

## 2.7 Environmental Justice

“Environmental justice” (EJ), which seeks to minimize the effects of environmental hazards, is defined by the California Government Code (Section 65040.12) as the “fair treatment and meaningful participation of people of all races, culture, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” The term “fair treatment” can be defined as a condition under which “no group of people, including racial, ethnic, or socioeconomic group, shall bear a disproportionate share of negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies” (EPA 2020).

At present, there is no requirement for a separate evaluation of EJ impacts in CEQA or the State CEQA Guidelines. However, in response to the trial court’s determination that the 2018 CAP SEIR inadequately analyzed impacts related to EJ, San Diego County, as the lead agency, is preparing this section to evaluate potential EJ implications that could result from project implementation.

This section identifies EJ populations within the unincorporated county, summarizes existing regulatory requirements, and evaluates the potential for CAP Update implementation to result in adverse environmental impacts that might be disproportionately borne by minority and low-income communities within the unincorporated county. Table 2.7-1 summarizes the EJ impact that would occur with implementation of the project. Because the 2011 GPU PEIR did not evaluate EJ impacts, no comparison is made related to whether a new or more severe significant EJ impact would occur with implementation of the CAP Update.

**Table 2.7-1 Summary of Environmental Justice–Related Impacts**

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Disproportionately high and adverse human health or environmental impact on an EJ community	Not evaluated	CAP Update Only: No	CAP Update Only: No
		Not evaluated	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

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

Source: Compiled by Ascent Environmental in 2023.

The County received a comment concerning project impacts on economically disadvantaged communities (DACs) during the Notice of Preparation (NOP) scoping process. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this draft SEIR.

## 2.7.1 Existing Conditions

This section summarizes existing conditions related to DACs consistent with the information included in the County of San Diego General Plan Environmental Justice Element (EJ Element). To broaden the reach of the EJ Element and to align with current County programs directed at high-need areas, the County refers to DACs as Environmental Justice Communities (EJ communities) to differentiate them from the state’s designated DACs (County of San Diego 2021).

### ***2.7.1.1 Environmental Justice Communities***

This section incorporates by reference the EJ community’s definition and characteristics from the EJ Element. The County utilized the state recommended (at the time of preparing the EJ Element) California Communities Environmental Health Screening Tool 3.0 (CalEnviroScreen 3.0)<sup>1</sup> in combination with localized data available through the County’s *Live Well San Diego* vision program, to identify EJ communities within their jurisdiction. CalEnviroScreen identifies California communities by census tract that are disproportionately burdened by, and vulnerable to, multiple sources of pollution. The customized methodology identified 17 census tracts with varying population sizes, demographics, socioeconomic characteristics, and environmental conditions that meet the intent for addressing EJ issues, concerns, and priorities as part of the EJ Element. To tailor goals, policies, and implementation measures, the 17 census tracts were grouped into four distinct EJ communities. The four EJ communities are listed below and shown on Figure EJ-1 of the EJ Element:

- North El Cajon
- North Lemon Grove
- Spring Valley
- Sweetwater

### **Population and Socioeconomic Characteristics**

Examining the racial and ethnic makeup of communities is vital to identifying the strengths and assets of community networks, resources, and other indicators of social capital. It is also important in analyzing disparities related to pollution burdens, health impacts, quality of services, and level of community investments. Race and ethnicity are among the factors considered when measuring health equity and the social determinants of health, along with income, educational attainment, employment status, and access to healthcare. Achieving EJ goals requires that disparate conditions be understood and addressed so that resulting policies and implementation programs can address disproportionate EJ impacts and prevent further inequities.

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<sup>1</sup> CalEnviroScreen 4.0 was released in October 2021, but at the time of preparing the EJ Element CalEnviroScreen 3.0 was the most current model.

While a number of community characteristics can be considered in identifying EJ communities, communities of color (i.e., minority communities) and low-income communities often bear a disproportionate burden of pollution and associated health risks based on legacy decisions that place industrial or polluting uses next to these communities. The following defines minority and low-income populations, and describes their representation and distribution within the unincorporated county.

### **Minority Populations**

The Council on Environmental Quality (CEQ) defines the term “minority” as persons from any of the following US Census categories for race: Black/African-American; Asian, Native Hawaiian or Other Pacific Islander; and American Indian or Alaska Native. For purposes of this analysis, “minority” also includes all other nonwhite racial categories that were used in the American Community Survey (ACS) 5-Year Estimates (2014-2018), such as “some other race” and “two or more races.” Population density and percent minority information for each EJ community is summarized in Table 2.7-2, presented at the end of this section.

As shown on Table 2.7-2, the population of EJ communities is more racially and ethnically diverse when compared to the county as a whole. According to 2014-2018 ACS Estimates, the county has 54.2 percent people of color overall (compared to California with 62.5 percent). Apart from North El Cajon, which is the only EJ community with a majority White population, the other EJ communities are “majority minority” areas: North Lemon Grove, Spring Valley, and Sweetwater.

### **Low-income Populations**

As a measurement of community well-being, the ability to access economic opportunity and positive health impacts are closely linked. Research indicates that economic opportunity is one of the most powerful predictors of good health, and that impacts on health are especially pronounced for people in or near poverty (HPI 2021). When families are in poverty, they often do not have reliable access to the goods and services that are necessary for a healthy life (Robert Wood Johnson Foundation 2011). Persons living with income below poverty are identified as “low-income,” utilizing the annual poverty thresholds established by the US Census. In California, 200 percent of the federal poverty level is often used to measure poverty, with \$24,280 as the income threshold for an individual due to high cost of living. For purposes of this analysis, ACS Estimates (2014-2018)<sup>2</sup> and California income thresholds were used to estimate poverty status in EJ communities. Poverty status for each EJ community is summarized in Table 2.7-3, presented at the end of this section.

As shown on Table 2.7-3, 12.5 percent of the population in the unincorporated county live below the federal poverty level. In the EJ communities, North Lemon Grove has the highest poverty level followed by North El Cajon, Spring Valley, and Sweetwater. When considering the high cost of living in California, nearly one out of three residents in the

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<sup>2</sup> ACS 2014-2018 population and demographic estimates were the most complete set of data available at the time of preparing the EJ Element.

county have incomes below the \$24,280 income threshold. In the EJ communities, North Lemon Grove, North El Cajon, and Spring Valley all have higher poverty levels compared to those of the county.

## **2.7.2 Regulatory Framework**

### ***2.7.2.1 Federal***

#### **Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations**

Executive Order 12898, issued by President William J. Clinton in 1994, requires federal agencies to (1) identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law, (2) develop a strategy for implementing EJ, and (3) promote nondiscrimination in federal programs that affect human health and the environment, as well as provide minority and low-income communities access to public information and public participation. In addition, the Executive Order authorized the creation of an Interagency Working Group on EJ, overseen by the US Environmental Protection Agency, to implement the Executive Order and provide a forum for federal agencies to collectively advance EJ principles.

#### **Executive Order 13175: Consultation and Coordination with Indian Tribal Governments**

Executive Order 13175, issued by President William J. Clinton in 2000, recognized tribal rights of self-government and tribal sovereignty, and affirmed and committed the federal government to work with Native American Governments on a government-to-government basis as agencies develop policy on issues that impact Indian communities. This order established specific requirements that the federal government must follow as it develops and carries out policy actions that affect Indian tribes.

#### **Council on Environmental Quality: Environmental Justice – Guidance under the National Environmental Policy Act**

CEQ has oversight of the federal government's compliance with Executive Order 12898 and the National Environmental Policy Act (NEPA). In consultation with the US Environmental Protection Agency and other agencies, CEQ developed guidance to assist federal agencies with NEPA procedures to effectively identify and address EJ concerns. Agencies are permitted to supplement CEQ's guidance with their own, more specific guidance tailored to their programs or activities or departments, insofar as is permitted by law. Under NEPA, the identification of a disproportionately high and adverse human health or environmental effect on a low-income or minority population does not preclude a proposed agency action from going forward or compel a finding that a proposed action is environmentally unacceptable. Instead, the identification of such effects is expected to encourage agency consideration of alternatives, mitigation measures, and preferences expressed by the affected community or population (CEQ 1997).

## **2.7.2.2 State**

### **Senate Bill 535 and Assembly Bill 1550**

Authorized by the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32), the cap-and-trade program is one of several strategies that California uses to reduce GHG emissions that cause climate change. The state's portion of the cap-and-trade auction proceeds are deposited in the Greenhouse Gas Reduction Fund (GGRF) and used to further the objectives of AB 32. In 2012, the California Legislature passed Senate Bill (SB) 535 (de Leon), directing that 25 percent of the proceeds from the GGRF go to projects that provide a benefit to DACs. In 2016, the legislature passed AB 1550 (Gomez), which now requires that 25 percent of proceeds from the GGRF be spent on projects located in DACs. The law requires the investment plan to allocate (1) a minimum of 25 percent of the available moneys in the fund to projects located within and benefiting individuals living in DACs; (2) an additional minimum of 5 percent to projects that benefit low-income households or to projects located within, and benefiting individuals living in, low-income communities located anywhere in the state; and (3) an additional minimum of 5 percent either to projects that benefit low-income households that are outside of, but within 0.5 mile of, DACs or to projects located within the boundaries of, and benefiting individuals living in, low-income communities that are outside of, but within 0.5 mile of, DACs.

