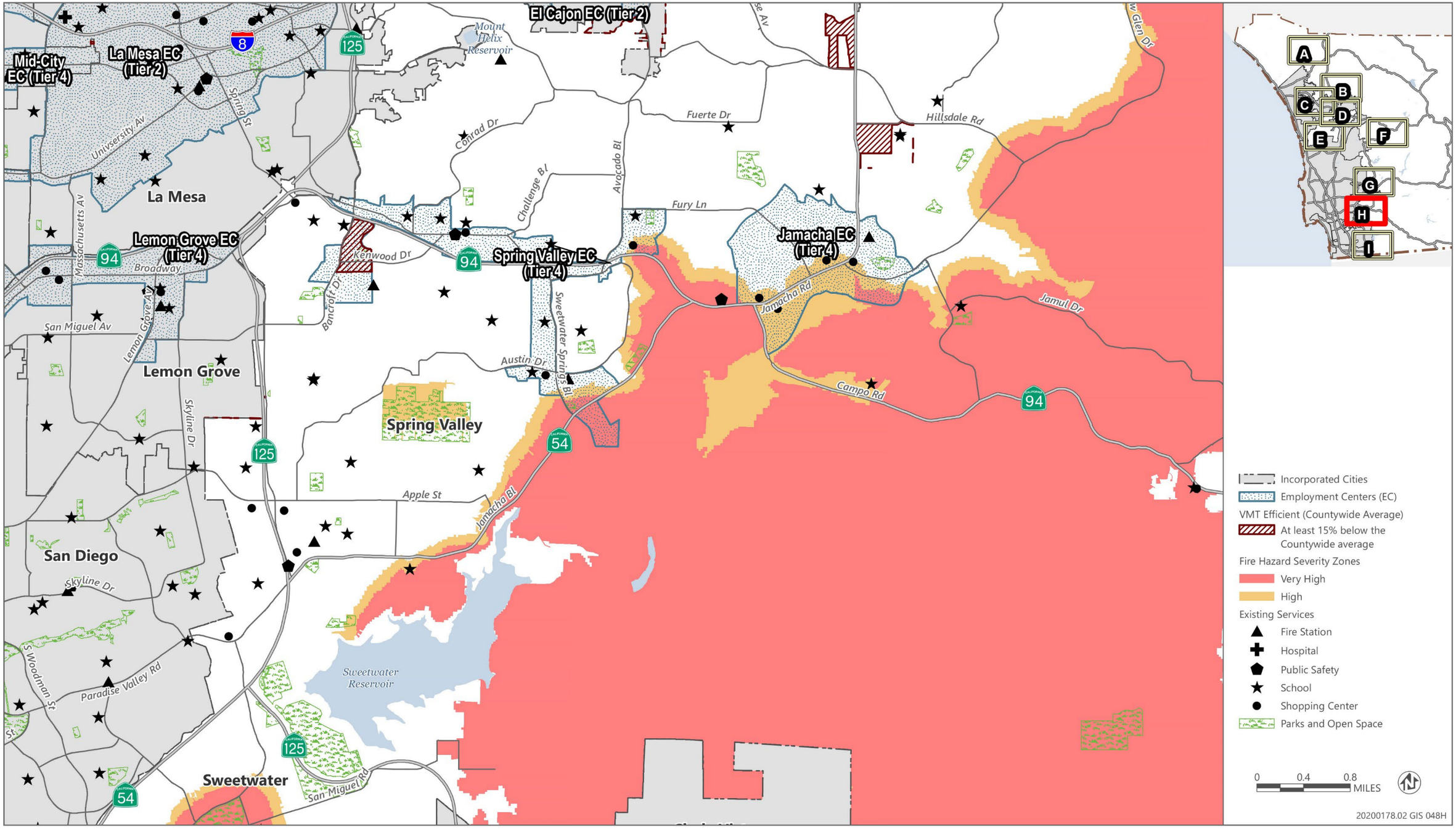
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1g Fire Safe and VMT Efficient Smart Growth Locations - Inset F



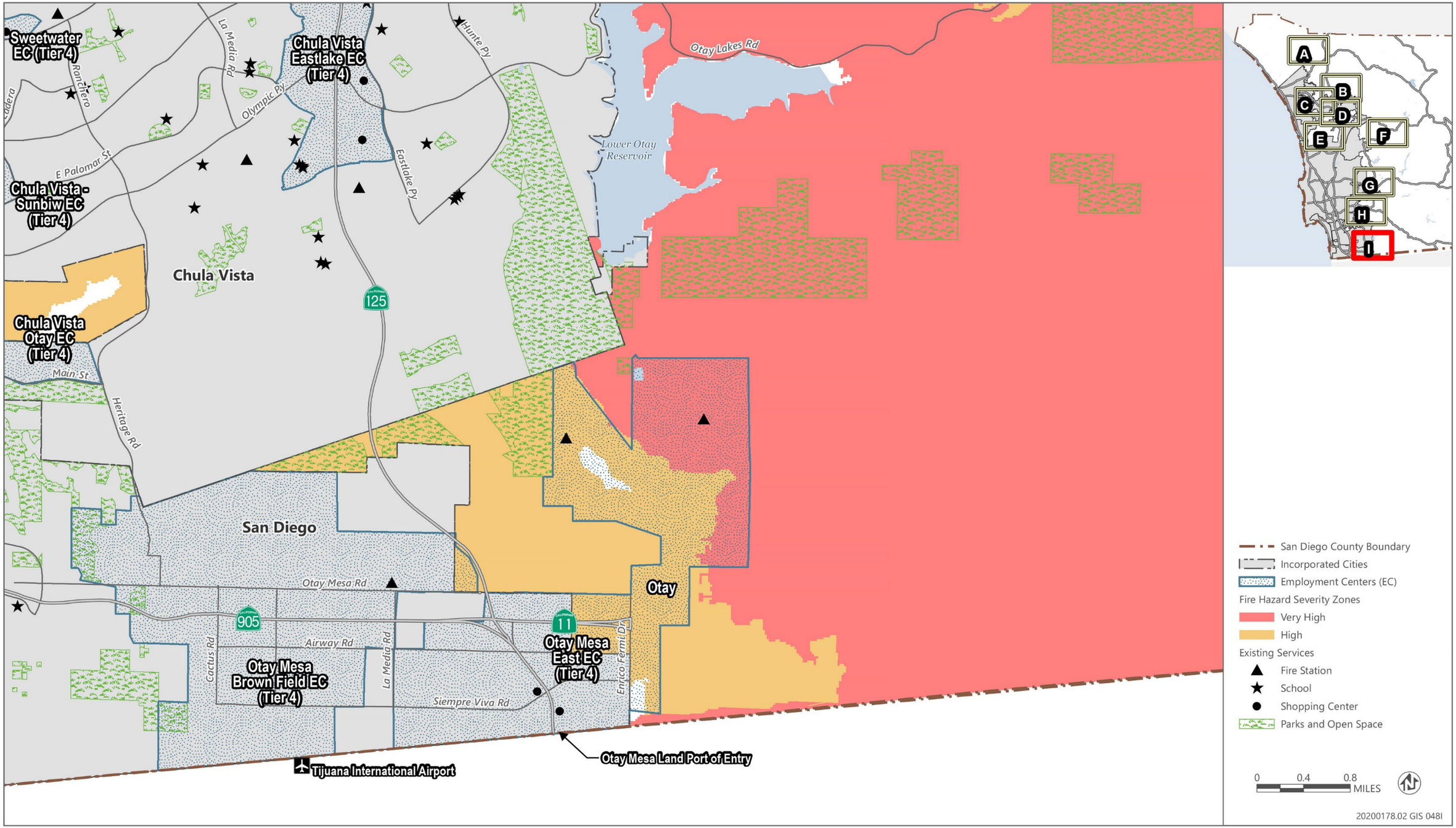
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1h Fire Safe and VMT Efficient Smart Growth Locations - Inset G



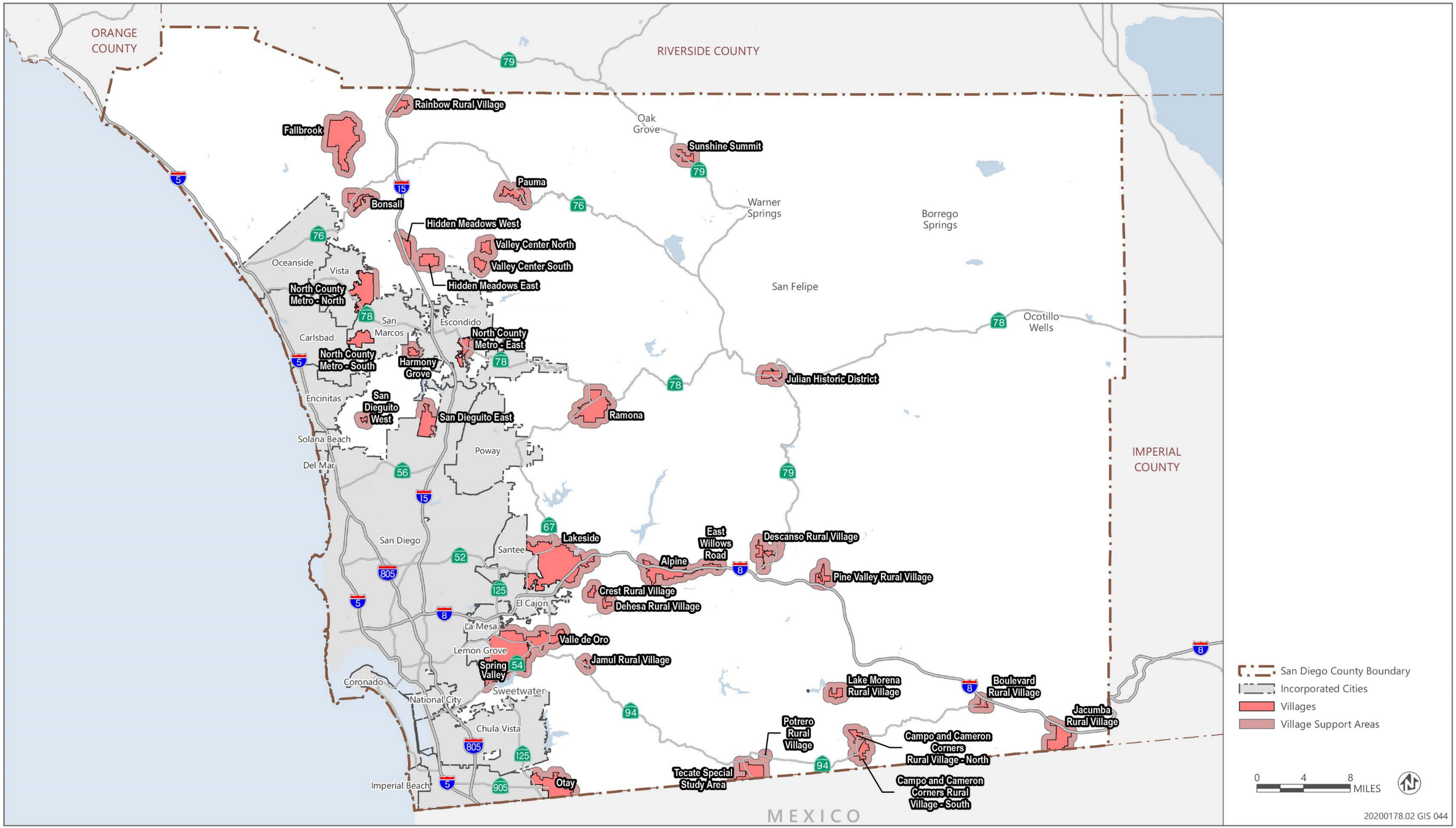
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1i Fire Safe and VMT Efficient Smart Growth Locations - Inset H



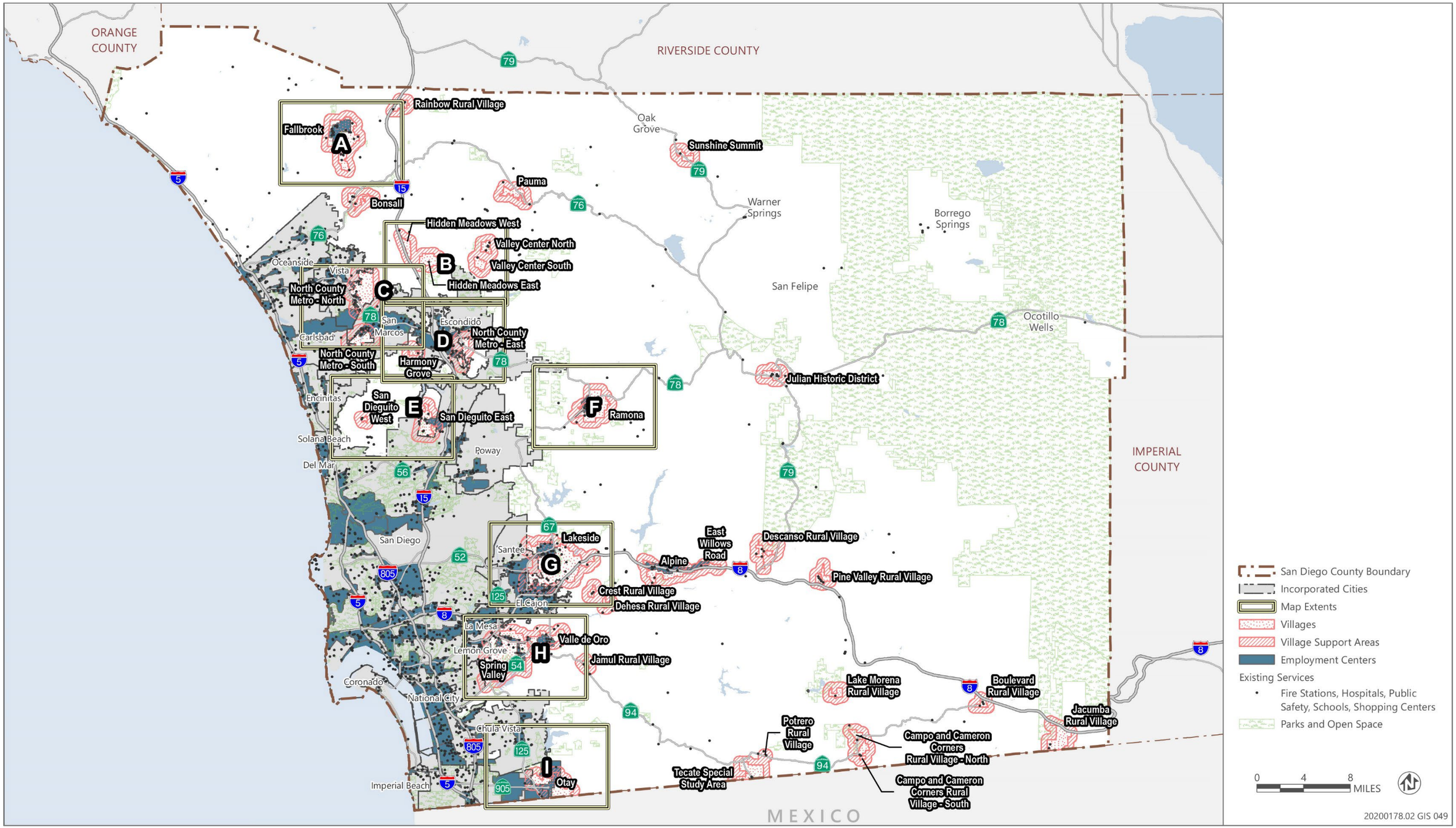
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1j Fire Safe and VMT Efficient Smart Growth Locations - Inset I



