



The County of San Diego

Planning Commission Hearing Report

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| Date: | June 14, 2024 | Case/File No.: | PDS2020-POD-20-016; PDS2020-GPA-004; PDS2020-ER-20-00-002 |
| Place: | County Conference Center 5520 Overland Avenue San Diego, CA 92123 | Project: | County of San Diego Climate Action Plan Update and General Plan Amendment |
| Time: | 9:00 a.m. | Location: | Districts All |
| Agenda Item: | #3 | General Plan: | Various |
| Appeal Status: | Approval by the Board of Supervisors | Zoning: | N/A |
| Applicant/Owner: | County of San Diego | Community: | All |
| Environmental: | Supplemental Environmental Impact Report | APNs: | Various |

A. OVERVIEW

The Climate Action Plan (CAP) Update outlines measures and actions the County of San Diego (County) will take to reduce greenhouse gas (GHG) emissions from existing and new development in the unincorporated areas of the county (community) and from County facilities and operations regardless of their location (County operations). The CAP Update fulfills requirements set by the County's 2011 General Plan Program Environmental Impact Report (2011 General Plan PEIR) to reduce GHG emissions associated with building out the General Plan. The CAP also reduces GHG emissions that are consistent with state legislative GHG reduction targets.

Upon adoption of the CAP Update, new discretionary development projects that are consistent with the General Plan are eligible to streamline the analysis of project specific GHG emissions under the California Environmental Quality Act (CEQA) by complying with the CAP Update Checklist. Currently, without an adopted CAP, applicants for discretionary projects must complete their own environmental review, adding project time and cost. Applicants for discretionary projects would benefit from the CAP Update Checklist because it can save time and money and decrease the risk of successful litigation against a project.

In addition to satisfying General Plan requirements and providing project streamlining benefits, the CAP Update would also result in additional complementary social, economic, and environmental benefits for the community. Examples include, improved air quality and health outcomes, increased resiliency from climate-related issues, and green workforce training opportunities. The CAP Update also aligns with County efforts to create sustainable and resilient communities, such as through the Sustainable Land Use Framework, Regional Decarbonization Framework, the study of Transit Opportunity Areas, and others.

The CAP Update includes the preparation of a Supplemental Environmental Impact Report (CAP Update SEIR), as required by CEQA, to evaluate the environmental impacts of the proposed CAP Update measures

and actions. The CAP Update SEIR also evaluates alternatives to the CAP Update that would reduce significant impacts from implementing the CAP. As part of the alternatives analysis, the CAP Update SEIR includes an evaluation of smart growth alternatives that are intended to significantly reduce vehicle miles traveled (VMT) (i.e., the volume of daily trips or the average distance people drive to and from destinations) beyond what is reduced through the CAP Update, to help further reduce GHG emissions. If a smart growth alternative is selected, it would require further actions by the Board, such as the direction of new technical studies, program development, outreach, and environmental review. Staff recommends that any preferred smart growth alternative concepts be implemented through existing County programs and initiatives that seek to create sustainable development patterns (e.g., Sustainable Land Use Framework, Transit Opportunity Areas, Development Feasibility Analysis, Regional VMT Mitigation Program) as an efficient and effective approach to reduce VMT in the unincorporated county.

This report provides an overview of the CAP Update development process including public engagement, technical components, and its implementation plan, and the CAP Update SEIR.

B. STAFF RECOMMENDATIONS

This is a request for the for the Planning Commission to consider the CAP Update and related information and make the following recommendations to the Board of Supervisors:

1. Adopt the CEQA Findings which include the certification and findings regarding significant effects of the Project, the mitigation and monitoring program, the Statement of Overriding Considerations, and the decision to not recirculate the Draft SEIR pursuant to CEQA Guidelines Sections 15088.5, 15090, 15091, 15093, and 15097 (Attachment G) and Certify the Final Supplemental Environmental Impact Report (Attachment F).
2. Adopt the Guidelines for Determining Significance for Climate Change and Greenhouse Gas Threshold of Significance, dated October 2023 (Attachment A-8).
3. Adopt the Final CAP Update (Attachment A).
4. Adopt the Climate Action Plan Consistency Review Checklist, dated October 2023 (Attachment A-8).
5. Adopt the RESOLUTION OF THE COUNTY OF SAN DIEGO BOARD OF SUPERVISORS UPDATING THE 2011 GENERAL PLAN UPDATE PROGRAM ENVIRONMENTAL IMPACT REPORT MITIGATION MEASURE CC-1.2, CC-1.7, AND CC-1.8; GPA 20-004 (Attachment C-1).
6. Adopt the RESOLUTION OF THE SAN DIEGO COUNTY BOARD OF SUPERVISORS ADOPTING THE GENERAL PLAN AMENDMENT (GPA) PDS2020-GPA-20-004, AMENDING THE 2011 GENERAL PLAN UPDATE GOAL COS-20 AND POLICY COS-20.1; GPA 20-004 (Attachment C-2).
7. Adopt the RESOLUTION OF THE COUNTY OF SAN DIEGO BOARD OF SUPERVISORS TO APPLY FOR AND ACCEPT GRANT FUNDING TO SUPPORT THE CLIMATE ACTION PLAN (Attachment C-3).

