**SUPPLEMENTAL INFORMATION MODIFYING OPTION 3**

FEBRUARY 2018

Modified Option 3 builds upon the Planning Commission Recommendation to the Board of Supervisors, which consisted of Option 3 (Residential and Non-residential Development) with a modification to GHG Reduction Measure E-1.2. Modified Option 3 was developed to incorporate 90% renewable electricity, while also addressing housing affordability and cost to development.

The Supplemental Information Modifying Option 3 includes four attachments:

1. Modified Option 3 Climate Action Plan Modifications (Supplemental Information Modifying Option 3 – Attachment A)
2. Modified Option 3 Measure Quantification Table (Supplemental Information Modifying Option 3 – Attachment B)
3. Modified Option 3 Gap Analysis (Supplemental Information Modifying Option 3 – Attachment C)
4. Modified Option 3 CEQA Findings (Supplemental Information Modifying Option 3 – Attachment D)

# Modified Option 3 Climate Action Plan Modifications
(Supplemental Information Modifying Option 3 – Attachment A)

**SUBJECT:** COUNTY OF SAN DIEGO CLIMATE ACTION PLAN AND GENERAL PLAN AMENDMENT; POD15-002; GPA16-007

**MODIFIED OPTION 3**

Modified Option 3 builds upon the Planning Commission Recommendation to the Board of Supervisors, which consisted of Option 3 (Residential and Non-residential Development) with a modification to GHG Reduction Measure E-1.2. Modified Option 3 was developed to incorporate 90% renewable electricity, while also addressing housing affordability and cost to development. This modified option includes the following elements:

1. Draft Final SEIR "Increased Solid Waste Diversion Alternative" would replace the components of GHG reduction measure SW-1.1;
2. Remove GHG reduction measures T-3.1, E-1.1, E-1.3, E-2.2;
3. Accelerate implementation of GHG reduction measure T-1.3 by updating 15 community plans by 2030 and an additional 4 community plans between 2031 and 2040;
4. A Local Direct Investment Program would be implemented to achieve a total reduction of 176,614 $MTCO_2e$; and
5. Measure E-1.2 would be modified to include a program for existing homeowners meeting certain income criteria to reduce the cost to replace natural gas tank-based water heaters with solar, electric, or tankless gas.

**REQUISITE CHANGES TO THE FINAL CLIMATE ACTION PLAN**

This Climate Action Plan (CAP) Modification document is submitted to the Board of Supervisors (the Board) to make the following modifications to the draft Final County of San Diego CAP and Attachment 1 of Appendix C of the CAP should the Board choose to adopt the Modified Option 3.

1. The Modified Option 3 Measure Quantification Table (Supplemental Information Modifying Option 3 – B) details the changes to the greenhouse gas reduction measures under the Modified Option 3. The revised reduction numbers will replace the anticipated reductions for 2030 and 2050 in the "GHG EMISSIONS REDUCTIONS" table for each respective measure. Changes related specifically to the Modified Option 3 are highlighted in yellow. All other changes relate to those made to the Public Draft CAP as they appear in the draft Final CAP.

2. The Modified Option 3 Gap Analysis (Supplemental Information Modifying Option 3 – C) details the changes to the reduction measures' quantification within Attachment 1 of Appendix C of the Climate Action Plan. Changes are highlighted in yellow.

3. Universal Revision: Replace all references to "30" measures with "26" measures.

4. Page 3-3: Revise Table 3.1 GHG Reductions by Category from Proposed Strategies and Measures ($MTCO_2e$) as follows:

| Category | 2020 | 2030 | 2050 |
|---|---|---|---|
| **Built Environment and Transportation** | 6,020 | ~~227,842~~<br>233,758 | ~~66,703~~<br>64,459 |
| **Energy** | 125,140 | ~~581,315~~<br>553,449 | ~~729,187~~<br>639,508 |
| **Solid Waste** | 0 | ~~57,103~~<br>79,052 | ~~62,159~~<br>86,052 |
| **Water and Wastewater** | 254 | 17,920 | 19,738 |
| **Agriculture and Conservation** | 791 | 12,965 | 16,384 |
| **Total Reductions** | **132,205** | **897,145** | ~~**894,170**~~<br>**826,141** |

5. Page 3-3: Revise percentages in Figure 3.1 Total GHG Reductions from Strategies and State Actions in 2030 as follows:

| Category | Revised Category Percentages |
|---|---|
| **Built Environment and Transportation** | 13% |
| **Energy** | ~~32%~~<br>31% |
| **Solid Waste** | ~~3%~~<br>4% |
| **Water and Wastewater** | 1% |
| **Agriculture and Conservation** | 1% |
| **State Reductions** | 50% |

6. Page 3-8: The Built Environment and Transportation category is composed of four strategies and ~~13~~ 12 measures with supporting efforts

7. Page 3-8: ~~Measure T-3.1: Use Alternative Fuels in New Residential and Non-residential Construction Projects~~

8. Page 3-14:

MEASURE SUMMARY

Focus growth in the county villages to achieve mixed-use, transit-oriented village centers by updating ~~10~~ 15 community plans by 2030 and an additional ~~9~~ 4 community plans between 2031 and 2040

9. Page 3-15:

ACTIONS

| DESCRIPTION | RESPONSIBILITY | TIME FRAME | RELATIVE COST |
|---|---|---|---|
| Update ~~10~~ 15 community plans that include villages | PDS | 2030 | Medium |
| Update ~~9~~ 4 community plans that include villages | PDS | 2031-2040 | Medium |

10. Page 3-15:

OUTCOMES

| PERFORMANCE METRIC | TIME FRAME |
|---|---|
| ~~10~~ 15 community plan updates completed | 2030 |
| ~~9~~ 4 community plan updates completed | 2031-2040 |

11. Page 3-27: This strategy emphasizes transitioning fossil fuel-based County fleet vehicles and equipment to alternative fuels such as renewable diesel, renewable natural gas, and electric, and facilitating the replacement of older on-road vehicles to meet state and federal fuel economy standards. This strategy emphasizes opportunities to transition County construction equipment fuel types from petroleum-diesel to renewable diesel, as well as their conversion to electric or hybrid-electric options, including bulldozers, excavators or loaders, all of which are available on the market.

12. Pages 3-28 and 3-29: Delete both pages to remove Measure T-3.1: Use Alternative Fuels in New Residential and Non-residential Construction Projects.

13. Page 3-42: Revise percentage in Figure 3.4 Energy Reductions for 2030 to be consistent with revised percentage in Figure 3.1, per change shown in #5.

14. Page 3-42: The energy measures included in the CAP aim to further reduce emissions by improving energy efficiency ~~earlier than or beyond state r~~equirements, streamlining access to renewable energy, and increasing the supply of renewable energy for homes and businesses within the county. Major measures include achievement of 90% renewable energy in the county by 2030, increased installation of rooftop photovoltaics (PV) in new and existing development, ~~achievement of energy efficiency in existing building~~s, and a water heater replacement program.

15. Page 3-42: The Energy category is composed of two strategies and ~~eight~~ five measures with supporting efforts.

16. Page 3-42:

~~Measure E-1.1: Improve Building Energy Efficiency in New Development~~ ~~Measure E-1.3: Improve Building Energy Efficiency in Existing Development~~ ~~Measure E-2.2: Increase Renewable Electricity in Non-Residential Development~~

17. Page 3-43: This strategy focuses on opportunities to increase energy efficiency in ~~both new and existing residential and non-residential buildings, including~~ residential buildings and County facilities.

18. Pages 3-44 and 3-45: Delete both pages to remove Measure E-1.1: Improve Building Energy Efficiency in New Development

19. Page 3-46:

DESCRIPTION
This measure is a requirement, and will include a subsidy for replacement water heaters for participants meeting certain income criteria. The average life span of a residential natural gas water heater is 13 years. This measure will require all new and replacement water heaters to transition away from tank-based natural gas systems. The County will develop a program for existing homeowners meeting certain income criteria to reduce the cost to replace natural gas tank-based water heaters with solar, electric, or tankless gas. The measure will be enforced through the County's current permitting processes.

20. Page 3-47:

ACTIONS

| DESCRIPTION | RESPONSIBILITY | TIME FRAME | RELATIVE COST |
|---|---|---|---|
| Develop a program for existing homeowners meeting certain income criteria to reduce the cost to replace natural gas tank-based water heaters with solar, electric, or tankless gas | PDS | 2020 | Medium |

21. Page 3-48 and 3-49: Delete both pages to remove Measure E-1.3: Improve Building Energy Efficiency in Existing Development

22. Page 3-56 and 3-57: Delete both pages to remove Measure E-2.2: Increase Renewable Electricity in Non-Residential Development

23. Page 3-62: Revise percentage in Figure 3.5 Solid Waste Reductions for 2030 to be consistent with revised percentage in Figure 3.1, per change shown in #5.

24. Page 3-63: This strategy ~~includes~~ builds upon this recent Board action as a measure.

25. Page 3-64:

MEASURE SUMMARY
Achieve ~~75%~~ 80% waste diversion in the unincorporated county by 2030

DESCRIPTION
Through this measure, the County will continue to implement the Strategic Plan to Reduce Waste to achieve additional reductions through 2030. ~~By 2025, staff will return to the Board to request direction to establish a higher diversion target to make progress toward the 2050 GHG reduction goal.~~

26. Page 3-65: OUTCOMES

| PERFORMANCE METRIC | TIME FRAME |
|---|---|
| ~~75%~~ 80% of the unincorporated county's solid waste is diverted from landfills | 2030 |

27. Pages 5-11, 5-12, and 5-13:

Revise Table 5.1 CAP Monitoring Program as follows:

- Measure T-1.3 – revise "Measure Title & Action(s)" and "Outcome(s)" as follows: update ~~10~~ 15 community plans by 2030 and update ~~9~~ 4 community plans between 2031 and 2040
- Measure T-3.1 – delete measure and associated rows from table
- Measure E-1.1 – delete measure and associated rows from table
- Measure E-1.3 – delete measure and associated rows from table
- Measure E-1.2 – add the following information in a new row:
    - Measure Title & Action(s): Develop a program for existing homeowners meeting certain income criteria to reduce the cost to replace natural gas tank-based water heaters with solar, electric, or tankless gas
    - Outcome(s): All new an replacement water heaters in residential development are solar, electrically-powered, or tankless gas
    - Enforcement: Subsidy as part of requirement
    - Lead: PDS
    - Implementation Time Frame: 2020
    - Relative Cost: Medium
    - Potential Funding Source: Check box for County
- Measure E-2.2 – delete measure and associated rows from table
- Measure SW-1.1 – revise "Outcome(s)" as follows: ~~75%~~ 80% of the unincorporated county's solid waste is diverted from landfills

**CHANGES TO THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT**

Pursuant to CEQA Guidelines section 15088.5(a), "[a] lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043).

The County recognizes that new information has been added to the SEIR since circulation of the Draft SEIR, but the new information serves simply to clarify or amplify information already found in the Draft SEIR or improve the Project and its protection of the environment. It does not rise to the level of "significant new information".

Table 1 describes where the changes per the Modified Option 3 were analyzed in the Draft SEIR, whether the change has been evaluated, and whether recirculation of the Draft SEIR would be warranted. Please see Section VII of Supplemental Information Modifying Option 3 – D for a complete list and location of changes in the Final SEIR under the Modified Option 3. Ensuing changes to the draft Final CAP are documented above.

Table 1: Draft SEIR Evaluation of Project Changes under Modified Option 3

| Project Changes | Where changes were evaluated in Draft SEIR | Would new or substantially more severe impacts result from the change? | Discussion | Would recirculation be required? |
|---|---|---|---|---|
| Increased Solid Waste Diversion Alternative | Chapter 4 | No | As described in the draft Final SEIR, the County prepared an expanded analysis of the Increased Solid Waste Diversion Alternative to identify project-specific impacts, mitigation measures, and resulting conclusions if this alternative were selected for adoption. As described therein, this alternative would reduce environmental impacts compared to the Project and no new significant or substantially more severe impacts would result. Further, this alternative would better fulfill this objective because it provides a mechanism for additional GHG reductions to better achieve the 2050 GHG reduction goal. | No |
| Local Direct Investment Program at 176,614 $MTCO_2e$ | General discussion in Chapters 2, 3, and 4. Also see Table 1-1. | No | As described in the Draft SEIR, a total of 190,262 $MTCO_2e$ of GHG reductions were assumed through a Local Direct Investment Program. The revised amount of GHG reductions under the Modified Option 3 is less than the level evaluated in the Draft SEIR and could result in a reduction in the number or types of local direct investment projects that would be required. As such, the environmental impacts of constructing local direct investment projects to achieve 176,614 $MTCO_2e$ of GHG reductions has been evaluated in the Draft SEIR. | No |

| Project Changes | Where changes were evaluated in Draft SEIR | Would new or substantially more severe impacts result from the change? | Discussion | Would recirculation be required? |
|---|---|---|---|---|
| Accelerate GHG Reduction Measure T-1.3 | General discussion in Chapters 2, 3, and 4. Also see Table 1-1. | No | Acceleration of implementation of this measure would increase the number of community plans updated by 2030, but maintain the total number of plans updated by 2040, as analyzed in the Draft SEIR. This change would result in additional greenhouse gas emissions reductions of 6,974 $MTCO_2e$ by 2030. | No |
| Remove GHG Reduction Measure T-3.1 | General discussion in Chapters 2, 3, and 4. Also see Table 1-1. | No | Removal of this measure would eliminate the requirements for the use of alternative fuels in construction equipment. Removal of this measure would not lead to any new significant impacts and would reduce total GHG reductions by 885 $MTCO_2e$ under the Modified Option 3.<br><br>As described in the Modified Option 3 Measure Quantification Table (Supplemental Information Modifying Option 3 – B), these reductions would be replaced by reductions achieved from the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 176,614 $MTCO_2e$ under the Modified Option 3, which would not exceed the level of local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 $MTCO_2e$). | No |

| Project Changes | Where changes were evaluated in Draft SEIR | Would new or substantially more severe impacts result from the change? | Discussion | Would recirculation be required? |
|---|---|---|---|---|
| Remove GHG Reduction Measure E-1.1 | General discussion in Chapters 2, 3, and 4. Also see Table 1-1. | No | Removal of this measure would eliminate the requirements for Zero Net Energy (ZNE) standards in both new residential and non-residential development. Removal of this measure would not lead to any new significant impacts and would reduce total GHG reductions by 38,708 $MTCO_2e$ under the Modified Option 3.<br><br>As described in the Modified Option 3 Measure Quantification Table (Supplemental Information Modifying Option 3 – B), these reductions would be replaced by reductions achieved from the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 176,614 $MTCO_2e$ under the Modified Option 3, which would not exceed the level of local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 $MTCO_2e$). | No |
| Update GHG Reduction Measure E-1.2 | General discussion in Chapter 1 and Table 1-1. | No | Update of the measure to state that GHG Reduction Measure E-1.2 would be a requirement and would include a subsidy for replacement water heaters for participants meeting certain income criteria. This update would not lead to any new significant impacts as this measure would continue to be implemented at the levels proposed in the Final SEIR. | No |

| Project Changes | Where changes were evaluated in Draft SEIR | Would new or substantially more severe impacts result from the change? | Discussion | Would recirculation be required? |
|---|---|---|---|---|
| Remove GHG Reduction Measure E-1.3 | General discussion in Chapters 2, 3, and 4. Also see Table 1-1. | No | Removal of this measure would eliminate the requirements for energy efficiency audits. Removal of this measure would not lead to any new significant impacts and would reduce total GHG reductions by 3,694 $MTCO_2e$ under the Modified Option 3.<br><br>As described in the Modified Option 3 Measure Quantification Table (Supplemental Information Modifying Option 3 – B), these reductions would be replaced by reductions achieved from the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 176,614 $MTCO_2e$ under the Modified Option 3, which would not exceed the level of local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 $MTCO_2e$). | No |

| Project Changes | Where changes were evaluated in Draft SEIR | Would new or substantially more severe impacts result from the change? | Discussion | Would recirculation be required? |
|---|---|---|---|---|
| Remove GHG Reduction Measure E-2.2 | General discussion in Chapters 2, 3, and 4. Also see Table 1-1. | No | Removal of this measure would eliminate the requirements for the installation of renewable electricity systems on new non-residential development. Removal of this measure could reduce the potential environmental impacts that would occur because less structures would be modified and would reduced total GHG reductions by 13,444 $MTCO_2e$ under the Modified Option 3.<br><br>As described in the Modified Option 3 Measure Quantification Table (Supplemental Information Modifying Option 3 – B), these reductions would be replaced by reductions achieved from the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 176,614 $MTCO_2e$ under the Modified Option 3, which would not exceed the level of local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 $MTCO_2e$). | No |

| Project Changes | Where changes were evaluated in Draft SEIR | Would new or substantially more severe impacts result from the change? | Discussion | Would recirculation be required? |
|---|---|---|---|---|
| CAP Consistency Review Checklist | N/A | No | The CAP Consistency Review Checklist would implement the CAP through the discretionary review process for new development. It contains a list of measures and design features that would be implemented at the time of project application and discretionary review. The Checklist was evaluated as part of the proposed project in the Draft SEIR and there are no environmental impacts associated with the Checklist. The Modified Option 3 would result in the removal of GHG reduction measures T-3.1, E-1.1, E-1.3, and E-2.2, which would be removed from the Checklist as requirements. | No |

Modified Option 3 Measure Quantification Table
(Supplemental Information Modifying Option 3 – Attachment B)

**SUPPLEMENTAL INFORMATION MODIFYING OPTION 3 – Attachment B**

MODIFIED OPTION 3 MEASURE QUANTIFICATION TABLE

FEBRUARY 2018

| Measure | | | | GHG Reductions | | | |
|---|---|---|---|---|---|---|---|
| Measure Number | Measure Name | Increase | Difference from Public Draft | Modified Option 3 2030 GHG Reduction | Change in 2030 GHG Reduction from Public Draft | Modified Option 3 2050 GHG Reduction | Change in 2050 GHG Reduction from Public Draft |
| T-1.1 | Acquire open space conservation lands consistent with the County Multiple Species Conservation Program (MSCP) and future conservation efforts, including acquisition of 2,622 acres by 2020 and an additional 4,370 acres between 2021 and 2030 | Acquire open space conservation lands consistent with the County Multiple Species Conservation Program (MSCP) and future conservation efforts, including acquisition of 2,622 acres by 2020 and an additional 4,370 acres between 2021 and 2030 | No change in calculation | 5,771 | 0 | 5,291 | 0 |
| T-1.2 | Acquire agricultural easements through an expanded Purchase of Agriculture Conservation Easement (PACE) Program, including acquisition of 443 acres of agricultural easements by 2020 and an additional 4,430 acres between 2021 and 2030 | Acquire agricultural easements through an expanded Purchase of Agriculture Conservation Easement (PACE) Program, including acquisition of 443 acres of agricultural easements by 2020 and an additional 4,430 acres between 2021 and 2030 | No change in calculation | 2,330 | 0 | 2,136 | 0 |
| T-1.3 | Focus growth in the county villages to achieve mixeduse, transit-oriented village centers by updating 10 community plans by 2030 and an additional 9 community plans between 2031 and 2040 | Focus growth in the county villages to achieve mixeduse, transit-oriented village centers by updating ~~10~~ 15 community plans by 2030 and an additional ~~9~~ 4 community plans between 2031 and 2040 | Changed due to increase in number of community plans updated by 2030 | 20,923 | 6,974 | 27,913 | 0 |
| T-2.1 | Improve roadway segments, intersections, and bikeways to implement multi-modal enhancements for pedestrian and cyclist comfort and safety along County-maintained public roads by improving 700 centerline miles of roadway segments, including 250 intersections and 210 lane miles of bikeway improvements by 2030 and an additional 500 centerline miles of roadway segments, including 250 intersections and 210 lane miles of bikeway improvements by 2050. | Improve roadway segments, intersections, and bikeways to implement multi-modal enhancements for pedestrian and cyclist comfort and safety along County-maintained public roads by improving 700 centerline miles of roadway segments, including 250 intersections and 210 lane miles of bikeway improvements by 2030 and an additional 500 centerline miles of roadway segments, including 250 intersections and 210 lane miles of bikeway improvements by 2050. | No change in calculation | 604 | 0 | 1,292 | 0 |
| T-2.2 | Reduce emissions from commute Vehicle Miles Traveled (VMT) in new non-residential development by 15% by 2030 | Reduce emissions from commute Vehicle Miles Traveled (VMT) in new non-residential development by 15% by 2030 | No change in calculation | 2,180 | 0 | 3,762 | 0 |
| T-2.3 | Reduce County employee commute Vehicle Miles Traveled (VMT) by 20% by 2030 | Reduce County employee commute Vehicle Miles Traveled (VMT) by 20% by 2030 | No change in calculation | 7,473 | 0 | 7,783 | 0 |
| T-2.4 | Require shared and reduced parking for all new non-residential development to reduce new commute Vehicle Miles Traveled (VMT) by 10% by 2030 | Require shared and reduced parking for all new non-residential development to reduce new commute Vehicle Miles Traveled (VMT) by 10% by 2030 | Correction made to exclude reductions from T-2.2 to avoid double counting. T-2.4 and T-2.2 would both affect new non-residential. | 1,392 | -61 | 2,403 | -105 |
| T-3.1 | Require new residential and non-residential construction projects in the unincorporated county to use alternative fuels in 10% of construction equipment during construction by 2030 | REMOVED MEASURE | REMOVED MEASURE | 0 | -885 | 0 | -897 |
| T-3.2 | Require County projects to use alternative fuels in 10% of construction equipment during construction by 2030. | Require County projects to use alternative fuels in ~~10%~~ 100% of construction equipment during construction by 2030. | Increased alternative fuels requirement in County projects from 10% to 100% of construction equipment during construction by 2030. | 364 | 328 | 369 | 332 |