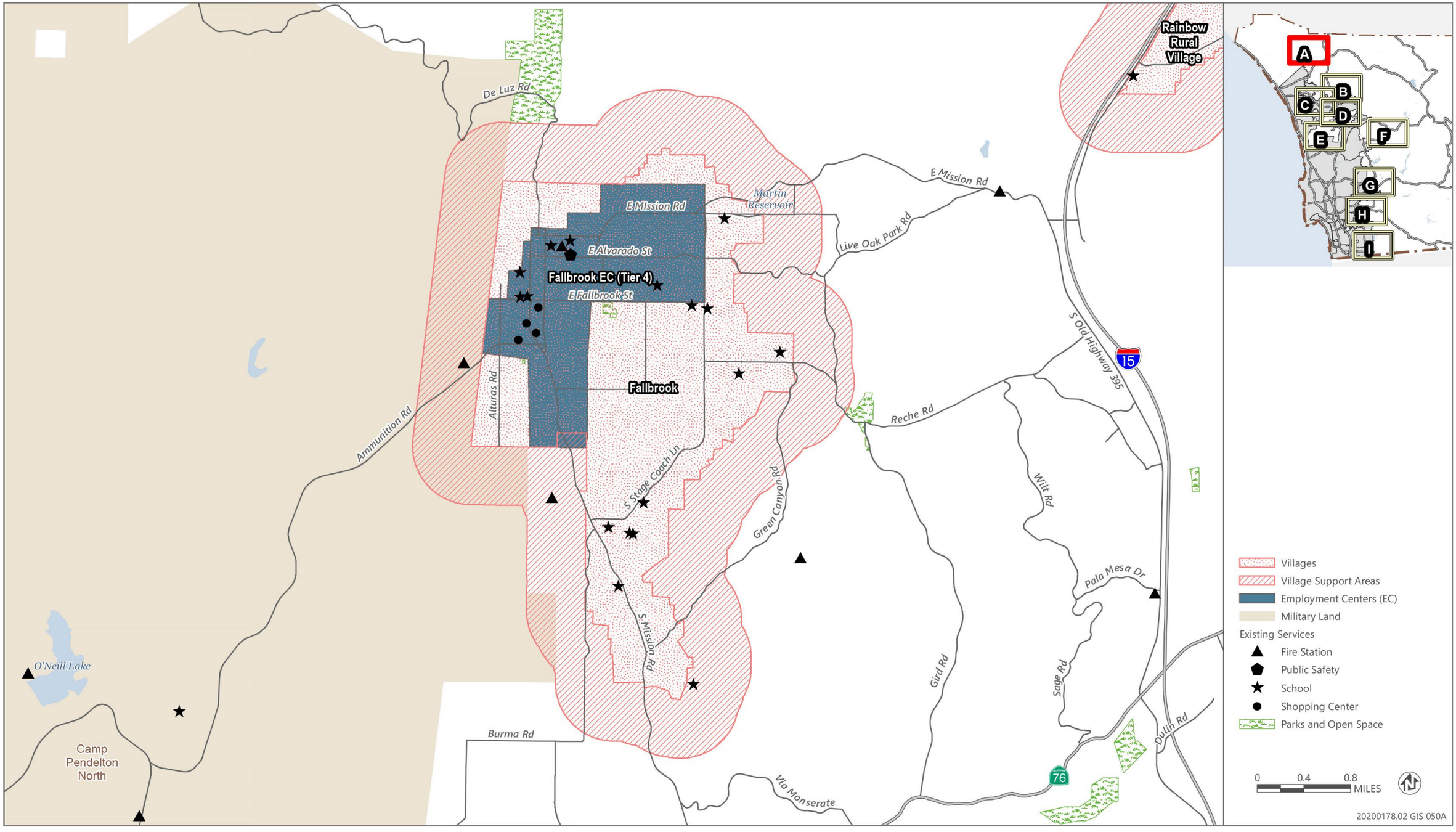
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2 Village Support Areas Alternative



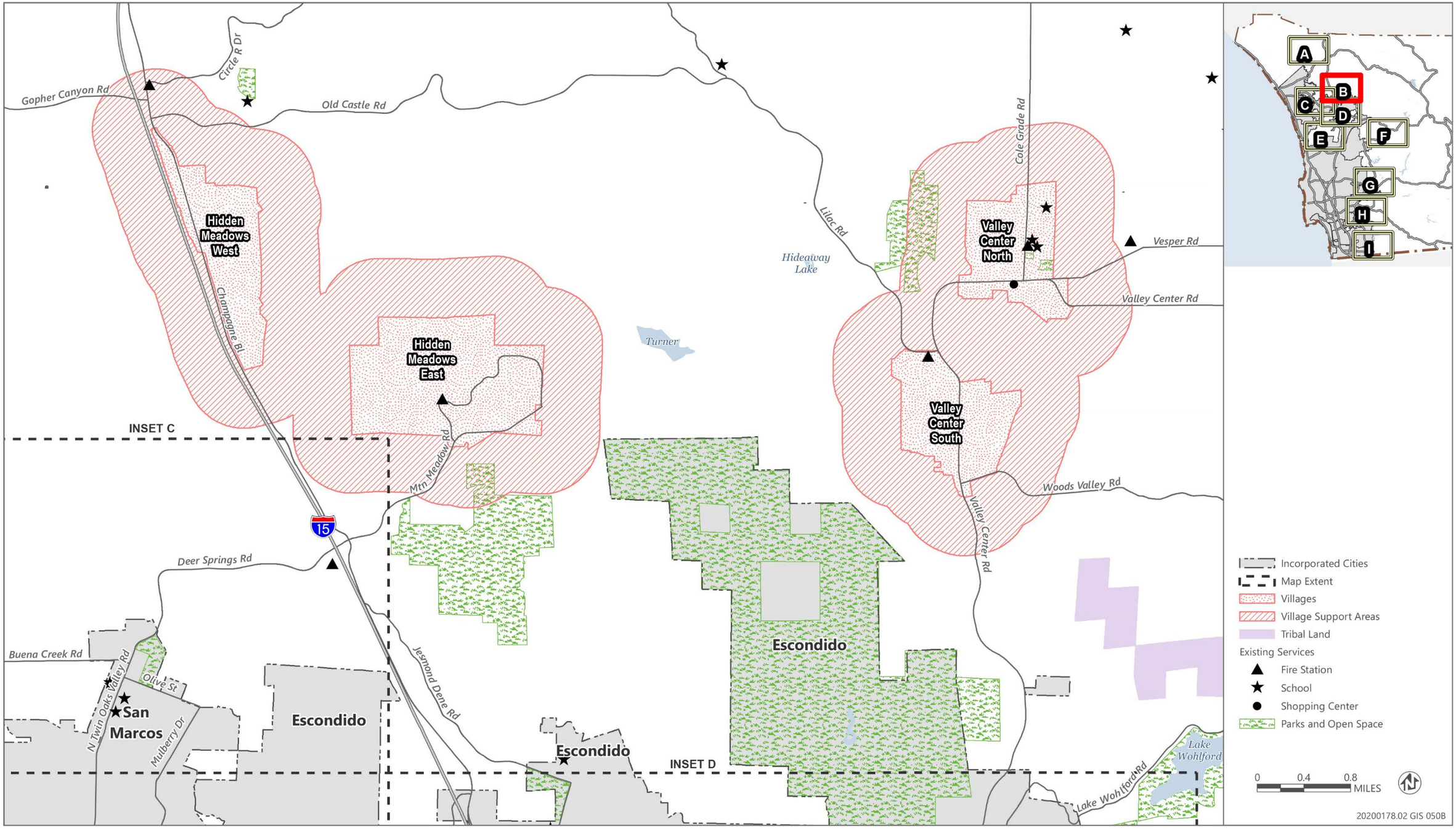
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023

Figure 5-2a Village and Village Support Areas



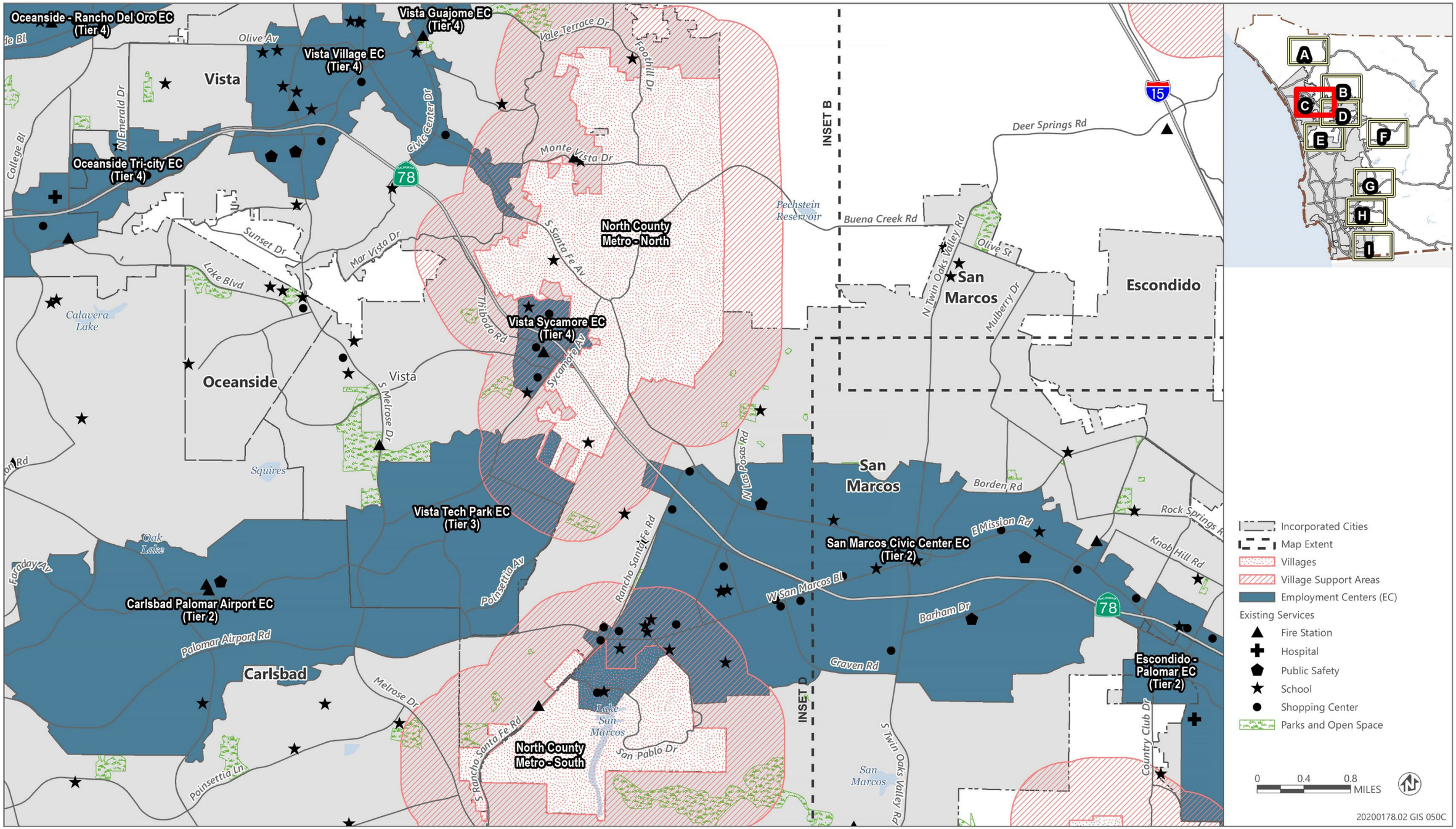
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2b Villages and Village Support Areas - Inset A



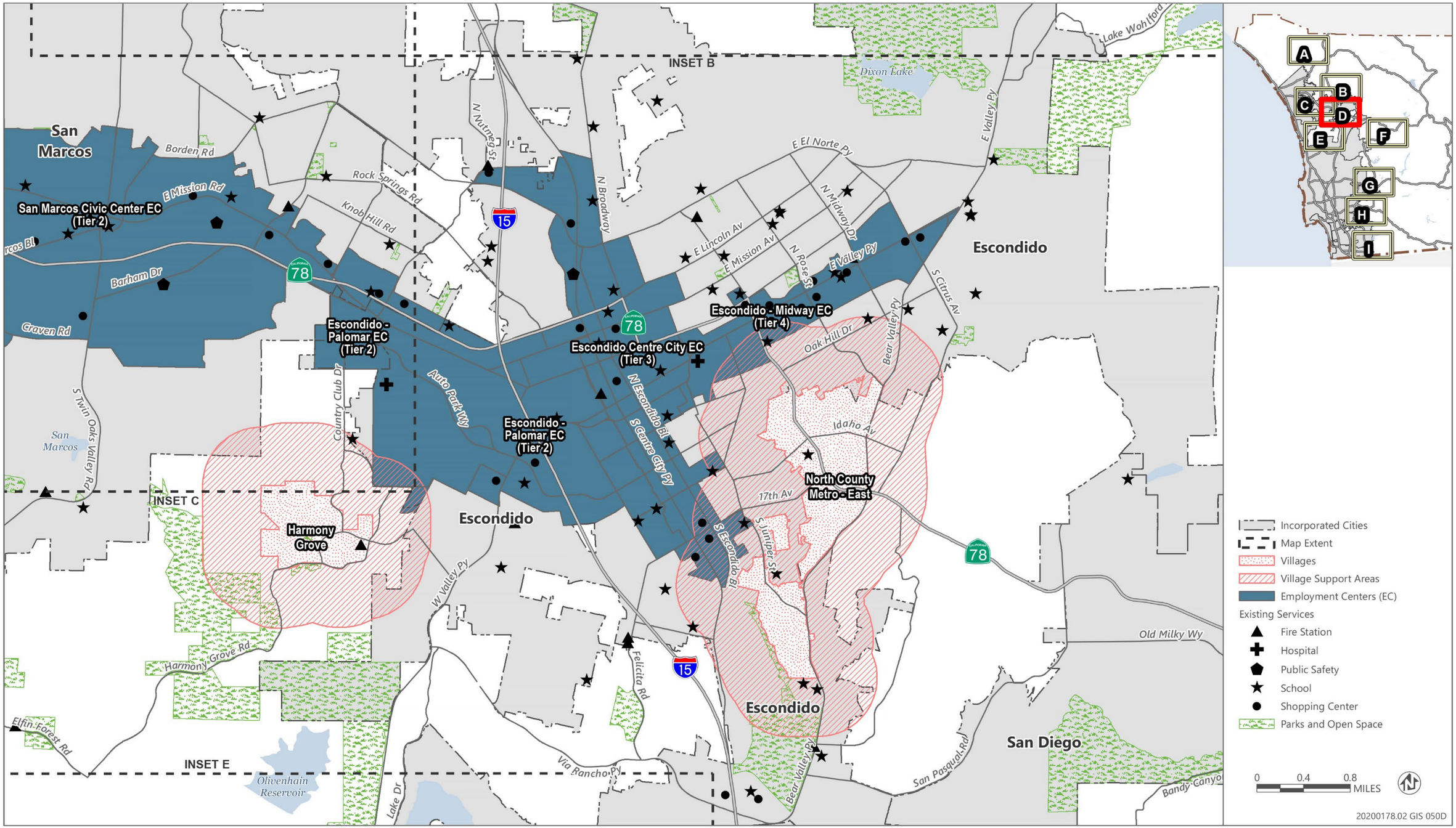
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2c Villages and Village Support Areas - Inset B