### **Senate Bill 1000**

SB 1000, enacted in 2016, amended California Government Code Section 65302(h) to require that general plans include an EJ element or related goals, policies, and objectives in other elements of general plans with respect to DACs. Inclusion of EJ policies is required when a city or county adopts or revises two or more general plan elements and a DAC is located within the city or county's jurisdictional boundary. EJ-related policies must endeavor to reduce the disproportionate health risks in DACs, promote civic engagement in the public decision-making process, and prioritize improvements that address the needs of DACs. Policies should focus on improving the health and overall well-being of vulnerable and at-risk communities through reductions in pollution exposure, access to healthy foods, healthy homes, improved air quality, and increased physical activity.

### **Assembly Bill 617**

AB 617 of 2017 aims to help protect air quality and public health in communities around industries subject to the state's cap-and-trade program for GHG emissions. AB 617 imposes a new state-mandated local program to address nonvehicular sources (e.g., refineries, manufacturing facilities) of criteria air pollutants and toxic air contaminants (TACs). The bill requires the California Air Resources Board to identify high-pollution areas and directs air districts to focus air quality improvement efforts through the adoption of community emission reduction programs in these identified areas. Currently, air districts review individual stationary sources and impose emissions limits on emitters based on best available control technology, pollutant type, and proximity to nearby existing land uses. This bill addresses the cumulative and additive nature of air pollutant health effects by requiring communitywide air quality assessment and emission reduction

planning, called a community risk reduction plan in some jurisdictions. The California Air Resources Board has developed a statewide blueprint that outlines the process for identifying affected communities, statewide strategies to reduce emissions of criteria air pollutants and TACs, and criteria for developing community emissions reduction programs and community air monitoring plans.

### **California Department of Justice’s Bureau of Environmental Justice**

In February 2018, California Attorney General Xavier Becerra established the Bureau of Environmental Justice (Bureau) within the Environment Section at the California Department of Justice. The Bureau enforces environmental laws, including CEQA, to protect communities disproportionately burdened by pollution and contamination. The Bureau accomplishes this through oversight and investigation and by using the law enforcement powers of the Attorney General’s Office to identify and pursue matters affecting vulnerable communities.

In 2012, then Attorney General Kamala Harris published a fact sheet titled, “Environmental Justice at the Local and Regional Level,” highlighting existing provisions in the California Government Code and CEQA principles that provide for the consideration of EJ in local planning efforts and CEQA. Attorney General Becerra cites the fact sheet on his web page, indicating its continued relevance.

### **California Government Code Section 65302(h)(4)(A)**

Pursuant to California Government Code Section 65302(h)(4)(A), “disadvantaged communities” are defined as (1) “an area identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code” or (2) “a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.”

### **California Communities Environmental Health Screening Tool**

CalEnviroScreen is a mapping tool developed by the Office of Environmental Health Hazards Assessment to help identify low-income census tracts in California that are disproportionately burdened by and vulnerable to multiple sources of pollution. CalEnviroScreen uses environmental, health, and socioeconomic information based on data sets available from state and federal government sources to produce scores for every census tract in the state. Scores are generated using 20 statewide indicators in four categories: exposures, environmental effects, sensitive populations, and socioeconomic factors. Exposures and environmental effects characterize the pollution burden that a community faces, while sensitive populations and socioeconomic factors define population characteristics.

### **Governor’s Office of Planning and Research’s 2020 Updated EJ Element Guidelines**

The Governor’s Office of Planning and Research (OPR) published updated General Plan Guidelines in June 2020 that include revised EJ guidance in response to SB 1000. OPR

has also published example policy language in an appendix document along with several case studies to highlight EJ-related policies and initiatives that can be considered by other jurisdictions. Section 4.8 of the General Plan Guidelines contains the EJ guidance. The guidelines offer recommendations for identifying vulnerable communities and reducing pollution exposure related to health conditions, air quality, project siting, water quality, and land use compatibility related to industrial and large-scale agricultural operations, childcare facilities, and schools, among other things. It provides many useful resources, including links to research, tools, reports, and sample general plans.

### **2.7.2.3 Local**

#### **2011 San Diego County General Plan**

The County of San Diego General Plan includes an EJ Element that was adopted by the Board of Supervisors on July 14, 2021. The EJ Element reflects the County's commitment to the fair treatment of people of all races, cultures, and incomes concerning the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. The policy framework is tailored to address specific EJ-related and public health-related issues. The EJ Element also includes implementation programs and actions that are incorporated into a stand-alone EJ Implementation Plan. The plan directs the County to develop programs to monitor progress, prioritize funding for EJ communities, establish cross-sector and multi-jurisdictional partnerships to address EJ issues, and other actions as appropriate (County of San Diego 2021a).

The General Plan goals and policies referenced in the EJ Element that are applicable to the CAP Update include the following:

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

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

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

Policy EJ-2.5: Conflicting Land Use Buffers (All Unincorporated Areas). Consistent with the Land Use Element, avoid land use conflicts by ensuring sensitive land uses are adequately buffered from heavy industrial uses and other facilities that may pose a threat to human health. *See Land Use Element Policies: LU-2.8, LU-4.5, LU6.10, LU-11.2, LU-11.10.*

**Goal EJ-4: Protect and Restore Surface Water.** Protect and restore surface water bodies in the unincorporated area, including those within EJ Communities, from future contamination.

### **County of San Diego Office of Sustainability and Environmental Justice**

The County is leading a regional effort to reduce community exposures to health hazards, led by its new Office of Sustainability and EJ (OSEJ) (formerly Office of Environmental and Climate Justice). The OSEJ is part of the Land Use and Environmental Group and will lead the County's effort to reduce community exposures to health hazards as a uniquely positioned entity with a geographic scope that includes environmental and climate justice issues in the unincorporated areas of the county, as well as the incorporated cities throughout the region (County of San Diego 2023a).

### **Strategic Initiatives**

The Strategic Initiatives provide the framework for the County to set measurable goals under the following categories: sustainability, equity, empower, community, and justice (County of San Diego 2023b).

### **General Management System**

The County has reimagined its operational approach to planning and decision making by integrating the General Management System with the strategic framework adopted by the Board of Supervisors. The General Management System applies an equity lens to appropriately design programs and services so that underserved communities have equitable opportunities. The policies and programs are developed to ensure equity using data-driven metrics, lived experiences, and community voices (County of San Diego 2023c).

### **Office of Equity and Racial Justice**

The Office of Equity and Racial Justice (OERJ) was established in 2020 to strengthen the County's commitment to racial equity, with the intent that race no longer be a determining factor in a person's life outcomes. This approach supports groups across ethnicity, gender, age, ability, and other identities to live and participate in our society to their full potential. The OERJ's mission is to partner with the community to co-create transformative, enduring, structural, and systemic change in the county by shaping policies, informing budget process, and working toward building more equitable and accessible programs, services, and resources (County of San Diego 2023d).

### **Budget Equity Assessment Tool**

The Budget Equity Assessment Tool is a set of six questions to be completed by each department annually as part of the budget process. Its main purpose is to help county departments understand how their resource allocations affect Black, Indigenous and People of Color, low-income, and other communities historically and currently suffering from inequalities and inequities, and to help ensure that funding allocations are spent in an equitable manner and prioritized through an equity lens (County of San Diego 2022).



## **Department of Homeless Solutions and Equitable Communities: Office of Equitable Communities**

The Office of Equitable Communities is focused on enhancing community engagement and collaborating and devoting efforts to meet the needs of underserved communities with a focus on embracing diversity, social and health equity, economic inclusion, and poverty reduction. The Office ensures equity among all San Diegans using a regional model to enhance community engagement and meet the needs of underserved communities through many services (County of San Diego 2023e).

### **Public Health Services: Health Equity**

In 2008, the County of San Diego Health and Human Services Agency (HHSA) made health equity a priority. This was followed by the health equity framework developed by the Public Health Officer. Currently, educational materials are posted on the Public Health Services (PHS) webpage in multiple languages. Following HHSA's declaration of health equity as an agency priority, the Chronic Disease and Health Disparities Unit (later named the Chronic Disease and Health Equity Unit) was created, with its activities supporting the Building Better Health component of *Live Well San Diego*, focusing on nutrition, physical activity, and tobacco. The PHS Public Health Officer created a health equity framework for the California Conference of Local Health Officers in 2010, which was used to integrate health equity into PHS to prepare for national public health accreditation. As part of this accreditation journey, in 2015, an Office of Health Equity was created (followed by including Climate Change in the name of the unit in 2020). The Health Equity Working Group was also created in 2015 and continues to meet every 2 months and to implement its internally focused health equity work plan. A departmental Health Equity Policy was also created. The PHS also developed Health Equity goals, which are part of the PHS Strategic Plan (County of San Diego 2023f).