**SUPPLEMENTAL INFORMATION MODIFYING OPTION 3 – Attachment B**

MODIFIED OPTION 3 MEASURE QUANTIFICATION TABLE

FEBRUARY 2018

| Measure | | | | GHG Reductions | | | |
|---|---|---|---|---|---|---|---|
| Measure Number | Measure Name | Increase | Difference from Public Draft | Modified Option 3 2030 GHG Reduction | Change in 2030 GHG Reduction from Public Draft | Modified Option 3 2050 GHG Reduction | Change in 2050 GHG Reduction from Public Draft |
| T-3.3 | Retire 800 late-model vehicles (model year 1996 or older) in the unincorporated county by 2030. | Retire ~~800~~ 1,600 late-model vehicles (model year 1996 or older) in the unincorporated county by 2030. | Increased vehicle retirement target from 800 to 1,600 late-model vehicles (model year 1996 or older) in the unincorporated county by 2030.<br><br>Also made following corrections:<br>Annual VMT per vehicle MY1997 or newer: ~~4,248~~ 10,494<br>Average Emission Factor for Light Duty Vehicles MY1996 or older in San Diego County: ~~423 gCO2/mi~~ 400 gCO2e/mi<br>Average Emission Factor for Light Duty Vehicles MY1996 or older in San Diego County: ~~214 gCO2/mi~~ 216 gCO2e/mi<br>Replacement Rate: ~~50%~~ 48% | 446 | -420 | 0 | 0 |
| T-3.4 | Reduce the County fleet's GHG emissions levels, including on-road and non-construction off-road vehicles, by 10% by 2020 and 20% by 2030 | Reduce the County fleet's GHG emissions levels, including on-road and non-construction off-road vehicles, by 10% by 2020 and 20% by 2030 | No change in calculation | 3,673 | 0 | 3,411 | 0 |
| T-3.5 | Install 2,040 Level 2 electric vehicle charging stations (EVCS) through public-private partnerships at priority locations in the unincorporated county by 2030. | Install 2,040 Level 2 electric vehicle charging stations (EVCS) through public-private partnerships at priority locations in the unincorporated county by 2030. | New Measure | 11,987 | 11,987 | 10,100 | 10,100 |
| T-4.1 | Establish a Local Direct Investment Program | Changed depending on changes to other measures | Changed depending on changes to other measures<br><br>As of January 26, 2018, the revisions shown for E-1.2 resulted in a decrease in the Direct Investment reduction for 2030 by 1,842 MTCO2e relative to the version presented to the Planning Commission as of January 18, 2018. | 176,614 | -13,647 | 0 | 0 |
| E-1.1 | Achieve 10% greater building energy efficiency in all new non-residential development than is required by the 2016 State Energy Code (Title 24 Part 6) by 2020; require all new residential development to meet the State's Zero Net Energy (ZNE) standards by 2020; and require all new non-residential development to meet the State's ZNE standards by 2030 | REMOVED MEASURE | REMOVED MEASURE | 0 | -38,708 | 0 | -145,215 |

**SUPPLEMENTAL INFORMATION MODIFYING OPTION 3 – Attachment B**

MODIFIED OPTION 3 MEASURE QUANTIFICATION TABLE

FEBRUARY 2018

| Measure | | | | GHG Reductions | | | |
|---|---|---|---|---|---|---|---|
| Measure Number | Measure Name | Increase | Difference from Public Draft | Modified Option 3 2030 GHG Reduction | Change in 2030 GHG Reduction from Public Draft | Modified Option 3 2050 GHG Reduction | Change in 2050 GHG Reduction from Public Draft |
| E-1.2 | Require all new and replacement water heaters in residential development to be either solar, electrically-powered, or tankless gas by 2020 | Require all new and replacement water heaters in residential development to be either solar, electrically-powered, or tankless gas by 2020 | As of January 26, 2018, E-1.2 has been revised to reflect the impacts of this measure on new construction. Previously, water heater improvements in new construction were assumed to be accounted for in E-1.1. Without E-1.1, the credits associated with usage of more efficient water heaters in new construction have been added to the calculation of E-1.2, resulting in an increase of approximately 1,842 MTCO2e of reductions. | 21,018 | 1,842 | 21,945 | 2,769 |
| E-1.3 | Achieve energy efficiency improvements in one percent of existing residential and non-residential buildings in the unincorporated county by 2030 and an additional four percent by 2050 | REMOVED MEASURE | REMOVED MEASURE | 0 | -3,694 | 0 | -18,470 |
| E-1.4 | Reduce energy use intensity at County facilities by 10% below 2014 levels by 2020 and by 15% below 2014 levels by 2030 | Reduce energy use intensity at County facilities by 10% below 2014 levels by 2020 and by ~~15%~~ 20% below 2014 levels by 2030 | Increased energy use reduction from 15% to 20% below 2014 levels by 2030 | 10,702 | 2,494 | 11,578 | 2,494 |
| E-2.1 | Achieve 90% renewable electricity for the unincorporated county by 2030 | Achieve 90% renewable electricity for the unincorporated county by 2030 | Changed depending on other measures due to reduction in electricity demand from energy efficiency measures. | 255,991 | 25,623 | 340,245 | 84,079 |
| E-2.2 | Require installation of renewable electricity systems (e.g., solar photovoltaics, wind) on new non-residential development | REMOVED MEASURE | REMOVED MEASURE | 0 | -13,444 | 0 | -13,444 |
| E-2.3 | Increase installation of photovoltaic (PV) electrical systems in 52,273 existing homes by 2020 and an additional 77,902 homes by 2030 | Increase installation of photovoltaic (PV) electrical systems in 52,273 existing homes by 2020 and an additional 77,902 homes by 2030 | No change in calculation | 260,322 | 0 | 260,322 | 0 |
| E-2.4 | Generate 10% of the County's operational electricity on-site with renewables by 2020 and 20% by 2030 | Generate 10% of the County's operational electricity on-site with renewables by 2020 and 20% by 2030 | Changed due to change in Measure E-1.4 reducing electricity demand. | 5,417 | -339 | 5,417 | -338 |
| W-1.1 | Require installation of water-efficient appliances and plumbing fixtures in all new residential construction pursuant to Tier 1 of the California Green Building Standards Code (CALGreen) by 2020 | Require installation of water-efficient appliances and plumbing fixtures in all new residential construction pursuant to Tier 1 of the California Green Building Standards Code (CALGreen) by 2020 | No change in calculation | 87 | 0 | 303 | 0 |
| W-1.2 | Require a 40% reduction from 2014 outdoor water use budgets for landscaping in new and existing residential and non-residential development by 2020 | Require a 40% reduction from 2014 outdoor water use budgets for landscaping in new and existing residential and non-residential development by 2020 | No change in calculation | 17,535 | 0 | 19,087 | 0 |
| W-1.3 | Reduce potable water consumption at County facilities by 15% below 2014 levels by 2020 and 20% below 2014 levels by 2030 | Reduce potable water consumption at County facilities by 15% below 2014 levels by 2020 and 20% below 2014 levels by 2030 | No change in calculation | 276 | 0 | 325 | 0 |

**SUPPLEMENTAL INFORMATION MODIFYING OPTION 3 – Attachment B**

MODIFIED OPTION 3 MEASURE QUANTIFICATION TABLE

FEBRUARY 2018

| Measure | | | | GHG Reductions | | | |
|---|---|---|---|---|---|---|---|
| Measure Number | Measure Name | Increase | Difference from Public Draft | Modified Option 3 2030 GHG Reduction | Change in 2030 GHG Reduction from Public Draft | Modified Option 3 2050 GHG Reduction | Change in 2050 GHG Reduction from Public Draft |
| W-2.1 | Capture, store, and re-use rainwater in existing and new developments by installing 1,200 rain barrels by 2020 and an additional 2,000 rain barrels by 2030 | Capture, store, and re-use rainwater in existing and new developments by installing 1,200 rain barrels by 2020 and an additional 2,000 rain barrels by 2030 | No change in calculation | 23 | 0 | 23 | 0 |
| SW-1.1 | Achieve 75% solid waste diversion in the unincorporated county by 2030 | Achieve ~~75%~~ 80% solid waste diversion in the unincorporated county by 2030 | Increased Solid Waste diversion rate from 75% to 80% by 2030 | 79,052 | 21,950 | 86,052 | 23,893 |
| A-1.1 | Convert farm equipment used in the unincorporated county from gas- and petroleum-diesel-powered to electric to achieve an eight percent conversion rate by 2030 | Convert farm equipment used in the unincorporated county from gas- and petroleum-diesel-powered to electric to achieve an eight percent conversion rate by 2030 | No change in calculation | 6,737 | 0 | 6,679 | 0 |
| A-1.2 | Convert stationary petroleum-diesel or gas-powered irrigation pumps to electric to achieve four electric stationary irrigation pumps by 2020 and an additional 40 electric stationary irrigation pumps by 2030 | Convert stationary petroleum-diesel or gas-powered irrigation pumps to electric to achieve four electric stationary irrigation pumps by 2020 and an additional 40 electric stationary irrigation pumps by 2030 | No change in calculation | 3,249 | 0 | 3,249 | 0 |
| A-2.1 | Require trees be planted for every new residential dwelling unit constructed in the unincorporated county at a rate of two trees per new dwelling unit | Require trees be planted for every new residential dwelling unit constructed in the unincorporated county at a rate of two trees per new dwelling unit | No change in calculation | 1,244 | 0 | 2,243 | 0 |
| A-2.2 | Prepare and implement a tree planting program for the unincorporated county to plant a minimum of 3,500 trees annually starting in 2017 | Prepare and implement a tree planting program for the unincorporated county to plant a minimum of 3,500 trees annually starting in 2017 | No change in calculation | 1,735 | 0 | 4,213 | 0 |
| | | | **Total Reductions** | **897,145** | **1** | **826,141** | **0** |

# Modified Option 3 Gap Analysis
(Supplemental Information Modifying Option 3 – Attachment C)

# GHG Measure Reduction Summary

| GHG Emission Reductions by Category | | | |
|---|---|---|---|
| | Annual GHG Reduction (MT $CO_2e$) | | |
| **Category** | **2020** | **2030** | **2050** |
| Built Environment and Transportation | 6,020 | 233,758 | 64,459 |
| Energy | 125,140 | 553,449 | 639,508 |
| Solid Waste | 0 | 79,052 | 86,052 |
| Water and Wastewater | 254 | 17,920 | 19,738 |
| Agriculture and Conservation | 791 | 12,965 | 16,384 |
| **TOTAL Reductions from Proposed Measures** | **132,205** | **897,145** | **826,141** |
| **Emissions Gap: Needed reductions to meet CAP Targets after GHG Reduction Measures have been applied (MT $CO_2e$) (Surplus)** | -260,810 | 0 | 1,426,721 |

| Projections with Legislative Reductions | | | | |
|---|---|---|---|---|
| **Category** | Annual GHG Emissions (MT $CO_2e$) | | | |
| | **2014** | **2020** | **2030** | **2050** |
| Built Environment and Transportation | 1,492,987 | 1,347,494 | 1,125,161 | 1,165,847 |
| Energy | 1,061,264 | 1,002,533 | 995,329 | 1,088,173 |
| Solid Waste | 338,107 | 358,651 | 389,610 | 411,298 |
| Water and Wastewater | 155,452 | 148,617 | 153,813 | 167,430 |
| Agriculture and Conservation | 163,696 | 161,376 | 160,136 | 158,760 |
| **TOTAL Emissions with Legislative Reductions** | **3,211,505** | **3,018,671** | **2,824,049** | **2,991,507** |
| Projected Percent Reduction from 2014 | | -6% | -12% | -7% |
| CAP Targets (adjusted for percent reduction from 2014) | | -2% | -40% | -77% |
| CAP Targets (MT $CO_2e$) | | 3,147,275 | 1,926,903 | 738,646 |
| Needed reductions to meet CAP Targets from 2014 levels (MT $CO_2e$) | | 64,230 | 1,284,602 | 2,472,859 |
| Needed reductions to meet CAP Targets from Legislative reductions (MT $CO_2e$) (Surplus) | | -128,605 | 897,145 | 2,252,861 |
| **TOTAL BAU Emissions** | **3,211,505** | **3,407,168** | **3,723,596** | **4,220,560** |

| Projections with Legislative Reductions and County CAP Measures | | | | |
|---|---|---|---|---|
| **Category** | Annual GHG Emissions (MT $CO_2e$) | | | |
| | **2014** | **2020** | **2030** | **2050** |
| Built Environment and Transportation | 1,492,987 | 1,341,474 | 891,403 | 1,101,388 |
| Energy | 1,061,264 | 877,393 | 441,879 | 448,665 |
| Solid Waste | 338,107 | 358,651 | 310,558 | 325,246 |
| Water and Wastewater | 155,452 | 148,363 | 135,892 | 147,692 |
| Agriculture and Conservation | 163,696 | 160,585 | 147,171 | 142,376 |
| **TOTAL** | **3,211,505** | **2,886,465** | **1,926,903** | **2,165,367** |
| Percent below 2014 | | -10% | -40% | -33% |
| Additional Reductions Needed to meet CAP Targets (MT $CO_2e$) (Surplus) | | -260,810 | 0 | 1,426,721 |

| GHG Measure Reduction Summary (continued) | | | |
|---|---|---|---|
| **Percent below 2014 by Category. Legislative reductions only** | | | |
| **Category** | **2020** | **2030** | **2050** |
| Built Environment and Transportation | -10% | -25% | -22% |
| Energy | -6% | -6% | 3% |
| Solid Waste | 6% | 15% | 22% |
| Water and Wastewater | -4% | -1% | 8% |
| Agriculture and Conservation | -1% | -2% | -3% |
| **Percent below 2014 by Category. Combined effect of legislative reductions and proposed actions** | | | |
| **Category** | **2020** | **2030** | **2050** |
| Built Environment and Transportation | -10% | -40% | -26% |
| Energy | -17% | -58% | -58% |
| Solid Waste | 6% | -8% | -4% |
| Water and Wastewater | -5% | -13% | -5% |
| Agriculture and Conservation | -2% | -10% | -13% |
| **Percent below BAU by Category. Effect of proposed actions** | | | |
| **Category** | **2020** | **2030** | **2050** |
| Built Environment and Transportation | 0% | -21% | -6% |
| Energy | -12% | -56% | -59% |
| Solid Waste | 0% | -20% | -21% |
| Water and Wastewater | 0% | -12% | -12% |
| Agriculture and Conservation | 0% | -8% | -10% |

## Built Environment and Transportation Reduction Measure Quantification

Assumptions

| | | 2020 | 2030 | 2050 |
|---|---|---|---|---|
| San Diego County Average Electricity Emissions Factor (MTCO2e/MWh) | | 0.260 | 0.237 | 0.237 |
| Natural Gas Emissions Factor (MTCO2e/therm) | | | 0.00685 | |

**T-1.1**

| **Acquire Open Space Conservation Land** | **2014** | **2020** | **2030** | **2050** |
|---|---|---|---|---|
| Current MSCP program (2011-2016) | | | | |
| Average Annual Acres purchased | 436.93 | | | |
| Dwelling Units Offset | 31 | | | |
| Total Dwelling Units Offset between 2015 and 2020 | 184 | | | |
| Total Dwelling Units Offset between 2021 and 2030 | 307 | | | |
| | | 2020 | 2030 | 2050 |
| Annual Dwelling Units offset due to acquisition of open space conservation lands | | 184 | 491 | 491 |
| Building Electricity Avoided (kWh) | | 1,723,535 | 4,594,533 | 4,594,533 |
| Building Natural Gas Avoided (therms) | | 68,329 | 182,148 | 182,148 |
| Transportation Emissions Avoided (MTCO2e) | | 2,189 | 4,154 | 3,674 |
| Building Energy Emissions Avoided (MTCO2e) | | 916 | 1,090 | 1,090 |
| Waste Emissions Avoided (MTCO2e) | | 109 | 291 | 291 |
| Water Emissions Avoided (MTCO2e) | | 89 | 237 | 237 |

*Source: Scaled from modeling results from CalEEMod 2016 for 25 single family homes in 2030.*

| | | | | |
|---|---|---|---|---|
| *Emissions per mile for Passenger and LDT1 vehicles (MTCO2e/mi) (used to scale emissions from 2030 values)* | | *2.90E-04* | *2.07E-04* | *1.83E-04* |
| *Back-calculated annual VMT from transportation emissions* | | *7,536,082* | *20,089,393* | *20,089,393* |
| Building Energy Reductions | MTCO2e | 916 | 1,090 | 1,090 |
| Transportation Emissions Reductions | MTCO2e | 2,189 | 4,154 | 3,674 |
| Waste Emissions Reductions | MTCO2e | 109 | 291 | 291 |
| Water Emissions Reductions | MTCO2e | 89 | 237 | 237 |
| GHG Reductions from T-1.1 (MTCO2e) | | 3,303 | 5,771 | 5,291 |

**T-1.2**

| **Acquire Agricultural Easements** | **2014** | **2020** | **2030** | **2050** |
|---|---|---|---|---|
| Annual Activity based on County estimates of $1,500,000 in annual funding starting in 2020 | | | | |
| Total Acres Purchased by 2020 | 443 | | | |
| Acres per unit | 24.60 | | | |
| Dwelling Units Offset Annually | 18 | | | |
| Total Dwelling Units Offset in 2020 | 18 | | | |
| Total Dwelling Units Offset between 2021 and 2030 | 180 | | | |
| | | 2020 | 2030 | 2050 |
| Annual Dwelling Units offset due to expanded PACE program | | 18 | 198 | 198 |
| Building Electricity Avoided (kWh) | | 168,607 | 1,854,674 | 1,854,674 |
| Building Natural Gas Avoided (therms) | | 6,684 | 73,528 | 73,528 |
| Transportation Emissions Avoided (MTCO2e) | | 214 | 1,677 | 1,483 |
| Building Energy Emissions Avoided (MTCO2e) | | 90 | 440 | 440 |
| Waste Emissions Avoided (MTCO2e) | | 11 | 118 | 118 |
| Water Emissions Avoided (MTCO2e) | | 9 | 95 | 95 |

