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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