C. BACKGROUND

On August 3, 2011 (1), the County of San Diego (County) Board of Supervisors (Board) approved a comprehensive General Plan Update (2011 General Plan). The 2011 General Plan Program Environmental Impact Report (2011 General Plan PEIR) identified contributions to climate change as a potentially significant environmental impact and included Mitigation Measure CC-1.2 to: "Prepare a County Climate Change Action Plan with an update[d] baseline inventory of greenhouse gas emissions from all sources, more detailed

greenhouse gas emissions reduction targets and deadlines, and comprehensive and enforceable [greenhouse gas] emissions reduction measures that will achieve a 17% reduction in emissions from County operations from 2006 by 2020 and a 9% reduction in community emissions between 2006 and 2020. Once prepared, implementation of this plan will be monitored and progress reported on a regular basis.” Mitigation Measure CC-1.2. was incorporated into the 2011 General Plan as Goal COS-20 and Policy COS-20.1.

The County has prepared two previous versions of Climate Action Plans, in 2012 and 2018, both of which were rescinded by the Board due to court rulings. On January 13, 2021 (5), the Board approved new policy guidelines to guide the preparation of a Climate Action Plan (CAP) Update. The guidelines directed the Chief Administrative Officer to:

- 1) Develop a Climate Action Plan for the County that is: comprehensive and legally enforceable; does not rely on the purchase of carbon offsets to meet emission reduction targets; uses updated data and modeling; sets clear goals and measurable metrics that show how we are ensuring environmental justice and equity; is shaped by community input; and will meet or exceed Senate Bill 32, GHG emissions reductions of 40% below the 1990 level by 2030 and establish actions to meet a goal of net zero carbon emissions by 2035-2045 (in line with Executive Order B-55-18).
- 2) Conduct stakeholder engagement, hold public hearings, and undertake environmental review; and
- 3) Report back to the Board bi-monthly with progress.

The CAP Update is a programmatic planning document that contains measures and actions the County will take to reduce the greenhouse gas (GHG) emissions associated with existing and future development as established by the 2011 General Plan land use map. It includes several technical components to substantiate the quantified GHG emissions reductions outlined in the CAP Update measures and achieve GHG reduction targets for the community and County operations. The CAP Update’s Supplemental Environmental Impact Report (CAP Update SEIR) also evaluates the impacts of the CAP Update’s measures on the environment as required by CEQA, which supplements the previous environmental analysis included in the 2011 General Plan PEIR and corrects deficiencies in the 2018 CAP document as articulated by the courts.

D. PUBLIC INPUT

Following the Board’s policy guidelines for the CAP Update to be “shaped by community input and center environmental justice”, staff conducted a multi-year, robust public engagement process to solicit feedback and input from diverse stakeholders on the development of the CAP Update. Outreach and engagement efforts outlined in Chapter 2 and Appendix 1 of the CAP Update (Attachment A-1) sought to reach residents and members of the unincorporated communities who have not traditionally engaged in the planning process, in addition to the County’s diverse stakeholder network of community members, environmental organizations, business and labor, industry, and development communities. This comprehensive approach to public participation ensures that the CAP Update has been shaped by robust community input and that the CAP Update’s measures represent diverse interests, demonstrate equity and inclusion, and provide economic and environmental benefits to the unincorporated area. In total, staff hosted 21 in-person and virtual workshops on the CAP Update with 694 people in attendance. In addition, staff distributed information at 232 meetings, presentations (including to Community Planning Groups and Community Sponsor Groups), and community-oriented events with a combined total of over 20,000 people in attendance. A postcard survey was distributed to 1,500 unincorporated community members, which received 563 online and hardcopy responses.

The Draft CAP Update and Draft SEIR were available for an extended (71-day) public review period from October 26, 2023, through January 5th, 2024. Following the completion of the public review period of the CAP Update and Draft SEIR, staff reviewed all comments received and incorporated the public feedback to

prepare the Draft Final CAP Update and Final CAP Update SEIR. No substantive changes to the GHG emissions inventory, projections, reduction targets, or CAP Update measures were required as a result of the public review comments.