## **2.7.3 Analysis of Effects and Significance Determination**

### ***2.7.3.1 Significance Criteria***

CEQA does not require analysis of EJ, nor does it have specific thresholds of significance for EJ. However, the following assessment of potential disproportionate environmental effects to low-income and minority populations is consistent with Executive Order 12898 and CEQ guidance and procedures to effectively identify and address EJ concerns under NEPA. Accordingly, a significant effect could occur if the project would:

- Cause a disproportionately high and adverse human health or environmental impact on an EJ community (a minority or a low-income population).

### ***2.7.3.2 Approach to Analysis***

To determine whether project implementation would cause a disproportionately high and adverse impact on identified EJ communities (as defined above and in the General Plan EJ Element), this analysis identifies the potential for significant impacts resulting from

implementation of the CAP Update to result in disproportionately high and adverse human health or environmental effects on an EJ community. Implementation of the project-specific mitigation measures identified throughout this SEIR would reduce impacts related to energy, greenhouse gas (GHG) emissions, hazards and hazardous materials, transportation, and wildfire to below a level of significance. However, implementation of the CAP Update would result in significant and unavoidable impacts related to aesthetics, agricultural resources, air quality, biological resources, cultural and paleontological resources, hydrology and water quality, tribal cultural resources, land use and planning, and noise. These environmental resources are analyzed in the following section to identify whether related significant impacts would result in disproportionate effects on minority and/or low-income people. For the purposes of this analysis, “disproportionately high and adverse effect” is defined as a condition under which “an adverse effect or impact” (EPA 2004):

- Is predominantly borne by any segment of the population, including, for example, a minority population and/or a low-income population; or
- Will be suffered by a minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect or impact that will be suffered by a non-minority population and/or non-low-income population.

### **Scope of This SEIR Impact Analysis**

As noted above, EJ impacts were not analyzed in the 2011 GPU PEIR. However, impacts on aesthetics, agricultural resources, air quality, biological resources, cultural and paleontological resources, hydrology and water quality, land use and planning, noise, and tribal cultural resources were analyzed, and the impact conclusions related to those resources for the proposed project relative to the 2011 GPU PEIR are included in the individual resource sections and are summarized below. The CAP Update identifies strategies, measures, and supporting actions (referred to herein as measures and actions) to demonstrate progress toward established GHG reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impacts of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unincorporated county) and its role as a planning document designed to guide future decision-making related to the reduction of GHG emissions within the unincorporated county, the study area for the following analysis is the unincorporated area of the county within the County’s jurisdiction (i.e., excluding tribal lands, state and federally owned lands, and military installations).

The analysis in this ~~draft~~ SEIR is programmatic. Implementation of all CAP Update measures and actions were considered during preparation of this ~~draft~~ SEIR, to the degree specific information about their implementation is known. Because future projects associated with the CAP Update have yet to be specifically defined, this SEIR considers the types of impacts that could occur with implementation of future projects associated with the proposed GHG reduction measures and actions. Future discretionary projects associated with the CAP Update would be evaluated by the County to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to

what is concluded in this analysis. If additional impacts result, subsequent CEQA documentation would be required to evaluate impacts, determine mitigation, and conclude whether impacts are reduced to a less-than-significant level.

### **Proposed CAP Update Strategies**

The CAP Update addresses equity through preparation of a cost analysis to understand how populations and communities may experience disproportionate costs or impacts from climate change, and through development of an Equity Implementation Framework, to prioritize climate action in communities that are at the front line of climate change impacts, such as the County's EJ Communities. As described in the General Plan EJ Element and noted in the CAP Update, these communities and populations have historically been impacted by poverty, lack of services, and unequal distribution of economic and social opportunities like access to high-paying careers, healthcare, or education. As a result, these communities are most at risk from the threat of heat, industrial pollution, poor air quality, wildfires, and more. Utilizing the cost benefit analysis and Equity Implementation Framework, the CAP Update would prioritize climate action in frontline communities<sup>3</sup> to ensure that equity-based outcomes and co-benefits are realized equitably throughout the unincorporated county.

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

**Solid Waste Measures and Actions.** This category includes strategies to achieve zero solid waste in County operations and within the unincorporated county. Measures SW-1 through SW-4 have the potential to result in the construction of new or expanded solid waste facilities to meet waste diversion targets and increase the prevalence of composting, anaerobic digestion, and recycling throughout the county. Implementation of solid waste measures and actions would reduce the air pollution burdens (e.g., methane) faced by EJ communities, would improve health in EJ communities located adjacent to solid waste facilities, and would increase training and job opportunities for EJ communities.

**Water and Wastewater Measures and Actions.** This category includes strategies to decrease water consumption and increase wastewater and stormwater treatments. Measures W-1 through W-3 would involve development of policies and programs to

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<sup>3</sup> Frontline communities are defined in the CAP Update as historically marginalized communities that experience the most immediate and worst impacts of climate change and other injustices and are often communities of color and low-income. The analysis in this section focuses specifically on impacts on EJ communities, which are more precisely defined in the County's General Plan EJ Element to reflect a broader array of environmental harms and disproportionate burdens. The EJ element defines EJ communities as those communities that are disproportionately affected by environmental pollution that can lead to negative public health effects, exposure, or environmental degradation, and establishes the location of these communities within the unincorporated county by identifying pollution burden and population vulnerability in particular areas of the county and using localized data measuring health, wellness, and equity to identify inequities and disparities that need to be addressed through key interventions.

encourage water conservation and increase water and wastewater efficiency. Implementation of water and wastewater measures and actions is intended to increase access to incentives in frontline communities, would reduce utility bills for homeowners and renters in EJ communities, and would increase education and access to incentives in EJ communities.

**Agriculture and Conservation Measures and Actions.** This category includes strategies to preserve natural land and agricultural land. Measures A-1 through A-4 have potential to result in impacts to EJ communities. Implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. Implementation of agriculture and conservation measures and actions is intended to increase EJ communities' access to open space, would reduce urban heat islands in EJ communities, and would increase incentives to US Department of Agriculture–defined disadvantaged farming communities.

**Energy Measures and Actions.** This category includes a strategy to develop policies and programs to increase energy efficiency and renewable energy use. Key measures and actions with potential to result in impacts to EJ communities include Measure E-2 and Actions E-2.2 and E-2.2.a, which could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities. Measure E-2 would expand County-led programs such as those that would support green workforce development. Through Action E-3.2.b, the County would work with partners to promote and support on-site renewable (wind and solar) energy generation and storage (microgrids, site-specific and/or community scale) to increase renewable energy generation and use in the unincorporated area, which would be regulated by existing County ordinances and policies. Action E-3.3 would require the County to develop a program to provide the unincorporated area with 100 percent renewable energy from San Diego Community Power by 2030. This action may indirectly result in the construction of large-scale renewable energy infrastructure. Implementation of CAP Update energy measures and actions is intended to improve energy efficiency and air quality in County buildings used by EJ communities, would increase education and access to incentives in EJ communities, and would reduce utility bills for homeowners and renters in EJ communities.

**Built Environment and Transportation Measures and Actions.** This category includes strategies to decarbonize the vehicle fleet, install electric vehicle charging stations, incentivize the use of alternative fuels and landscaping practices, and support transit and ridesharing to reduce single-occupancy vehicle use. Implementation of CAP Update built environment and transportation measures and actions is intended to reduce air pollution burdens faced by EJ communities and would prioritize electric vehicle charging stations, pedestrian and bicycle infrastructure, and roadway treatments in EJ communities.

### ***2.7.3.3 Issue 1: Cause a Disproportionately High and Adverse Human Health or Environmental Impact on an EJ Community (a Minority or a Low-Income Population)***

#### **Aesthetics**

##### ***Summary of Project Impacts***

Impacts related to aesthetics are analyzed in Sections 2.1.3.3 to 2.1.3.6 of this SEIR. Implementation of the CAP Update would result in potentially significant impacts related to scenic vistas and scenic resources, visual character and quality, or light and glare.

Implementation of the CAP Update could result in new or expanded solid waste facilities (e.g., Actions SW-1.1, SW-3.1, SW-4.1, SW-4.1.a, and SW-4.1.b), water and wastewater efficiency appliances or systems (e.g., Actions W-1.1, W-2.2, W-2.3, and W-2.4), new farmworker housing if opportunities to increase farmworker housing in the unincorporated area are identified, energy efficiency retrofits and solar and wind renewable energy facilities (e.g., Actions E-3.1, E-3.2, and E-3.3), and transit-supportive roadway treatments and electric vehicle charging stations (e.g., Actions T-3.1 and T-5.1). Because specific locations for these potential developments have not been identified, it is assumed that construction and operation of future development would have the potential to result in impacts to scenic vistas and resources and visual character and quality, if they are sited in areas close to scenic resources. Future development would be required to implement adopted General Plan Policies LU-6.6, LU-6.9, LU-10.2, LU-11.2, LU-12.4, COS-11.3, and COS-12.2 and adopted 2011 GPU PEIR mitigation measures (Mitigation Measures Aes-1.2, Aes-1.6 through Aes-1.9) to ensure that new development would conserve and protect unique and sensitive visual features, the scenic quality, and the visual character and quality of the environment. In addition, implementation of adopted General Plan Policies COS-13.1 through COS-13 and 2011 GPU PEIR Mitigation Measures Aes-4.1 and Aes-4.2 would ensure that no significant impacts related to new light source or glare would occur.