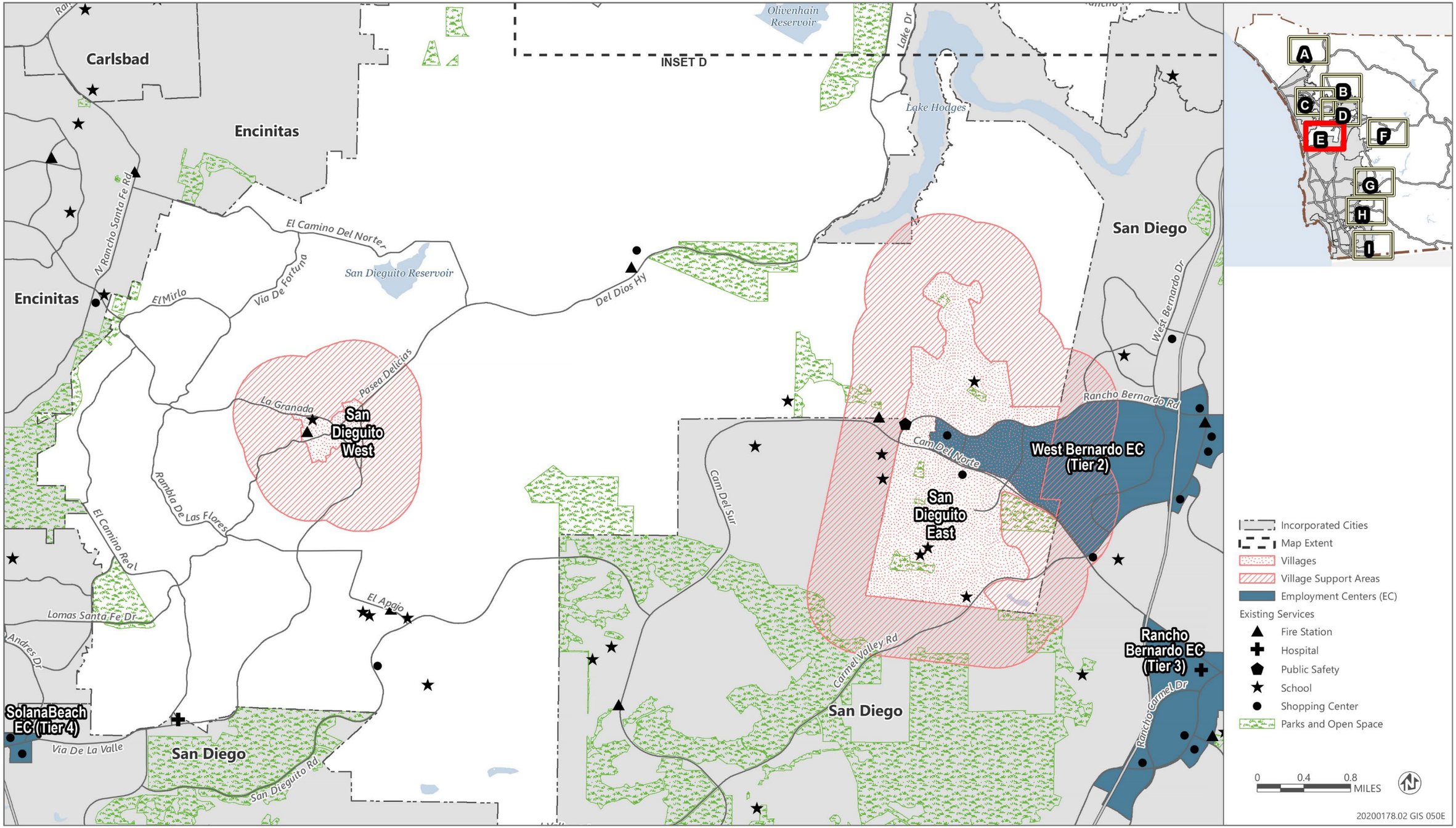
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2d Villages and Village Support Areas - Inset C



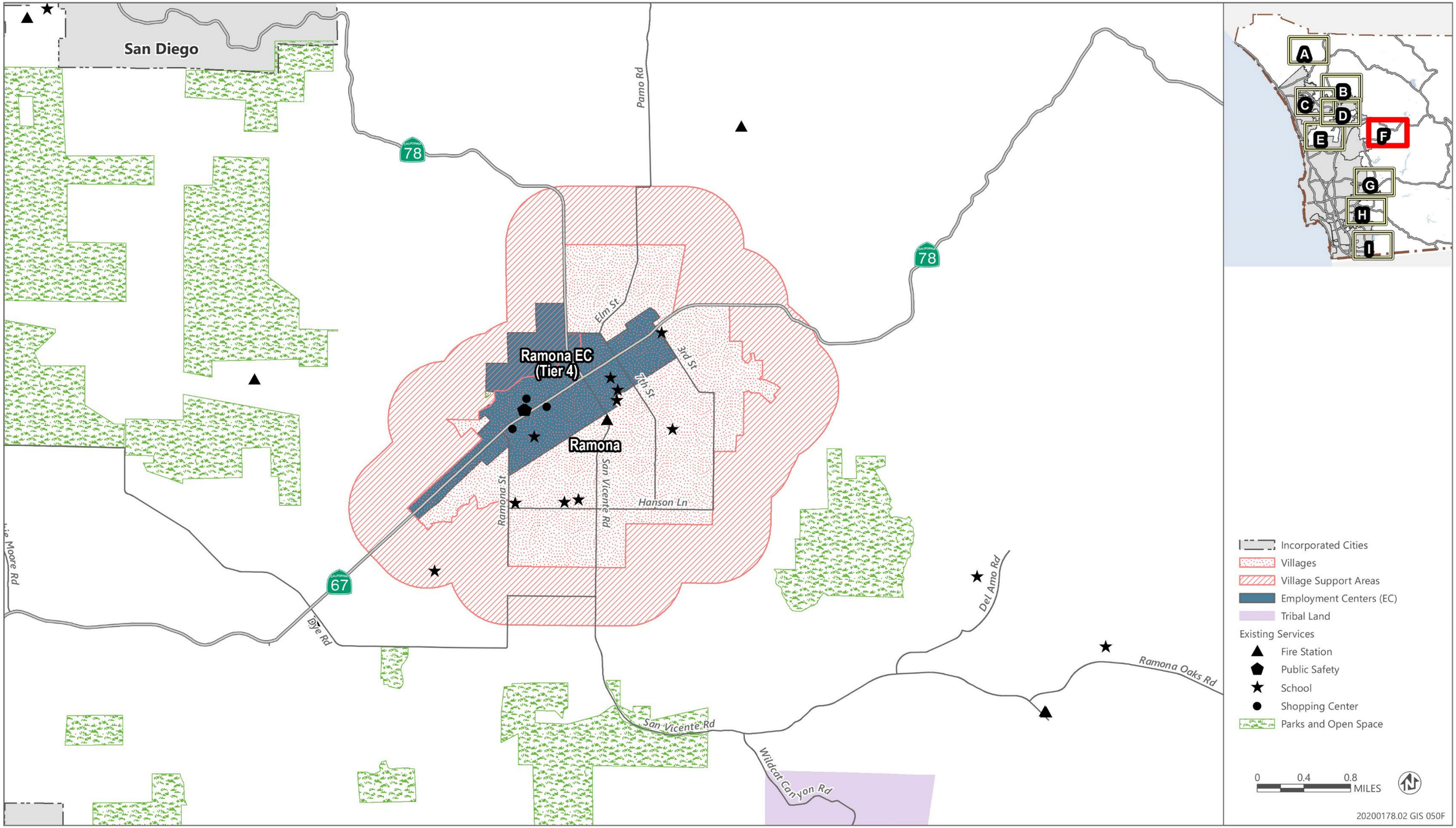
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2e Villages and Village Support Areas - Inset D



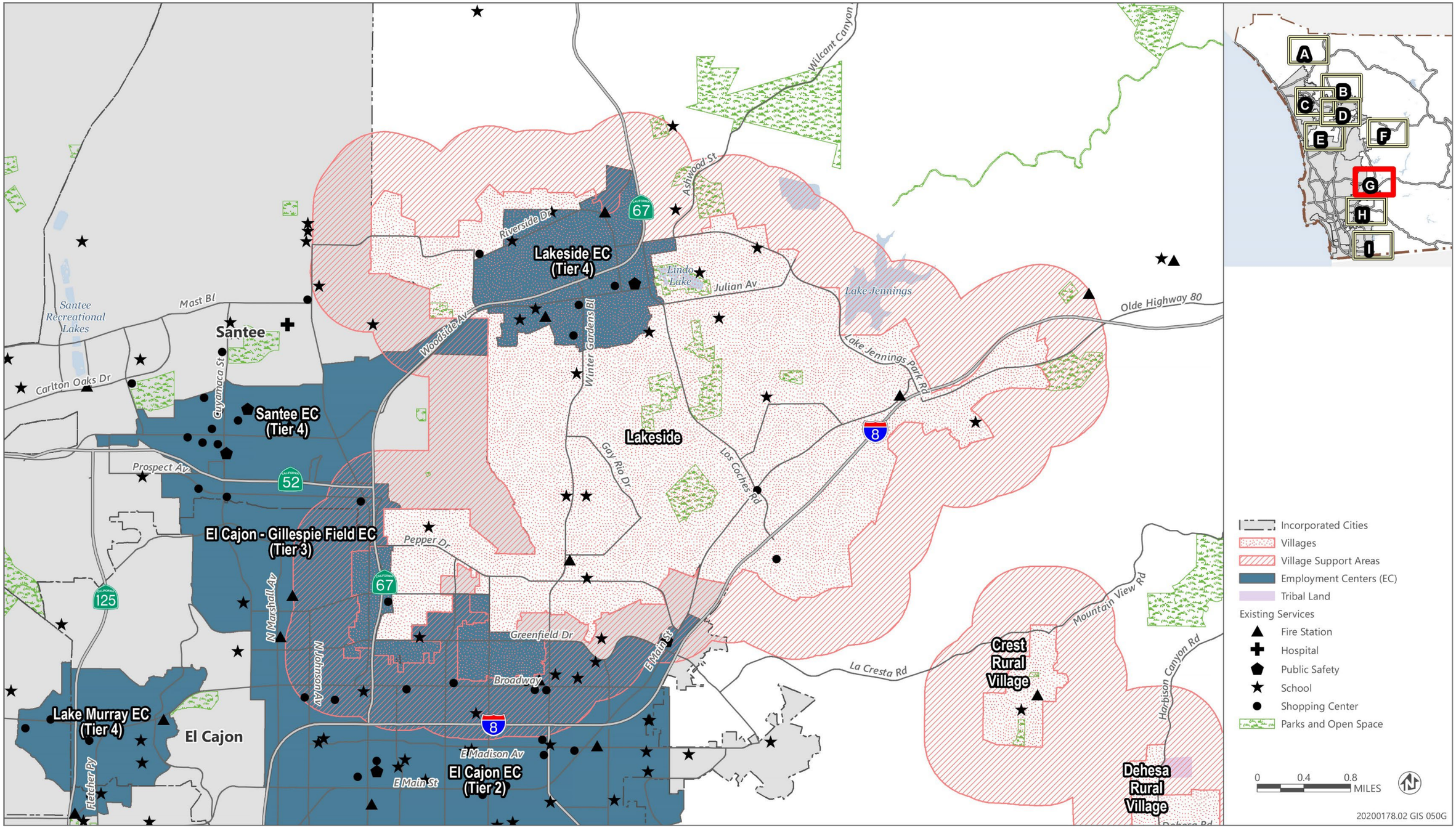
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2f Villages and Village Support Areas - Inset E