*Source: Scaled from modeling results from CalEEMod 2016 for 25 single family homes in 2030.*

| | | | | |
|---|---|---|---|---|
| *Emissions per mile for Passenger and LDT1 vehicles (MTCO2e/mi) (used to scale emissions from 2030 values)* | *0.00E+00* | *2.90E-04* | *2.07E-04* | *1.83E-04* |
| *Back-calculated annual VMT from transportation emissions* | | *737,225* | *8,109,480* | *8,109,480* |
| Building Energy Reductions | MTCO2e | 90 | 440 | 440 |
| Transportation Emissions Reductions | MTCO2e | 214 | 1,677 | 1,483 |
| Waste Emissions Reductions | MTCO2e | 11 | 118 | 118 |
| Water Emissions Reductions | MTCO2e | 9 | 95 | 95 |
| GHG Reductions from T-1.2 (MTCO2e) | | 323 | 2,330 | 2,136 |

## Built Environment and Transportation Reduction Measure Quantification (Continued)

| T-1.3 | | | | |
|---|---|---|---|---|
| **Update Community Plans** | **2014** | **2020** | **2030** | **2050** |

*Measure assumes that reductions from other street-transforming measures affect areas outside of these 19 Community Plans.*

**Background Calculations**

| Number | Community Plan Area Name | | 2016 Population Estimate |
|---|---|---|---|
| 1 | Alpine | | 5,701 |
| 2 | Bonsall | | 1,451 |
| 3 | Central Mountain | | 1,854 |
| 4 | County Islands | | 2,427 |
| 5 | Desert | | 711 |
| 6 | Fallbrook | | 27,508 |
| 7 | Julian | | 55 |
| 8 | Lakeside | | 55,251 |
| 9 | Mountain Empire | | 1,025 |
| 10 | North County Metro | | 28,033 |
| 11 | North Mountain | | 123 |
| 12 | Pala-Pauma | | 803 |
| 13 | Rainbow | | - |
| 14 | Ramona | | 9,550 |
| 15 | San Dieguito | | 16,889 |
| 16 | Spring Valley | | 61,401 |
| 17 | Sweetwater | | 10,083 |
| 18 | Valle De Oro | | 21,292 |
| 19 | Valley Center | | 216 |
| Population Affected by the 19 Community Plans (excluding Specific Plan Areas, Otay, and Camp Pendleton) | | | 244,372 |

*Source: County of San Diego 2017*

| | 2014 | 2020 | 2030 | 2050 |
|---|---|---|---|---|
| Modified Unincorporated County Population | 454,599 | 493,604 | 551,712 | 600,560 |
| Population affected by Community Plan updates (assumes 2016 population remains in 2020) | | 244,372 | 280,210 | 310,953 |
| Percent of Population/VMT affected | | 50% | 51% | 52% |
| Passenger and LDT1 VMT (excluding non-unincorporated County employee commute) | 1,654,960,756 | 1,906,820,493 | 2,186,461,667 | 2,426,351,442 |
| VMT affected by Community Plan updates | | 944,022,641 | 1,110,485,989 | 1,256,297,888 |
| Percent of Plans Implemented | | 0% | 75% | 100% |

**CAPCOA LUT-9: Improve Design of Development (note that CAPCOA mislabels LUT-9 as LUT-8)**

| | |
|---|---|
| % VMT Reduction (Low) | 3% |
| % VMT Reduction (High) | 21% |
| Median Percentage | 12.2% |
| % VMT reduction | 12.2% |

**Emissions Reductions**

| | | | |
|---|---|---|---|
| Annual VMT Reduced | - | 101,193,036 | 152,640,193 |
| Emissions per mile for Passenger and LDT1 vehicles (MTCO2e/mi) | 0.0002905 | 0.0002068 | 0.0001829 |
| Emissions Reductions (MTCO2e) | - | 20,923 | 27,913 |
| GHG Reductions from T-1.3 (MTCO2e) | - | 20,923 | 27,913 |

**Built Environment and Transportation Reduction Measure Quantification (Continued)**

| T-2.1 | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Improve Roadway Segments as Multi-Modal** | | | | **2014** | **2020** | **2030** | **2050** |
| Passenger and LDT1 VMT (excluding non-unincorporated County employee commute) | | | | 1,654,960,756 | 1,906,820,493 | 2,186,461,667 | 2,426,351,442 |
| New Passenger and LDT1 VMT since 2020 (for calculation of T-2.2) | | | | | 0 | 279,641,173 | 519,530,949 |

**CAPCOA SDT-2 ( Percent reduction in VMT for rural contexts)**

| % of streets with improvements | | | | | | | |
|---|---|---|---|---|---|---|---|
| | **5%** | **10%** | 25% | **36%** | 50% | **61%** | 100% |
| % of intersections with improvements | % VMT Reduction | | | | | | |
| **5%** | 0.02% | 0.04% | 0.12% | 0.13% | 0.17% | 0.27% | 0.42% |
| **10%** | 0.04% | 0.06% | 0.15% | 0.16% | 0.20% | 0.29% | 0.45% |
| 25% | 0.12% | 0.16% | 0.25% | 0.23% | 0.25% | 0.36% | 0.50% |
| **36%** | 0.15% | 0.17% | 0.23% | 0.30% | 0.38% | 0.42% | 0.63% |
| 50% | 0.17% | 0.19% | 0.25% | 0.38% | 0.50% | 0.50% | 0.75% |
| **61%** | 0.27% | 0.29% | 0.36% | 0.42% | 0.50% | 0.55% | 0.75% |
| 75% | 0.37% | 0.41% | 0.50% | 0.48% | 0.50% | 0.61% | 0.75% |
| 100% | 0.42% | 0.44% | 0.50% | 0.63% | 0.75% | 0.75% | 1% |

*Note: Bolded percentage values were interpolated based on CAPCOA estimates for 25%, 50%, 75%, and 100%.*

| | 2020 | 2030 | 2050 |
|---|---|---|---|
| Number of Intersections Improved by X year | 0 | 250 | 500 |
| Streets Improved by X year (measured in centerline miles) | 0 | 700 | 1200 |
| Total Number of Intersections | 5054 | 5054 | 5054 |
| Total Streets (measured in centerline miles) | 1954 | 1954 | 1954 |

*Source: County GIS Data dated June 16, 2016*

| | 2020 | 2030 | 2050 |
|---|---|---|---|
| Percent of intersections in the Unincorporated County with improvements | 0% | 5% | 10% |
| Percent of streets in the Unincorporated County with improvements | 0% | 36% | 61% |
| Percent Reduction in VMT under T-2.1 | 0.00% | 0.13% | 0.29% |
| Annual VMT Reduced under T-2.1 | - | 2,919,809 | 7,062,562 |
| Annual VMT Reduced under T-2.1 (from new VMT as of 2020 only) | - | 373,434 | 1,512,237 |
| Emissions per mile for Passenger and LDT1 vehicles (MTCO2e/mi) | 2.90E-04 | 2.07E-04 | 1.83E-04 |
| GHG Reductions from T-2.1 (MTCO2e) | - | 604 | 1,292 |

**Built Environment and Transportation Reduction Measure Quantification (Continued)**

| T-2.2 | | | | | |
|---|---|---|---|---|---|
| **Reduce New Non-Residential Development Vehicle Miles Traveled** | | | **2020** | **2030** | **2050** |
| Passenger and LDT1 VMT *(excluding non-unincorporated County employee commute)* | | 1,654,960,756 | 1,906,820,493 | 2,186,461,667 | 2,426,351,442 |
| New Passenger and LDT1 VMT since 2020 | | | 0 | 279,641,173 | 519,530,949 |
| New Passenger VMT (since 2020) reduced from other measures | | | | | |
| | *T-1.1* | | 0 | 20,089,393 | 20,089,393 |
| | *T-1.2* | | 0 | 8,109,480 | 8,109,480 |
| | *T-2.1* | | 0 | 373,434 | 1,512,237 |
| Adjusted New Passenger and LDT1 VMT (assumed to represent all new household VMT) | | | 0 | 251,068,866 | 489,819,838 |
| Percent of Household VMT for commuting (AASHTO 2013) | | 28% | | | |
| New County Commute VMT from Adjusted Passenger and LDT1 VMT since 2020 | | | - | 70,299,283 | 137,149,555 |
| New Jobs in Unincorporated County since 2020 | | | | 8,487 | 34,117 |
| Annual VMT per employee | | | | 8,283 | 4,020 |
| **Target** | | | | | |
| Target Percent Reduction in New Commute VMT starting in 2020 | | | 0% | 15.0% | 15% |
| Annual VMT reduced under T-2.2 | | | - | 10,544,892 | 20,572,433 |
| Target Average Annual VMT per employee | | | | 7,041 | 3,417 |

**CAPCOA Percent Commute VMT reduction from TRT-1, TRT-2, and TRT-3**

| | |
|---|---|
| CAPCOA TRT-1 Percent Shift in Vehicle Mode Share of Commute Trips for Participating Employees (Commute Trip Reduction Programs - Voluntary) - Low Density Suburb | 5.2% |
| CAPCOA TRT-2 Percent Shift in Vehicle Mode Share of Commute Trips for Participating Employees (Commute Trip Reduction Programs with Monitoring) | 21.0% |
| CAPCOA TRT-3 Percent Shift in Vehicle Mode Share of Commute Trips with a Ride Sharing Program - Low Density Suburb | 5% |

| | 2020 | 2030 | 2050 |
|---|---|---|---|
| **Percent of New Employees eligible/participating in TDM programs (Required to meet the Target Percent Reduction in Commute VMT)** | | 100% | 100% |
| Commute Trip Reduction Programs - Voluntary (TRT-1) | 0% | 33% | 33% |
| Commute Trip Reduction Programs - Monitored (TRT-2) | 0% | 62% | 62% |
| Commute Trip Reduction Programs - Ride Sharing (TRT-3) | 0% | 5% | 5% |
| Total Participation Rate | 0% | 100% | 100% |
| Emissions per mile for Passenger and LDT1 vehicles (MTCO2e/mi) | 2.90E-04 | 2.07E-04 | 1.83E-04 |
| GHG Reductions from T-2.2 (MTCO2e) | - | 2,180 | 3,762 |

**Built Environment and Transportation Reduction Measure Quantification (Continued)**

| T-2.3 | | | | | |
|---|---|---|---|---|---|
| **Reduce County Employee Vehicle Miles Traveled** | | **2014** | **2020** | **2030** | **2050** |
| County employee commute miles (scaled by change in employee forecast) (VMT) | | 155,043,720 | 156,969,260 | 160,178,494 | 166,596,960 |
| County Employee Count Forecast | | 19,205 | 19,444 | 19,841 | 20,636 |
| Emissions per mile for Passenger and LDT1 vehicles (MTCO2e/mi) | | 0.00E+00 | 2.90E-04 | 2.07E-04 | 1.83E-04 |
| Forecasted emissions from County Employee Commuting (MTCO2e) | | - | 45,595 | 33,119 | 30,465 |
| Percent reduction in employee commute miles **below 2014 levels** | | | 0% | 20% | 20% |
| Annual employee commute miles after reduction (VMT) | | | 156,969,260 | 124,034,976 | 124,034,976 |
| Annual reduction in employee commute miles from forecasts (VMT) | | | - | 36,143,517 | 42,561,984 |
| Forecasted commute emissions after reduction (MTCO2e) | | | 45,595 | 25,646 | 22,682 |
| Forecasted commute emissions after reduction (MTCO2e) | | | 45,595 | 22,440 | 19,847 |
| GHG Reductions from T-2.3 (MTCO2e) | | | - | 7,473 | 7,783 |

| T-2.4 | | | | | |
|---|---|---|---|---|---|
| **Shared and Reduced Parking in New Non-Residential Development** | | **2014** | **2020** | **2030** | **2050** |
| Passenger and LDT1 VMT (excluding non-unincorporated County employee commute) | | 1,654,960,756 | 1,906,820,493 | 2,186,461,667 | 2,426,351,442 |
| New Passenger VMT (since 2020) | | | 0 | 279,641,173 | 519,530,949 |
| New Passenger VMT (since 2020) reduced from other measures | | | | | |
| | *T-1.1* | | 0 | 20,089,393 | 20,089,393 |
| | *T-1.2* | | 0 | 8,109,480 | 8,109,480 |
| | *T-2.1* | | 0 | 373,434 | 1,512,237 |
| | *T-2.2* | | 0 | 10,544,892 | 20,572,433 |
| Adjusted New VMT | | | 0 | 240,523,974 | 469,247,405 |
| Percent of Household VMT for commuting (AASHTO 2013) | 28% | | | | |
| New Commute VMT | | | - | 67,346,713 | 131,389,273 |
| *Reductions in Commute VMT from other measures not included as the percent reduction is from the forecasted commute VMT* | | | | | |
| Target Percent VMT reduction from New Commute VMT | | | 0% | 10% | 10% |
| Calculated Percent Reduction in Parking Spaces at new Non-residential land uses to achieve the target percent reduction (CAPCOA PDT-1) | | | 0% | 20% | 20% |
| VMT reduction under this measure | | | - | 6,734,671 | 13,138,927 |
| Emissions per mile for Passenger and LDT1 vehicles (MTCO2e/mi) | | | 0.00029047 | 0.000206765 | 0.000182867 |
| GHG Reductions from T-2.4 (MTCO2e) | | | - | 1,392 | 2,403 |

**Built Environment and Transportation Reduction Measure Quantification (Continued)**

| T-3.1 | MEASURE REMOVED | | | |
|---|---|---|---|---|

| T-3.2 | | | | |
|---|---|---|---|---|
| **Use Alternative Fuels in County Projects** | **2014** | **2020** | **2030** | **2050** |
| *Measure assumes the level of conversion from diesel to alternative fuels is proportional to level of emissions reductions from such actions Measure also assumes that any emissions related to additional electricity use from converted equipment are negligible. Emissions from electricity use would decrease in future years due to the increasing renewable energy mix in the electricity generation.This measure only applies to construction equipment in the County fleet.* | | | | |
| County-Only (Municipal) Construction Equipment Emissions (MTCO2e) from CRIS database and Municipal Forecast | 431 | 381 | 364 | 369 |
| Percent County construction fuel offset due to conversion of equipment to renewable diesel or electric fuel sources | | 0% | 100% | 100% |
| Construction Equipment Emission offset by renewable and electric conversions (MTCO2e) | | - | 364 | 369 |
| Diesel fuel emission factors (kg CO2/gal) (The Climate Registry 2016) | 10.21 | | | |
| Approximate diesel fuel use offset by electric conversions (gal) | | - | 35,653 | 36,143 |
| GHG Reductions from T-3.2 (MTCO2e) | | - | 364 | 369 |

| T-3.3 | | | | |
|---|---|---|---|---|
| **Develop a Local Vehicle Retirement Program** | **2014** | **2020** | **2030** | **2050** |
| *Measure assumes any replaced vehicles are replaced with the average light-duty vehicle in the same year, as a conservative approach. Newer vehicles would have even lower emission factors.* | | | 0.38 | |
| | | | 4,248.01 | |
| **Light Duty Vehicles MY1996 or older County-wide (LDA, LDT1, LDT2, and MDV)** | | | | |
| Vehicle Population (EMFAC2014 forecasts) | | | 28,600 | |
| Annual VMT | | | 97,786,270 | |
| Annual VMT per vehicle | | | 3,419 | |
| **Light Duty Vehicles MY1997 or newer County-wide (LDA, LDT1, LDT2, and MDV)** | | | | |
| Vehicle Population (EMFAC2014 forecasts) | | | 2,581,230 | |
| Annual VMT | | | 27,086,935,423 | |
| Annual VMT per vehicle | | | 10,494 | |
| **Average Emission Factor for Light Duty Vehicles MY1996 or older in San Diego County (g CO2/mi)** | | | 396 | |
| **Average Emission Factor for Light Duty Vehicles MY1997 or older in San Diego County (g CO2/mi)** | | | 214 | |
| CO2 to CO2e Conversion factor used in inventory for transportation emissions | | | 1.01 | |
| **Average Emission Factor for Light Duty Vehicles MY1996 or older in San Diego County (g CO2e/mi)** | | | 400 | |
| **Average Emission Factor for Light Duty Vehicles MY1997 or older in San Diego County (g CO2e/mi)** | | | 216 | |
| Total Number of MY1996 vehicles removed | | | 1,600 | |
| Replacement Rate (based on 2013 ARB Survey Report) (https://www.arb.ca.gov/msprog/aqip/EFMP_Update_Staff_Report_November_2013.pdf) page 34 | | | 48% | |
| Annual VMT from retired vehicles | | | 5,470,653 | |
| Annual VMT from replacement vehicles | | | 16,790,094 | |
| Emissions from old vehicles (MTCO2e) | | | 2,187 | |
| Emissions from replaced vehicles (MTCO2e) | | | 1,742 | |
| Emissions Reductions (MTCO2e) | | | 446 | |
| GHG Reductions from T-3.3 (MTCO2e) | | | 446 | |

## Built Environment and Transportation Reduction Measure Quantification (Continued)

**T-3.4**

| Reduce the County's Fleet Emissions | 2014 | 2020 | 2030 | 2050 |
|---|---|---|---|---|
| Forecasted BAU Emissions by Fuel from County Fleet Operations (MTCO2e) | 2014 | 2020 | 2030 | 2050 |
| CNG | 40 | 41 | 42 | 43 |
| Diesel | 4,061 | 3,916 | 3,779 | 3,860 |
| Gasoline | 22,063 | 19,985 | 14,544 | 13,152 |
| Total | 26,164 | 23,942 | 18,365 | 17,055 |

| Fuel Type | Scaling Factors for business-as-usual forecasted emissions |
|---|---|
| CNG | No change |
| Diesel | Includes additional construction emissions from capitol projects anticipated through 2020. Assumes emissions constant after 2020. |
| Gasoline | No change |

| | 2020 | 2030 | 2050 |
|---|---|---|---|
| Percent reduction in vehicle fleet emissions below future forecasts years | 10% | 20% | 20% |
| Target fleet emissions after reduction (MTCO2e) | 21,548 | 14,692 | 13,644 |
| Annual reduction in fleet emissions from forecast (MTCO2e) | 2,394 | 3,673 | 3,411 |
| GHG Reductions from T-3.4 (MTCO2e) | 2,394 | 3,673 | 3,411 |