E. ANALYSIS AND DISCUSSION

1. Draft Final Climate Action Plan (CAP Update)

The primary objective of the CAP Update is to reduce GHG emissions generated from activities within the unincorporated area (community) and emissions generated by operating County facilities, regardless of location (County operations). The CAP Update includes a GHG emissions inventory and projections, identifies GHG reduction targets, specifies GHG reduction measures and actions to achieve these targets, and establishes a monitoring program to evaluate implementation progress over time to create a defensible and legally enforceable CAP.

GHG Emissions Inventory and Projections

The CAP Update's inventory quantifies GHG emissions from activities within the community and from County operations across nine categories: On-Road Transportation; Off-Road Transportation; Electricity; Natural Gas; Propane; Solid Waste; Agriculture; Water; and Wastewater for the baseline year of 2019. GHG emissions from within the community and County operations were 2,984,000 metric tons of carbon dioxide equivalent (MTCO_{2e}) in 2019. Carbon dioxide is the most common GHG and can serve as a reference to compare and measure other GHGs (i.e., equivalent). On-road transportation was the largest source of emissions, contributing 45% of the total GHG emissions for 2019, followed by electricity (20%), natural gas (16%), solid waste (6%), agriculture (4%), propane (4%), off-road transportation (2%), water (1%), and wastewater (1%) [total may not add up due to rounding].

The CAP Update estimates future GHG emissions by considering forecasted growth in population, housing units, and employment. Projections also consider the impact of adopted legislation and regulations on future emissions, such as federal and State requirements to sell more efficient and zero emission vehicles, generate more electricity from renewable sources, and construct buildings to use energy more efficiently. The GHG emission projections for the community and County operations are 2,397,000 MTCO_{2e} in 2030 and 1,678,000 MTCO_{2e} in 2045.

In addition to the GHG emissions inventory and projections, the CAP Update includes an evaluation of carbon storage potential in the unincorporated county. As part of this analysis, existing carbon stock in natural and working lands (e.g., shrubland, forest, orchard, row crop, wetland) were estimated to consider actions that increase carbon storage in the CAP Update to contribute quantified reductions towards the net zero emissions goal. Total carbon stock in the unincorporated area was approximately 178 million MTCO_{2e} as of 2016. Most (87%) carbon is stored in shrublands and forests, with the rest stored in urban (developed) areas, grasslands, orchards, barren lands, row crops, and wetlands.

For more information on how the GHG emissions inventory and projections were developed, please refer to the CAP Update Chapter 3 (Attachment A).

GHG Emissions Reduction Targets and Net Zero Goal

The CAP Update includes GHG emissions reduction targets that were set based on Board direction and State legislation and plans. Senate Bill (SB) 32, adopted in 2016, mandates that statewide GHG emissions reach 40% below 1990 levels by 2030. In 2022, Assembly Bill (AB) 1279 established legislation for the State to achieve net zero GHG emissions as soon as possible, but no later than 2045, and to ensure that statewide

anthropogenic GHG emissions (e.g., those arising from human activity such as through the burning of fossil fuels) are reduced to at least 85% below 1990 levels by 2045. In addition, the State released the 2022 Scoping Plan (Scoping Plan), which outlined how the State could meet the goals established in AB 1279. The Scoping Plan concluded that additional reductions beyond what are required by SB 32 are needed in 2030 to reach AB 1279 targets for 2045. The State-level GHG reduction targets identified in AB 1279 and the Scoping Plan were evaluated using County-specific data and scaled to develop the CAP Update reduction targets specific to the County using the 2019 GHG emissions inventory baseline.

The CAP Update establishes anthropogenic GHG reduction targets for the community and County operations to reach 43.6% below 2019 levels (or 1,683,156 MTCO_{2e} emissions) by 2030 and 85.4% below 2019 levels (or 434,185 MTCO_{2e} emissions) by 2045. Additionally, a net zero emissions goal by 2045 is established to align with Board direction. For more information on how the reduction targets were developed and substantiated, refer to CAP Update Chapter 3 (Attachment A).