However, development of large-scale renewable energy systems (CAP Update Action E-3.1) would result in potentially significant impacts related to scenic vistas and scenic resources, visual character and quality, and light and glare. Implementation of adopted General Plan policies, 2011 GPU PEIR mitigation measures, and CAP Update Mitigation Measure Aes-1 (requiring feasible and appropriate project-specific mitigation measures to be incorporated to mitigate aesthetic impacts for all large-scale renewable energy projects), CAP Update Mitigation Measure Aes-2 (requiring a Lighting Mitigation Plan for all large-scale renewable energy projects), and CAP Update Mitigation Measure Aes-3 (requiring a Shadow Flicker Study for all large-scale wind turbine projects) would reduce the potential for significant impacts related to aesthetics resources in the planning area; however, it is not possible to guarantee that all project and cumulative impacts to aesthetics resources would be reduced to a less-than-significant level because of the uncertainty of the types, locations, and scale of future renewable energy projects. Therefore, implementation of the CAP Update would result in significant and unavoidable impacts related to scenic vistas and scenic resources, visual character and quality, and light and glare. Therefore, implementation of the CAP Update would result in new or more

severe significant impacts not identified in the 2011 GPU PEIR related to scenic vistas and scenic resources, visual character and quality, and light and glare.

### ***Impact on EJ Communities***

As noted above, the specific locations and designs of the potential new development associated with the CAP Update are not known at this time. Implementation of CAP Update measures and actions would occur within the unincorporated county and could affect the scenic resources, visual character and quality, and dark skies in the county. Adopted General Plan policies and 2011 GPU PEIR mitigation measures would be implemented to reduce the potential contribution of the project and to ensure that any impacts to aesthetics resources are treated appropriately and with respect to all communities, including EJ communities. However, future development of large-scale renewable energy projects would result in significant and unavoidable impacts related to scenic resources, visual character and quality, and light and glare that could affect EJ communities. While development of large-scale renewable energy in EJ communities has the potential to further affect and/or worsen existing adverse environmental conditions in communities, General Plan Policies EJ-2.3 and EJ-2.5 would require evaluation of potential environmental impacts of renewable energy facilities that affect EJ communities and would require adequate buffers for sensitive land uses from heavy industrial uses. Compliance with General Plan policies and adopted mitigation measures would ensure that implementation of the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to aesthetics on an EJ community.

### **Agriculture and Forestry Resources**

#### ***Summary of Project Impacts***

Impacts related to agricultural resources are analyzed in Sections 2.2.3.3 to 2.2.3.6 of this SEIR. Implementation of the CAP Update would result in potentially significant impacts related to agriculture and forestry resources.

Implementation of CAP update measures and actions associated with solid waste (e.g., Actions SW-1.1, SW-3.1, SW-4.1, SW-4.1.a, and SW-4.1.b), water and wastewater (e.g., Actions W-1.1, W-2.2, W-2.3, and W-2.4), agriculture and conservation (e.g., Actions A-2.1, A-2.2, and A-3.1.), energy (e.g., Actions E-3.1 through E-3.3), and built environment and transportation (e.g., Actions T-3.1 and T-5.1) would result in potentially significant impacts related to agricultural resources and the loss or conversion of forest land due to the potential development of large-scale renewable energy projects. The adopted General Plan Policies COS-6.2, COS-6.4, and LU-7.1 would ensure that development would be implemented to protect agricultural lands, and Policies LU-16.1 and LU-16.3 would ensure that new solid waste facilities would be sited in areas with appropriate zoning designation (e.g., industrial land use). In addition, 2011 GPU PEIR Mitigation Measures Agr-1.1 through Agr-1.5 and Agr-2.1 and CAP Update Mitigation Measure Agr-1 (applying the *County Guidelines for Determining Significance for Agricultural Resources* during environment review of all large-scale renewable energy projects) would be implemented to reduce the potential for significant impacts related to conversion of agricultural resources. CAP Update

Measures Agr-2 would require that all large-scale renewable energy projects (including both solar and wind projects) apply the *County Guidelines for Determining Significance for Biological Resources*. When impacts to forest land are determined to be significant, these projects are required to implement feasible and appropriate project-specific mitigation measures, including avoidance of sensitive resources, preservation of habitat, revegetation, and resource management. However, due to the uncertainty of the types, locations, and scale of future large-scale renewable energy projects, the impacts would remain significant after mitigation. Implementation of the CAP Update would result in new impacts related to agriculture and forestry resources beyond what was disclosed in the 2011 GPU PEIR.

### ***Impact on EJ Communities***

Implementation of the CAP Update would be required to be consistent with the adopted General Plan policies related to agriculture resources protection. As discussed in Sections 2.2.3.3 to 2.2.3.6 of this SEIR, actions that would result in the acquisition and management of conservation lands would have potential to benefit agriculture resources. The adopted General Plan policies and mitigation measures from the 2011 GPU PEIR and this SEIR would be implemented to reduce the potential contribution of the project and to ensure that any impacts to agricultural resources are treated appropriately and with respect to all communities, including EJ communities. However, future large-scale renewable energy projects would result in significant and unavoidable impacts related to conversion of agricultural land to non-agricultural use. Development of large-scale renewable energy in EJ communities has the potential to further affect the community and/or worsen existing adverse environmental conditions in communities. However, General Plan Policy EJ-2.3 requires evaluation of potential environmental impacts of renewable energy facilities that affect EJ communities, and future development of large-scale renewable energy systems would be subject to CEQA. Compliance with General Plan policies and adopted mitigation measures would ensure that implementation of the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to agricultural resources on an EJ community. Therefore, implementation of the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to agricultural resources on an EJ community.

### **Air Quality**

#### ***Summary of Project Impacts***

Impacts related to air quality are analyzed in Sections 2.3.3.3 to 2.3.3.8 of this SEIR. Implementation of the CAP Update would not conflict with or obstruct implementation of the San Diego County Regional Air Quality Strategy or State Implementation Plan. Implementation of solid waste measures and actions would result in construction of new or expanded solid waste facilities. Odors may result from the operation of new or expanded facilities. While the specific location of these types of facilities and activities is not known, solid waste projects would be subject to the County odor policies enforced by the San Diego County Air Pollution Control District, including Rule 51 and County Code Sections

63.401 and 63.402, which prohibit nuisance odors and identify enforcement measures to reduce odor impacts to nearby receptors. Therefore, implementation of solid waste measures and their associated actions would result in a less-than-significant impact associated with objectionable odors.

However, construction related to implementation of the CAP Update measures and their associated actions could result in exceedances of local thresholds for criteria air pollutant and nonattainment pollutants and result in exposure of sensitive receptors to TACs. Because of the programmatic nature of the CAP Update, it is not possible to determine the size and location of projects that would be built, nor the details of their construction typically used to estimate emissions such as duration, equipment use, and intensity. Despite the potential for reductions in operational emissions to offset those related to construction, this impact would be potentially significant. It is possible that emissions from individual projects could exceed one or more construction or operations emissions thresholds and expose sensitive receptors to TACs. Therefore, due to the programmatic nature of the General Plan and CAP Update, the potential that subsequent projects may result in emissions that cannot be reduced below established thresholds remains. Implementation of the CAP Update would result in significant and unavoidable impacts related to exceedances of local thresholds for criteria air pollutant and nonattainment pollutants and exposure of sensitive receptors to TACs following implementation of mitigation measures (Adopted Mitigation Measures Air-2.1 through Air-2.13 and Air-4.1 and CAP Update Mitigation Measure Air-2.1), consistent with the conclusions in the 2011 GPU PEIR.

### ***Impact on EJ Communities***

Due to the programmatic nature of the CAP Update, it is not possible to determine the locations of future projects. Future projects associated with the CAP Update would be located within the unincorporated county, including the EJ communities, and may result in emissions that cannot be reduced below established thresholds, result in exceedance of local criteria air pollutant thresholds for nonattainment pollutants (i.e., oxides of nitrogen, volatile organic compounds, particulate matter 10 micrometers or less in diameter, and particulate matter 2.5 micrometers or less in diameter), and result in exposure of sensitive receptors to TACs. However, future projects would be required to comply with the EJ Element goals and policies related to reducing pollution exposure and improving air quality in EJ communities. EJ Element Goal EJ-2 protects sensitive land uses (e.g., schools, housing, health facilities, childcare facilities, senior centers, parks) from increased pollution exposure in EJ communities; Policy EJ-2.4 minimizes heavy truck traffic and designated routes away from residential neighborhoods and other sensitive areas in EJ communities; and Policy EJ-2.5 ensures sensitive land uses are adequately buffered from heavy industrial uses and other facilities that may pose a threat to human health. Compliance with the EJ Element goals and policies would ensure that future projects associated with the CAP Update would not worsen existing environmental conditions related to air quality in EJ communities. In addition, implementation of the CAP Update Measures SW-1, T-1, and T-3 would result in co-benefits related to air quality in EJ communities by reducing solid waste and vehicle contribution to air pollution burdens faced by frontline communities. Therefore, implementation of the CAP Update would not



cause a disproportionately high and adverse human health or environmental impact related to air quality on an EJ community.