**T-3.5**

| Install Electric Vehicle Charging Stations | 2020 | 2030 | 2050 |
|---|---|---|---|
| *The reductions calculated for this measure are assumed to achieve reductions above and beyond those forecasted by the State.* | | | |
| **EMFAC2014 Outputs for San Diego County** | | | |
| Total Vehicle Miles per day (All vehicle types) | 82,315,741 | 89,623,697 | 100,696,455 |
| VMT/year | 30,045,245,368 | 32,712,649,577 | 36,754,206,224 |
| Number of EVs | 28,999 | 188,321 | 330,314 |
| **Unincorporated San Diego County Adjustments** | | | |
| SANDAG unincorporated VMT/year | 3,240,906,504 | 3,546,863,373 | 3,945,087,154 |
| Unincorporated percentage of regional VMT | 11% | 11% | 11% |
| Number of EVs in Unincorporated County | 3,128 | 20,419 | 35,455 |
| 10% of EVs | 313 | 2,042 | 3,545 |
| 10% of EVs (rounded) | 310 | 2,040 | 3,550 |
| **Emissions from EV Charger Usage** | | | |
| Number of Chargers installed by 2030 (no additional targets set for 2050) | - | 2,040 | 2,040 |
| Number of Connections per Charge | 0 | 2 | 2 |
| Average Charging hours per Connection per day | 0 | 3 | 3 |
| Number of hours of charge per year for all chargers (h/year) | - | 4,169,760 | 4,169,760 |
| Average Efficiency of EV LDV (kWh/100-mi) (1) | 34 | 34 | 34 |
| GHG Emissions per MWh in San Diego (MTCO2e/MWh) | 0.260 | 0.237 | 0.237 |
| Charger Power (kW) (Level 2 - High) (2) | 6.6 | 6.6 | 6.6 |
| Charged amount (kWh) | - | 27,520,416 | 27,520,416 |
| EV emissions (MT CO2e) | - | 6,526 | 6,526 |
| *Source:* | | | |
| *(1) http://www.fueleconomy.gov/feg/download.shtml (Without EV efficiency forecasts, EV efficiency assumed to be the same for all future years)* | | | |
| *(2) https://www.driveclean.ca.gov/pev/Charging.php* | | | |
| **Emissions from Equivalent Gasoline/Diesel Vehicles** | | | |
| Equivalent Annual VMT (mi) | - | 81,837,791 | 81,837,791 |
| Avg GHG Emissions per mi for Gasoline/Diesel Passenger and LDT1 vehicles (gCO2/mi) (EMFAC2014) | 296 | 224 | 201 |
| CO2 to CO2e Conversion factor used in inventory for transportation emissions | 1.01 | 1.01 | 1.01 |
| GHG Emissions per mi for average gasoline LDV (gCO2e/mi) | 299 | 226 | 203 |
| Equivalent Gasoline emissions (MT CO2e) | - | 18,514 | 16,626 |
| **Emissions Reductions** | | | |
| Emissions reductions (MT CO2e) | - | 11,987 | 10,100 |
| Emissions reductions per hour of charge (kg CO2e/h) | | 2.9 | 2.4 |
| GHG Reductions from T-3.5 (MTCO2e) | - | 11,987 | 10,100 |

**T-4.1**

| Establish a Direct Investment Program | 2020 | 2030 | 2050 |
|---|---|---|---|
| Calculation based on emissions reductions from the forecast needed to meet the 2030 target with all other measures applied. | | | |
| As of January 26, 2018, the revisions shown for E-1.2 resulted in a decrease in the DI reduction for 2030 by 1,842 MTCO2e. | | | |
| GHG Reductions from T-4.1 (MTCO2e) | - | 176,614 | - |

## Energy Reduction Measure Quantification

Assumptions

| | 2020 | 2030 | 2050 |
|---|---|---|---|
| San Diego County Average Electricity Emissions Factor (MTCO2e/MWh) | 0.260 | 0.237 | 0.237 |
| SD County Average Electricity EF with E-2.1 | 0.000 | 0.045 | 0.040 |
| SD County Local Government Electricity Emission Factor (MTCO2e/MWh) | 0.317 | 0.237 | 0.237 |
| Natural Gas Emissions Factor (MTCO2e/therm) | | 0.00685 | |
| Propane Emissions Factor (MTCO2e/therm) | | 0.00627 | |

**E-1.1** **MEASURE REMOVED**

**E-1.2**

| **Use Alternatively-powered Water Heaters in Residential Development** | **2020** | **2030** | **2050** |
|---|---|---|---|

*Note: Only homes not connected to natural gas utilities are allowed to install electric water heaters (See 2016 California Energy Code, Title 24 Part 6). Measure is conservative in that it assumes no water heaters are converted to solar, which would reslut in more GHG reductions.*

*As of January 26, 2018, E-1.2 has been revised to reflect the impacts of this measure on new construction. Previously, water heater improvements in new construction were assumed to be accounted for in E-1.1. Without E-1.1, the credits associated with usage of more efficient water heaters in new construction have been added to the calculation of E-1.2, resulting in an increase of approximately 1,842 MTCO2e of reductions.*

| Percent of natural gas use in homes by end use in California (assumed to apply to propane -only homes also) | ***2009*** |
|---|---|
| *Space Heating* | 25% |
| *Water Heating* | 34% |
| *Cooking* | 25% |
| *Other* | 16% |

| Water heating usage by fuel type | ***2009*** |
|---|---|
| *Natural Gas* | 85% |
| *Electric* | 11% |
| *Propane* | 4% |

*Source: EIA 2009. http://www.eia.gov/consumption/residential/data/2009/*

*Note: This is based on most recent data from the US. Energy Information Administration as of May 2017. There was a survey done in 2015, but the breakdown of fuel use by end use will not be available until 2018.*

*https://www.eia.gov/consumption/residential/data/2015/index.php?view=consumption*

Average age of natural gas water heater at replacement (years) 13

| | **Percent of existing NG/Propane water heaters by age (EIA 2009)** | **Assumed percent of existing NG/Propane water heaters replaced by this year by age** | | |
|---|---|---|---|---|
| | ***2009*** | ***2020*** | ***2030*** | ***2050*** |
| *Less Than 2 Years* | 16% | 0 | 100% | 100% |
| *2 to 4 Years* | 16% | 0 | 100% | 100% |
| *5 to 9 Years* | 30% | 50% | 100% | 100% |
| *10 to 14 Years* | 18% | 100% | 100% | 100% |
| *15 to 19 Years* | 7% | 100% | 100% | 100% |
| *20 Years or More* | 14% | 100% | 100% | 100% |

| | ***2014*** | ***2020*** | ***2030*** | ***2050*** |
|---|---|---|---|---|
| Annual Residential Natural Gas Use in San Diego with Legislative Reductions (therms) | 28,860,437 | 30,197,611 | 32,189,665 | 33,864,286 |
| Annual Residential Propane Gas Use in San Diego with Legislative Reductions (therms) | 1,577,792 | 1,650,894 | 1,759,799 | 1,851,350 |
| *Total Therms* | 30,438,228 | 31,848,505 | 33,949,464 | 35,715,636 |

## Energy Reduction Measure Quantification (Continued)

**E-1.2 (Continued)**

| | | 2020 | 2030 | 2050 |
|---|---|---|---|---|
| **Percent of replacement water heaters that are electric (only applicable to households that do not have natural gas connections per 2016 Energy Code)** | | 0% | 5% | 5% |
| **Percent of replacement water heaters that are natural gas tankless** | | 0% | 95% | 95% |
| ***Natural Gas Savings from not using traditional Water Heaters in new construction*** | | | | |
| Natural gas usage in new water heaters (No Action) (therms) | | | 1,120,622 | 1,684,302 |
| Average annual natural gas usage per water heater (therms/heater) (assuming 64 gal/year and a 0.61 energy factor) (https://energy.gov/eere/femp/energy-cost-calculator-electric-and-gas-water-heaters-0#output) | 244 | | | |
| Estimated equivalent number of water heaters replaced | | | 4,593 | 6,903 |
| Natural Gas Savings from avoidance of traditional water heaters in new construction (therms) | | | 1,120,622 | 1,684,302 |
| GHG Reductions from Natural Gas Savings (MTCO2e) | | | 7,676 | 11,537 |
| ***Natural Gas Savings from replacement of Existing Water Heaters*** | | | | |
| Natural gas usage in existing water heaters (No Action) (therms) | | | 9,714,461 | 9,714,461 |
| Average annual natural gas usage per water heater (therms/heater) (assuming 64 gal/year and a 0.61 energy factor) (https://energy.gov/eere/femp/energy-cost-calculator-electric-and-gas-water-heaters-0#output) | 244 | | | |
| Estimated equivalent number of water heaters replaced | | | 39,813 | 39,813 |
| Natural Gas Savings from removal of traditional water heaters in existing homes (therms) | | | 9,714,461 | 9,714,461 |
| GHG Reductions from Natural Gas Savings (MTCO2e) | | | 66,544 | 66,544 |
| ***Propane Savings from replacement of Existing Water Heaters*** | | | | |
| Propane usage in existing water heaters (No Action) (therms) | | | 531,087 | 531,087 |
| Propane usage in **existing** water heaters after replacement (therms) | | | - | - |
| Propane Savings from replacement of Existing Water Heaters (therms) | | | 531,087 | 531,087 |
| GHG Reductions from Propane Savings (MTCO2e) | | | 3,329.91 | 3,329.91 |
| ***Additional emissions from electricity use in new water heaters in Existing Propane-only homes*** | | | | |
| Therms needed to heat 45 gallons of hot water (61% efficiency) | 0.333333 | | | |
| kWh needed to heat 45 gallons of hot water (99% efficiency) | 6.6 | | | |
| kwh per therm conversion for water heating | 19.8000198 | | | |
| Total electricity use needed to offset propane water heating (kWh) | | | 525,776 | 525,776 |
| Additional GHG emissions from Electricity Use (MTCO2e) | | | 125 | 125 |
| ***Additional emissions from natural gas use in new NG tankless water heaters in Existing NG Homes and New Construction*** | | | | |
| Percent savings relative to storage tank natural gas water heaters (Average) | 20% | *Source: https://energy.gov/energysaver/tankless-or-demand-type-water-heaters* | | |
| Total natural gas use needed for new NG tankless water heaters (therms) | | | 8,234,663 | 8,663,060 |
| Additional GHG emissions from new NG Use (MTCO2e) | | | 56,407 | 59,342 |
| GHG Reductions from E-1.2 (MTCO2e) | | | 21,018 | 21,945 |

**E-1.3** **MEASURE REMOVED**

## Energy Reduction Measure Quantification (Continued)

| E-1.4 | | | | |
|---|---|---|---|---|
| **Reduce Energy Use Intensity at County Facilities** | **2014** | **2020** | **2030** | **2050** |
| *Propane and diesel use is not included in these calculations because the County primarily uses these fuels for facilities in emergency generators.* | | | | |
| **Electricity Use at County Facilities County-wide (MWh)** | | | | |
| Facility Type | | | | |
| Airports | 755 | 771 | 797 | 849 |
| Buildings & Other Facilities | 133,837 | 134,387 | 135,305 | 137,139 |
| Public Lighting | 7,594 | 7,879 | 8,354 | 9,305 |
| Wastewater/Water Facilities | 739 | 802 | 897 | 977 |
| Total Electricity | 142,925 | 143,840 | 145,353 | 148,270 |
| Total Electricity in the unincorporated County (from CRIS data) | 44,051 | 44,559 | 45,394 | 46,956 |
| Percent of Electricity use in the unincorporated County | 31% | 31% | 31% | 32% |
| **Natural Gas Use at County Facilities (therms)** | | | | |
| Airports | 6,730 | 6,954 | 7,329 | 8,077 |
| Buildings & Other Facilities | 2,334,004 | 2,341,919 | 2,355,110 | 2,381,492 |
| Total Natural Gas | 2,340,734 | 2,348,873 | 2,362,438 | 2,389,568 |

| Facility Type | Forecasting Methodology |
|---|---|
| Airport | County plans to construct accessory facilities at the Palomar Airport, however this project has not yet been funded through 2020. Assume no change in airport operations in future years. |
| Building & Other Facilities | County's 5-year plan through 2020. Assumed growth rate continues through 2050. |
| Lighting | County's 5-year plan through 2020. Assumed growth rate continues through 2050. |
| Wastewater/Water Facilities | County Population |

| | | | |
|---|---|---|---|
| Percent reduction in energy use **below 2014 levels** | 10% | 20% | 20% |
| Target Annual Electricity Use (MWh) | 128,633 | 114,340 | 114,340 |
| Target Annual Natural Gas Use (Therms) | 2,106,661 | 1,872,587 | 1,872,587 |
| Annual Electricity Reductions (MWh) | 15,207 | 31,013 | 33,930 |
| Annual Electricity Reductions in the unincorporated County (MWh) | 4,711 | 9,685 | 10,745 |
| Annual Natural Gas Reductions (therms) | 242,212 | 489,851 | 516,981 |
| Emissions savings from reduced electricity (MTCO2e) | 4,827 | 7,346 | 8,037 |
| Emissions savings from reduced natural gas (MTCO2e) | 1,659 | 3,355 | 3,541 |
| GHG Reductions from E-1.4 (MTCO2e) | 6,486 | 10,702 | 11,578 |

## Energy Reduction Measure Quantification (Continued)

| E-2.1 | | | | | |
|---|---|---|---|---|---|
| **Increase Renewable Electricity** | | | **2020** | **2030** | **2050** |
| **Background Calculations** | | | | | |
| Forecasted County electricity from existing and new development (MWh) | | 2,496,327 | 2,633,427 | 2,788,644 | 3,051,096 |
| Reductions from other measures (MWh) | *Existing or New* | | | | |
| *E-1.1* | *New only* | MEASURE REMOVED | | 0 | 0 |
| *E-1.2* | *New and Existing* | *Accounted for in E-2.3* | | | |
| *E-1.3* | *Existing Only* | MEASURE REMOVED | | 0 | 0 |
| *E-1.4* | *New and Existing (County only) Excludes municipal electricity use outside the County* | | | 9,685 | 10,745 |
| *E-2.3* | *Existing Only* | | | 1,097,768 | 1,097,768 |
| *E-2.4* | *New and Existing (County only) Excludes municipal electricity use outside the County* | | | 7,142 | 7,242 |
| *T-1.1* | *New only* | | | 4,595 | 4,595 |
| *T-1.2* | *New only* | | | 169 | 1,855 |
| *T-3.1* | *New and Existing* | MEASURE REMOVED | | 0 | 0 |
| *W-1.2* | *New and Existing* | | | 7,406 | 8,062 |
| *W-1.3* | *Excludes electricity use outside the County* | | | 73 | 73 |
| *W-2.1* | *New and Existing* | | | 10 | 10 |
| *A-1.2* | *New and Existing* | | | -1 | -6 |
| *Total Reductions from Other Measures* | | | | 1,126,846 | 1,130,343 |
| *Note: W-1.1, A-1.1, T-3.2, and T-3.3 were not included. W-1.1 savings are already included in E-1.1. A-1.1, T-3.2, and T-3.3 are not clear as to what part of the reductions are coming from electricity vs. other fuels, so it is more conservative to assume no electric replacements are being made.* | | | | | |
| Non-Renewable Emissions from Local Utility (MTCO2e/MWh) | | | | 0.474 | 0.474 |
| Estimated Renewable Energy Program (REP) Emission Factor (MTCO2e/MWh) | | | | 0.045 | 0.040 |
| Average SDGE Emission Factor (MTCO2e/MWh) | | | | 0.237 | 0.237 |
| REP Participation Rate | | | | 80% | 90% |
| REP Renewable Mix | | | | 90% | 90% |
| REP Member Participation Rate in 100% renewable option | | | | 6% | 15% |
| *City of Fairfax's current participation rate with similar subsidy program for Deep Green which is limited to 100 households* | | *6%* | | | |
| Overall Renewable Mix of REP (includes those choosing the 100% renewable option) | | | | 91% | 92% |
| Adjusted County Electricity Use (MWh) | | | | 1,661,797 | 1,920,753 |
| Electricity Use of Participating Customers (MWh) | | | | 1,329,438 | 1,728,678 |
| Emissions related to Electricity Use from participating customers without REP program (MTCO2e) | | | | 315,260 | 409,934 |
| Emissions related to Electricity Use from participating customers with REP program (MTCO2e) | | | | 59,269 | 69,689 |
| Emissions Reductions (MTCO2e) | | | | 255,991 | 340,245 |
| GHG Reductions from E-2.1 (MTCO2e) | | | | 255,991 | 340,245 |

| E-2.2 | MEASURE REMOVED |
|---|---|

## Energy Reduction Measure Quantification (Continued)

**E-2.3**

**Install Solar Photovoltaic in Existing Homes**

*This assumes that buildings with solar would opt out of the Renewable Energy Program (REP). (See measure discounts in E-2.1). Also assumes that permitted solar panels are constructed six months after permits are approved. An assumption of 5.06 kW per home allows the calculated electricity generated by solar per existing home to match the average energy use per existing home in 2020. With additional improvements in energy efficiency from other measures, some homes may still see lower energy use compared to solar electricity generation post-2020.*

| Solar permits approved from July 2013 through January 2017 for **existing and new construction** | Total kW | Total Non-residential kW | Total Residential kW | Number of Residential Permits |
|---|---|---|---|---|
| *Fiscal Year 13/14* | 32,680 | 0 | 32,680 | 4,583 |
| *Fiscal Year 14/15* | 57,359 | 8,854 | 48,505 | 6,165 |
| *Fiscal Year 15/16* | 70,617 | 7,149 | 63,468 | 8,674 |
| *Fiscal Year 16/17 (through January 2017)* | 27,474 | 2,374 | 25,100 | 3,394 |
| *Total* | 188,130 | 18,377 | 169,753 | 22,816 |

| | |
|---|---|
| Annual kWh per kW in San Diego County | 1,665 |
| Average solar size per residence based on average electricity demand per existing household as of 2014 (kW) | 5.06 |

Calculating Residential solar permits for **new construction only** with only information on number of new building permits. (For the purposes of calculating solar reductions from existing homes only)

*Assume all new homes construct minimum solar requirement as a conservative approach.*

| Number of New Home Building Permits | Custom Homes | Tract Homes | Mobile Homes (Private Lot) |
|---|---|---|---|
| *Fiscal Year 13/14* | 298 | 218 | 39 |
| *Fiscal Year 14/15* | 351 | 292 | 29 |
| *Fiscal Year 15/16* | 380 | 256 | 45 |
| *Fiscal Year 16/17 (through January 2017)* | 206 | 53 | 29 |
| Total | 1,235 | 819 | 142 |
| Size per system (kW) | 5.06 | 5.06 | 5.06 |
| Annual electricity generated per system (kWh) | 8,433 | 8,433 | 8,433 |

| *Assumed Solar Panel Size if all New Construction installed Solar (kW)* | Total |
|---|---|
| *Fiscal Year 13/14* | 2,810 |
| *Fiscal Year 14/15* | 3,403 |
| *Fiscal Year 15/16* | 3,448 |
| *Fiscal Year 16/17 (through January 2017)* | 1,458 |
| Total | 11,120 |

*Source: County of San Diego 2017. NREL PV Watts Calculator*

| Calculated Size of **residential** solar permits approved from July 2013 through January 2017 for **existing buildings only** | kW | Months | Number of Existing Residential Permits |
|---|---|---|---|
| *Fiscal Year 13/14* | 29,870 | 12 | 4,028 |
| *Fiscal Year 14/15* | 45,102 | 12 | 5,493 |
| *Fiscal Year 15/16* | 60,020 | 12 | 7,993 |
| *Fiscal Year 16/17 (through January 2017)* | 23,642 | 7 | 3,106 |
| Total | 158,633 | 43 | 20,620 |
| Average annual size | 44,270 | N/A | N/A |

## Energy Reduction Measure Quantification (Continued)

**E-2.3** **(Continued)**

| | 2014-2017 | 2018-2019 | 2020-2029 | 2040-2050 |
|---|---|---|---|---|
| Target annual number of homes (residential permits approved) within these years | 5,754 | 10,027 | 8,200 | - |
| Target annual size of solar permits for **existing residential** buildings approved within these years (kW) | 44,270 | 50,773 | 41,523 | - |
| Size of solar permits approved within these years (kW) | 177,079 | 101,547 | 415,229 | |
| Installation rate: Percent of permitted solar panel actually constructed | 95% | | | |
| | | 2020 | 2030 | 2050 |
| Cumulative size of all rooftop solar systems in operation from 2014 (kW) | | 264,695 | 659,162 | 659,162 |
| Average solar size per residence (kW/unit) | | 5.06 | 5.06 | 5.06 |
| Target cumulative number of existing residential units with solar since 2014 | | 52,273 | 130,175 | 130,175 |

| | | 2020 | 2030 | 2050 |
|---|---|---|---|---|
| Annual kWh generated per kW of solar PV in San Diego County | 1,665 | | | |
| Annual Electricity Generated by new Solar PVs from new permits in existing residences (MWh) | | 440,822 | 1,097,768 | 1,097,768 |
| **Feasibility Assessment** | | | | |
| Existing Electricity Usage in Residential land uses (MWh) | | 1,377,278 | 1,377,278 | 1,377,278 |
| Electricity Reductions from Existing Residential land uses from other Measures (MWh) (excludes measures that only affect Non-residential, new construction, or any energy use not used on existing residential land uses, such as water consumption) | | | | |
| *E-1.2* | | 0 | -526 | -526 |
| Adjusted Electricity Usage from Existing Residential land uses (MWh) | | 1,377,278 | 1,377,803 | 1,377,803 |
| Number of Existing Residential units | | 163,354 | 163,354 | 163,354 |
| Electricity Usage per Existing Residence (MWh/residence) | | 8.43 | 8.43 | 8.43 |
| Number of Existing Residences with Solar under this measure | | 52,273 | 130,175 | 130,175 |
| Electricity use in participating residences (MWh) | | 440,729 | 1,097,954 | 1,097,954 |
| Annual Electricity Generated by new Solar PVs from new permits (MWh) | | 440,822 | 1,097,768 | 1,097,768 |
| Unused electricity generated (MWh) | | 94 | (186) | (186) |
| Percent of electricity sent back into grid | | 0% | 0% | 0% |
| **Percent of Electricity use in Existing Homes offset by solar (Feasibility Check)** | | **32%** | **80%** | **80%** |

| | | | |
|---|---|---|---|
| **Emissions reductions from solar built on existing residential buildings (MTCO2e)** | 114,571 | 260,322 | 260,322 |
| GHG Reductions from E-2.3 (MTCO2e) | 114,571 | 260,322 | 260,322 |

**E-2.4**

| **Increase Use of On-Site Renewable Electricity Generation for County Operations** | **2020** | **2030** | **2050** |
|---|---|---|---|
| County electricity use after the implementation of E-1.4 (MWh) | 128,633 | 114,340 | 114,340 |
| Percent of renewable electricity generated on-site | 10% | 20% | 20% |
| Electricity offset (MWh) | 12,863 | 22,868 | 22,868 |
| GHG Reductions from E-2.4 (MTCO2e) | 4,083 | 5,417 | 5,417 |

## Solid Waste Reduction Measure Quantification

| SW-1.1 | |
|---|---|
| **Increase Solid Waste Diversion** | |

See additional quantification on separate sheets.