GHG Reduction Measures (CAP Measures)

The CAP Update identifies nine strategies, 21 measures, and 70 actions with measurable outcomes that the County will implement to reduce GHG emissions from five emissions reduction sectors: Built Environment and Transportation, Energy, Solid Waste, Water and Wastewater, and Agriculture and Conservation. Through implementation of these measures and actions, the County will meet and exceed the 2030 and 2045 GHG emissions reduction targets through quantified emissions reductions and make progress towards the 2045 net zero emissions goal through quantified reductions and additional, unquantified “Path to Net Zero” actions. Each CAP measure is within the County’s jurisdiction and ability to monitor progress over time, able to be monitored with readily available data to demonstrate progress over time, achievable within the County’s regulatory framework, and additional to existing regulations from the State or federal government. Staff worked with stakeholders, County departments, and technical experts to develop CAP measures that effectively reduce GHG emissions and achieve additional complimentary benefits important to community members. Refer to Chapter 4 of the CAP Update (Attachment A) for more information on each of the CAP measures. Table 1 shows a summary of the GHG emissions reductions, organized by emission reduction sector and strategy, that are anticipated in 2030 and 2045 from implementation of CAP measures and their contribution towards the achievement of the CAP Update GHG emissions reduction targets.

Table 1: Summary of Greenhouse Gas Emissions Reductions

| GHG REDUCTION SECTORS AND STRATEGIES | GHG EMISSIONS REDUCTIONS (MTCO _{2e}) | |
|---|--|---------|
| | 2030 | 2045 |
| Built Environment and Transportation | | |
| Decarbonize the On-Road and Off-Road Vehicle Fleet | 236,498 | 396,815 |
| Support Active Transportation and Reduce Single-Occupancy Vehicle Trips | 32,333 | 51,926 |
| Energy | | |
| Increase Building Energy Efficiency, Renewable Energy, and Electrification in the Unincorporated Area and County Operations | 333,097 | 536,299 |
| Solid Waste | | |
| Increase Solid Waste Diversion in the Unincorporated Area and County Operations | 39,109 | 60,258 |
| Increase Availability of Sustainable Solid Waste Facilities in the Unincorporated Area and County Operations | 1,373 | 69,448 |
| Water and Wastewater | | |

| | | | |
|---|--|------------|------------|
| Decrease Potable Water Consumption in the Unincorporated Area and County Operations | | 445 | 0 |
| Increase Stormwater Collection, Water Pumping, and Wastewater Treatment Efficiency | | 10,046 | 1,869 |
| Agriculture and Conservation | | | |
| Preserve Natural Lands and Improve Land Management Practices to Protect Habitat and Increase Carbon Storage | | 66,256 | 99,217 |
| Support Climate-Friendly Farming Practices and Preserve Agricultural Land | | 22,015 | 158,522 |
| Reductions from CAP Strategies | Total Annual Reductions (MTCO _{2e} /year) | 741,171 | 1,374,354 |
| | Percent Reduction (from 2019 levels) | 44.5% | 89.8% |
| CAP Targets | Total Annual Reductions (MTCO _{2e} /year) | 713,844 | 1,243,815 |
| | Percent Reduction (from 2019 levels) | 43.6% | 85.4% |
| CAP Target Achieved? | | Yes | Yes |

Implementation and Monitoring Program

Implementation of the CAP Update includes a combination of regulations, programs, incentives, and outreach and educational activities to reduce GHG emissions. CAP implementation will require coordination between County departments, cooperation with regional partners, identification of funding sources, and integration of CAP actions with other County planning initiatives and administrative procedures.

The CAP Update includes an Implementation and Monitoring Program that identifies measurable performance outcomes, lead and supporting departments responsible for implementation, estimated cost to the County to implement, potential funding sources, and enforcement mechanisms for each of the 70 actions. As part of the Implementation and Monitoring Program, the County would annually monitor implementation progress to track the effectiveness of each measure and action, update the emissions inventory at least every two years, and make adjustments as needed through CAP updates at least every five years to keep the County on track towards meeting its reduction targets. Through implementation, the County will continue its CAP public outreach efforts so that County departments, external stakeholders, and the public can monitor the progress and effectiveness of CAP implementation over time¹. Refer to Chapter 5 of the CAP Update (Attachment A) for more information on the Implementation and Monitoring Program.

CAP Consistency Review Checklist

The CAP Update has been prepared in accordance with CEQA Guidelines Section 15183.5, which allows for public agencies to analyze and mitigate GHG emissions as part of a larger “plan for the reduction of greenhouse gases.” The CAP Update, CAP Consistency Review Checklist, and the CAP Update SEIR collectively include the required elements of “a plan for the reduction of greenhouse gas emissions” set forth in CEQA Guidelines Section 15183.5(b), making the CAP Update a CEQA-qualified climate action plan.