## **Biological Resources**

### ***Summary of Project Impacts***

Impacts related to biological resources are analyzed in Sections 2.4.3.3 to 2.4.3.9 of this SEIR. Implementation of CAP Update would result in less-than-significant impacts related to state and federal protected wetlands, local policies and ordinances, and Habitat Conservation Plans and Natural Community Conservation Plans after implementation of General Plan Policies COS-3.1 and COS-3.2; 2011 GPU PEIR Mitigation Measures Bio-1.5 through Bio-1.7 and Bio-2.1 through Bio-2.4; and CAP Update Mitigation Measures Bio-1 and Bio-2. However, future development associated with the CAP Update would result in significant and unavoidable impacts related to special-status species, riparian and other sensitive natural communities, and wildlife movement corridors and nursery sites, consistent with the conclusions in the 2011 GPU PEIR.

Implementation of CAP Update Measures and Actions SW-1.1, SW-3.1, SW-4.1, SW-4.1.a, SW-4.1.b, W-1.1, W-2.2, W-2.3, W-2.4, E-3.1, E-3.2, E-3.3, T-3.1, and T-5.1 would result in development of new or expanded solid waste facilities, irrigation systems, stormwater and grey water capture systems, stormwater and wastewater treatment systems, solar arrays, small and large wind turbines, and transportation infrastructure improvements. At the programmatic level, it is not possible to determine with certainty that impacts on biological resources resulting from construction activities would be reduced to a less-than-significant level. While all feasible mitigation would be applied at the project level as part of the County's discretionary review process, construction of projects associated with the CAP Update could still adversely affect special-status species, riparian habitats, sensitive natural communities, and wildlife movement corridors and nursery sites. Impacts would be significant and unavoidable, consistent with the impacts disclosed in the 2011 GPU PEIR.

### ***Impact on EJ Communities***

Due to the programmatic nature of the CAP Update, it is not possible to determine the locations of future projects. Future projects associated with the CAP Update would be located within the unincorporated county, including the EJ communities. Adverse biological impacts are not anticipated to be disproportionately higher on the EJ communities. Applicable General Plan policies and mitigation measures would be implemented to ensure that any impacts related to biological resources are treated appropriately and with respect to all communities, including EJ communities. Compliance with General Plan policies and adopted mitigation measures would ensure that the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to biological resources on an EJ community.

## **Cultural and Paleontological Resources**

### ***Summary of Project Impacts***

Impacts related to cultural and paleontological resources are analyzed in Sections 2.5.3.3 to 2.5.3.7 of this SEIR. Implementation of the CAP Update would result in potentially significant impacts to historical, archaeological, and paleontological resources, and human remains. Implementation of General Plan policies (Policies COS-7.1 through COS-7.3, COS-7.5, COS-9.1, and COS-9.2) and 2011 GPU PEIR mitigation measures (Mitigation Measures Cul-1.1, Cul-1.6, Cul-2.1 through Cul-2.3, Cul-2.5, Cul-2.6, Cul-3.1, Cul-3.2 and Cul-4.1) would reduce the potential impacts to archaeological resources, paleontological resources, and human remains but not to a less-than-significant level. These are new significant impacts that were not discussed in the 2011 GPU PEIR.

### ***Impact on EJ Communities***

Due to the programmatic nature of the CAP Update, it is not possible to determine the locations of future projects. Future projects associated with the CAP Update would be located within the unincorporated county, including the EJ communities. Adverse cultural and paleontological impacts could occur in any area within the unincorporated county where cultural or paleontological resources may be located. Adverse cultural resources impacts are not anticipated to be disproportionately higher on the EJ communities. Applicable General Plan policies and mitigation measures would be implemented to ensure that any impacts related to cultural resources are treated appropriately and with respect to all communities, including EJ communities. Compliance with General Plan policies and 2011 GPU PEIR mitigation measures would ensure that impacts would not be disproportionately higher on EJ communities. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to cultural and paleontological resources on an EJ community.

## **Energy**

### ***Summary of Project Impacts***

Impacts related to energy are analyzed in Sections 2.6.3.3 and 2.6.3.5 of this SEIR. Implementation of the CAP Update would not result in significant impacts related to energy.

Implementation of the CAP Update would result in temporary construction activities that would consume energy resources. However, CAP Update Action E-2.2 would improve energy efficiency, Action T-1.1.a would promote the use of alternative fuel in construction equipment, and Action T-3.1 would involve the installation of electric vehicle chargers and encourage alternative transportation. Overall, implementation of the CAP Update would not result in wasteful, inefficient, or unnecessary consumption of energy. Rather, implementation of the CAP Update would result in a long-term reduction in energy consumption through encouraging improvements to alternative transportation infrastructure, requiring energy efficiency and water conservation, and enhancing waste processing. The CAP Update would not result in conflict with or obstruction of a state or

local plan for renewable energy efficiency. The impact would be less than significant. Therefore, implementation of the CAP Update would not result in potentially significant impacts not identified in the 2011 GPU PEIR related to energy.

### ***Impact on EJ Communities***

The GHG reduction measures proposed within the CAP Update would result in the use of more efficient technology that would generally reduce energy demand and ultimately result in cost saving related to energy use in all communities, including EJ communities. In addition, implementation of the CAP Update Measures T-3, T-5, and T-6 would result in co-benefits related to energy conservation in EJ communities by prioritizing installation of electric vehicle charging stations, prioritizing improvements to pedestrian and bicycle infrastructure, and distributing transit passes in frontline communities. Therefore, implementation of the CAP Update would result in beneficial energy impacts on EJ communities. The CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to energy on an EJ community.

## **Greenhouse Gas Emissions**

### ***Summary of Project Impacts***

Impacts related to GHGs are analyzed in Sections 2.8.3.3 and 2.8.3.5 of this SEIR. The goal of the CAP Update is to reduce GHG emissions generated within the unincorporated county by increasing the use of alternatively fueled vehicles, reducing vehicle miles traveled (VMT), generating and utilizing renewable energy, reducing waste generation, and increasing carbon sequestration. Implementation of the CAP Update would not generate significant GHG emissions nor would the CAP Update conflict with the goals of SB 32 and AB 1279. Impacts would be less than significant, consistent with the conclusion of the 2011 GPU PEIR.

### ***Impact on EJ Communities***

As noted above, the goal of the CAP Update is to reduce overall GHG emissions within the unincorporated county, including the EJ communities. Implementation of CAP Update Measures S-2, E-3, W-2, T-2, and T-3 would increase frontline communities' access to organic material processing facilities; increase frontline communities' access to incentives for conserving water, using renewable energy use, and purchasing electric vehicles; and increase incentives for low-income residents to transition to zero-emission construction equipment. The CAP Update would result in beneficial impacts related to GHG emissions in EJ communities. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to GHG emissions on an EJ community.

## **Hazards and Hazardous Materials**

### ***Summary of Project Impacts***

Impacts related to hazards and hazardous materials are analyzed in Sections 2.9.3.3 to 2.9.3.8 of this SEIR. Implementation of the CAP Update would not result in potentially significant impacts related to hazardous materials and sites, airport hazards, emergency response and evacuation plans, wildland fires, or vectors.

Implementation of these CAP Update measures and actions could result in the construction of new or expanded solid waste facilities; new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure; energy efficiency retrofit; solar and wind renewable energy development; new farmworker housing (if opportunities to increase farmworker housing in the unincorporated area are identified); and pedestrian, bicycle, and transit network improvements. Construction of new facilities and improvements to existing facilities would involve the use of similar types of hazardous materials as are commonly used as part of new development, including paints, oils, solvents, fuels, lubricants, asphalt products, and other materials. The transport, use, and disposal of hazardous materials during construction would be required to comply with the federal, state, and local regulatory requirements. Should the development of these facilities occur on a listed hazardous materials site compiled pursuant to Government Code Section 65962.5, compliance with applicable federal, state, and local regulations related to existing on-site hazardous materials contamination would also be required. In addition, the 2011 GPU PEIR mitigation measures pertaining to airport hazards (Mitigation Measures Haz-1.1, Haz-1.3, and Haz-1.5) would further limit the project impacts on airport hazards by requiring new development projects to be reviewed for compatibility with surrounding airports, military airbases, and land uses.

Implementation of CAP update measures and actions would have potential to result in impacts related to impairing emergency response or evacuation plans. However, adopted General Plan policies (Policies S-1.2, M-1.2, M-3.3, and M-4.3) and 2011 GPU PEIR mitigation measures (Mitigation Measures Haz-3.1, Haz-3.2, and Haz-3.3) would reduce impediments and conflicts with adopted emergency response and evacuation plans to a less-than-significant level by facilitating coordination with applicable planning and emergency services agencies, implementing roadway standards to ensure road improvements are consistent with emergency response and evacuation plans, and requiring the inclusion of fire access roads in planning documents.