**From implementation of Zero Waste diversion program (80% diversion)**

| | | Source |
|---|---|---|
| **Baseline** | | |
| Total Unincorporated Waste Accepted by Landfills in 2014 (wet short tons) | 449,323 | Unincorporated County of San Diego 2014 Greenhouse Gas Emissions Inventory and Projections |
| Total Unincorporated Waste Accepted by Landfills in 2030 (Post-diversion) (tons) | 545,308 | Scaled with population |
| Organics Content in Unincorporated SD County | 66% | Calculated from CalRecycle Data. Date unreported. |
| Total Unincorporated Waste Accepted by Landfills in 2030 (Post-diversion) - organics only (tons) | 362,486 | |
| Current Diversion Rate | 62% | CalRecycle |
| Total Unincorporated Generated Waste (tons) | 1,435,022 | Calculated |
| **Target** | | |
| Target Diversion Rate | 80% | Assumed |
| Target Disposal Tonnage under 80% diversion rate | 287,004 | Calculated |
| Target Diverted Tonnage under 80% diversion rate | 1,148,018 | Calculated |
| Waste disposal reduction under 80% diversion rate compared to baseline (ton) | 258,304 | Calculated |
| Organics content in reduced waste | 60% | Estimated from HF&H Calculations |
| Additional Diverted waste generation under 80% diversion rate - organics only (ton) | 154,483 | Calculated |
| **Reduction in Organics** | | |
| Percent reduction in organics compared to baseline | 43% | Calculated. Assume that emissions are proportional to organics content in waste |

**Forecasted Emissions Reductions**

| | 2030 | 2050 |
|---|---|---|
| GHG Emissions from Waste Disposal (MTCO2e) | 185,492 | 201,915 |
| Emissions reductions from SWP (MTCO2e) | 79,052 | 86,052 |

| | 2020 | 2030 | 2050 |
|---|---|---|---|
| GHG Reductions from SW-1.1 (MTCO2e) | - | 79,052 | 86,052 |

## Water and Wastewater Reduction Measure Quantification

Assumptions

| | 2020 | 2030 | 2050 |
|---|---|---|---|
| San Diego County Average Electricity Emissions Factor (MTCO2e/MWh) | 0.302 | 0.237 | 0.237 |
| Natural Gas Emissions Factor (MTCO2e/therm) | 0.00685 | | |

### W-1.1

**Increase Water Efficiency in New Residential Development**

*Note that this measure will not be in effect until after 2020.*

| | Mandatory Reqmt/ Standard Equivalent | Measure Reqmt/Energy Star Rating | Requirement Metric |
|---|---|---|---|
| Kitchen Faucet Flow Rate (gal per minute) | 1.8 | 1.5 | Flow Rate |
| Dishwasher water use (gal/cycle) | 5 | 3.5 | Energy Star Appliance - standard size |
| Dishwasher energy use (kWh/year) | 307 | 270 | Energy Star Appliance - standard size |
| Clotheswasher water use (gal/cycle) | 16.82 | 9.25 | Energy Star Appliance - 2.5 cu-ft front loading |
| Clotheswasher energy use (kWh/cycle) | 7.93 | 5.95 | Energy Star Appliance |

| | | |
|---|---|---|
| Kitchen faucet water use per day per household with dishwasher (HH) (minutes) | 5 | Assumption based on water usage used for dishwashing and standard flowrate: https://water.usgs.gov/edu/qa-home-percapita.html. Assumes water is also used for washing produce, cooking, and drinking. |
| Average dishwasher cycles per unit per year | 215 | https://www.energystar.gov/products/appliances/dishwashers/key_product_criteria |
| Average dishwasher cycles per year per HH | 215 | |
| Average American family wash loads per year | 300 | https://www.energystar.gov/products/appliances/clothes_washers |
| Average clotheswasher cycles per year per HH | 300 | |

| | 2014 | 2020 | 2030 | 2050 |
|---|---|---|---|---|
| Households in Unincorporated San Diego County | 162,805 | 163,354 | 174,741 | 204,604 |
| Number of new households since 2014 | | 549 | 11,936 | 41,799 |
| **Activity in New Households Only** | | | | |
| Water use with standard equipment (MG/year) | | | | |
| Kitchen Faucets | | | 39 | 137 |
| Dishwashers | | | 13 | 45 |
| Clotheswashers | | | 60 | 211 |
| Total | | | 112 | 393 |
| Water use with Tier 1 equipment (MG/year) | | | | |
| Kitchen Faucets | | | 33 | 114 |
| Dishwashers | | | 9 | 31 |
| Clotheswashers | | | 33 | 116 |
| Total | | | 75 | 262 |
| Water Savings (MG/year) | | | | |
| Kitchen Faucets | | | 7 | 23 |
| Dishwashers | | | 4 | 13 |
| Clotheswashers | | | 27 | 95 |
| Total | | | 37 | 131 |
| Emissions per gallon of water (MTCO2e/MG) (see calculation in measure W-2.1) | | | 2.31 | 2.31 |
| GHG Reductions from W-1.1 (MTCO2e) | | - | 87 | 303 |

**Water and Wastewater Reduction Measure Quantification (Continued)**

| W-1.2 | | | | |
|---|---|---|---|---|
| **Reduce Outdoor Water Use** | **2014** | **2020** | **2030** | **2050** |
| *This measure only applies to potable water use in outdoor landscaping, and not all outdoor applications.* | | | | |
| Residential and Non-residential Landscape irrigation water use per capita per day (gallons) (Assumed for 2014) | 94 *Source: California Water Plan Update 2013 Vol. 3. Table 3-2. Based on 2009 gallons and population.* | | | |
| Modified Unincorporated County Population | 454,599 | 493,604 | 551,712 | 600,560 |
| Estimated annual water demand for landscaping based on 2014 rates (MG) | 15,631 | 16,972 | 18,970 | 20,649 |
| In existing development | | 15,631 | 15,631 | 15,631 |
| In new development | | 1,341 | 3,339 | 5,019 |
| Percent reduction in outdoor landscaping water use rates from 2014 rates | | | | |
| In existing development | | 0% | 40% | 40% |
| In new development | | 0% | 40% | 40% |
| Annual Water Reduction (MG) | | | | |
| In existing development | | - | 6,252 | 6,252 |
| In new development | | - | 1,336 | 2,007 |
| TOTAL | | - | 7,588 | 8,260 |
| Emissions per gallon of water (MTCO2e/MG) (see calculation in measure W-2.1) | | 2.53 | 2.31 | 2.31 |
| Remaining water use for landscape irrigation (MG) | | | | |
| In existing development | | 15,631 | 9,378 | 9,378 |
| In new development | | 1,341 | 2,003 | 3,011 |
| GHG Reductions from W-1.2 (MTCO2e) | | - | 17,535 | 19,087 |
| Electricity savings from local water distribution and treatment (MWh) to calculate E-2.1 | | - | 7,406 | 8,062 |

| W-1.3 | | | | | |
|---|---|---|---|---|---|
| **Reduce Potable Water Consumption at County Facilities** | | **2014** | **2020** | **2030** | **2050** |
| Imported Potable water consumption at all County facilities (HCF) | | 622,568 | | | |
| Imported Potable water consumption at all County facilities (Million gallons) | | 466 | 472 | 481 | 501 |
| Forecasting method: Employee growth | | | | | |
| County Employee Count Forecast | | 19205 | 19,444 | 19,841 | 20,636 |
| Electricity Use from Potable Water Consumption (MWh) | | 4,988 | 5,049 | 5,153 | 5,359 |
| Electricity intensity per million gallons of imported potable water (includes conveyance, treatment, and distribution) (Average for the County) | | | | | |
| *Water Activity* | *kWh/MG* | | | | |
| *Upstream Supply and Conveyance* | | *9,727* | | | |
| *Local water distribution* | | *292* | | | |
| *Conventional water treatment* | | *684* | | | |
| *Total (kWh/MG)* | | *10,703* | | | |
| *Total (MWh/MG)* | | *10.70* | | | |
| Percent reduction in potable water consumption at County facilities **below 2014 levels** | | | 15% | 20% | 20% |
| Water use forecast with water reduction (MG) | | | 396 | 373 | 373 |
| Electricity Use with water reduction (MWh) | | | 4,239 | 3,990 | 3,990 |
| Difference in electricity use (MWh) | | | 810 | 1,163 | 1,369 |
| GHG Reductions from W-1.3 (MTCO2e) | | | 244 | 276 | 325 |
| Electricity savings from local water distribution and treatment (MWh) to calculate E-2.1 | | | 58 | 73 | 73 |

## Water and Wastewater Reduction Measure Quantification (Continued)

**W-2.1**

**Increase Rain Barrel Installations**

Note: Rainwater catchment would only be used for landscaping uses.

| **Background and Assumptions** | 2014 | 2020 | 2030 | 2050 |
|---|---|---|---|---|
| Modified Unincorporated County Population | 454,599 | 493,604 | 551,712 | 600,560 |
| Water Use (million gallons) | 45,678 | 49,597 | 55,436 | 60,344 |
| Emissions from water use (MTCO2e) | 134,269 | 125,616 | 128,104 | 139,446 |
| Emissions per gallon (MTCO2e/MG) | | 2.53 | 2.31 | 2.31 |

| **Water Demand** | | 2020 | 2030 | 2050 |
|---|---|---|---|---|
| Landscaping water demand | | 16,972 | 11,382 | 12,390 |
| Total roof sqft in County (see below) | | 116,938,533 | 130,255,005 | 144,445,872 |
| Annual landscaping water demand per roof sqft (gal/sqft) | | 145 | 87 | 86 |
| Annual landscaping water demand per barrel (see below) (gal/sqft) | | 72,568 | 43,691 | 42,887 |

| **Rain Barrel Savings** | | | | |
|---|---|---|---|---|
| Annual Rainfall in San Diego, CA (inches) (height per any unit area) | 10.13 | *Source: Western Regional Climate Center 2016* | | |
| Number of rain barrels installed starting in 2020 | | 1,200 | 3,200 | 3,200 |
| Rain barrel size (gal) | 50 | | | |
| Average roof collection area per barrel (e.g., half of a low-rise house roof slanted in a single direction) (sqft) | 500 | | | |
| Maximum annual rain collected per average roof per barrel (gal/barrel) | 3,157 | | | |
| Annual rain collected per roof sqft (gal/sqft) | 6.31 | | | |
| Annual rain collected under this measure (assuming average roof area per barrel) (gal) | | 3,788,883 | 10,103,688 | 10,103,688 |
| Maximum annual barrel fillings per year (feasibility check) | | 3,157 | 3,157 | 3,157 |
| Utilization/Emptying rate (Rate at which barrels are emptied everytime it is full so there is no wasted water to overflow) | | 100% | 100% | 100% |
| Annual water savings per year under this measure (gal) | | 3,788,883 | 10,103,688 | 10,103,688 |
| Percent of landscaping demand of participating buildings | | 4.4% | 7.2% | 7.4% |
| Percent of landscaping demand offset by this measure | | 0.022% | 0.089% | 0.082% |
| **Emissions reductions from water savings (MTCO2e) (million gallons X MTCO2e/MG) (see beginning of calculation)** | | 10 | 23 | 23 |

| **Existing Countywide Rooftop Area** | | |
|---|---|---|
| Area of commercial/industrial roofspace in 2005 (sqft) (Anders and Bailek 2009) | 235,047,321 | |
| Area of residential roofspace in 2010 (sqft) (calculated below) | 646,002,117 | |
| Sum of roofspace (sqft) | 881,049,438 | |
| *Source: Anders and Bailek 2009 (https://www.sandiego.edu/law/documents/centers/epic/060309_ASESPVPotentialPaperFINAL_000.pdf)* | | |
| **Calculating Residential Rooftop Space in San Diego County** | | |
| Matching PV rating (kW) from NREL PV Calculator | 2,772,000 | *Source: Anders and Bailek 2009* |
| sq meter per kW | 1 | *PV Watts Calculator Default* |
| sqft per sq meter | 10.76391042 | *PV Watts Calculator Default* |
| Module efficiency | 0.16 | *PV Watts Calculator Default* |
| Size of PV area needed (sf) | 186,484,748 | *Calculated* |
| Tilt Degree | 30 | *Source: Anders and Bailek 2009* |
| Footprint of PV area needed (sqft) | 161,500,529 | *Calculated* |
| % sqft roof | 50% | *Source: Anders and Bailek 2009* |
| % homes suitable | 50% | *Source: Anders and Bailek 2009* |
| Footprint of Available Rooftop (sqft) | 646,002,116.66 | *Calculated* |
| *Calculations based on methods used in NREL's PV Watts Calculator http://pvwatts.nrel.gov/pvwatts.php* | | |

| **Estimated Unincorporated San Diego County Roofspace (Scaled from entire county) (sqft)** | 2014 | 2020 | 2030 | 2050 |
|---|---|---|---|---|
| Commercial/Industrial | 13,890,169 | 15,498,609 | 16,873,464 | 21,025,604 |
| Residential | 93,424,065 | 101,439,924 | 113,381,541 | 123,420,268 |
| Total | 107,314,235 | 116,938,533 | 130,255,005 | 144,445,872 |
| All Existing Roofspace (as of 2014) | 107,314,235 | 107,314,235 | 107,314,235 | 107,314,235 |
| All New Roofspace (since 2014) | - | 9,624,299 | 22,940,770 | 37,131,637 |

| | | | |
|---|---|---|---|
| GHG Reductions from W-2.1 (MTCO2e) | 10 | 23 | 23 |
| Electricity savings from local water distribution and treatment (MWh) to calculate E-2.1 | 3.70 | 9.86 | 9.86 |

## Agriculture Reduction Measure Quantification

Assumptions

| | | 2020 | 2030 | 2050 |
|---|---|---|---|---|
| San Diego County Average Electricity Emissions Factor (MTCO2e/MWh) | | 0.260 | 0.237 | 0.237 |
| Cropland in SD County (acres) | 97,432 | 96,051 | 95,313 | 94,494 |

**A-1.1**

| **Convert Farm Equipment to Electric** | | **2020** | **2030** | **2050** |
|---|---|---|---|---|
| **Background Information** | | 2020 | 2030 | 2050 |
| Emissions from Agricultural Equipment Except for Irrigation Pumps. Scaled by change in cropland. (MTCO2e) | 86,087 | 84,867 | 84,215 | 83,491 |
| | | 2020 | 2030 | 2050 |
| Percent of Equipment Converted to Electric or Alternative Fuel | | 0% | 8% | 8% |
| GHG Reductions from A-1.1 (MTCO2e) | | - | 6,737 | 6,679 |

**A-1.2**

| **Convert Stationary Irrigation Pumps to Electric** | | **2014** | **2020** | **2030** | **2050** |
|---|---|---|---|---|---|
| Number of Diesel Pumps in San Diego County. Scaled by change in cropland. | | 159 | 157 | 156 | 154 |
| Total Number of Pumps Converted | | | 4 | 44 | 44 |
| Percent of Pump Energy Converted | | | 3% | 28% | 28% |
| Emissions from Diesel Pumps to be Converted (MTCO2) | | 11,768 | 296 | 3,251 | 3,251 |
| Diesel Emission Factor (kg CO2/gal) | 10.21 | | | | |
| Calculated fuel use of converted pumps (gal) | | 1,152,982 | 28,954 | 318,491 | 318,491 |
| Energy content of diesel (kBTU/gal) - lower heating value | | 128 | 128 | 128 | 128 |
| Efficiency of diesel pump (%) | | 35% | 35% | 35% | 35% |
| Energy required by pumps (kBTU) | | 51,851 | 1,302 | 14,323 | 14,323 |
| Efficiency of electric pump (%) | | 75% | 75% | 75% | 75% |
| Calculated electricity use in electric pumps (kBTU) | | 69,134 | 1,736 | 19,097 | 19,097 |
| Calculated electricity use in electric pumps (kWh) | | 20,261 | 509 | 5,597 | 5,597 |
| Emissions from electricity use (MTCO2e) | | | 0.13 | 1.33 | 1.33 |
| GHG Reductions from A-1.2 (MTCO2e) | | | 295 | 3,249 | 3,249 |
| Calculated electricity use in electric pumps for selected option (kWh) | | | 509 | 5,597 | 5,597 |