Projects that are consistent with the County’s CAP Update are eligible for streamlined analysis of their GHG emissions impacts under CEQA. A project can show consistency with the CAP Update by implementing the measures in the CAP Consistency Review Checklist (Attachment A-8).

Supplemental Implementation Information

¹ See 2018 CAP Annual Monitoring Report GHG reduction documentation for the first five years of implementation here: www.sandiegocounty.gov/sustainability/annualmonitoringreport

Additional supplemental implementation information has been developed to assist in the budgetary process, evaluate cost effectiveness, and ensure environmental justice and equity are addressed in CAP Update implementation.

An Implementation Cost Analysis (Attachment A-10) estimates costs to the County to implement the CAP Update to assist with future budget requests and the identification of funding sources. The analysis estimates a total cost of \$650 million in the first five years (FY 2025-26 to FY 2029-30) of CAP Update implementation. Seventy-six percent of the costs (\$494 million) are associated with existing programs that are currently operational and contribute toward CAP goals, like investments in active transportation infrastructure (i.e., bike lanes, sidewalks) and conservation lands. The remaining 24 percent of the total costs (\$156 million) are associated with new and expanded programs which will not occur without CAP Update adoption, like increased access to electric and efficient buildings and investments in climate smart agricultural practices. Through implementation and monitoring, including the five-year CAP updates and annual monitoring reporting, the County will track implementation efforts and reassess costs to synchronize with the County's annual five-year forecast and Operational Plan budget process. The County will also monitor funding opportunities and mechanisms to leverage other financing sources.

A Cost Effectiveness and Disproportionate Cost Analysis (Appendix to be available prior to CAP Update adoption) identifies the cost effectiveness and any disproportionate costs that may be experienced by residents and businesses in the community, including any financial impacts to home and business owners, as a result of implementing the CAP Update. The analysis estimates, for each measure, the cost or benefit to reduce one ton of carbon dioxide equivalent to compare the cost effectiveness of the measures. Additionally, it includes the anticipated upfront costs to comply with the CAP Update and estimates the net benefit or net cost over the lifetime of implementation, after accounting for related rebates or other incentives. Initial programs under the CAP Update would be incentive-based and voluntary. Future regulatory-based code updates may increase upfront construction costs but must demonstrate program-specific cost effectiveness prior to implementation. Any increases to upfront construction costs would be evaluated as part of the code update process prior to approval by the Board. Further, with the CAP Update in place, discretionary project review processes can be streamlined using the CAP Consistency Review Checklist, resulting in an average savings of \$805 per unit from avoided environmental review costs.

An Equity Implementation Framework (Attachment A-9) was developed in partnership with community-based organizations, equity-focused offices within the County, and the CAP's implementing departments to ensure outcomes and co-benefits are realized equitably throughout the unincorporated area. The framework is a resource for all County departments that will implement the CAP Update and includes step-by-step guidance on how to develop CAP projects, programs, and policies that can lead to equitable investments in communities and avoid unintended consequences.

2. Final Supplemental Environmental Impact Report (CAP Update SEIR)

The CAP Update process includes the development of an SEIR, as required by CEQA. The CAP Update SEIR analyzes the environmental impacts of the proposed CAP Update and associated actions and augments the previous environmental analysis included in the 2011 General Plan PEIR, which did not consider the impacts of the CAP Update measures and actions on the environment. The CAP Update SEIR also addresses issues raised in the 2018 CAP Court of Appeal decision (*Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467) and implemented by the Superior Court, as summarized in Table 1-1 in the CAP Update SEIR (Attachment F). Components of the CAP Update SEIR are described below.

Project Description

The CAP Update SEIR (Attachment F) identifies the potential impacts that could result from implementation of the CAP Update and related project components. The following proposed actions constitute the Project (Project) analyzed in the CAP Update SEIR:

- a. Climate Action Plan (CAP Update) (Attachment A) – Includes measures and actions to reduce GHG emissions from the unincorporated area and County operations;
- b. General Plan Amendment (Attachment B) – Updates General Plan Conservation and Open Space COS-20 and Policy COS-20.1 to be consistent with current regulatory standards;
- c. 2011 General Plan Final Program Environmental Impact Report (2011 GPU PEIR) Mitigation Measure (MM) Amendment (Attachment B) – Updates the 2011 GPU PEIR, including revised mitigation measures and a revised Mitigation, Monitoring and Reporting Program, specifically Climate Change (CC) MM CC-1.2 (Prepare a County Climate Change Action Plan), MM CC-1.7 (County Guidelines for Determining Significance for Climate Change, which includes a threshold of significance for GHG emissions); and MM CC-1.8 (Revise County Guidelines for Determining Significance based on the Climate Change Action Plan) to update the regulatory requirements and goals to make them current with existing regulatory standards;
- d. GHG Threshold of Significance, Guidelines for Determining Significance for Climate Change (Guidelines), and CAP Consistency Review Checklist (Checklist) (Attachment A-8) – The Guidelines were developed pursuant to the updated MM CC-1.7 and CC-1.8 of the 2011 GPU PEIR and incorporate a “threshold of significance” in accordance with the 2011 GPU PEIR MM CC-1.7 (as updated) for general use as part of the County’s environmental review process to be separately adopted by the Board. The proposed “threshold of significance” is consistency with the CAP, which would be determined through the Checklist. County staff will use this document as part of the environmental review process to evaluate GHG emissions for future individual discretionary projects:
 “A proposed project would have a less than significant cumulatively considerable contribution to climate change impacts if it is found to be consistent with the County’s Climate Action Plan; and, would normally have a cumulatively considerable contribution to climate change impacts if it is found to be inconsistent with the County’s Climate Action Plan.”

The CAP Update SEIR identifies mitigation measures that would reduce potentially significant impacts to the extent feasible. The CAP Update SEIR also functions as a PEIR under CEQA Guidelines Section 15168 for streamlining future projects. The CAP Update supports future project-specific GHG emissions analyses consistent with the tiering and streamlining provisions of CEQA. The CAP Update SEIR provides the appropriate level of environmental review to allow future projects to tier from and streamline analysis of GHG emissions. The CAP Update SEIR does not provide project-level review of any specific development projects within the unincorporated area.

Potentially Significant Environmental Impacts

The County has determined that the Project could potentially result in one or more new or more severe significant effects that were not previously evaluated in the 2011 General Plan PEIR. The County prepared a Supplemental EIR to the 2011 General Plan PEIR consistent with the requirements of CEQA Guidelines Section 15163. Table S-1 in the CAP Update SEIR (Attachment F), Summary of Impacts and Mitigation

Measures, summarizes the results of the environmental analysis completed for the Project. Table S-1 also includes: (1) the direct and cumulative impacts that would occur with implementation of the CAP Update; (2) the level of significance of impacts before mitigation; (3) the recommended mitigation measures that would avoid or reduce significant environmental impacts; (4) the level of significance of impacts after mitigation measures are implemented; and (5) whether new or more severe significant impacts (compared with the impact conclusions in the 2011 General Plan PEIR) would occur with the CAP Update after mitigation.

Project Alternatives

CEQA requires that an Environmental Impact Report evaluate project alternatives that would avoid or substantially lessen significant or potentially significant, adverse environmental effects that would result from implementation of the Project while still attaining most of the basic project objectives. Two CAP Update alternatives were selected for detailed analysis, in addition to the four smart growth alternatives, as described below.

The “No Project Alternative” is analyzed to allow decision makers to compare the impacts of approving the CAP Update with the impacts of not approving the CAP Update. Under this alternative, the CAP Update would not be implemented, and the County would not have a mechanism for meeting legislative requirements for GHG emissions nor satisfy the County’s obligation under the 2011 GPU PEIR MM CC-1.2. The “No Project Alternative” would not achieve any of the CAP Update SEIR’s project objectives and would not provide a streamlining mechanism for future development projects to evaluate their GHG impacts.

The “Distributed Generation Only Alternative” would develop a program to provide 100 percent renewable energy to residents and businesses through distributed generation. Distributed generation systems are currently allowed within the unincorporated area and would be encouraged through mechanisms such as permit process improvements, and zoning and code updates, potentially including a renewable energy zoning overlay. This alternative would not increase demand for large-scale renewable energy systems. Overall impacts that are specific to the conversion of undeveloped land to energy infrastructure would be reduced compared to the Project. This alternative may not meet the project objectives related to meeting the SB 32 target in 2030. However, it would support the sustainability principles in the General Plan, contribute to progress toward environmental justice and equity, include other adaptable measures and actions, and minimize undue and unnecessary economic impacts on businesses and property owners.

Smart Growth Alternatives

The CAP Update SEIR includes an analysis of four “smart growth” alternatives that were developed in close coordination with stakeholders and evaluate conceptual land use patterns that, when compared to the existing General Plan land use map, would significantly reduce VMT. Analysis of the smart growth alternatives assumed that all measures and actions included in the CAP Update would be implemented as proposed and advancement of the smart growth alternatives would be optional and supplemental to adoption of the CAP Update. Evaluation of the smart growth alternatives was directed by the courts as part of the 2018 CAP ruling. “Smart growth” is defined by the Court of Appeal as “compact, efficient, and environmentally sensitive pattern of development that focuses future growth away from rural areas and closer to existing and planned job centers and public facilities, while preserving open space and making more efficient use of existing urban infrastructure.”