Implementation of CAP Update measures and actions in fire-prone areas would have the potential to expose people or structures to significant risk of loss, injury, or death involving wildland fires. However, compliance with General Plan policies (Policies S-4.1 through S-4.4, S-4.6, S-4.7, S-5.1, and COS-18.3) and 2011 GPU PEIR mitigation measures (Mitigation Measures Haz-4.1 through Haz-4.4, and Pub-1.5 through Pub-1.7) would reduce impacts related to wildland fires to a less-than-significant level by minimizing wildfire in the county, locating development away from fire hazard areas, and complying with existing regulations. Impacts related to hazards and hazardous materials would be less than significant with compliance with existing regulations and 2011 GPU PEIR

mitigation measures. No new or more severe significant impacts would occur compared to the 2011 GPU PEIR.

### ***Impact on EJ Communities***

Adverse hazards and hazardous materials impacts could occur in any area within the unincorporated county where future projects associated with the CAP Update would occur, including EJ communities. The use and handling of hazardous materials during construction would be conducted in a manner consistent with existing regulations and 2011 GPU PEIR mitigation measures, so that no significant impacts would occur. Adopted General Plan policies and 2011 GPU PEIR mitigation measures would be implemented to reduce the potential contribution of the project and to ensure that any impacts to hazards and hazardous materials are treated appropriately and with respect to all communities, including EJ communities. These impacts are not anticipated to be disproportionately higher on EJ communities. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to hazards and hazardous materials on an EJ community.

## **Hydrology and Water Quality**

### ***Summary of Project Impacts***

Impacts related to hydrology and water quality are analyzed in Sections 2.10.3.3 to 2.10.3.6 of this SEIR. Implementation of the CAP Update would result in significant and unavoidable impacts related to water quality issues, groundwater supply, and groundwater recharge and would result in less-than-significant impacts related to surface hydrology and drainage with mitigation incorporated, consistent with the conclusions in the 2011 GPU PEIR.

Future projects associated with the CAP Update could include new or expanded solid waste facilities; new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure; energy efficiency retrofits; solar and wind renewable energy development; new farmworker housing (if opportunities to increase farmworker housing in the unincorporated area are identified); and pedestrian, bicycle, and transit network improvements. Construction of new facilities and improvements to existing facilities would involve the use of heavy equipment, paving, ground disturbance, and other typical construction activities that could adversely affect water quality standards or waste discharge requirements where projects are located near waterways or discharges runoff to stormwater drainage systems. Future projects associated with the CAP Update could also occur in areas that are currently experiencing groundwater supply issues and would contribute to worsening an already unsustainable groundwater supply. At the programmatic level, it is not possible to determine with certainty that impacts on water quality, groundwater supply, and groundwater recharge would be reduced to below a less-than-significant level.

Several federal, state, and local regulations exist that reduce the potential for projects to violate water quality standards, including the Clean Water Act, Porter-Cologne Water

Quality Control Act, National Pollutant Discharge Elimination System permitting requirements, San Diego Basin Plan, Colorado River Basin Plan, County's Watershed Protection, Stormwater Management, and Discharge Control Ordinance, and low-impact development requirements. In addition, General Plan Policies LU-6.5, LU-6.9, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.4 would maximize stormwater filtration and minimize projects impacts to water quality. The 2011 GPU PEIR Mitigation Measures Hyd-1.1 through Hyd-1.5 would further reduce project impacts on surface water and groundwater quality by requiring implementation of the County's Jurisdictional Runoff Management Plan and Watershed Protection, Stormwater Management, and Discharge Control Ordinance, implementation of low impact development standards to minimize runoff and maximize infiltration, implementation of the Stormwater Standards Manual, and utilization of the *County of San Diego Guidelines for Determining Significance: Hydrology and Water Quality* (County of San Diego 2021b) and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources* (County of San Diego 2007). The adopted 2011 GPU PEIR Mitigation Measures Hyd-2.1 through Hyd-2.5 would require compliance with existing regulations and implement programs to protect groundwater supply. However, at the programmatic level, it is not possible to determine with certainty that impacts on water quality, groundwater supply, and groundwater recharge would be reduced to a less-than-significant level.

With compliance with existing federal, state, and local regulations and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures (Adopted Mitigation Measures Hyd-1.2 through Hyd-1.3, Hyd-2.5, Hyd-3.1, Hyd-3.2, Hyd-3.3, Hyd-4.1 through Hyd-4.3, Hyd-6.1, and Hyd-8.2), impacts related to surface hydrology and drainage from implementation of the CAP Update would be reduced to a less-than-significant level.

### ***Impact on EJ Communities***

Adverse hydrology and water quality impacts could occur in any area within the unincorporated county where future projects associated with the CAP Update would occur and are not anticipated to be disproportionately higher on EJ communities. In addition to the General Plan policies and 2011 GPU PEIR mitigation measures listed above, which would be implemented to reduce hydrology and water quality impacts throughout the unincorporated county, future projects associated with the CAP Update would be implemented in compliance with EJ Element Goal EJ-4, which aims to protect and restore surface water bodies in the unincorporated county, including EJ communities, from future contamination. The CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to hydrology and water quality on an EJ community.

## **Land Use and Planning**

### ***Summary of Project Impacts***

Impacts related to land use and planning are analyzed in Sections 2.11.3.3 and 2.11.3.5 of this SEIR. Implementation of the CAP Update would result in less-than-significant impacts related to the physical division of established communities or conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact.

Future projects associated with the CAP Update could include new or expanded solid waste facilities; new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure; energy efficiency retrofit; solar and wind renewable energy development; new farmworker housing (if opportunities to increase farmworker housing in the unincorporated area are identified); and pedestrian, bicycle, and transit networks improvements.

New and expanded solid waste facilities would be sited on land that is zoned for this type of land use or allowable conditionally in accordance with adopted General Plan Policies LU-16.1 and LU-16.3. These facilities would not be sited in a manner that would physically divide existing communities. Greywater and stormwater projects would facilitate water efficiency and conservation for existing development and new development as it is approved. These infrastructure improvements, when considered separately from the future development that they may accompany, would not result in the conversion of any land uses or the introduction of new land uses that would be incompatible with existing and planned surrounding land uses. Pedestrian, bicycle, and transit network improvements would likely occur within existing developed residential and commercial centers throughout the county or as part of new development as it is approved. Future projects associated with the CAP Update would not result in the development of new large-scale infrastructure (e.g., freeway, railroad, airport) or large open space areas that would bisect existing land uses or that would change existing circulation patterns in a manner that would hinder access to existing communities.

Implementation of CAP Update Action E-3.3 would have the potential to result in development of large-scale renewable energy projects. Large-scale renewable energy projects would be required to comply with adopted General Plan policies (e.g., Policies LU-12.4, EJ-2, EJ-2.3, EJ-2.5, EJ-2.7, and EJ-5.2) and implement 2011 GPU PEIR mitigation measures (Mitigation Measures Lan-1.1 through Lan-1.3) to reduce the potential for roadways to physically divide an established community. However, it cannot be guaranteed that impacts related to the physical division of established communities would be reduced to a less-than-significant level because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects. This impact would be significant and unavoidable and would be a new significant impact not discussed in the 2011 GPU PEIR.

Future projects associated with the CAP Update are compatible with the goals and initiatives laid out in the County's *2020-2030 County Operations Strategic Sustainability Plan*, which includes initiatives and goals that focus on energy (reducing energy use and

promoting clean energy production), water (reducing potable water consumption and promoting water reuse systems), waste (increasing diversion of solid waste and promoting recycling), and transportation (reducing fleet vehicle emissions and VMT, electrifying the fleet, and expanding electric vehicle charging infrastructure); the County's *Zero Carbon Portfolio Plan*, which presents measures to support and build on existing state, County, and industry goals, including GHG emission reduction goals established by AB 32 and Executive Orders B-30 and B-55; and the County's *Renewable Energy Plan*, which outlines a series of measures to transition existing electricity consumption from fossil-fuel grid electricity to clean, renewable power sources. Therefore, the solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions proposed in the CAP Update would be generally consistent applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact.

### ***Impact on EJ Communities***

Adverse land use and planning impacts could occur in any area within the unincorporated county where future projects associated with the CAP Update would occur. As discussed above, development of large-scale renewable energy associated with the CAP Update would have the potential to physically divide an established community. The adopted General Plan policies and 2011 GPU PEIR mitigation measures would be implemented to reduce the potential contribution of the project and to ensure that any impacts related to physically dividing an established community are treated appropriately and with respect to all communities, including EJ communities. Compliance with General Plan policies and 2011 GPU PEIR mitigation measures would ensure that impacts are not anticipated to be disproportionately higher on EJ communities.