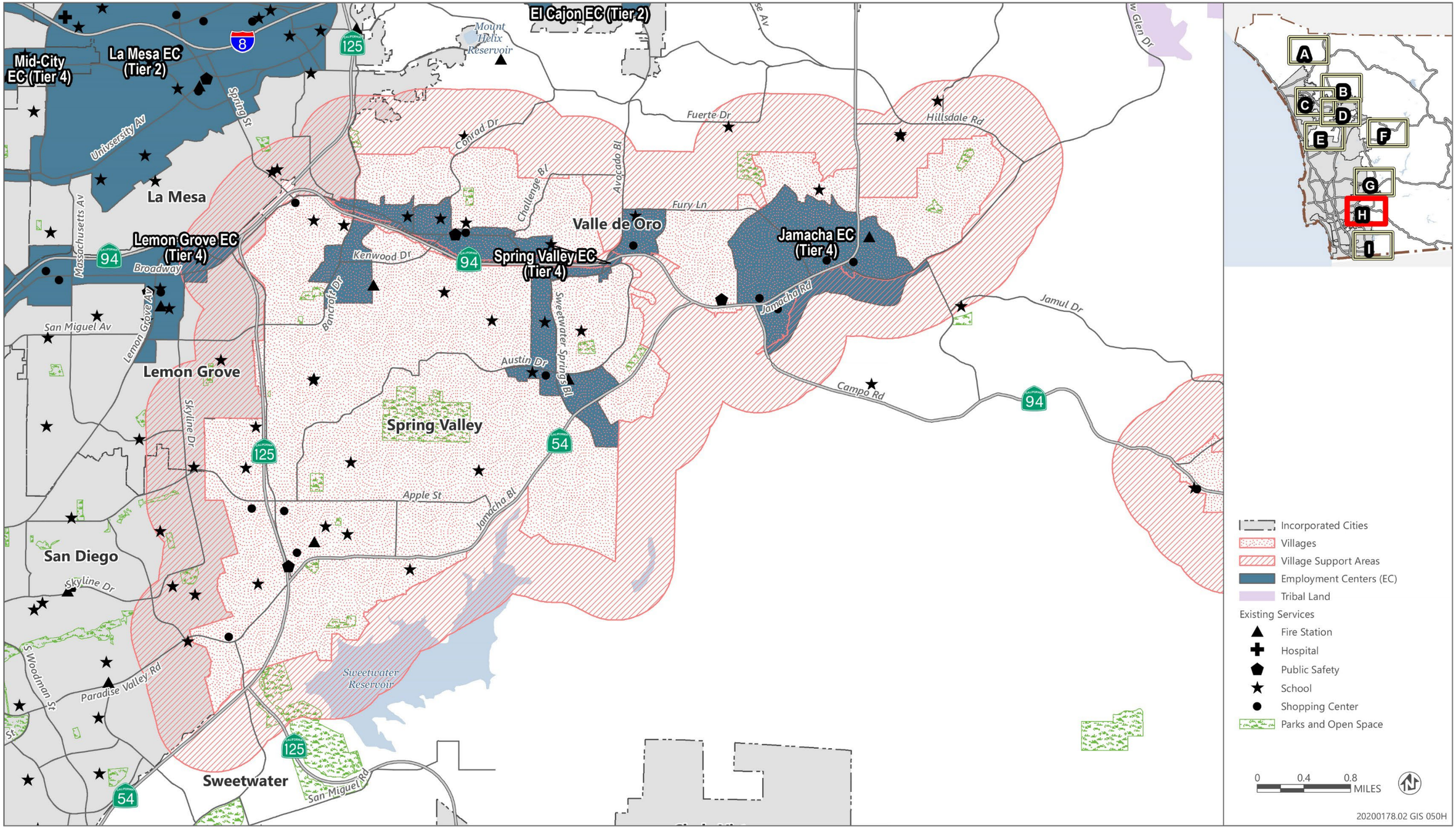
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2g Villages and Village Support Areas - Inset F



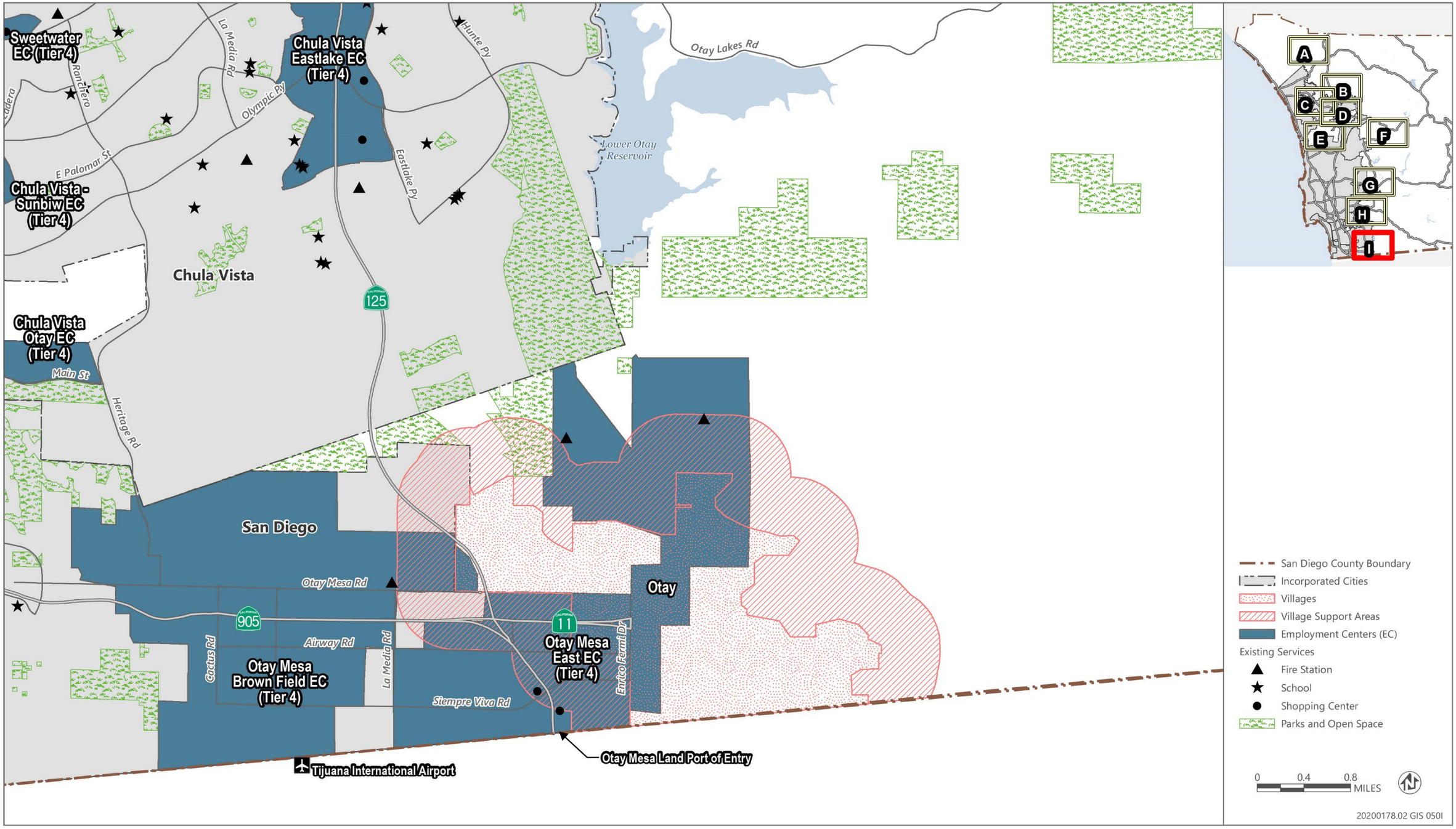
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2h Villages and Village Support Areas - Inset G



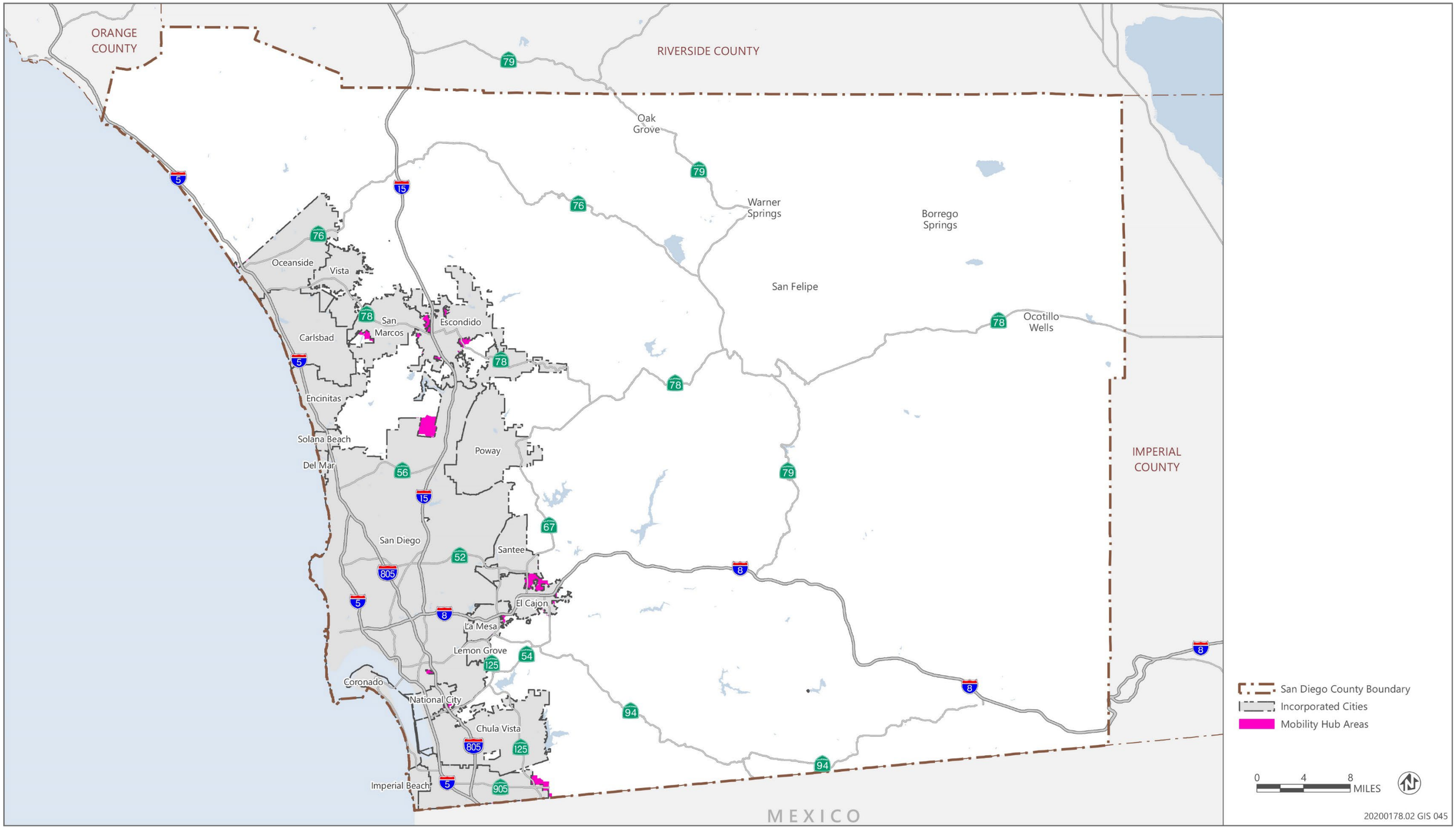
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2i Villages and Village Support Areas - Inset H



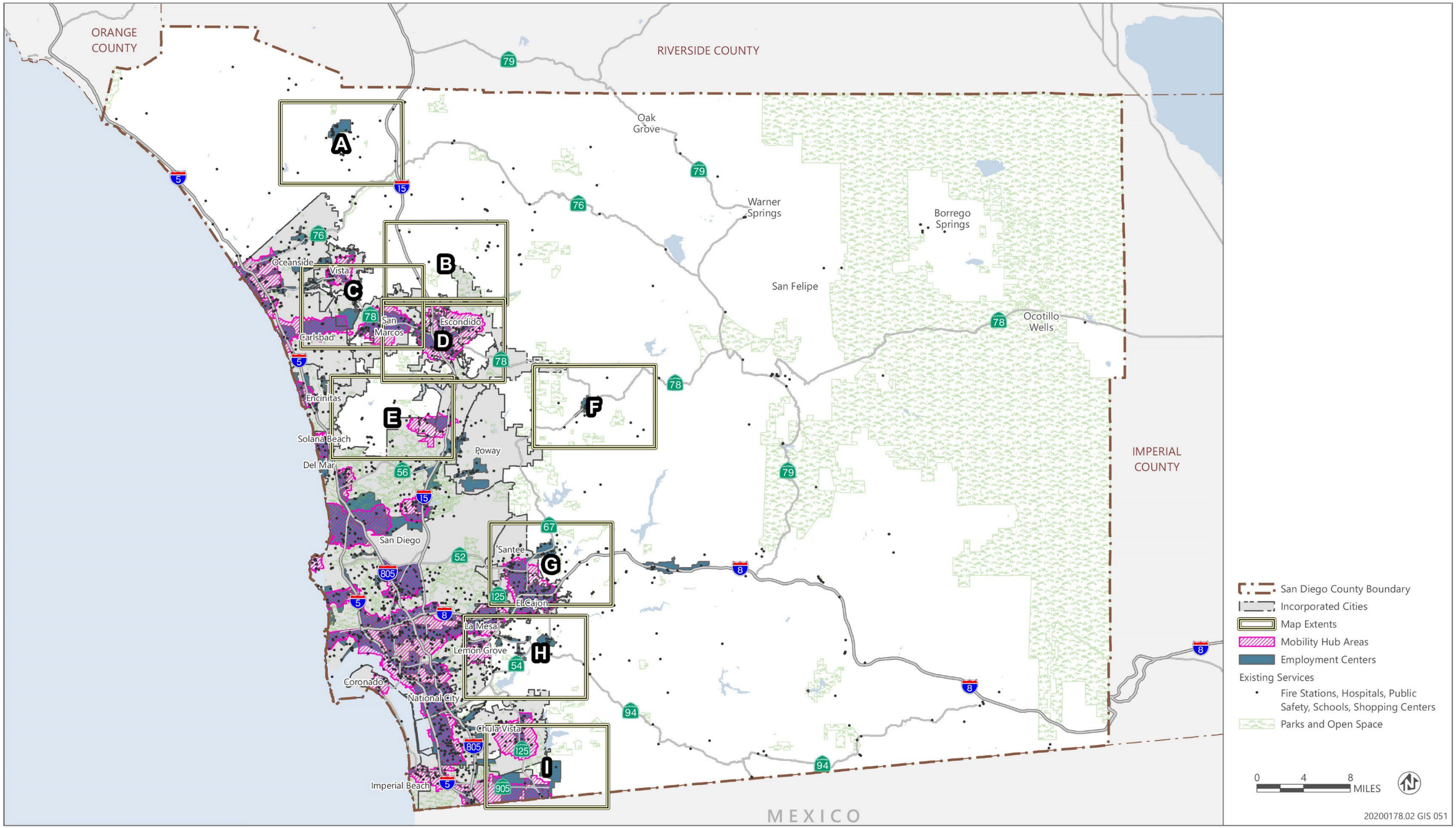
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2j Villages and Village Support Areas - Inset I