Since the courts directed the County to analyze smart growth alternatives, the Board has issued important policy direction that further demonstrates the County’s commitment to smart growth and associated development. On February 9, 2022 (7), the Board provided direction to develop options for a Sustainable

Land Use Framework for the unincorporated area, including the identification of sustainable development principles that could inform future land use decisions regarding how the unincorporated area could grow. On September 28, 2022 (6), the Board adopted its CEQA transportation threshold, including a revised Transportation Study Guide that establishes guidance for evaluating project-level VMT and encourages infill development. It provides criteria on how development projects should be evaluated for consistency related to the County's transportation goals, policies and plans, and through procedures established under the CEQA. The Board has also directed additional focus areas to support development and housing in areas that are closer to existing services and infrastructure, including future transit-oriented locations (e.g., Transit Opportunity Areas, Development Feasibility Analysis, VMT Mitigation Program, Removing Barriers to Housing).

Implementation of smart growth alternatives would require Board direction, subsequent planning, stakeholder engagement, and additional CEQA analysis. If the Board selects a smart growth alternative and directs staff to advance it, this could be implemented quickly through a smart growth zoning overlay with incentives for development within smart growth areas, or longer through zoning and/or land use changes, or other planning mechanisms or efforts, depending on the alternative selected and/or direction provided at the hearing.

As part of the CAP Update adoption hearing, the Board may select one, multiple, or none of the smart growth alternatives to advance in addition to adoption of the CAP Update and certification of the CAP Update SEIR. If directed, staff would return with a smart growth alternative for consideration within six to 60 months, depending on the alternative and planning mechanism selected for implementation. Alternatively, smart growth alternative concepts can be added to existing efforts such as those described above for schedule, staffing, outreach, and budget efficiency. The four smart growth alternatives are summarized below and described in detail in Chapter 5 of the CAP Update SEIR (Attachment F).

The "Fire Safe and VMT Efficient Alternative" defines a smart growth geography based on areas that are both outside of areas mapped by the California Department of Forestry as areas with High or Very High fire risk and within areas mapped by the County as at least 15 percent below the regional average for residential VMT (based on the County of San Diego SB 743 Location-Based Screening Maps developed as part of the County's Transportation Study Guidelines adopted in September of 2022). This alternative would focus future growth away from rural areas and closer to existing and planned job centers and public facilities.

The "Village Support Areas Alternative" would establish 0.5-mile buffers around the established Villages identified in the General Plan to encourage housing development and spur redevelopment around County Villages. This alternative would promote compatible and connected growth in the Village Support Areas to realize the densities included for Villages in the General Plan.

The "Sustainable Communities Strategy Alternative" would align with the San Diego Association of Governments (SANDAG) 2021 Regional Plan Mobility Hubs. The Regional Plan incorporates smart growth planning concepts into a regional growth pattern focused around Mobility Hubs which are envisioned as places of activity where capital transportation investment will support future housing and jobs. This alternative would focus growth in the portions of the Mobility Hubs that are in the unincorporated area.

The "General Plan Goals and Policy Edits Alternative" would amend General Plan goals and policies from the Land Use, Conservation and Open Space, Mobility, and Safety Elements of the adopted General Plan to further enhance the smart growth principles included in the General Plan. The Board may choose some or all of these additional goal and policy amendments and pair them with the proposed CAP Update or an alternative. See Table 5-1 of the CAP Update SEIR (Attachment F) for edits to General Plan goals and policies. In summary, these edits would support the County's climate policies, reduce VMT, reduce risks

resulting from wildfire, protect biological and groundwater resources, and impose additional criteria for the approval of future General Plan amendment projects. This alternative could be directed in addition to, or in lieu of, any of the geographic-based smart growth alternatives described above.

F. CALIFORNIA ENVIRONMENTAL QUALITY ACT

On August 3, 2011 (1), the Board certified the Program Environmental Impact Report (PEIR) and approved the 2011 General Plan Update. The County determined that the CAP Update could potentially result in one or more new significant effects that were not previously evaluated in the 2011 GPU PEIR. This Project has been reviewed in compliance with the CEQA and the Project qualifies for a Supplement to the 2011 GPU PEIR under CEQA Guidelines Section 15163. A CAP Update SEIR dated May 2024, has been prepared for the Project and is on file with Planning & Development Services (PDS). The CAP Update SEIR evaluated potentially significant effects for the following environmental areas of potential concern: Aesthetics; Agricultural and Forestry Resources; Air Quality; Biological Resources; Cultural and Paleontological Resources; Energy; Environmental Justice; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Transportation; Tribal Cultural Resources; and Wildfire.