Future projects would be required to comply with EJ Element goals and policies intended to mitigate environmental impacts in EJ communities, including Goal EJ-5, which protects and restores surface water bodies in the unincorporated county (including EJ communities) from future contamination; Goal EJ-2, which protects sensitive land uses from increased pollution exposures in EJ communities; Policy EJ-2.3, which develops criteria to identify and evaluate potential environmental impacts of renewable energy facilities on EJ communities; Policy EJ-2.4, which minimizes heavy truck traffic and designates routes away from neighborhoods and sensitive areas in EJ communities; and Policy EJ-2.5, which avoids land use conflicts by establishing adequate buffers around sensitive land uses to protect them from uses that may pose a threat to human health. Implementation of the CAP Update would not conflict with EJ Element goals and policies intended to mitigate environmental impacts. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to land use and planning on an EJ community.



## **Noise**

### ***Summary of Project Impacts***

Impacts related to noise are analyzed in Sections 2.12.3.3 to 2.12.3.5 of this SEIR. Implementation of the CAP Update would result in less-than-significant impacts related to excessive noise, groundborne vibration, and excessive noise exposure from a public and private airport with mitigation incorporated.

Implementation of the CAP Update would result in development of new or modified facilities and structures (e.g., new or expanded solid waste facilities, water and wastewater infrastructure and efficiency improvements, and solar and wind renewable energy infrastructure). Development of new or modified facilities and structures could involve the use of limited heavy-duty equipment that would result in noise and groundborne vibration. Future projects associated with the CAP Update would be required to comply with the adopted General Plan Policy N-4.9, which reduces potential noise impacts to noise-sensitive land uses; Policy N-6.4, which requires non-emergency construction to be limited near noise-sensitive land uses; Policy LU-2.8, which requires measures to minimize significant impacts to surrounding areas from uses or operations that cause excessive noise; Policy N-3.1 which limits the extent of exposure that sensitive uses may have to groundborne vibration from construction equipment and other sources; and Policies S-15.1, S-15.2, and S-15.4, which require land uses surrounding airports to be compatible with airport operations. In addition, implementation of the 2011 GPU PEIR Mitigation Measures Noi-1.1, Noi-1.3, Noi-2.1, and Noi-2.4, which require acoustical analysis for projects may result in excessive noise, would reduce noise levels from these activities, and Noi-5.1 and Noi-5.3, which require using applicable ALUCP guidance and assessing noise impacts from private airports and helipads, would ensure that new development would not result in significant noise and vibration impacts.

However, implementation of CAP Update Action E.3.1 would have the potential to result in development of large-scale renewable energy projects. As discussed in Section 3.12.3.3, "Issue 1: Excessive Noise Levels," implementation of large-scale wind turbine projects could result in potentially significant impacts related to annoyance from low-frequency noise associated with operating large wind turbines. No feasible mitigation measures are available to reduce this impact to a less-than-significant level because noise waivers could be provided under certain circumstances for large-scale wind turbine projects located within the designated Noise Waiver Area on the Wind Resources Map. Therefore, implementation of large-scale wind turbine projects would result in significant and unavoidable impacts related to low-frequency noise. Implementation of the CAP Update would result in new or more severe significant impacts not identified in the 2011 GPU PEIR related to increased ambient low-frequency noise from operating large wind turbines.

### ***Impact on EJ Communities***

Noise and vibration would be generated during construction of new or modified facilities and structures, but the impacts would be minimized through implementation of adopted General Pan policies and 2011 GPU PEIR mitigation measures as discussed above. No

excessive noise levels, groundborne vibration, or excessive noise from an airport would occur. Development of large-scale wind turbine projects would result in significant and unavoidable impacts related to low-frequency noise. Adverse low-frequency impacts could occur in any area within the unincorporated county that are suitable for large-scale wind energy development. General Plan Policies EJ-2.3 and EJ-2.5 would reduce impacts to EJ communities by developing criteria to identify and evaluate potential environmental impacts of renewable energy facilities that affect EJ communities and ensuring that sensitive land uses are adequately buffered from heavy industrial uses and other facilities that may pose a threat to human health. Compliance with adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that impacts are not anticipated to be disproportionately higher on EJ communities. The CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to noise and vibration on an EJ community.

## **Transportation**

### ***Summary of Project Impacts***

Impacts related to transportation are analyzed in Sections 2.13.3.3 to 2.13.3.7 of this SEIR. Implementation of the CAP Update would result in less-than-significant impacts related to conflict with a program, ordinance or policy addressing the circulation system, and vehicle miles traveled (VMT); and would result in less-than-significant impacts related to substantially increased design hazards and inadequate emergency assess with mitigation incorporated.

The measures and actions proposed under the CAP Update are intended to further statewide and regional goals by promoting policies and actions that reduce GHG emissions through improved solid waste and water/wastewater use and management, increasing the availability of renewable sources of energy, promoting sustainable agricultural practices, and promoting transportation and built environment improvements that encourage the development of multi-modal transportation options and vehicular emissions reductions. Implementation of the CAP Update would be generally consistent with the San Diego Association of Governments' *2021 Regional Plan* which combines the Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan. Impacts related to conflict with a program, ordinance or policy addressing the circulation system would be less than significant.

Implementation of CAP Update measures and actions related to solid waste, water and wastewater, and energy would not increase residential or commercial uses and would only result in minimal numbers of employees. Therefore, the potential impacts to VMT would be less than significant. Implementation of agricultural and conservation measures and actions would not result in impacts to VMT because no new or expanded development would be anticipated from their associated agriculture and conservation activities. However, implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. Implementation of new farmworker housing would be expected to reduce VMT by locating housing on-site or near

agricultural lands where those residents would work, therefore reducing the distance farmworkers commute. CAP Update built environment and transportation measures and actions would also help reduce VMT by conducting new transit-supportive roadway treatments and bicycle and pedestrian facilities, implementing transportation demand management programs, providing educational initiatives to encourage increased alternative transportation use in the unincorporated county.

Future projects associated with the CAP Update could include development of new or expanded solid waste facilities; new greywater capture systems and new stormwater capture, treatment, and reuse infrastructure; energy efficiency retrofits; small- and large-scale solar and wind renewable energy facilities; new farmworker housing (if opportunities to increase farmworker housing in the unincorporated area are identified); and pedestrian, bicycle, and transit network improvements. Future large-scale renewable energy projects are required to obtain a Major Use Permit, which requires projects to undergo the County's discretionary review process. Discretionary large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application, and project-specific mitigation would be required to minimize or eliminate transportation-related impacts, where feasible.

During construction of each project, traffic operations could be degraded, and emergency access could be impeded. Project construction would be required to implement adopted General Plan goals and policies related to transportation hazards. General Plan Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety; Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that if impacts to planned routes would occur, any such impacts would be mitigated; Policy LU-9.8 requires that development within Villages include connected pedestrian routes and amenities; Goal M-4 encourages roads designed to be safe for all users and compatible with their context; Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists; Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access; Policies M-11.2 through M-11.4 require development in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks.

Future projects associated with the CAP Update would also be required to implement the following applicable mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3, Tra-1.4, and Tra-4.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* (County of San Diego 2011) to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. Mitigation Measure Tra-4.4 involves revisions to the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards. Impacts related to transportation hazards and inadequate emergency access would be reduced to a less-

than-significant level with implementation of General Plan policies and 2011 GPU PEIR mitigation measures.

### ***Impact on EJ Communities***

As noted above, implementation of the CAP Update would require compliance with the adopted General Plan goals and policies, and implementation of applicable 2011 GPU PEIR mitigation measures. With compliance with adopted goals and policies and applicable mitigation measures, impacts related to transportation would be reduced to less than significant. In addition, implementation of the CAP Update Measures T-4 through T-6 would result in co-benefits related to transportation in EJ communities by reducing air pollution burdens faced by frontline communities and prioritizing improvements to pedestrian and bicycle infrastructure and roadway treatment in frontline communities. General Plan Policy EJ-12.3 also requires prioritizing the incorporation and installation of pedestrian and bicycle facilities in EJ communities. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to transportation on an EJ community.

## **Tribal Cultural Resources**

### ***Summary of Project Impacts***

Impacts related to tribal cultural resources are analyzed in Sections 2.14.3.3 and 2.14.3.4 of this SEIR. Compliance with CEQA Sections 21080.3.1 and 21084.3 would require tribal consultation and provide an opportunity to avoid or minimize project impacts to tribal cultural resources where subsequent CEQA documentation is required. Implementation of 2011 GPU PEIR mitigation measures (Mitigation Measures Cul-2.2, Cul-2.4 through Cul-2.6, and Cul-4.1) and CAP Update SEIR mitigation measures (CAP Update Mitigation Measures TCR-1) would minimize impacts to tribal cultural resources by requiring coordination with local tribes, identification of tribal cultural resources, and Native American monitoring. However, because the specific location of project associated with CAP Update implementation are not known and because they could be implemented in areas where tribal cultural resources are present; project impacts would be potentially significant. This is a new significant impact that was not discussed in the 2011 GPU PEIR.