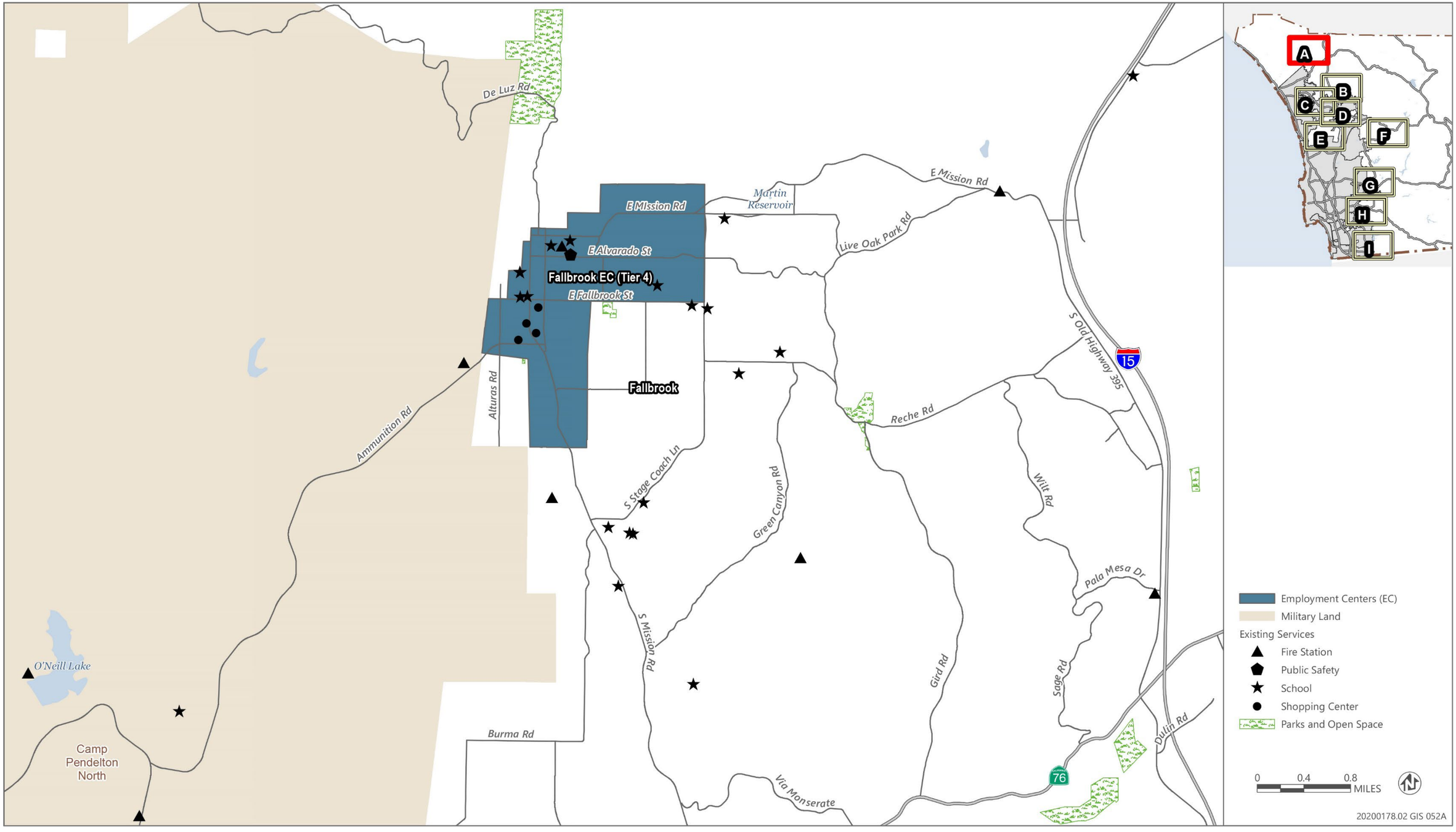
Sources: Data received from San Diego County in 2021.

Figure 5-3 Sustainable Communities Strategy Alternative



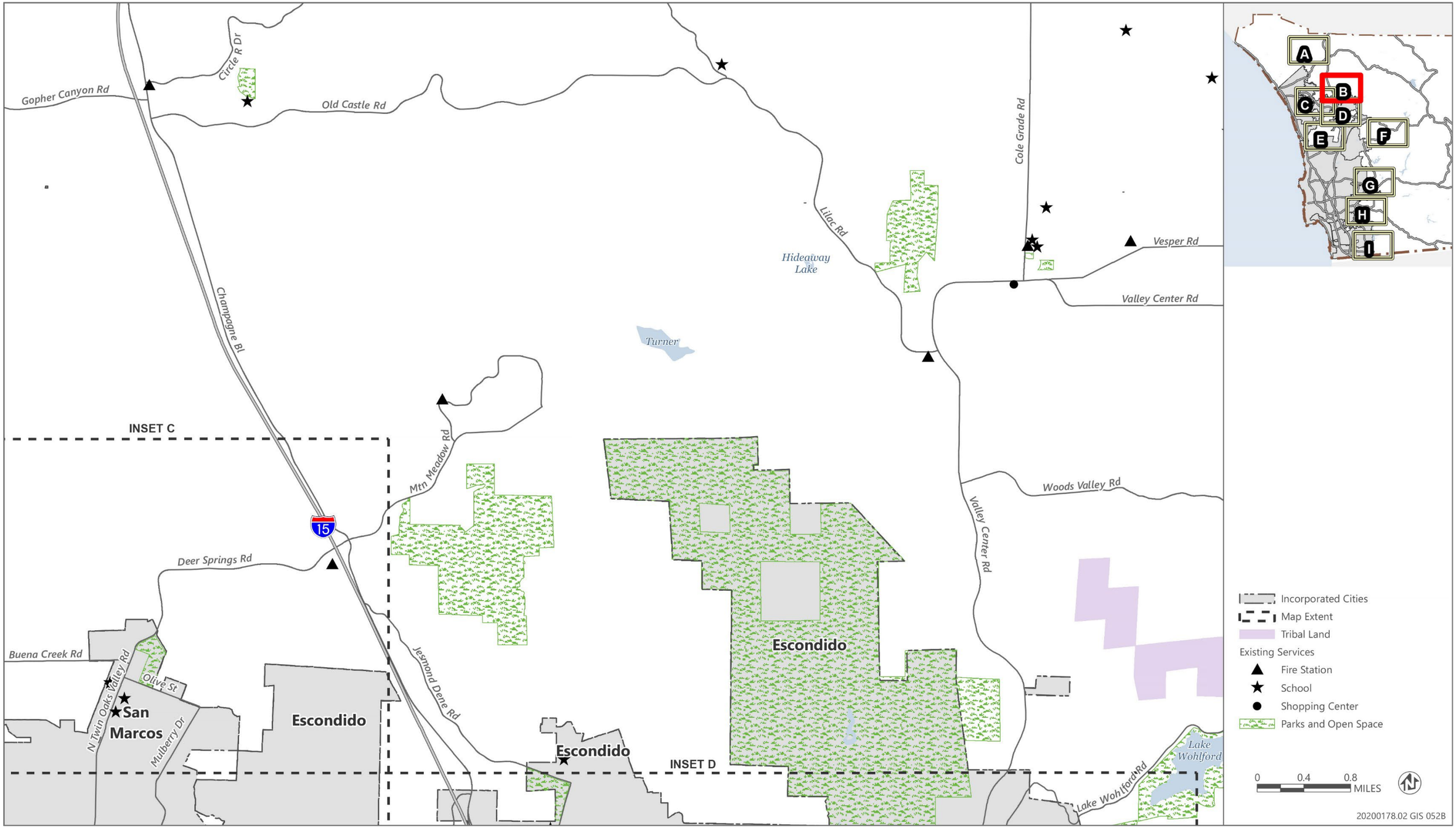
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3a Mobility Hub Areas



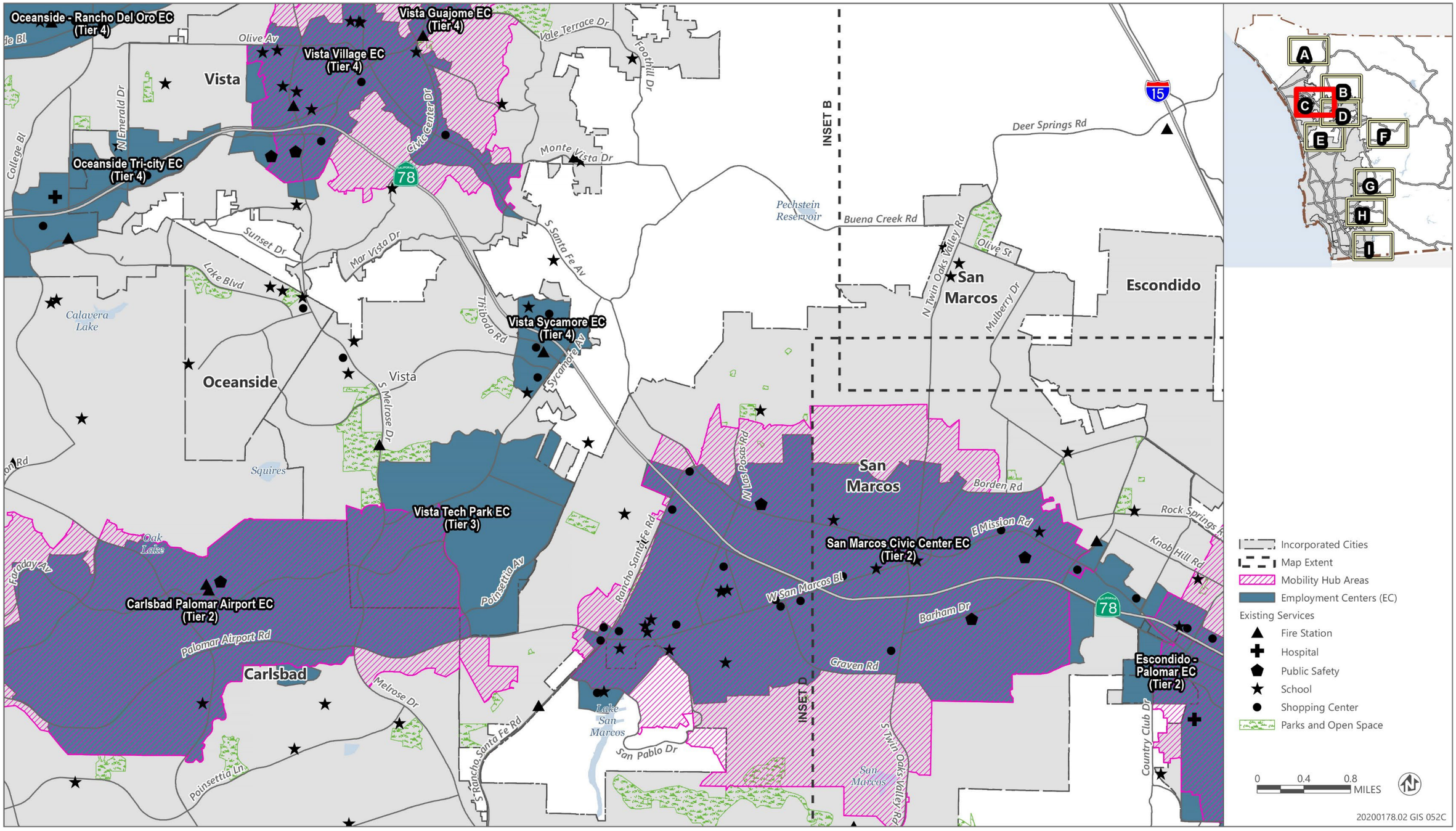
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3b Mobility Hub Areas - Inset A



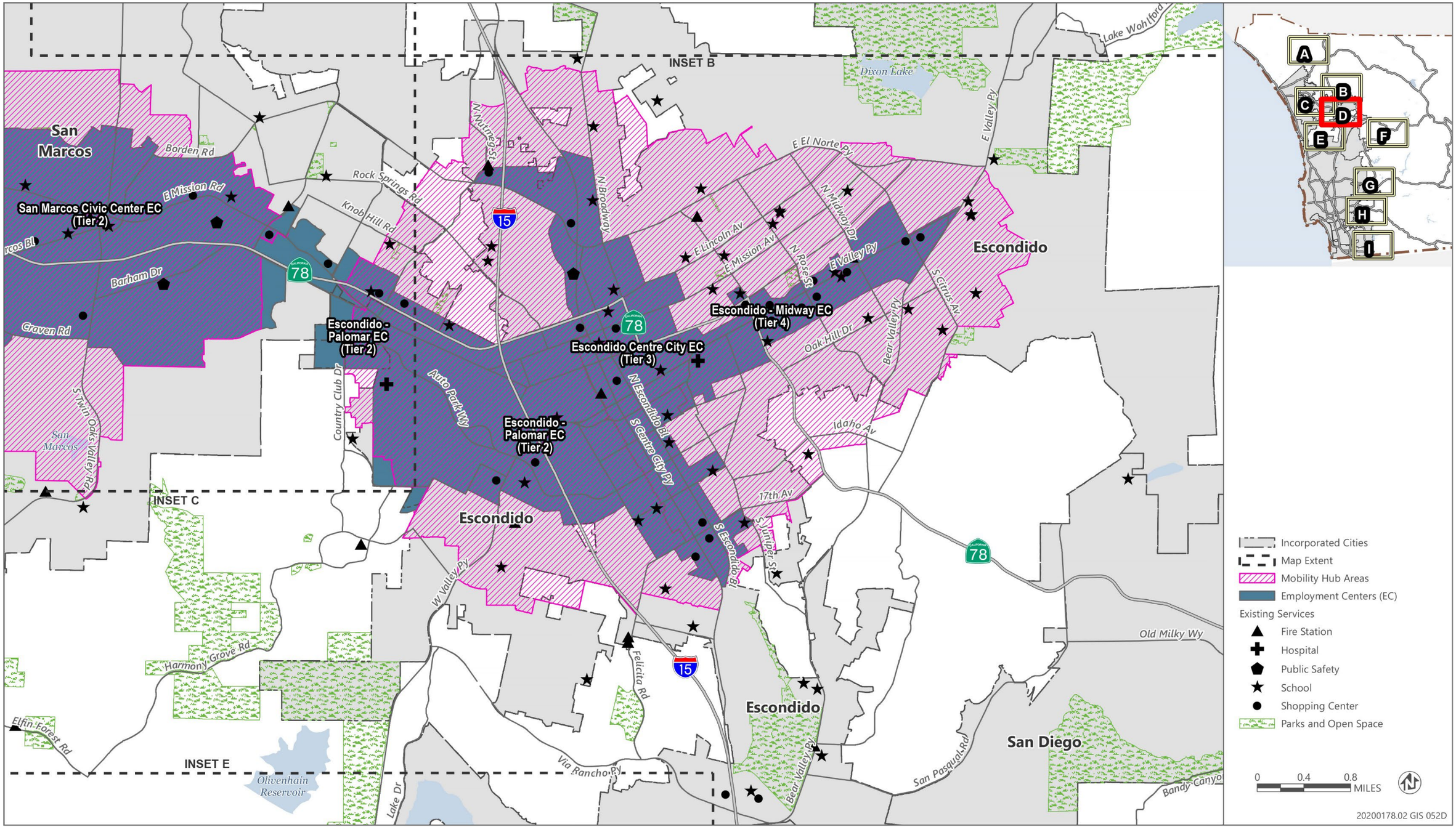
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3c Mobility Hub Areas - Inset B