G. COMMUNITY PLANNING AND SPONSOR GROUPS (CPGs and CSGs)

The Project area is the unincorporated area and affects all Community Planning Groups (CPGs) and Community Sponsor Groups (CSGs). CPGs and CSGs were engaged throughout the process as part of stakeholder engagement. Staff offered CAP Update presentations to all the CPGs and CSGs throughout the unincorporated area, distributed surveys, and collected input from CPG and CSG members and Chairs.

Report Prepared By:

Meghan Kelly
(619) 323-6462

Meghan.Kelly@sdcounty.ca.gov

Report Approved By:

Vince Nicoletti
(619) 993-0042

Vince.Nicoletti@sdcounty.ca.gov

AUTHORIZED REPRESENTATIVE:



VINCE NICOLETTI, INTERIM DIRECTOR

ATTACHMENTS:

Disclaimer: All attachments are pre-decision and deliberative and will not be included in the Planning Commission Report attachment within the Board of Supervisors Letter to avoid duplication.

Volume I – Climate Action Plan Update Documents

Attachment A – Draft Final Climate Action Plan Update

A-1 – CAP Appendix 1 – Community Outreach and Engagement

A-2 – CAP Appendix 2 – Co-Benefits Evaluation Tool

A-3 – CAP Appendix 3 – Unincorporated County of San Diego 2019 Greenhouse Gas Emissions Inventory and Projections

- A-4 – CAP Appendix 4 – County of San Diego Local Government Operations Greenhouse Gas 2019 Inventory and Projections
- A-5 – CAP Appendix 5 – County of San Diego Climate Action Plan Update: Greenhouse Gas Reduction Targets and Gap Analysis
- A-6 – CAP Appendix 6 – Carbon Stock Estimates for Unincorporated San Diego County
- A-7 – CAP Appendix 7 – Climate Action Plan Combined Measure Workbook
- A-8 – CAP Appendix 8 – CAP Consistency Checklist and Guidelines for Determining Significance for Climate Change
- A-9 – CAP Appendix 9 – Equity Implementation Framework
- A-10 – CAP Appendix 10 – Implementation Cost Analysis

Volume II – Related Project Documents

Attachment B – CAP General Plan Amendment

Attachment C – Draft Resolutions

- C-1 – Resolution of the County of San Diego Board of Supervisors Updating the 2011 General Plan Update Program Environmental Impact Report Mitigation Measures CC-1.2, CC-1.7, and CC-1.8; GPA 20-004
- C-2 – Resolution of the County of San Diego Board of Supervisors Adopting the General Plan Amendment (GPA) PDS2020-GPA-20-004, Amending the 2011 General Plan Update Goal COS-20 and Policy COS-20.1; GPA 20-004
- C-3 – Resolution of the County of San Diego Board of Supervisors to Apply for and Accept Grant Funding to Support the Climate Action Plan
- C-4 – Resolution of the County of San Diego Board of Supervisors Adopting the Greenhouse Gas Threshold of Significance

Attachment D – Minute Orders from Board Hearings Related to Climate Action Plan

- D-1 – 2011 General Plan Update Minute Order
- D-2 – 2012 Climate Action Plan Adoption Minute Order
- D-3 – 2012 Climate Action Plan Rescission Minute Order
- D-4 – 2018 Climate Action Plan Adoption Minute Order
- D-5 – 2018 Climate Action Plan Rescission Minute Order
- D-6 – Framework for Our Future: Actions to Achieve Bold Climate Action at the County of San Diego Minute Order

Attachment E – Minute Orders from Board Hearings Related to Smart Growth Alternatives

- E-1 – Sustainable Land Use Framework; Development Feasibility Analysis; Transit Opportunity Areas; and VMT Mitigation Program Direction Minute Order
- E-2 – Transportation Study Guide Adoption Minute Order
- E-3 – Removing Barriers to Housing Direction Minute Order

Volume III – Supplemental Environmental Impact Report Documents

Attachment F – Final Supplemental Environmental Impact Report

- F-1 – Final Supplemental Environmental Impact Report Sections
- F-2 – SEIR Technical Appendices

Attachment G – Findings and Statement of Overriding Considerations

Attachment H – Mitigation Monitoring and Reporting Program