## Agriculture Reduction Measure Quantification (Continued)

| A-2.1 | | | | | |
|---|---|---|---|---|---|
| **Increase Residential Tree Planting** | | **2014** | **2020** | **2030** | **2050** |
| Modified Number of Single Family Residences in Unincorporated County (detached units) (Exluding Camp Pendleton units) | | 134,815 | 146,436 | 164,009 | 178,110 |
| Number of New SFRs starting in 2020 | | | - | 17,573 | 31,674 |
| Trees planted per home | | | 2 | 2 | 2 |
| Total trees planted since 2020 | | | 0 | 35,146 | 63,348 |
| Default Annual CO2 accumulation per tree for Miscellaneous Trees (MT CO2e/tree/year) (From Appendix A of CalEEMod v2016.3.1) | | 0.0354 | | | |
| Annual Sequestration from Planted Trees (MTCO2e/year) | | | - | 1,244 | 2,243 |
| GHG Reductions from A-2.1 (MTCO2e) | | | - | 1,244 | 2,243 |

| A-2.2 | | | | | |
|---|---|---|---|---|---|
| **Increase County Tree Planting** | | | **2020** | **2030** | **2050** |
| Annual Tree Planting Targets starting in 2017 | | 3500 | | | |
| Annual Tree Planting Targets starting in 2020 | | 3500 | | | |
| Total number of Trees Planted since 2017 | | | 14,000 | 49,000 | 119,000 |
| Feasability Test | | | | | |
| Average Tree Canopy Area of mature tree (sqft) | | 50 | | | |
| Total Acres of Planted Tree Canopy (Acres) | | | 4.0 | 56.24 | 136.59 |
| Total undeveloped acres in the County (Acres) (SANDAG) | | | 346,055 | 306,876 | 219,557 |
| **Percent Coverage by new trees** | **Very Low-->** | | **0.001%** | **0.018%** | **0.062%** |
| Default Annual CO2 accumulation per tree for Miscellaneous Trees (MT CO2e/tree/year) (From Appendix A of CalEEMod v2016.3.1) | | 0.0354 | | | |
| Annual Sequestration from Planted Trees (MTCO2e/year) | | | 496 | 1,735 | 4,213 |
| GHG Reductions from A-2.2 (MTCO2e) | | | 496 | 1,735 | 4,213 |

| Assumptions | |
|---|---|
| **Category** | **Value** |
| **Conversions** | |
| sqin/sqft | 144 |
| cubic in/gallons | 231 |
| sqft/acre | 43560 |
| acre/hectare | 2.47105 |
| g/MT | 1000000 |
| lb/MT | 2204.622622 |
| g/lb | 453.592 |
| kg/MT | 1000 |
| lb/kg | 2.20462 |
| tons/MT | 1.10231 |
| kWh/MWh | 1000 |
| MWh/GWh | 1000 |
| btu/kWh | 3412.14 |
| Btu/therm | 100000 |
| MMBtu/therm | 0.1 |
| MMBtu/MWh | 3.41214148 |
| LPG Gallons/GGE | 1.344086022 |
| LNG Gallons/GGE | 1.572327044 |
| gal/cubic foot | 7.480519481 |
| gal/Liter | 3.785411784 |
| gallon/acrefoot | 325851.429 |
| million gal/hundred cubic feet | 0.000748503 |
| million gal/acre-feet | 0.325851429 |
| **GWP** | |
| CO2 | 1 |
| CH4 | 25 |
| N2O | 298 |
| *Source* | *IPCC Fourth Assessment Report* |

Modified Option 3 CEQA Findings
(Supplemental Information Modifying Option 3 – Attachment D)

COUNTY OF SAN DIEGO CLIMATE ACTION PLAN
EIR # PDS2016-ER-16-00-003
STATE CLEARINGHOUSE NUMBER 2016101055

## CEQA FINDINGS

a. Certify that the SEIR dated January 2018 on file with Planning & Development Services as EIR # PDS2016-ER-16-00-003 has been completed in compliance with the CEQA and the State CEQA Guidelines, that the SEIR was presented to the Board of Supervisors and that the Board of Supervisors reviewed and considered the information contained therein before approving the project, and that the SEIR reflects the independent judgment and analysis of the Board of Supervisors.

b. Adopt the findings concerning mitigation of significant environmental effects pursuant to CEQA Guidelines section 15091 (Section II, III, and V below).

c. Adopt the Statement of Overriding Considerations pursuant to State CEQA Guidelines section 15093 (Section IX below).

d. Adopt the Decision and Explanation Regarding Recirculation of the Draft Environmental Impact Report pursuant to State CEQA Guidelines Section 15088.5(e) (Section VII below).

e. Adopt the Mitigation Monitoring and Reporting Program pursuant to CEQA Guidelines section 15091(d) (Attachment L).

f. Adopt the Findings related to the 2011 General Plan Update PEIR Mitigation Measure CC-1.2 (Section VI below).

# FINDINGS PURSUANT TO STATE CEQA GUIDELINES SECTIONS 15088.5, 15090, 15091 AND 15093

## COUNTY OF SAN DIEGO CLIMATE ACTION PLAN

## FEBRUARY 2018

## SUPPLEMENTAL INFORMATION MODIFYING OPTION 3-D

## MODIFIED OPTION 3

# CEQA FINDINGS REGARDING SIGNIFICANT EFFECTS FOR THE COUNTY OF SAN DIEGO CLIMATE ACTION PLAN SCH #2016101055

## I. INTRODUCTION

The following Findings are made for the County of San Diego Climate Action Plan, and more specifically, for the Modified Option 3, which is recommended for approval based on consideration of the alternatives, project objectives, project benefits, environmental impacts, stakeholder input received during public review, Planning Commission informational workshops, and numerous other factors. Modified Option 3 is composed of the following: the Climate Action Plan (CAP), an associated General Plan Amendment (GPA) to the County's General Plan Update (GPU) and corresponding revision to mitigation in the Program Environmental Impact Report (PEIR) prepared for the 2011 General Plan Update (hereafter these two actions collectively referred to as [GPA]), a threshold of significance for greenhouse gases (GHG), and a revised Guidelines for Determining Significance for Climate Change (Guidelines). Modified Option 3, which includes the Increased Solid Waste Diversion Alternative, with removal of GHG Reduction Measures T-3.1 (alternative fuel in new residential and non-residential construction), E-1.1 (improve building efficiency in new residential development), E-1.3 (improve building energy efficiency in existing development), E-2.2 (increase renewable electricity in non-residential) and a revision to T-1.3 which would result in updating 15 community plans by 2030 will be presented to the decision makers for adoption. In addition, GHG Reduction Measure E-1.2 (new and replacement water heaters in residential development) has been updated to state that this measure would be a "requirement and will include a subsidy for replacement water heaters for participants meeting certain income criteria." In implementing the Modified Option 3, the direct investments required under GHG Reduction Measure T-4.1 would be reduced to 176,614 MTCO2e. Analysis of the components of this option is included in Final SEIR (see Final SEIR 4.3.3.4)

The environmental impacts of Modified Option 3 are addressed in a Supplemental Program Environmental Impact Report (SEIR) dated August of 2017, which is incorporated by reference herein.

The Final SEIR prepared for Modified Option 3 consists of three components:

A) Program Final SEIR evaluating the Project and a reasonable range of alternatives
B) Summary of Changes to the Draft Final SEIR, Comment Letters and Responses to comments on the Draft Final SEIR
C) Technical Appendices to the Final SEIR

The Final SEIR evaluated potentially significant effects for the following environmental areas of potential concern: 1) Aesthetics; 2) Agricultural and Forestry Resources; 3) Air Quality; 4) Biological Resources; 5) Cultural and Historical Resources; 6) Greenhouse Gas Emissions; 7) Hazards and Hazardous Materials; 8) Hydrology and Water Quality; 9) Land Use and Planning; 10) Noise; 11) Transportation and Traffic; 12) Tribal Cultural Resources. Potential impacts for the issues of Energy, Geology and Soils, Mineral Resources, Population and Housing, Public Services, Recreation, and Utilities and Services are identified as Effects Found Not to be

Significant (and discussed in Section 3.1 of the Final SEIR and Energy is discussed in Section 2.6 of the Final SEIR).

The Final SEIR functions as a supplement to the 2011 GPU PEIR and as such the analysis throughout relies upon pertinent information that is provided in the 2011 GPU PEIR and was adopted with the 2011 GPU. Specifically, as a supplement, the analysis relied upon the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures and applied those policies and mitigation measures to the project prior to rendering an impact conclusion. Where impacts were concluded to remain significant after application of all relevant policies and mitigation measures of the 2011 GPU, additional mitigation was considered and recommended in the Final SEIR. The Findings discussed below address the significant impacts of the project after application of relevant 2011 GPU policies and 2011 GPU PEIR mitigation measures. Where 2011 GPU PEIR mitigation measures were applied to Modified Option 3, those mitigation measures are referenced in the Mitigation Monitoring and Reporting Program for Modified Option 3.

The County Board of Supervisors concurs with the conclusions in the Final SEIR that Energy, Geology and Soils, Mineral Resources, Population and Housing, Public Services, Recreation, and Utilities and Services will not result in potentially significant impacts. Moreover, the remaining environmental issues evaluated will include impacts that are significant and unavoidable. For the 12 environmental subject areas in which environmental impacts will remain significant and unavoidable, even with the implementation of mitigation measures, overriding considerations exist that make the impacts acceptable (Section III, below).

The California Environmental Quality Act (CEQA) (California Public Resources Code §21000 *et. seq.* and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 *et. seq*.) require that no public agency shall approve or carry out a project which identifies one or more significant environmental effects of a project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale and facts supporting each finding.

The possible findings are:

(1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effects on the environment;

(2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been or can or should be adopted by that other agency; or

(3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR (CEQA, §21081(a); Guidelines, §15091(a)).

For each significant effect identified for the Climate Action Plan, one of the above three findings applies. Therefore, the discussion of significant impacts, and mitigation measures where possible, are organized below by finding rather than by environmental subject area.

In analyzing potential impacts, the Final SEIR noted that many of the projects that would be implemented under the GHG reduction measures would require further discretionary permits from the County, such as Grading Permits, triggering additional review under CEQA. Under these circumstances, projects will be reviewed under CEQA and 2011 GPU policies, and applicable mitigation measures from the Final SEIR will be incorporated to the extent feasible by future discretionary projects to ensure that significant impacts from the projects are avoided or reduced to a less-than-significant level.

However, the Final SEIR also acknowledged there may be circumstances where further discretionary permits are not required (e.g., small-scale renewable energy projects), and no additional CEQA review would occur. In addition, even with implementation of applicable policies and mitigation measures, the locations and details of many of the projects are currently unknown and it cannot be determined with certainty that impacts would be reduced to a less-than-significant level because of many influencing variables such as location, size, design, and technology. The Final SEIR concluded there would be no other mechanisms available to review potential significant environmental impacts and impose or implement feasible mitigation measures. Therefore, Modified Option 3 may have significant and unmitigated environmental impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural and historic resources, GHG, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, transportation and traffic, and tribal cultural resources. Details of these conclusions are provided in the findings below. A Statement of Overriding Considerations is being adopted to address these significant and unmitigated impacts.

## II. POTENTIALLY SIGNIFICANT EFFECTS WHERE MITIGATION IS AVAILABLE TO REDUCE IMPACTS TO LESS THAN SIGNIFICANT (CEQA GUIDELINES SECTION 15091(A)(1)

Pursuant to Section 21081(A) of the Public Resources Code and Section 15091(A)(1) of the State CEQA Guidelines, the County of San Diego Board of Supervisors finds that, for each of the following significant effects identified in the Final SEIR, changes or alternatives have been required in, or incorporated into, Modified Option 3 which mitigate or avoid the potentially significant effects on the environment. The potentially significant effects and mitigation measures are stated fully in the Final SEIR. These findings are explained below and are supported by substantial evidence in the record of proceedings.

To the extent these findings conclude that mitigation measures identified in the Final SEIR are feasible, the County hereby binds itself to implement those measures. These findings are not merely informational but constitute a binding set of obligations upon the County and responsible agencies that take effect upon the County's adoption of the resolutions certifying the Final SEIR and approving Modified Option 3.

In adopting these findings, the County concurrently adopts a Mitigation, Monitoring and Reporting Program (MMRP) pursuant to Public Resources Code section 21081.6. This MMRP is designed to ensure Modified Option 3 complies with the feasible mitigation measures identified below during implementation of Modified Option 3 and is incorporated herein by this reference.

## A. Greenhouse Gas Emissions

1. **Significant Effect: GHG Emissions:** Implementation of the CAP, in combination with GHG emissions from reasonably foreseeable GPA projects, would result in a considerable contribution such that a new significant cumulative 2030 GHG impact would occur (GHG-2) (Final SEIR p. 2.7-30 to 2.7-31; p 4-68 through 4-69).

   **Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

   **Mitigation Measures:**

   **CAP Mitigation Measure M-GHG-1:** The County shall require in-process and future GPAs to reduce their emissions to ensure that CAP emission forecasts are not substantially altered such that attainment of GHG reduction targets could not be achieved. Project applicants for in-process and future GPAs could accomplish this through two options, as outlined below:

   Option 1 (No Net Increase): GPA project applicants shall achieve no net increase in GHG emissions from additional density above the 2011 GPU. Applicants shall be required in their respective CEQA documents to quantify the GHG emissions from their projects that exceed the GHG emissions for the 2011 GPU density or intensity forming the basis of the CAP emission forecasts (i.e., projections). This increase in emissions shall be reduced through on-site design features and mitigation measures and off-site mitigation, including purchase of carbon offset credits by the applicant. Applicants shall demonstrate compliance with relevant CAP measures as identified in the "CAP Consistency Review Checklist" in addition to all feasible on-site design features and mitigation measures. Off-site mitigation, including purchase of carbon offset credits, would be allowed after all feasible on-site design features and mitigation measures have been incorporated.

   For example, if 400 residential units were allowed under the 2011 GPU and a GPA proposes 500 residential units, the emissions for the additional 100 units would be calculated and offset through compliance with the CAP Consistency Review Checklist and additional feasible on-site measures and off-site measures, including the use of carbon offsets. The emissions associated with the allowable density of 400 units would be mitigated through compliance with the CAP Consistency Review Checklist.

   The County will consider, to the satisfaction of the Director of Planning & Development Services (PDS), the following geographic priorities for GHG reduction features, and GHG reduction projects and programs: 1) project design features/on-site reduction measures; 2) off-site within the unincorporated areas of the County of San Diego; 3) off-site within the County of San Diego; 4) off-site within the State of California; 5) off-site within the United States; and 6) off-site internationally.

   Geographic priorities would focus first on local reduction features (including projects and programs that would reduce GHG emissions) to ensure that reduction efforts achieved locally would provide co-benefits. Depending on the carbon offset credit utilized, co-

benefits may include reductions in criteria air pollutants, toxic air contaminants, energy demand, water consumption, health benefits, social benefits, and economic benefits. The GPA applicant or its designee shall first pursue offset projects and programs locally within unincorporated areas of the County of San Diego to the extent such carbon offset credits are available and are financially feasible, as reasonably determined by the Director of PDS.

If carbon offset credits are provided as mitigation, the GPA applicant, or its designee, shall purchase and retire carbon offsets in a quantity sufficient to offset the net increase from GHG emissions above the density or intensity allowed in the 2011 GPU. This includes all GHG emissions from construction (including sequestration loss from vegetation removal) and operations.

For the net increase of construction and operations GHG emissions, prior to County's issuance of the project's first grading permit (for construction GHG emissions) or first building permit (for operations GHG emissions) the GPA applicant, or its designee, shall provide evidence to the satisfaction of the Director PDS that the project applicant or its designee has purchased and retired carbon offset credits in a quantity sufficient to offset the net increase of construction and operations GHG emissions generated by the project. Operations emissions may be offset in phases, commensurate with the overall phasing of the project.

Carbon offset credits must be purchased through any of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard, (ii) any registry approved by CARB to act as a registry under the state's cap-and-trade program, (iii) through the CAPCOA GHG Rx and the SDAPCD, or (iv) if no registry is in existence as identified in options (i), (ii), or (iii), above, then any other reputable registry or entity that issues carbon offsets consistent with Cal. Health & Saf. Code section 38562(d)(1)), to the satisfaction of the Director of PDS.

Option 2 (Net Zero): GPA project applicants shall reduce all project GHG emissions to zero to achieve no net increase over baseline conditions (carbon neutrality). Project emissions shall be reduced to zero through on-site design features and mitigation measures and off-site mitigation, including purchase of carbon offset credits by the applicant or its designee. Applicants shall demonstrate compliance with relevant CAP measures as identified in the "CAP Consistency Review Checklist" before considering additional feasible on-site design features and mitigation measures. Off-site mitigation, including purchase of carbon offset credits, would be allowed after all feasible on-site design features and mitigation measures have been incorporated.

The County will consider, to the satisfaction of the Director of Planning & Development Services (PDS), the following geographic priorities for GHG reduction features, and GHG reduction projects and programs: 1) project design features/on-site reduction measures; 2) off-site within the unincorporated areas of the County of San Diego; 3) off-site within the County of San Diego; 4) off-site within the State of California; 5) off-site within the United States; and 6) off-site internationally.

Geographic priorities would focus first on local reduction features (including projects and programs that would reduce GHG emissions) to ensure that reduction efforts achieved locally would provide co-benefits. Depending on the carbon offset credit utilized, co-benefits may include reductions in criteria air pollutants, toxic air contaminants, energy demand, water consumption, health benefits, social benefits, and economic benefits. The GPA applicant or its designee shall first pursue offset projects and programs locally within unincorporated areas of the County of San Diego to the extent such carbon offset credits are available and are financially feasible, as reasonably determined by the Director of PDS.

If carbon offset credits are provided as mitigation, the GPA applicant, or its designee, shall purchase and retire carbon offsets in a quantity sufficient to offset all GHG emissions from the project. This includes all GHG emissions from construction (including sequestration loss from vegetation removal) and operations.

Prior to the County's issuance of the project's first grading permit (for construction GHG emissions) or first building permit (for operations GHG emissions) the GPA applicant, or its designee, shall provide evidence to the satisfaction of the Director of PDS that the project applicant or its designee has purchased and retired carbon offset credits in a quantity sufficient to offset all construction and operations GHG emissions generated by the project. Operations emissions may be offset in phases, commensurate with the overall phasing of the project.

Carbon offset credits must be purchased through any of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard, (ii) any registry approved by CARB to act as a registry under the state's cap-and-trade program, (iii) through the CAPCOA GHG Rx and the San Diego County Air Pollution Control District (APCD), or (iv) if no registry is in existence as identified in options (i), (ii), or (iii), above, then any other reputable registry or entity that issues carbon offsets consistent with Cal. Health & Saf. Code section 38562(d)(1))., to the satisfaction of the Director of PDS (Final SEIR p. 2.7-36 to 2.7-40).

**Facts in Supporting Findings:** The policies applicable to GHG emissions that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-10.7, COS-15.1, COS-15.2, COS-15.3, COS-17.1, COS-17.5, COS-18.2, COS-20.1, COS-20.2, and COS-20.4 (Final SEIR pages 2.7-10 to 2.7-11). The mitigation measures applicable to GHG emissions that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include CC-1.1, CC-1.2, CC-1.3, CC-1.4, CC-1.5, CC-1.6, CC-1.7, CC-1.8, CC-1.9, CC-1.10, CC-1.11, CC-1.12, CC-1.13, CC-1.14, CC-1.15, CC-1.16, CC-1.17, CC-1.19, and CC-1.19 (Final SEIR p. 2.7-11 to 2.7-15).

With implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-GHG-1, GHG impacts associated with the CAP and GPAs would be reduced to less than significant because the incremental increase in GHG emissions from in-process and future GPAs would be offset such that the CAP emissions forecasts would not be affected (Final SEIR p. 2.7-36 to 2.7-41).

2. **Significant Effect: GHG Policy Conflicts:** Implementation of the CAP, along with GHG emissions described above, in combination with GHG emissions from reasonably foreseeable GPA projects, would result in a significant cumulative impact (GHG-3) (Final SEIR p. 2.7-31 to 2.7-40; 4-69).