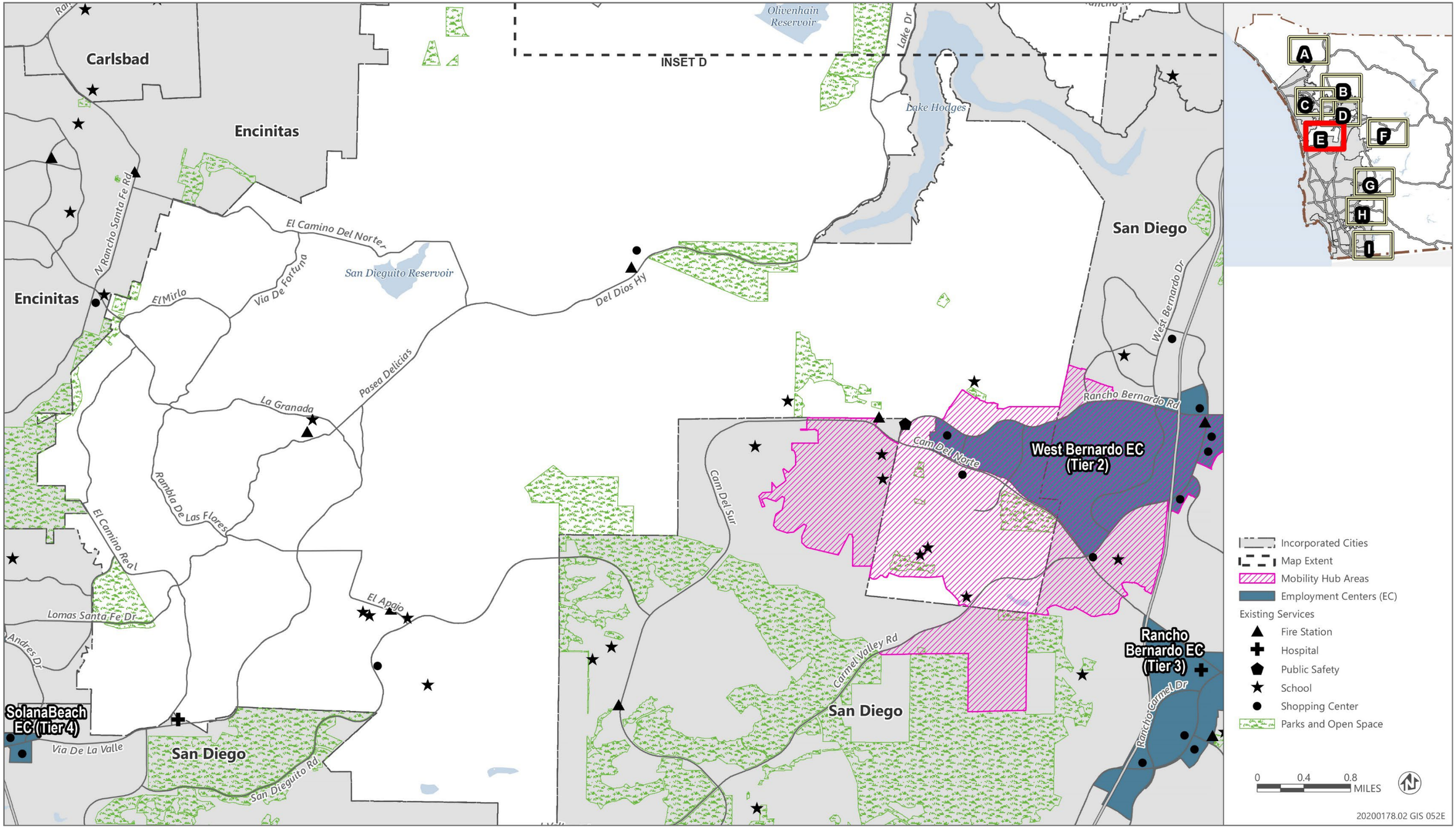
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3d Mobility Hub Areas - Inset C



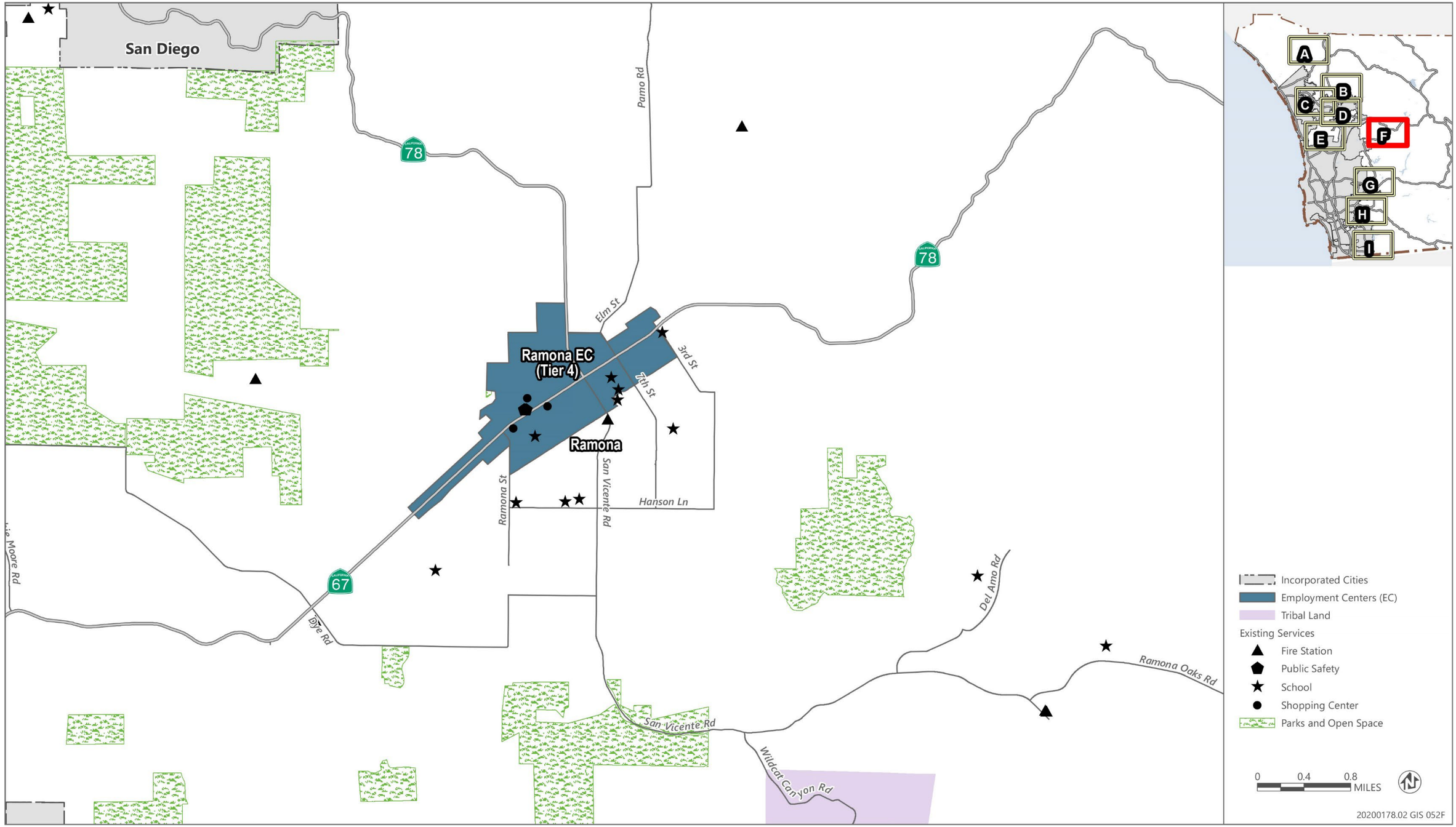
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3e Mobility Hub Areas - Inset D



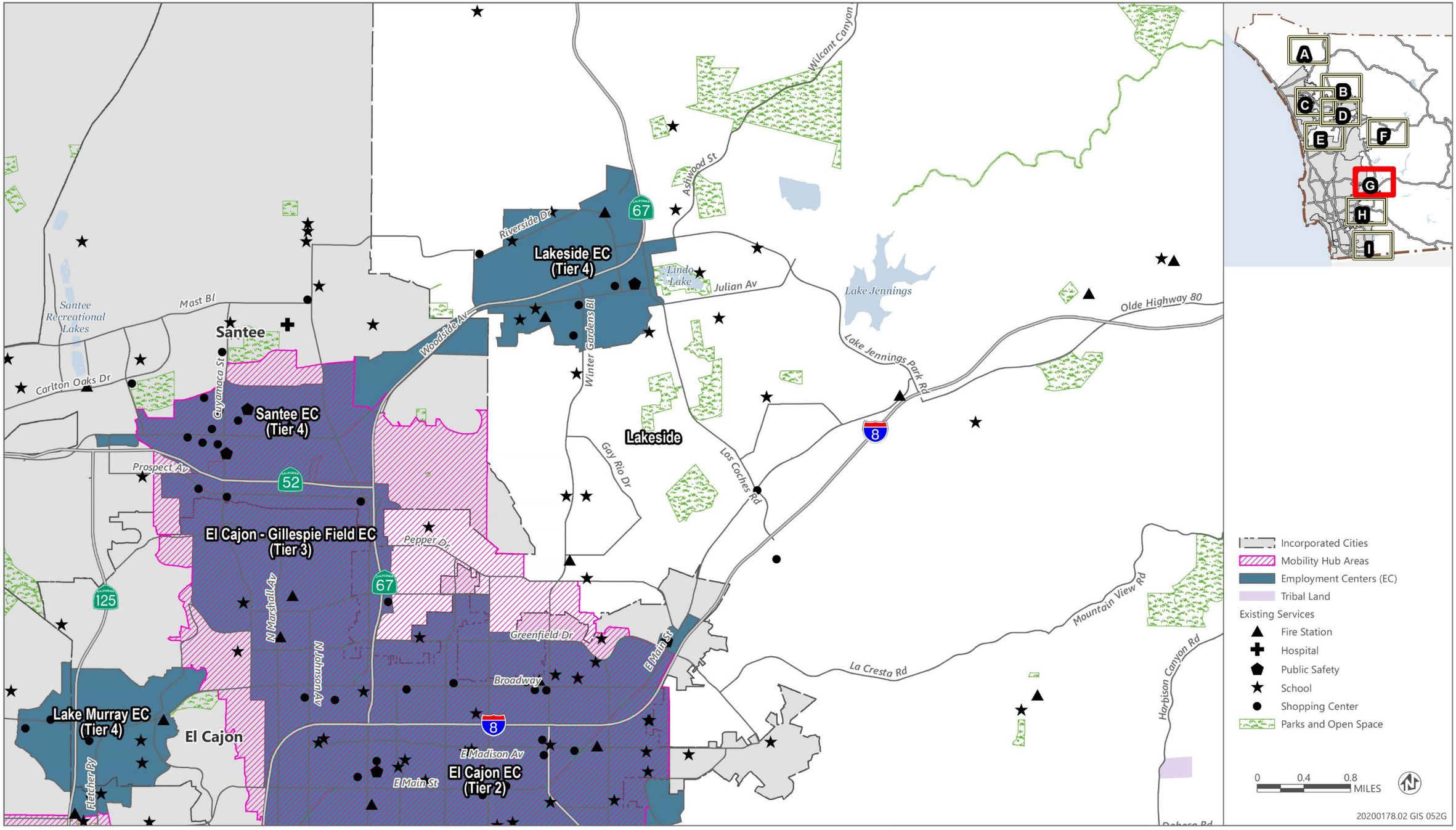
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3f Mobility Hub Areas - Inset E



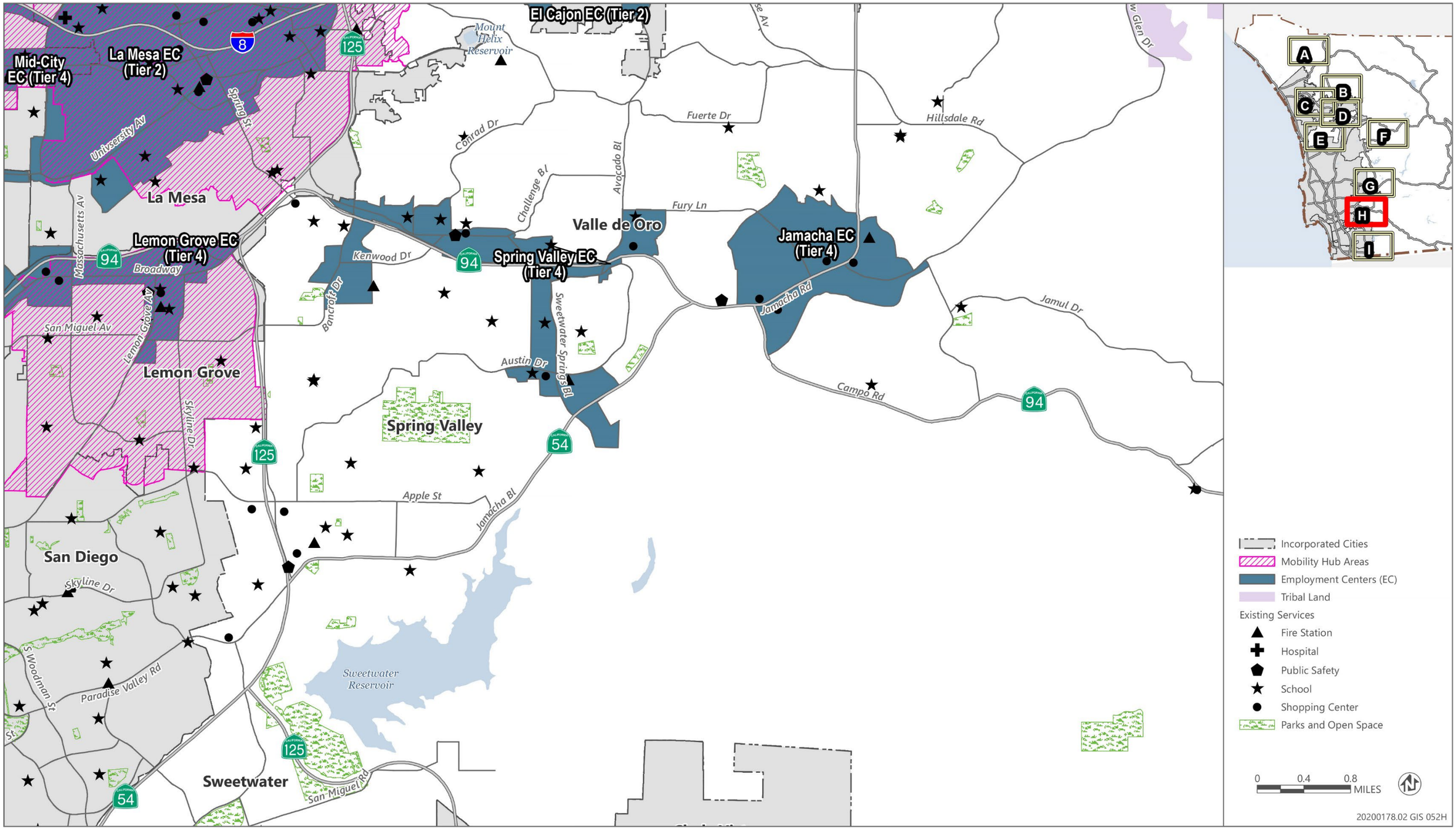
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3g Mobility Hub Areas - Inset F