### ***Impact on EJ Communities***

As discussed in the CAP Update, even though tribal lands are outside of the County's land use jurisdiction and therefore emissions from their activities and sources are not included in the CAP Update GHG inventory and measures, the County acknowledges the relationship with tribal nations and the importance of Tribal Ecological Knowledge to understand and respect cultural history. The County will continue to strengthen partnerships with the local tribal nations and elevate the voices of Indigenous people to ensure that they are fully represented in the implementation of the CAP Update. For example, Action A-1.2.a proposes partnering with tribal governments to incorporate tribal ecological knowledge and apply Indigenous land management practices to contribute toward habitat restoration efforts on County land. The co-benefit of implementing Action

A-1.2.a would be increasing educational opportunities with tribal communities to learn about the natural environment.

Adverse tribal cultural resources impacts could occur in any area within the unincorporated county where future projects associated with the CAP Update would occur. However, compliance with CEQA Sections 21080.3.1 and 21084.3 would provide an opportunity to avoid or minimize the disturbance of tribal cultural resources through tribal consultation and CEQA review procedures. Additionally, 2011 GPU PEIR and CAP Update SEIR mitigation measures would be implemented to reduce the potential contribution of the project and to ensure that any impacts to tribal cultural resources are treated appropriately and with respect to all communities, including EJ communities. General Plan Policies EJ-2.3 and EJ-2.5 also would reduce impacts to EJ communities by developing criteria to identify and evaluate potential environmental impacts of renewable energy facilities that affect EJ communities and ensuring that sensitive land uses are adequately buffered from heavy industrial uses and other facilities that may pose a threat to human health. Compliance with CEQA Sections 21080.3.1 and 21084.3, adopted General Plan policies, and 2011 GPU PEIR mitigation measures would ensure that impacts are not anticipated to be disproportionately higher on EJ communities. Therefore, implementation of the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to tribal cultural resources on a tribal community.

## **Wildfire**

### ***Summary of Project Impacts***

Impacts related to wildfire are analyzed in Section 2.15.3.3 to 2.15.3.6 of this SEIR. The measures and actions proposed in the CAP Update would have a limited potential to result in impacts related to impairing emergency response or evacuation plans. It is assumed that any new and improved structures generally would not be intended for extended occupancy. As a result, there is limited potential to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Where habitable structures are constructed, they would be unlikely to exacerbate wildfire risk due to slope, prevailing winds, and other factors, as all development would be consistent with adopted General Plan policies and would implement 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7 to address the potential for development to exacerbate wildfire hazards. In addition, the CAP Update would create co-benefits that reduce wildfire risk, thereby helping to make the county more adaptive and resilient to the impacts of climate change. Implementation of the CAP Update would result in a less-than-significant impact related to wildfire with mitigation incorporated. Therefore, implementation of the CAP Update would not result in potentially significant impacts not identified in the 2011 GPU PEIR related to exacerbation of fire risk or exposure of people or structures to post-fire risks.

### ***Impact on EJ Communities***

As noted above, impacts related to wildfire would be mitigated to a less-than-significant level through compliance with adopted General Plan policies and implementation of 2011 GPU PEIR mitigation measures. The same General Plan policies and 2021 GPU PEIR mitigation measures would be applied to future projects located within EJ communities to ensure that wildfire impacts would be less than significant. Therefore, the CAP Update would not cause a disproportionately high and adverse human health or environmental impact related to wildfire on an EJ community.

#### ***2.7.3.4 Cumulative Impacts***

The cumulative impact analysis study area for EJ was not established in the 2011 GPU PEIR because EJ is not identified as an environmental resources topic in the CEQA statute or State CEQA Guidelines. For this project, the cumulative study area for EJ impacts includes all the EJ communities within the cumulative study areas discussed in Sections 2.1 through 2.6 and Section 2.8 through 2.15 of this SEIR. The scope and approach to the cumulative impact analysis are described in the “Cumulative Impact Assessment Overview” section in the introduction to this chapter.

#### **Issue 1: Cause a Disproportionately High and Adverse Human Health or Environmental Impact on an EJ Community (a Minority or a Low-Income Population)**

Multiple projects with adverse effects on human health or the environment near an EJ community could generate a cumulative effect on that community. Cumulative development associated with buildout of other planning documents identified within the San Diego region is not expected to collectively contribute effects on minority or low-income populations in a manner that would cause disproportionately high and adverse human health or environmental impact on an EJ community. The project would not cause a disproportionately high and adverse human health or environmental impact on EJ communities and would not result in a substantial incremental effect that would result in a new significant cumulative impact.

#### **2.7.4 Summary of EJ Impacts**

As discussed in Section 2.7.1.1 above, the General Plan EJ Element identified the following four EJ communities within the county: North El Cajon, North Lemon Grove, Spring Valley, and Sweetwater. The CAP Update establishes strategies, measures, and actions that the County must take within the unincorporated area of San Diego County to reduce GHG emissions from five sectors: solid waste, water and wastewater, agricultural and conservation, energy, and built environment and transportation. Implementation of the CAP Update could result in construction or modification of facilities or structures in the unincorporated county and could result in potential significant impacts to hazards and hazardous materials, land use and planning, noise, transportation, and wildfire. However, adopted General Plan policies and 2011 GPU PEIR mitigation measures would be applied to reduce these potential significant impacts to a less-than-significant level. Due

to the programmatic level of the CAP Update, it is not possible to determine the size and location of future projects and the potential magnitude of construction activities. No feasible mitigation measures have been identified to reduce impacts related to aesthetics, agricultural resources, air quality, biological resources, cultural and paleontological resources, hydrology and water quality, and tribal cultural resources to a less-than-significant level. These impacts would remain significant following implementation of mitigation measures. Implementation of the CAP Update result in a long-term reduction in energy consumption and GHG emissions through encouraging improvements to alternative transportation infrastructure, requiring energy efficiency and water conservation, and enhancing waste processing.

Although the CAP Update would result in potential significant impacts to the existing environment, the adverse impacts are not anticipated to be disproportionately higher on the EJ communities. One of the EJ Element goals is to support and expand programs and services in the implementation plan to prioritize those that identify EJ communities, address EJ issues, and foster countywide partnerships and programs. The County departments and resources that provide framework, goals, or tools to strengthen the County's commitment to reach environmental equity and justice are discussed in Section 2.7.2.3, above. The CAP Update also includes the following procedures to ensure the GHG reduction measures and actions maximize equity-driven outcomes for our frontline communities:

- **Equity Implementation Framework:** to serve as guidance for the implementation of inclusive climate actions outlined in the CAP. The developed framework will be a flexible, scalable, and multi-level framework that identifies best practices in implementing and assessing fair and inclusive climate actions, programs, and outcomes and prioritizing communities with the greatest need.
- **Disproportionality Cost Analysis:** Identify socioeconomic groups or local communities that pay a disproportionate cost and should be compensated by socioeconomic groups or local communities that gain significant benefits from particular measures. An important assessment is consideration of what groups or communities are adversely impacted by both the current situation and proposed solutions.

In addition, as discussed in Section 2.7.2, "Regulatory Framework" and in the CAP Update, the County's OSEJ is leading a regional effort to reduce community exposures to health hazards. OSEJ supports the efforts of neighboring jurisdictions and regulatory entities to remedy environmental disparities and injustices related to issues such as stationary and mobile sources of air pollution; toxic hotspots; GHG emissions; the urban heat island effect; substandard housing; a lack of access to healthy food; lack of transportation options; poor quality neighborhood infrastructure, such as access to broadband and poor connectivity; and a historic deficiency in open space and recreational amenities. The OERJ identifies and addresses systemic bias and disparities to create equitable solutions with County departments and communities. Through the implementation process, the CAP Update investments would prioritize EJ and achieve equitable outcomes for communities and populations in the unincorporated county that have been historically left behind and most affected by climate change.

## 2.7.5 Mitigation Measures

### 2.7.5.1 Issue 1: Cause a Disproportionately High and Adverse Human Health or Environmental Impact on an EJ Community (a Minority or a Low-Income Population)

Mitigation measures listed in Table S-1 in the Executive Summary would be applied throughout the unincorporated county (including EJ communities) to reduce environmental impacts. With implementation of these mitigation measures, implementation of the CAP Update would not cause a disproportionately high and adverse environmental impact on EJ communities.

## 2.7.6 Significance Conclusions

The CAP Update would not cause a disproportionately high and adverse human health or environmental impact on an EJ community.

**Table 2.7-2 Population Density and Percent Minority Information**

	County of San Diego	North El Cajon	North Lemon Grove	Spring Valley	Sweetwater
Total Population	3,343,364	3,657	4,153	46,202	27,600
Population Density (people/square mile)	794	1,414	6,328	7,915	6,977
Percent (%) Minority	54.2%	45.4%	86.8%	74.6%	86.8%

Source: US Census Bureau 2019.

**Table 2.7-3 Poverty Status**

	County of San Diego	North El Cajon	North Lemon Grove	Spring Valley	Sweet Water
Below FPL (% of Population)	12.5%	18%	21%	12.6%	9.9%
Income Below 200 Percent FPL (\$24,280 income threshold) (% of Population)	54.2%	45.4%	86.8%	74.6%	86.8%

Note: FPL = federal poverty level.

Source: US Census Bureau 2019.