   **Finding:** Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

   **Mitigation Measures:**

   **CAP Mitigation Measure M-GHG-1:** See description above (Final SEIR p. 2.7-36 through 40).

   **Facts in Supporting Findings:** The policies applicable to GHG emissions that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-10.7, COS-15.1, COS-15.2, COS-15.3, COS-17.1, COS-17.5, COS-18.2, COS-20.1, COS-20.2, and COS-20.4 (Final SEIR pages 2.7-10 to 2.7-11). The mitigation measures applicable to GHG emissions that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include CC-1.1, CC-1.2, CC-1.3, CC-1.4, CC-1.5, CC-1.6, CC-1.7, CC-1.8, CC-1.9, CC-1.10, CC-1.11, CC-1.12, CC-1.13, CC-1.14, CC-1.15, CC-1.16, CC-1.17, CC-1.19, and CC-1.19 (Final SEIR p. 2.7-11 to 2.7-15).

   With implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-GHG-1, GHG policy conflicts associated with the CAP and GPAs would be reduced to less than significant because the incremental increase in GHG emissions from in-process and future GPAs would be offset such that the CAP emissions forecasts would not be affected (Final SEIR p. 2.7-40 to 2.7-41).

## III. CEQA GUIDELINES SECTION 15091 FINDINGS FOR POTENTIALLY SIGNIFICANT IMPACTS FOR WHICH FEASIBLE MITIGATION MEASURES OR ALTERNATIVES ARE NOT AVAILABLE (CEQA GUIDELINES SECTION 15091(A)(3)

Pursuant to Section 21081(A) of the Public Resources Code and Section 15091(A)(3) of the State CEQA Guidelines, the County of San Diego Board of Supervisors finds that, for each of the following significant effects identified in the Final SEIR, specific economic, legal, social, technological, or other considerations, make infeasible the mitigation measures or alternatives identified in the SEIR. These findings are explained below and are supported by substantial evidence in the record of proceedings.

In adopting these findings, the County concurrently adopts a Mitigation, Monitoring and Reporting Program (MMRP) pursuant to Public Resources Code section 21081.6. This MMRP is designed to ensure Modified Option 3 complies with the feasible mitigation measures identified below during implementation of Modified Option 3 and is incorporated herein by this reference.

## A. Aesthetics

1. **Significant Effect: Scenic Vistas / Scenic Resources:** Implementation of GHG Reduction Measures E-2.1 and E-2.4 that would result in the development of small-scale wind turbines would potentially result in direct and cumulative impacts to scenic vistas because of the introduction of new vertical elements within the viewshed of a scenic vista or affect scenic resources through the removal or alteration of a scenic resource during the course of development (Impacts AES-1, AES-2). Implementation of GHG Reduction Measure E-2.1 that would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to scenic vistas because of the introduction of tall vertical elements into the viewshed or affect scenic resources by allowing large renewable energy facilities to be constructed near the viewshed of a scenic resource (Impacts AES-3, AES-4) (See Final SEIR p. 2.1-9 through 2.1-21; p 4-54 through 4-55).

   **Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

   **Mitigation Measures:**

   **CAP Mitigation Measure M-AES-1**: During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Visual Resources and Dark Skies and Glare shall be applied. When aesthetic impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: siting/location considerations; minimizing development and grading of steep slopes; natural screening and landscaping; undergrounding utilities; inclusion of buffers; and lighting restrictions (Final SEIR p. 2.1-36 through 38).

   **Facts in Supporting Findings:** The policies applicable to aesthetic and visual resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-6.6, LU-6.9, LU-10.2, LU-11.2, LU-12.4, COS-11.1, COS-11.3. COS-11.5, COS-11.7, COS-12.2, COS-13.1, COS-13.2, and H-2.1 (Final SEIR pages 2.1-2 – 2.1-4). The mitigation measures applicable to aesthetic and visual resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Aes-1.2, Aes-1.6, Aes-1.7, Aes-1.8, Aes-1.9, Aes-4.1, Aes-4.2 (Final SEIR pages 2.1-4 – 2.1-5).

   CAP Mitigation Measure M-AES-1 requires that the County Guidelines for Determining Significance for Visual Resources and Dark Skies and Glare shall be applied to future Major Use Permits for all large-scale renewable energy projects to minimize visual impacts. However, the development of both small and large-scale renewable energy projects would introduce vertical elements into the viewshed. Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-AES-1, because the specific locations for renewable energy projects have not yet been identified and it is unknown how many and what types of projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that all impacts to scenic vistas and scenic resources would be reduced. No other feasible mitigation is available. For the reasons stated

in Section 2.1.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.1 and 4.3; aesthetic related response to comments in Chapter 8 of the Final SEIR, and all other aesthetic related evidence in the administrative record.

2. **Significant Effect: Visual Character or Quality:** Implementation of GHG Reduction Measures E-2.1, and E-2.4 that would result in the development of small-scale wind turbines would potentially result in direct and cumulative impacts to visual character or quality because of the potential for increased visual contrasts, view blockage, or skylining from sensitive viewing locations (AES-5, AES-6). Implementation of GHG Reduction Measure E-2.1 that would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to visual character or quality because of the allowable height, increased visual contrasts, view blockage, or skylining from sensitive viewing locations (AES-7, AES-8) (See Final SEIR p. 2.1-21 through 2.1-30; p. 4-55 through 4-56).

   **Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

   **Mitigation Measures:**

   **CAP Mitigation Measure M-AES-1:** See description above (Final SEIR p. 2.1-36 through 38).

   **Facts in Supporting Findings:** The policies applicable to aesthetic and visual resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-6.6, LU-6.9, LU-10.2, LU-11.2, LU-12.4, COS-11.1, COS-11.3, COS-11.5, COS-11.7, COS-12.2, COS-13.1, COS-13.2, and H-2.1 (Final SEIR pages 2.1-2 – 2.1-4). The mitigation measures applicable to aesthetic and visual resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Aes-1.2, Aes-1.6, Aes-1.7, Aes-1.8, Aes-1.9, Aes-4.1, Aes-4.2 (Final SEIR pages 2.1-4 – 2.1-5).

   Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-AES-1, because the specific locations for renewable energy projects have not yet been identified and it is unknown how many and what types of projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that all impacts to visual character or quality would be reduced. No other feasible mitigation is available. For the reasons stated in Section 2.1.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

   **Reference:** Final SEIR Section 2.1 and 4.3; aesthetic related response to comments in Chapter 8 of the Final SEIR, and all other aesthetic related evidence in the administrative record.

3. **Significant Effect: Light and Glare:** Implementation of GHG Reduction Measure E-2.1 that would result in the development of large scale renewable energy projects would potentially result in direct and cumulative impacts to light and glare because of the need for safety lighting

and the introduction of infrastructure that may emit some glare (AES-9, AES-10) (See Final SEIR p. 2.1-30 through 2.1-36; p. 4-56).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

**Mitigation Measures:**

**CAP Mitigation Measure M-AES-2:** Require that a Lighting Mitigation Plan be prepared as part of the MUP discretionary review process for all large-scale renewable energy projects. The Lighting Mitigation Plan would demonstrate that the design and installation of all permanent lighting for large wind turbines or large geothermal stacks ancillary facilities is such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. The Lighting Mitigation Plan would demonstrate consistency with the Light Pollution Code (Section 59.100 et al.) and Sections 6322 and 6324 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky do not result in a detrimental effect on astronomical research and to ensure reflected glare and light trespass is minimized. See description above (Final SEIR p. 2.1-39 through 42).

**CAP Mitigation Measure M-AES-3:** Require that a Shadow Flicker Study be prepared as part of the MUP discretionary review process for all wind turbine projects. The Shadow Flicker Study would utilize a shadow flicker model run to determine the potential shadow flicker that could occur at sensitive receptors within 2,000 meters (6,562 feet) of the proposed turbines. For wind turbine projects, because some receptors may lie within 60° due north of the turbines, outside the sun's path at any given point in the year, these receptors may be excluded from the study. Beyond 2,000 meters, the human eye would not be able to discern a shadow cast from a wind turbine for example. The modeling should utilize many different inputs, including:

1) Real Data

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

2) Conservative Assumptions

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

3) Realistic Features

- Actual wind data from a local meteorological tower to account for the percentage of time wind blows from each direction
- National Weather Service sunshine probability data to approximate average cloud cover (Final SEIR p. 2.1-39 through 42).

**Facts in Supporting Findings:** The policies applicable to aesthetic and visual resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-6.6, LU-6.9, LU-10.2, LU-11.2, LU-12.4, COS-11.1, COS-11.3, COS-11.5, COS-11.7, COS-12.2, COS-13.1, COS-13.2, and H-2.1 (Final SEIR pages 2.1-2 to 2.1-4). The mitigation measures applicable to aesthetic and visual resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Aes-1.2, Aes-1.6, Aes-1.7, Aes-1.8, Aes-1.9, Aes-4.1, Aes-4.2 (Final SEIR pages 2.1-4 to 2.1-5).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-AES-2 and M-AES-3, because the specific locations for renewable energy projects have not yet been identified and it is unknown how many and what types of projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that all direct aesthetic and visual resources impacts would be reduced. No other feasible mitigation is available. For the reasons stated in Section 2.1.5 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.1 and 4.3; aesthetic related response to comments in Chapter 8 of the Final SEIR, and all other aesthetic related evidence in the administrative record.

## B. Agriculture and Forestry Resources

**4. Significant Effect: Direct or Indirect Conversion of Agricultural Resources:** Implementation of GHG Reduction Measure E-2.1 that would result in the development of large scale renewable energy projects would potentially result in direct and cumulative impacts to direct or indirect conversion of agricultural resources because of the size and magnitude of projects and unknown locations for future projects (AG-1, AG-2) (See Final SEIR p. 2.2-8 through 2.2-13; p. 4-57).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

**Mitigation Measures:**

**CAP Mitigation Measure M-AGR-1:** During the environmental review process for future MUPs for large-scale renewable energy projects, the County Guidelines for Determining Significance for Agricultural Resources shall be applied. When impacts to Farmland are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management (Final SEIR p. 2.2-21 through 23).

**Facts in Supporting Findings:** The policies applicable to agricultural and forestry resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-7.1, LU-7.2, COS-6.2, COS-6.4 (Final SEIR pages 2.2-4 to 2.2-3). The mitigation measures applicable to agricultural and forestry resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Agr-1.1, Agr-1.2, Agr-1.3, Agr-1.4, Agr-1.5, Agr-2.1 (Final SEIR p. 2.2-5).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-AGR-1, because the specific locations for renewable energy projects have not yet been identified and it is unknown how many and what types of projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that all direct or indirect agricultural conversion impacts would be reduced. No other feasible mitigation is available. For the reasons stated in Section 2.2.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.2 and 4.3; agriculture and forestry resources related response to comments in Chapter 8 of the Final SEIR, and all other aesthetic and forestry resources related evidence in the administrative record.

5. **Significant Effect: Conflict with Agricultural or Forest Zoning:** Implementation of GHG Reduction Measure E-2.1 that would result in the development of large scale renewable energy projects would potentially result in direct and cumulative impacts to Williamson Act contracts and agricultural zoning because at a programmatic level it is not possible to ensure that zoning conflicts would not occur (AG-3, AG-4) (See Final SEIR p. 2.2-13 through 2.2-17; p. 4-57 through 4-58).

   **Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

   **Mitigation Measures:**

   **CAP Mitigation Measure M-AGR-1:** See description above (Final SEIR p. 2.2-21 through 23).

   **Facts in Supporting Findings:** The policies applicable to agricultural and forestry resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-7.1, LU-7.2, COS-6.2, COS-6.4 (Final SEIR pages 2.2-4 to 2.2-3). The mitigation measures applicable to agricultural and forestry resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Agr-1.1, Agr-1.2, Agr-1.3, Agr-1.4, Agr-1.5, Agr-2.1 (Final SEIR p. 2.2-5).

   Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-AGR-1, because the specific locations for renewable energy projects have not yet been identified and it is unknown how many and what types of projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that all Williamson Act and agricultural zoning conflict impacts would be reduced. No other feasible mitigation is available. For the reasons stated in Section 2.2.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

   **Reference:** Final SEIR Section 2.2 and 4.3; agriculture and forestry resources related response to comments in Chapter 8 of the Final SEIR, and all other aesthetic and forestry resources related evidence in the administrative record.

6. **Significant Effect: Direct or Indirect Conversion of Forest Land:** Implementation of GHG Reduction Measure E-2.1 that would result in the development of large scale renewable energy projects would potentially result in direct and cumulative impacts to direct or indirect conversion or loss of forest land because at a programmatic level, it is not possible to ensure that no impacts to forest resources would occur (AG-5, AG-6) (See Final SEIR p. 2.2-17 through 2.2-21; p. 4-58 through 4-59).

   **Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

   **Mitigation Measures:**

   **CAP Mitigation Measure M-AGR-1:** See description above (Final SEIR p. 2.2-23 through 24).

   **CAP Mitigation Measure M-AGR-2:** During the environmental review process for future MUPs for large-scale renewable energy projects, the County Guidelines for Determining Significance for Agriculture shall be applied. When impacts to forest land are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; and resource management (Final SEIR p. 2.2-21 through 23).

   **Facts in Supporting Findings:** The policies applicable to agricultural and forestry resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-7.1, LU-7.2, COS-6.2, COS-6.4 (Final SEIR p. 2.2-43 to 2.2-4). The mitigation measures applicable to agricultural and forestry resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Agr-1.1, Agr-1.2, Agr-1.3, Agr-1.4, Agr-1.5, and Agr-2.1 (Final SEIR p. 2.2-5).

   Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-AGR-1 and M-AGR-2, because the specific locations for renewable energy projects have not yet been identified and it is unknown how many and what types of projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that direct and indirect forest conversion impacts would not occur. No other feasible mitigation is available. For the reasons stated in Section 2.2.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

   **Reference:** Final SEIR Section 2.2 and 4.3; agriculture and forestry resources related response to comments in Chapter 8 of the Final SEIR, and all other aesthetic and forestry resources related evidence in the administrative record.

## C. Air Quality

7. **Significant Effect: Conformance to Federal and State Air Quality Standards:** Implementation of GHG Reduction Measure T-2.1 and Supporting Measures that would result in the development of bicycle, pedestrian, and park-and-ride infrastructure improvements would potentially result in direct and cumulative impacts to air quality standards because

construction emissions may lead to short-term air emissions such that air quality standards are exceeded (AIR-1, AIR-2). Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to air quality standards because construction emissions may lead to short-term air emissions such that air quality standards are exceeded (AIR-3, AIR-4). Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts related to air quality standards because construction emissions may lead to short-term air emissions such that air quality standards are exceeded (AIR-5, AIR-6). Implementation of GHG Reduction Measure SW-1.1 which would result in the development of new or expanded waste facilities would potentially result in direct and cumulative impacts related to air quality standards because construction emissions may lead to short-term air emissions such that air quality standards are exceeded (AIR-7, AIR-8) (See Final SEIR p. 2.3-21 through 2.3-32; p. 4-59 through 4-60).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

**Mitigation Measures:**

> **CAP Mitigation Measure M-AQ-1:** During the environmental review process for future discretionary permits for projects implemented under the CAP, the County Guidelines for Determining Significance for Air Quality shall be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: dust control efforts; grading or fuel use restrictions; use of modified equipment; and restrictions on vehicle idling time (Final SEIR p. 2.3-59 through 61).

**Facts in Supporting Findings:** The policies applicable to air quality that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-14.1, COS-14.2, COS-14.8, COS-14.9, COS-14.10, COS-15.1, COS-15.3, COS-15.4, COS-15.5, COS-15.6, COS-16.2, COS-16.3, COS-20.3, and LU-2.8 (Final SEIR p. 2.3-4 to 2.3-5). The mitigation measures applicable to air quality that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Air-12.1, Air-2.2, Air-2.3, Air-2.4, Air-2.5, Air-2.6, Air-2.7, Air-2.8, Air-2.9, Air-2.10, Air-2.11, Air-2.12, Air-2.13, and Air-4.1 (Final SEIR p.2.3-4 to 2.3-5).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-AQ-1, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures T-2.1, T-4.1, E-2., and SW-1.1 have not yet been identified and it is unknown how many projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that air quality violations would not occur. No other feasible mitigation beyond existing federal and state permitting requirements is available. For the reasons stated in Section 2.2.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.3 and 4.3; air quality related response to comments in Chapter 8 of the Final SEIR, and all other air quality related evidence in the administrative record.

8. **Significant Effect: Non-attainment of Criteria Pollutants:** Implementation of GHG Reduction Measure T-2.1 and Supporting Measures that would result in the development of bicycle, pedestrian, and park-and-ride infrastructure improvements would potentially result in direct and cumulative impacts to criteria air pollutants because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-9, AIR-10). Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to criteria air pollutants because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-11, AIR-12). Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts related to criteria air pollutants because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-13, AIR-14). Implementation of GHG Reduction Measure SW-1.1 which would result in the development of new or expanded waste facilities would potentially result in direct and cumulative impacts related to criteria air pollutants because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-15, AIR-16) (See Final SEIR p. 2.3-32 through 2.3-42; p. 4-60).

   **Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

   **Mitigation Measures:**

   **CAP Mitigation Measure M-AQ-1** See description above (Final SEIR p. 2.3-59 through 61).

   **CAP Mitigation Measure M-AQ-2:** Coordinate with SDAPCD in implementing pending Rule 67.25 to reduce emissions and odors from composting operations. The rule is expected to establish best management practices for chipping and grinding of green waste to produce materials for composting or other uses, and to better manage stockpile operations to reduce emissions (Final SEIR p. 2.3-61 through 62).

   **Facts in Supporting Findings:** The policies applicable to air quality that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-14.1, COS-14.2, COS-14.8, COS-14.9, COS-14.10, COS-15.1, COS-15.3, COS-15.4, COS-15.5, COS-15.6, COS-16.2, COS-16.3, COS-20.3, and LU-2.8 (Final SEIR p. 2.3-4 to 2.3-5). The mitigation measures applicable to air quality that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Air-12.1, Air-2.2, Air-2.3, Air-2.4, Air-2.5, Air-2.6, Air-2.7, Air-2.8, Air-2.9, Air-2.10, Air-2.11, Air-2.12, Air-2.13, and Air-4.1 (Final SEIR p. 2.3-6 to 2.3-7).

   Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-AQ-1 and M-AQ-2, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures T-2.1, T-4.1, E-2.1, and SW-1.1 has not yet been identified and it is unknown how many projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that significant non-attainment criteria air pollutant emissions would not occur. No other feasible mitigation beyond existing federal and state permitting requirements is available. For the

reasons stated in Section 2.2.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.3 and 4.3; air quality related response to comments in Chapter 8 of the Final SEIR, and all other air quality related evidence in the administrative record.

9. **Significant Effect: Sensitive Receptors:** Implementation of GHG Reduction Measure T-2.1 and Supporting Measures that would result in the development of bicycle, pedestrian, and park-and-ride infrastructure improvements would potentially result in direct and cumulative impacts to sensitive receptors because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-17, AIR-18). Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to sensitive receptors because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-19, AIR-20). Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts related to sensitive receptors because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-21, AIR-22). Implementation of GHG Reduction Measure SW-1.1 which would result in the development of new or expanded waste facilities would potentially result in direct and cumulative impacts related to sensitive receptors because construction emissions may lead to short-term air emissions such that standards are exceeded (AIR-23, AIR-24) (See Final SEIR p. 2.3-42 through 2.3-52; p. 4-60 through 4-61).