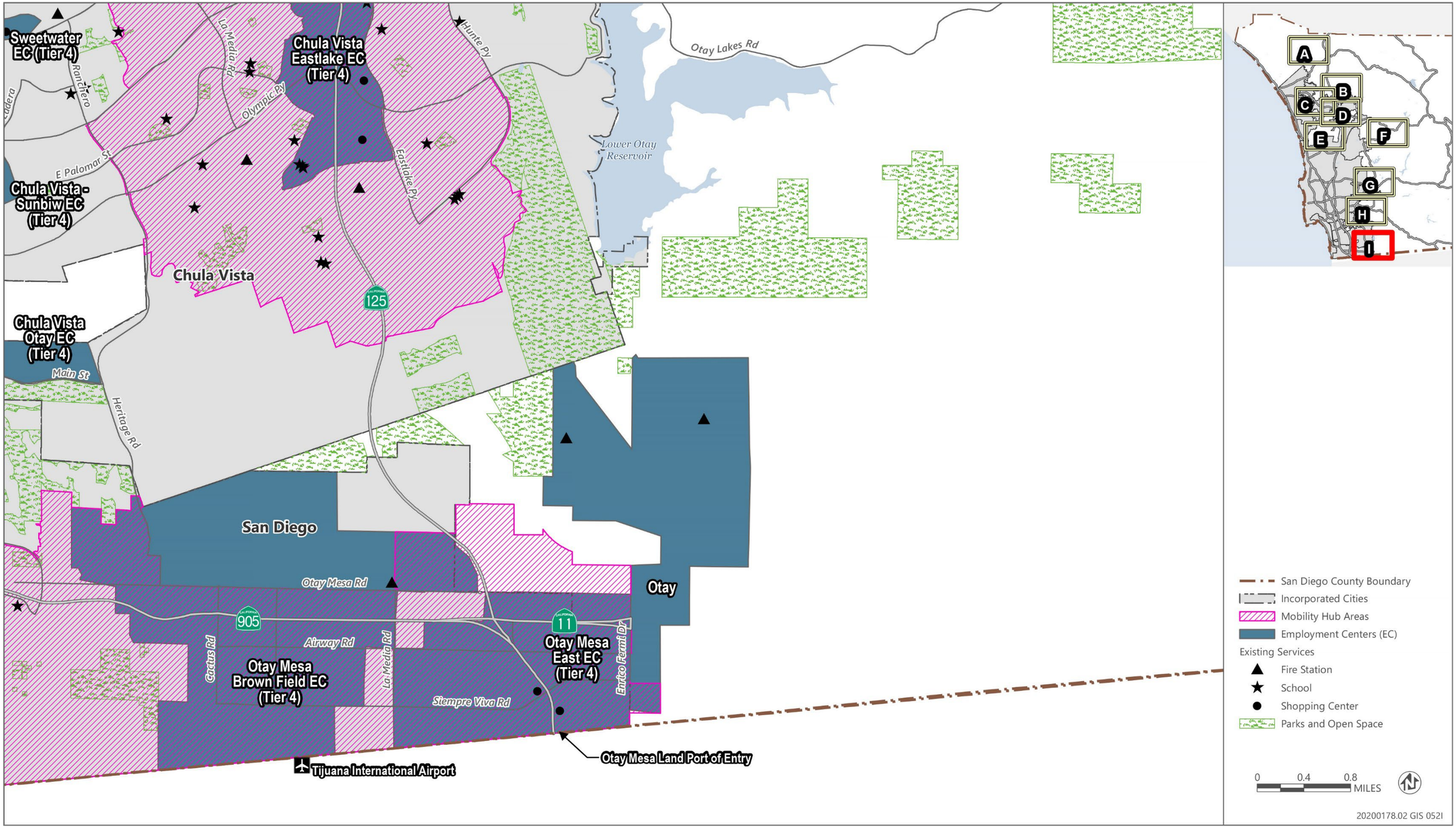
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3h Mobility Hub Areas - Inset G



Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3i Mobility Hub Areas - Inset H



Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3j Mobility Hub Areas - Inset I

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CHAPTER 8 MITIGATION MEASURES

8.1 List of Mitigation Measures

8.1.1 Aesthetics

Adopted Mitigation Measure Aes-1.2: Protect sensitive biological habitats and species through regulations that require avoidance and mitigation of impacts. Existing programs include the County MSCP and associated BMOs, RPO, and California Environmental Quality Act (CEQA) Guidelines. While protecting biological resources, these programs also preserve natural open space that contributes to the quality of many of the County's scenic vistas.

Adopted Mitigation Measure Aes-1.6: Require that project approvals with significant potential to adversely affect the scenic quality of a community require community review and specific findings of community compatibility. Examples can be found in the Zoning Ordinance with the numerous special uses or exceptions allowed pursuant to Administrative and Use Permits, and Site Plans. This practice has been proven useful for reducing impacts to aesthetic resources and their usefulness will increase as community plans and design guideline are updated pursuant to Aes-1.3 and Aes-1.4.

Adopted Mitigation Measure Aes-1.7: Develop and implement programs and regulations that preserve agricultural lands. Agricultural lands are often key components of scenic vistas and community character. Therefore, preservation of these lands will help to minimize potential impacts to scenic resources.

Adopted Mitigation Measure Aes-1.8: Continue to develop and implement programs and regulations that minimize landform alteration and preserve ridgelines and steep slopes where appropriate. Examples include the County's Grading Ordinance, RPO, and CEQA Guidelines.

Adopted Mitigation Measure Aes-1.9: Work with communities and other stakeholders to identify key scenic vistas, viewsheds of County scenic road and highways, and other areas of specific scenic value. Apply Resource Conservation Area designations or other special area designators, guidelines, and tools to guide future development of parcels within these viewsheds to avoid impacts to the scenic vistas.

Adopted Mitigation Measure Aes-4.1: County to coordinate with communities and stakeholders to review light pollution controls and consider amendments or expansions to those controls as determined necessary to reduce impacts to dark skies that are important to community character. This will ensure that potential artificial lighting impacts from development are monitored and controlled as needed to preserve community character.

Adopted Mitigation Measure Aes-4.2: County to maintain light and glare regulations that minimize impacts to adjacent properties, sensitive areas, community character, observatories, and dark skies. These regulations are currently found in the Light

Pollution Code and Zoning Ordinance. Additional reviews are implemented on discretionary projects in accordance with CEQA and the County's CEQA guidelines. These efforts will help protect the existing unincorporated area and surrounding environment from excessive artificial lighting impacts.

Adopted Mitigation Measure-M-AES-1: During the environmental review process for future Major Use Permits for wind turbines, the County Guidelines for Determining Significance for Visual Resources and Dark Skies and Glare shall be applied. When aesthetic impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: siting/location considerations; minimizing development and grading of steep slopes; natural screening and landscaping; undergrounding utilities; inclusion of buffers; and lighting restrictions.

Adopted Mitigation Measure-M-AES-2: Require that a Lighting Mitigation Plan be prepared as part of the MUP discretionary review process. The Lighting Mitigation Plan would demonstrate that the design and installation of all permanent lighting for large wind turbine ancillary facilities is such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. The Lighting Mitigation Plan would demonstrate consistency with the Light Pollution Code (Section 59.100 et al.) and Sections 6322 and 6324 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky do not result in a detrimental effect on astronomical research and to ensure reflected glare and light trespass is minimized.

Adopted Mitigation Measure-M-AES-3: Require that a Shadow Flicker Study be prepared as part of the MUP discretionary review process. The Shadow Flicker Study would utilize a shadow flicker model run to determine the potential shadow flicker that could occur at sensitive receptors within 2,000 meters (6,562 feet) of the proposed turbines. Due to the fact that some receptors may lie within 60° due north of the turbines, outside of the sun's path at any given point in the year, those receptors may be excluded from the study. Beyond 2,000 meters, the human eye would not be able to discern a shadow cast from a wind turbine. The modeling should utilize many different inputs, including:

1) Real Data

    - Actual coordinates of turbines
    - Actual coordinates of receptors
    - Actual topographic data

2) Conservative Assumptions

    - Specifications of the turbines being considered with the highest hub height and longest rotor diameter

- 100 percent turbine operation
- No vegetative screening
- Receptors can be impacted from all directions (i.e., “greenhouse mode”)

3) Realistic Features

- Actual wind data from a local meteorological tower to account for the percentage of time wind blows from each direction
- National Weather Service sunshine probability data to approximate average cloud cover.

CAP Update Mitigation Measure Aes-1: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Visual Resources and Dark Skies and Glare shall be applied. When aesthetic impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: siting/location considerations; minimizing development and grading of steep slopes; natural screening and landscaping; undergrounding utilities; inclusion of buffers; and lighting restrictions.

CAP Update Mitigation Measure Aes-2: Require that a Lighting Mitigation Plan be prepared as part of the MUP discretionary review process for all large-scale renewable energy projects. The Lighting Mitigation Plan shall demonstrate that the design and installation of all permanent lighting for large wind turbines is such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. The Lighting Mitigation Plan shall demonstrate consistency with the Light Pollution Code (Section 59.100 et al.) and Sections 6322 and 6324 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky do not result in a detrimental effect on astronomical research and to ensure reflected glare and light trespass is minimized.

CAP Update Mitigation Measure Aes-3: Require that a Shadow Flicker Study be prepared as part of the MUP discretionary review process for large-scale wind turbine projects. The Shadow Flicker Study shall utilize a shadow flicker model run to determine the potential shadow flicker that could occur at sensitive receptors within 2,000 meters (6,562 feet) of the proposed turbines. Due to the fact that some receptors may lie within 60 degrees due north of the turbines, outside of the sun’s path at any given point in the year, those receptors may be excluded from the study. Beyond 2,000 meters, the human eye would not be able to discern a shadow cast from a wind turbine. The modeling shall utilize many different inputs, including:

1) Real Data

- Actual coordinates of turbines

- Actual coordinates of receptors
- Actual topographic data

2) Conservative Assumptions

- Specifications of the turbines being considered with the highest hub height and longest rotor diameter
- 100 percent turbine operation
- No vegetative screening
- Receptors can be impacted from all directions (i.e., “greenhouse mode”)

3) Realistic Features

- Actual wind data from a local meteorological tower to account for the percentage of time wind blows from each direction
- National Weather Service sunshine probability data to approximate average cloud cover

8.1.2 Agricultural Resources

Adopted Mitigation Measure Agr-1.1: Implement the General Plan Regional Category map and Land Use Maps which protect agricultural lands with lower density land use designations that will support continued agricultural.

Adopted Mitigation Measure Agr-1.2: Develop and implement programs and regulations that protect agricultural lands (such as the CEQA guidelines, Zoning Ordinance, Right to Farm Act, Open Space Subvention Act, Farm and Ranch Lands Protection Program, San Diego County Agricultural Enterprises and Consumer Information Ordinance, BOS Policy I-133, and the San Diego County Farming Program), as well as, those that support implementation of the Williamson Act (including the CEQA Guidelines, Zoning Ordinance, and Subdivision Ordinance).

Adopted Mitigation Measure Agr-1.3: Create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary with the goal of promoting conservation of natural resources and open space (including agricultural lands) while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted.

Adopted Mitigation Measure Agr-1.4: Develop and implement the PACE program which compensates landowners for voluntarily limiting future development on their land.

Adopted Mitigation Measure Agr-1.5: Revise community plans to identify important agricultural areas within them and specific compatible uses and desired buffers necessary to maintain the viability of that area. Community plans are used to review development projects (including General Plan Amendments).

Adopted Mitigation Measure Agr-2.1: Prior to the approval of any Zoning Ordinance Amendment that would result in the removal of an "A" designator from a certain property, an analysis shall be conducted to ensure that the action removing such a designation will not result in any significant direct or indirect adverse impact to a Williamson Act Contract lands.

Adopted Mitigation Measure M-AGR-1: During the environmental review process for future Major Use Permits for wind turbines, the County Guidelines for Determining Significance for Agricultural Resources shall be applied. When impacts to Farmland are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of agricultural resources; preservation of agriculture; and inclusion of compatibility buffers near areas intended for agricultural uses.

Adopted Mitigation Measure M-AGR-2: During the environmental review process for future Major Use Permits for wind turbines, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts to forest land are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management.

CAP Update Mitigation Measure Agr-1: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Agricultural Resources shall be applied. When impacts to Important Farmland are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of agricultural resources; preservation of agriculture; and inclusion of compatibility buffers near areas intended for agricultural uses.

CAP Update Mitigation Measure Agr-2: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts to forest land are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management.

8.1.3 Air Quality

Adopted Mitigation Measure Air-2.1: Provide incentives such as preferential parking for hybrids or alternatively fueled vehicles such as compressed natural gas (CNG) vehicles or hydrogen- or electric-powered vehicles. The County shall also establish programs for priority or free parking on County streets or in County parking lots for hybrids or alternatively fueled vehicles.

Adopted Mitigation Measure Air-2.2: Replace existing vehicles in the County fleet as needed with the cleanest vehicles commercially available that are cost-effective and meet vehicle use needs.

Adopted Mitigation Measure Air-2.3: Implement transportation fleet fueling standards to improve the number of alternatively fueled vehicles in the County fleet.

Adopted Mitigation Measure Air-2.4: Provide incentives to promote the siting or use of clean air technologies where feasible. These technologies shall include, but not be limited to, fuel cell technologies, renewable energy sources, and hydrogen fuel.

Adopted Mitigation Measure Air-2.5: Require that the following measures be implemented on all construction projects where project emissions are above the SLTs:

- multiple applications of water during grading between dozer/scraper passes;
- paving, chip sealing, or chemical stabilization of internal roadways after completion of grading;
- use of sweepers or water trucks to remove “track-out” at any point of public street access;
- termination of grading if winds exceed 25 miles per hour;
- stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control;
- use of low-sulfur fuels in construction equipment;
- use of low VOC paints; and
- projects exceeding SLTs will require 10 percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NOX), CO, and PM. Tier I standards are for engines over 50 horsepower (hp) (such as bulldozers) built between 1996 and 2000, and engines under 50 hp (such as lawn tractors) prop built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are

for engines rated over 50 hp from 2006 to 2008. Tier IV standards apply to engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV.

Adopted Mitigation Measure Air-2.6: Use County Guidelines for Determining Significance for Air Quality to identify and mitigate adverse environmental effects on air quality.

Adopted Mitigation Measure Air-2.7: Implement County Air Pollution Control District regulations for air emissions from all sources under its jurisdiction.

Adopted Mitigation Measure Air-2.8: Require NSRs to prevent permitting projects that are "major sources."

Adopted Mitigation Measure Air-2.9: Implement the Grading, Clearing, and Watercourses Ordinance by requiring all clearing and grading to be conducted with dust control measures.

Adopted Mitigation Measure Air-2.10: Revise Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County-funded renovation and new building projects. This could be achieved by making the guidelines within the policy mandatory rather than voluntary.

Adopted Mitigation Measure Air-2.11: Implement County RAQS to attain state air quality standards for ozone.

Adopted Mitigation Measure Air-2.12: Revise Board Policy G-15 to require County facilities to comply with Silver Leadership in Energy and Environmental Design (LEED) standards or other equivalent Green Building rating systems.

Adopted Mitigation Measure Air-2.13: Revise Board Policy G-16 to require the County to:

- adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability, and

- require government contractors to use low-emission construction vehicles and equipment.

Adopted Mitigation Measure Air-4.1: Use the policies set forth in the CARB's Land Use and Air Quality Handbook as a guideline for siting sensitive land uses. Implementation of this measure will ensure that sensitive land uses such as residences, schools, day care centers, playgrounds, and medical facilities are sited appropriately to minimize exposure to emissions of TACs.

CAP Update Mitigation Measure Air-2.1: Require construction contractors to reduce construction-related exhaust emissions by ensuring that all off-road equipment greater

than 50 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall operate on at least an EPA-approved Tier 3 or newer engine. Exemptions can be made for specialized equipment where Tier 3 engines are not commercially available within 200 miles of the proposed project location. The construction contract must identify these pieces of equipment, document their unavailability, and ensure that they operate on no less than an EPA-approved Tier 2 engine.

8.1.4 Biological Resources

Adopted Mitigation Measure Bio-1.5: Utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources. Also, utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special-status species populations on or near project sites. This information will be used to avoid or mitigate impacts as appropriate.

Adopted Mitigation Measure Bio-1.6: Implement the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species.

Adopted Mitigation Measure Bio-1.7: Minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance.

Adopted Mitigation Measure Bio-2.1: Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development.

Adopted Mitigation Measure Bio-2.2: Require that development projects obtain CWA Section 401/404 permits issued by the California Regional Water Quality Control Board and US Army Corps of Engineers for all project-related disturbances of waters of the US and/or associated wetlands. Also, continue to require that projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Game for all project-related disturbances of streambeds.

Adopted Mitigation Measure Bio-2.3: Ensure that wetlands and wetland buffer areas are adequately preserved whenever feasible to maintain biological functions and values.

Adopted Mitigation Measure Bio-2.4: Implement the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands.

Adopted Mitigation Measure M-Bio-1: During the environmental review process for future MUPs for wind turbines, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts on biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise.

Adopted Mitigation Measure M-Bio-2: Update the County Guidelines for Determining Significance for Biological Resources to include, or incorporate by reference, recommendations from the California Department of Fish and Game, the Avian Power Line Interaction Committee, the USFWS Draft Guidance, and the California Energy Commission (e.g., California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development). Examples of recommended mitigation measures include: site screening; pre-permitting monitoring; acoustic monitoring; buffer zone inclusion; reduction of foraging resources near turbines; specific lighting to reduce bird collisions; post-construction monitoring; and avian protection plans.

CAP Update Mitigation Measure Bio-1: During the environmental review process for future MUPs for large-scale renewable energy projects, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts on biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise.

CAP Update Mitigation Measure Bio-2: Update the County Guidelines for Determining Significance for Biological Resources to include, or incorporate by reference, recommendations from the California Department of Fish and Wildlife, the Avian Power Line Interaction Committee, the USFWS Draft Guidance, and the California Energy Commission (e.g., California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development). Examples of recommended mitigation measures include: site screening; pre-permitting monitoring; acoustic monitoring; buffer zone inclusion; reduction of foraging resources near turbines and transmission lines; specific lighting to reduce bird collisions; post-construction monitoring; and avian protection plans.

8.1.5 Cultural and Paleontological Resources

Adopted Mitigation Measure Cul-1.1: Utilize the RPO, CEQA, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources by requiring appropriate reviews and applying mitigation when impacts are significant.

Adopted Mitigation Measure CuI-1.6: Implement, and update as necessary, the "County's Guidelines for Determining Significance for Cultural Resources" to identify and minimize adverse impacts to historic and archaeological resources.

Adopted Mitigation Measure CuI-2.1: Develop management and restoration plans for identified and acquired properties with cultural resources.

Adopted Mitigation Measure CuI-2.2: Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information.

Adopted Mitigation Measure CuI-2.3: Support the dedication of easements that protect important cultural resources by using a variety of funding methods, such as grants or matching funds, or funds from private organizations.

Adopted Mitigation Measure CuI-2.5: Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys.

Adopted Mitigation Measure CuI-2.6: Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the South Coast Information Center (SCIC) and consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review, while maintaining the confidentiality of sensitive cultural information.

Adopted Mitigation Measure CuI-3.1: Implement the Grading Ordinance and CEQA to avoid or minimize impacts to paleontological resources, require a paleontological monitor during grading when appropriate, and apply appropriate mitigation when impacts are significant.

Adopted Mitigation Measure CuI-3.2: Implement, and update as necessary, the County's Guidelines for Determining Significance for Paleontological Resources to identify and minimize adverse impacts to paleontological resources.

Adopted Mitigation Measure CuI-4.1: Include regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant.

8.1.6 Energy

None.

8.1.7 Environmental Justice

None.

8.1.8 Greenhouse Gas Emissions

None.

8.1.9 Hazards and Hazardous Materials

Adopted Mitigation Measure Haz-1.1: Implement the Guidelines for Determining Significance, Airport Hazards, when reviewing new development projects to ensure compatibility with surrounding airports and land uses and apply appropriate mitigation when impacts are significant.

Adopted Mitigation Measure Haz-1.3: Review the AICUZ when reviewing new development projects within the study area. Ensure that such development projects are consistent with the land use compatibility and safety policies therein.

Adopted Mitigation Measure Haz-1.5: Coordinate with the San Diego County Regional Airport Authority (SDCRAA) and County Airports for issues related to airport planning and operations.

Adopted Mitigation Measure Haz-3.1: Facilitate coordination between DPLU (now PDS) and the Office of Emergency services to implement and periodically update the Hazard Mitigation Plan.

Adopted Mitigation Measure Haz-3.2: Implement the CEQA Guidelines for Determining Significance to ensure that discretionary projects do not adversely impact emergency response or evacuation plans. Also implement the County Public Road Standards and County Private Road Standards during these reviews and ensure that road improvements are consistent with Emergency Response and Evacuation Plans. Apply appropriate mitigation when impacts are significant.

Adopted Mitigation Measure Haz-3.3: Prepare Fire Access Road network plans and include in Community Plans or other document as appropriate. Also implement the County Fire Code and require fire apparatus access roads and secondary access for projects.

Adopted Mitigation Measure Haz-4.1: Identify and minimize potential fire hazards for future development by using and maintaining a database that identifies fire prone areas, locating development away from Fire Hazard areas whenever practicable, and adhering to the County Guidelines for Determining Significance for Wildland Fires & Fire Protection and applying appropriate mitigation when impacts are significant.

Adopted Mitigation Measure Haz-4.2: Conduct effective and environmentally sensitive brush management measures such as: addressing habitat-specific fire controls within Resource Management Plans; implementation of the Weed Abatement Ordinance and

enforcing proper techniques for maintaining defensible space around structures; coordination with the local FAHJ to ensure that district goals for fuel management and fire protection are being met; and recognizing the Memorandum of Understanding between the wildlife agencies and fire authorities that guides the abatement of flammable vegetation without violating environmental regulations for habitat protection.

Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.

Adopted Mitigation Measure Haz-4.4: Create a Conservation Subdivision Program that facilitates conservation-oriented, fire-safe, project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary.

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

8.1.10 Hydrology and Water Quality

Adopted Mitigation Measure Hyd-1.1: Update and implement the County of San Diego's Jurisdictional Runoff Management Program (JRMP).

Adopted Mitigation Measure Hyd-1.2: Implement and revise as necessary the Watershed Protection Ordinance to reduce the adverse effects of polluted runoff discharges on waters and to encourage the removal of invasive species and restore natural drainage systems.

Adopted Mitigation Measure Hyd-1.3: Establish and implement low impact development (LID) standards for new development to minimize runoff and maximize infiltration.

Adopted Mitigation Measure Hyd-1.4: Revise and implement the Stormwater Standards Manual requiring appropriate measures for land use with a high potential to contaminate surface water or groundwater resources.

Adopted Mitigation Measure Hyd-1.5: Utilize the County Guidelines for Determining Significance for Hydrology and Water Quality and Groundwater Resources to identify adverse environmental effects.

Adopted Mitigation Measure Hyd-2.1: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available water districts. Also implement and revise as necessary Board Policy G-15 to conserve water at County facilities.

Adopted Mitigation Measure Hyd-2.2: Implement the Groundwater Ordinance to balance groundwater resources with new development. Also revise the Ordinance Relating to Water Conservation for Landscaping (currently Zoning Ordinance Sections 6712 through 6725) to further water conservation through the use of recycled water.

Adopted Mitigation Measure Hyd-2.3: Establish a water credits program between the County and the Borrego Water District to provide a streamlined and consistent process for the permanent cessation of outdoor water intensive uses such as irrigated agricultural or golf course land.

Adopted Mitigation Measure Hyd-2.4: Coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and implementation and enhancement of water conservation programs.

Adopted Mitigation Measure Hyd-2.5: Implement and revise as necessary the Resource Protection Ordinance and Policy I-68 Proposed Projects in Flood Plains / Floodways to restrict development in flood plains / floodways.

Adopted Mitigation Measure Hyd-3.1: Implement, and revise as necessary, ordinances to require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater.

Adopted Mitigation Measure Hyd-3.2: Implement, and revise, as necessary the Resource Protection Ordinance to limit development on steep slopes. Also incorporate Board Policy I-73, the Hillside Development Policy, into the Resource Protection Ordinance to the extent that it will allow for one comprehensive approach to steep-slope protections.

Adopted Mitigation Measure Hyd-3.3: Implement the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability.

Adopted Mitigation Measure Hyd-4.1: Implement the Flood Damage Prevention Ordinance to reduce flood losses in specified areas.

Adopted Mitigation Measure Hyd-4.2: Implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses.

Adopted Mitigation Measure Hyd-4.3: Implement and revise as necessary Board Policies such as: Policy I-68, which establishes procedures for projects that impact floodways; Policy I-45, which defines watercourses that are subject to flood control; and Policy I-56, which permits, and establishes criteria for, staged construction of off-site flood control and drainage facilities by the private sector when there is a demonstrated and substantial public, private or environmental benefit.

Adopted Mitigation Measure Hyd-6.1: Implement the Resource Protection Ordinance to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil, geological and drainage problems.

Adopted Mitigation Measure Hyd-8.2: Review discretionary projects for dam inundation hazards through application of the County's Guidelines for Determining Significance for Hydrology and Guidelines for Determining Significance for Emergency Response Plans.

8.1.11 Land Use and Planning

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

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

Adopted Mitigation Measure Lan-1.3: Maintain plans and standards for infrastructure and roads so that divisions of communities do not occur. This will include: 1) updates to

County Road Standards to ensure that roads are designed and built in a safe manner consistent with the General Plan and community context; 2) adherence to Community Plans to guide infrastructure planning in the individual and unique communities of the County; 3) evaluation and, if necessary, revisions to the subdivision ordinance to ensure future project designs, and corresponding infrastructure designs, are consistent with the General Plan and with established community character; 4) preparation of local public road network plans to improve mobility, connectivity, and safety; and 5) preparation of community road standards that supplement the County road standards in order to recognize the unique constraints and character of different communities.

8.1.12 Noise

Adopted Mitigation Measure Noi-1.1: Require an acoustical analysis whenever a new development may result in any existing or future noise sensitive land uses being subject to on-site noise levels of 60 dBA (CNEL) or greater, or other land uses that may result in noise levels exceeding the “Acceptable” standard in the Noise Compatibility Guidelines (Table N-1 in the Noise Element).

Adopted Mitigation Measure Noi-1.3: Require an acoustical study for projects proposing amendments to the County General Plan Land Use Element and/or Mobility Element that propose a significant increase to the average daily traffic due to trips associated with the project beyond those anticipated in the General Plan.

Adopted Mitigation Measure Noi-2.1: For Land Use Designations defined in Table 2.11-14, a groundborne vibration technical study shall be required for proposed land uses within the following distances from the Sprinter Rail Line right-of-way and the property line: 600 feet of a Category 1 Land Use, 200 feet of a Category 2 Land Use, and 120 feet of a Category 3 Land Use. If necessary, mitigation shall be required for land uses in compliance with the standards listed in Tables 2 and 3 of the County of San Diego Guidelines for Determining Significance - Noise.

Adopted Mitigation Measure Noi-2.4: Require an acoustical study whenever a proposed extractive land use facility may result in a significant noise impact to existing noise sensitive land uses, or when a proposed noise sensitive land use may be significantly affected by an existing extractive land use facility. The results of the acoustical study may require a “buffer zone” to be identified on all Major Use Permit applications for extractive facilities whenever a potential for a noise impact to noise sensitive land uses may occur.

Adopted Mitigation Measure Noi-5.1: Use the applicable Airport Land Use Compatibility Plan’s (ALUCP) as guidance/reference during development review of projects that are planned within an Airport Influence Area (AIA). Any projects that are within the AIA shall be submitted to the SDCRAA for review.

Adopted Mitigation Measure Noi-5.3: Consult with the FAA standards and the County Noise Ordinance as a guide for assessing noise impacts from private airports and helipads.

8.1.13 Transportation

Adopted Mitigation Measure Tra-1.3: Implement the County Public Road Standards during review of new development projects. Also revise the Public Road Standards to include a range of road types according to Regional Category context.

Adopted Mitigation Measure Tra-1.4: Implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Adopted Mitigation Measure Tra-4.4: Implement and revise as necessary the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards.

8.1.14 Tribal Cultural Resources

Adopted Mitigation Measure Cul-2.2: Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information.

Adopted Mitigation Measure Cul-2.4: Protect significant cultural resources through regional coordination and consultation with the NAHC and local tribal governments, including SB-18 review.

Adopted Mitigation Measure Cul-2.5: Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys.

Adopted Mitigation Measure Cul-2.6: Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the South Coast Information Center (SCIC) and consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review, while maintaining the confidentiality of sensitive cultural information.

Adopted Mitigation Measure Cul-4.1: Include regulations and procedures for discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to discovery of human remains promote preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant.

CAP Update Mitigation Measure TCR-1: Require development to avoid tribal cultural resources, if feasible. If complete avoidance is not possible, require development to

mitigate impacts to tribal cultural resources pursuant to Assembly Bill 52 and CEQA Sections 21080.3.1 and 21084.3.

8.1.15 Wildfire

Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

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