   **Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

   **Mitigation Measures:** No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

   **Facts in Supporting Findings:** The policies applicable to air quality that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-14.1, COS-14.2, COS-14.8, COS-14.9, COS-14.10, COS-15.1, COS-15.3, COS-15.4, COS-15.5, COS-15.6, COS-16.2, COS-16.3, COS-20.3, and LU-2.8 (Final SEIR p. 2.3-4 to 2.1-5). The mitigation measures applicable to air quality that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Air-12.1, Air-2.2, Air-2.3, Air-2.4, Air-2.5, Air-2.6, Air-2.7, Air-2.8, Air-2.9, Air-2.10, Air-2.11, Air-2.12, Air-2.13, and Air-4.1 (Final SEIR p. 2.3-6 to 2.3-7).

   Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures T-2.1, T-4.1, E-2.1, and SW-1.1 has not yet been identified and it is unknown how many projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that significant sensitive receptor impacts would not occur. No other feasible mitigation beyond existing federal and state permitting requirements is

available. For the reasons stated in Section 2.2.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.3 and 4.3; air quality related response to comments in Chapter 8 of the Final SEIR, and all other air quality related evidence in the administrative record.

10. **Significant Effect: Odors:** Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative odor impacts because the types of projects that could be considered may include heavy construction equipment and project locations are unknown (AIR-25, AIR-26). Implementation of GHG Reduction Measure SW-1.1 which would result in the development of new or expanded waste facilities would potentially result in direct and cumulative odor impacts from construction and operations of waste facilities (AIR-27, AIR-28) (See Final SEIR p. 2.3-52 through 2.3-59; p. 4-61 through 4-62).

    **Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

    **Mitigation Measures:**

    **CAP Mitigation Measure M-AQ-1:** See description above (Final SEIR p. 2.3-59 through 61).

    **CAP Mitigation Measure M-AQ-2:** See description above (Final SEIR p. 2.3-61 through 62).

    **CAP Mitigation Measure M-AQ-3:** The County shall use the policies set forth in the CARB's Land Use and Air Quality Handbook as a guideline for siting new sources of odor related to solid waste (Final SEIR p. 2.3-63).

    **CAP Mitigation Measure M-AQ-4:** Require project applicants to conduct an odor impact analysis and incorporate control measures including but not limited to rapid incorporation of food waste and biweekly turnover to maintain aerobic conditions for open systems, and wet or dry scrubbers or bioscrubber systems on enclosed structures to reduce impacts (Final SEIR p. 2.3-63).

    **Facts in Supporting Findings:** The policies applicable to air quality that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-14.1, COS-14.2, COS-14.8, COS-14.9, COS-14.10, COS-15.1, COS-15.3, COS-15.4, COS-15.5, COS-15.6, COS-16.2, COS-16.3, COS-20.3, and LU-2.8 (Final SEIR p. 2.3-4 to 2.1-5). The mitigation measures applicable to air quality that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Air-12.1, Air-2.2, Air-2.3, Air-2.4, Air-2.5, Air-2.6, Air-2.7, Air-2.8, Air-2.9, Air-2.10, Air-2.11, Air-2.12, Air-2.13, and Air-4.1 (Final SEIR p. 2.1-6 – 2.1-7).

    Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measures M-AQ-1, M-AQ-2, M-AQ-3 and M-AQ-4, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures T-4.1 and SW-1.1 has not yet been identified and it is unknown how many projects would be

required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that significant odor impacts would not occur. No other feasible mitigation beyond existing federal and state permitting requirements is available. For the reasons stated in Section 2.2.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.3 and 4.3; air quality related response to comments in Chapter 8 of the Final SEIR, and all other air quality related evidence in the administrative record.

## D. Biological Resources

**11. Significant Effect: Special-Status Species:** Implementation of GHG Reduction Measures T-2.1, SW-1.1, A-1.2 and their Supporting Efforts, could result in new or expanded park-and-ride facilities, new or expanded pedestrian and bicycle improvements, new or expanded solid waste facilities, and improvements related to agricultural equipment and could result in cumulative impacts to special-status species because projects could contribute to the disturbance or loss of special status species or their habitats (BIO-1).Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to special-status species because the construction of projects could disturb special status species or their habitats (BIO-2, BIO-3). Implementation of GHG Reduction Measures E-2.1, E-2.3, E-2.4, and Supporting Efforts could result in energy efficiency retrofits on existing residential, new non-residential structures, and County facilities including rooftop or ground-mounted photovoltaic solar arrays or small wind turbines, modern mechanical systems, and other similar improvements. These measures could result in potentially significant direct and cumulative impacts to special-status species or their habitats because of the construction and operation of small-scale renewable energy projects (BIO-4, BIO-5). Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts related to special-status species because of the construction and operation of large-scale renewable energy projects (BIO-6, BIO-7) (See Final SEIR p. 2.4-10 through 2.3-20; p. 4-62 through4-63).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

**Mitigation Measures:**

**CAP Mitigation Measure M-BIO-1:** During the environmental review process for future MUPs for large-scale renewable energy projects, the County Guidelines for Determining Significance for Biological Resources shall be applied. When impacts to biological resources are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: avoidance of sensitive resources; preservation of habitat; revegetation; resource management; and restrictions on lighting, runoff, access, and/or noise (Final SEIR 2.4-39 through 2.4-41).

**CAP Mitigation Measure M-BIO-2:** Update the County Guidelines for Determining Significance for Biological Resources to include, or incorporate by reference,

recommendations from the California Department of Fish and Wildlife, the Avian Power Line Interaction Committee, the USFWS Draft Guidance, and the California Energy Commission (e.g., California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development). Examples of recommended mitigation measures include: site screening; pre-permitting monitoring; acoustic monitoring; buffer zone inclusion; reduction of foraging resources near turbines and transmission lines; specific lighting to reduce bird collisions; post-construction monitoring; and avian protection plans (Final SEIR 2.4-39 through 2.4-41).

**Facts in Supporting Findings:** The policies applicable to biological resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-1.1, COS-1.2, COS-1.3, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-2.1, COS-2.2, COS-3.1, COS-3.2, LU-6.1, LU-6.2, LU-6.3, LU-6.6, LU-6.7, and LU-10.2 (Final SEIR p. 2.4-3 to 2.4-5). The mitigation measures applicable to biological resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Bio-1.2, Bio-1.3, Bio-1.4, Bio-1.5, Bio-1.6, Bio-1.7, Bio-2.1, Bio-2.2, Bio-2.3, and Bio-2.4 (Final SEIR p. 2.4-5 to 2.4-6).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-BIO-1 and M-BIO-2, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures A-2.1, T-2.1, T-4.1, E-1.2, E-2.1, E-2.3, E-2.4, and SW-1.1 and supporting efforts has not yet been identified and it is unknown how many projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that significant special-status species impacts would not occur. No other feasible mitigation beyond existing federal and state permitting requirements is available. For the reasons stated in Section 2.4.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.4 and 4; biological resources related response to comments in Chapter 8 of the Final SEIR, and all other biological resources related evidence in the administrative record.

12. **Significant Effect: Riparian Habitat or Sensitive Natural Community:** Implementation of GHG Reduction Measures T-2.1, SW-1.1, A-1.2 and their Supporting Efforts, could result in new or expanded park-and-ride facilities, new or expanded pedestrian and bicycle improvements, new or expanded solid waste facilities, and improvements related to agricultural equipment and could result in cumulative impacts to riparian habitat because projects could contribute to the disturbance or loss of riparian habitats (BIO-8).Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to riparian habitat because the construction of projects could disturb riparian habitat (BIO-9, BIO-10). Implementation of GHG Reduction Measures E-2.1, E-2.3, E-2.4, and Supporting Efforts could result in energy efficiency retrofits on existing residential, new non-residential structures, and County facilities including rooftop or ground-mounted photovoltaic solar arrays or small wind turbines, modern mechanical systems, and other similar improvements. These measures could result in potentially significant direct and cumulative impacts to riparian habitat because of the construction of small-scale renewable energy projects (BIO-11, BIO-12). Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative

impacts related to riparian habitat because of the construction of large-scale renewable energy projects (BIO-13, BIO-14) (Final SEIR p. 2.4-20 through 2.4-28; p. 4-63 to 4-64).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

**Mitigation Measures:**

**CAP Mitigation Measure M-BIO-1:** See description above (Final SEIR 2.4-39 through 2.4-41).

**CAP Mitigation Measure M-BIO-2:** See description above (Final SEIR 2.4-39 through 2.4-41).

**Facts in Supporting Findings:** The policies applicable to biological resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-1.1, COS-1.2, COS-1.3, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-2.1, COS-2.2, COS-3.1, COS-3.2, LU-6.1, LU-6.2, LU-6.3, LU-6.6, LU-6.7, and LU-10.2 (Final SEIR p. 2.4-3 to 2.4-5). The mitigation measures applicable to biological resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Bio-1.2, Bio-1.3, Bio-1.4, Bio-1.5, Bio-1.6, Bio-1.7, Bio-2.1, Bio-2.2, Bio-2.3, and Bio-2.4 (Final SEIR p. 2.4-5 to 2.4-6).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-BIO-1 and M-BIO-2, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures A-2.1, T-2.1, T-4.1, E-1.2, E-2.1, E-2.3, E-2.4, and SW-1.1 and supporting efforts has not yet been identified and it is unknown how many projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that significant riparian or sensitive natural community impacts would not occur. No other feasible mitigation beyond existing federal and state permitting requirements is available. For the reasons stated in Section 2.4.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.4 and 4.3; biological resources related response to comments in Chapter 8 of the Final SEIR, and all other biological resources related evidence in the administrative record.

13. **Significant Effect: Wildlife Movement Corridors and Nursery Sites:** Implementation of GHG Reduction Measures T-2.1, SW-1.1, A-1.2 and their Supporting Efforts, could result in new or expanded park-and-ride facilities, new or expanded pedestrian and bicycle improvements, new or expanded solid waste facilities, and improvements related to agricultural equipment and could result in direct and cumulative impacts to wildlife movement corridors and nursery sites because projects could occur outside of regional conservation plan areas (BIO-15, BIO-16).Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to wildlife movement corridors and nursery sites because the construction of projects could disturb corridors and nurseries where regional conservation plans are not in place (BIO-17, BIO-18). Implementation of GHG Reduction Measures E-2.1, E-2.3, E-2.4, and Supporting Efforts could result in energy efficiency retrofits on existing residential, new non-

residential structures, and County facilities including rooftop or ground-mounted photovoltaic solar arrays or small wind turbines, modern mechanical systems, and large-scale renewable energy projects. These measures could result in potentially significant direct and cumulative impacts to wildlife movement corridors and nurseries because of the ability to develop outside of regional conservation plans (BIO-19, BIO-20) (Final SEIR p. 2.4-31 through 2.4-37; p. 4-64 to 4-65).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

**Mitigation Measures:**

**CAP Mitigation Measure M-BIO-1:** See description above (Final SEIR 2.4-39 through 2.4-41).

**CAP Mitigation Measure M-BIO-2:** See description above (Final SEIR 2.4-39 through 2.4-41).

**Facts in Supporting Findings:** The policies applicable to biological resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-1.1, COS-1.2, COS-1.3, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-2.1, COS-2.2, COS-3.1, COS-3.2, LU-6.1, LU-6.2, LU-6.3, LU-6.6, LU-6.7, and LU-10.2 (Final SEIR p. 2.4-3 to 2.4-5). The mitigation measures applicable to biological resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Bio-1.2, Bio-1.3, Bio-1.4, Bio-1.5, Bio-1.6, Bio-1.7, Bio-2.1, Bio-2.2, Bio-2.3, and Bio-2.4 (Final SEIR p. 2.4-5 – 2.4-6).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-BIO-1 and M-BIO-2, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures A-2.1, T-2.1, T-4.1, E-1.2, E-2.1, E-2.3, E-2.4, and SW-1.1 and supporting efforts has not yet been identified, they could occur outside regional conservation plan areas, and it is unknown how many projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that significant wildlife movement corridors and nursery site impacts would not occur. No other feasible mitigation beyond existing federal and state permitting requirements is available. For the reasons stated in Section 2.4.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.4 and 4.3; biological resources related response to comments in Chapter 8 of the Final SEIR, and all other biological resources related evidence in the administrative record.

## E. Cultural and Historical Resources

**14. Significant Effect: Historical Resources:** Implementation of GHG Reduction Measures T-2.1, T-4.1, E-2.1, E-2.3, SW-1.1 and Supporting Efforts that would result in bicycle, pedestrian and park-and-ride facilities, direct investment projects, energy efficiency improvements and the introduction of small-scale solar photovoltaic and small wind turbines, or large-scale renewable energy projects, and solid waste facilities could result in potentially significant direct

and cumulative impacts related to historical resources because of the possibility of implementing retrofits on historic structures, disturbing historic structures, or changing the setting within which an historic structure is located (CULT-1, CULT-2) (Final SEIR p. 2.5-9 through 2.5-13; p. 4-65 to 4-66).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

**Mitigation Measures:**

**CAP Mitigation Measure M-CUL-1:** For all small-scale wind turbine projects, the County shall provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources. This will be done by reaching out to property owners with identified historic resources to participate (Final SEIR p. 2.5-31 through 2.5-32).

**Facts in Supporting Findings:** The policies applicable to cultural and historic resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-7.1, COS-7.2, COS-7.3, COS-7.4, COS-7.5, COS-7.6, COS-8.1, COS-8.2, COS-9.1, and COS-9.2 (Final SEIR p. 2.5-2 to 2.5-3). The mitigation measures applicable to cultural and historic resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Cul-1.1, Cul-1.2, Cul-1.3, Cul-1.4, Cul-1.5, Cul-1.6, Cul-1.7, Cul-1.8, Cul-2.1, Cul-2.2, Cul-2.3, Cul-2.4, Cul-2.5, Cul-2.6, Cul-3.1, Cul-3.2, and Cul-4.1 (Final SEIR p. 2.5-4 to 2.5-5).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-CUL-1, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures T-2.1, T-4.1, E-2.1, E-2.3, and SW-1.1 and supporting efforts has not yet been identified, they could be located on or near historic structures, could occur without discretionary review, and because it is unknown how many projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that significant historic resources impacts would not occur. No other feasible mitigation beyond existing federal and state permitting requirements is available. For the reasons stated in Section 2.5.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.5 and 4.3; cultural and historical resources related response to comments in Chapter 8 of the Final SEIR, and all other cultural and historical resources related evidence in the administrative record.

15. **Significant Effect: Archaeological Resources:** Implementation of GHG Reduction Measures E-2.1, and E-2.4 which would result in the development of new small-scale wind turbines could potentially result in direct and cumulative impacts related to archaeological resources because they are permitted as an accessory use (if zoning criteria met) and could result in impacts because of ground disturbance (CULT-3, CULT-4) (Final SEIR p. 2.5-13 through 2.5-20; p. 4-67).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

**Mitigation Measures:** No feasible mitigation is available because of the lack of discretionary review and ability to mitigate as a condition of a permit.

**Facts in Supporting Findings:** The policies applicable to cultural and historical resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-7.1, COS-7.2, COS-7.3, COS-7.4, COS-7.5, COS-7.6, COS-8.1, COS-8.2, COS-9.1, and COS-9.2 (Final SEIR p. 2.5-2 to 2.5-3). The mitigation measures applicable to cultural and historical resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Cul-1.1, Cul-1.2, Cul-1.3, Cul-1.4, Cul-1.5, Cul-1.6, Cul-1.7, Cul-1.8, Cul-2.1, Cul-2.2, Cul-2.3, Cul-2.4, Cul-2.5, Cul-2.6, Cul-3.1, Cul-3.2, and Cul-4.1 (Final SEIR p.2.5-4 to 2.5-6).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures E-2.1, and E-2.4 and supporting efforts has not yet been identified, small-scale wind turbines could be approved without discretionary review and could have the potential to result in significant archaeological impacts that would not be mitigated by County mitigation policies. No other feasible mitigation is available. For the reasons stated in Section 2.5.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.5 and 4.3; cultural and historical resources related response to comments in Chapter 8 of the Final SEIR, and all other cultural and historical resources related evidence in the administrative record.

16. **Significant Effect: Paleontological Resources:** Implementation of GHG Reduction Measures E-2.1, and E-2.4 which would result in the development of new small-scale wind turbines could potentially result in direct and cumulative impacts related to paleontological resources because they are permitted as an accessory use (if zoning criteria met) and could result in impacts because of ground disturbance (CULT-5, CULT-6) (Final SEIR p. 2.5-20 through 2.5-25; p. 4-67 to 4-68).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

**Mitigation Measures:** No feasible mitigation available because of the lack of discretionary review and ability to mitigate as a condition of a permit.

**Facts in Supporting Findings:** The policies applicable to cultural and historic resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-7.1, COS-7.2, COS-7.3, COS-7.4, COS-7.5, COS-7.6, COS-8.1, COS-8.2, COS-9.1, and COS-9.2 (Final SEIR p. 2.5-2 to 2.5-3). The mitigation measures applicable to cultural and historic resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Cul-1.1, Cul-1.2, Cul-1.3, Cul-1.4, Cul-1.5, Cul-1.6, Cul-1.7, Cul-1.8, Cul-

2.1, Cul-2.2, Cul-2.3, Cul-2.4, Cul-2.5, Cul-2.6, Cul-3.1, Cul-3.2, and Cul-4.1 (Final SEIR p. 2.5-4 to 2.5-5).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures E-2.1, and E-2.4 and supporting efforts has not yet been identified, small-scale wind turbines could be approved without discretionary review and could have the potential to result in significant paleontological impacts that would not be mitigated by County mitigation policies. No other feasible mitigation is available. For the reasons stated in Section 2.5.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.5 and 4.3; cultural and historical resources related response to comments in Chapter 8 of the Final SEIR, and all other cultural and historical resources related evidence in the administrative record.

17. **Significant Effect: Human Remains:** Implementation of GHG Reduction Measures E-2.1, and E-2.4 which would result in the development of new small-scale wind turbines could potentially result in direct and cumulative impacts related to human remains because they are permitted as an accessory use (if zoning criteria met) and could result in impacts because of ground disturbance (CULT-7, CULT-8). (Final SEIR p. 2.5-26 through 2.5-31; p. 4-68 to 4-69).

    **Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

    **Mitigation Measures:** No feasible mitigation available because of the lack of discretionary review and ability to mitigate as a condition of a permit.

    **Facts in Supporting Findings:** The policies applicable to cultural and historic resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-7.1, COS-7.2, COS-7.3, COS-7.4, COS-7.5, COS-7.6, COS-8.1, COS-8.2, COS-9.1, and COS-9.2 (Final SEIR p. 2.5-2 to 2.5-3). The mitigation measures applicable to cultural and historic resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Cul-1.1, Cul-1.2, Cul-1.3, Cul-1.4, Cul-1.5, Cul-1.6, Cul-1.7, Cul-1.8, Cul-2.1, Cul-2.2, Cul-2.3, Cul-2.4, Cul-2.5, Cul-2.6, Cul-3.1, Cul-3.2, and Cul-4.1 (Final SEIR p. 2.5-4 to 2.5-5).

    Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures E-2.1 and E-2.4 and supporting efforts has not yet been identified, small-scale wind turbines could be approved without discretionary review and could have the potential to result in significant human remains impacts that would not be mitigated by County mitigation policies. No other feasible mitigation is available. For the reasons stated in Section 2.5.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.5 and 4.3; cultural and historical resources related response to comments in Chapter 8 of the Final SEIR, and all other cultural and historical resources related evidence in the administrative record.

## F. Greenhouse Gas Emissions

**18. Significant Effect: GHG Emissions:** Implementation of the CAP would reduce emissions by 2020 and 2030, consistent with legislatively-adopted State targets and would, therefore, not result in a significant impact. However, considering the need for future implementation actions to achieve the emissions reductions necessary to achieve the 2050 goal, the impacts from the CAP are conservatively considered to be significant and unavoidable (GHG-1).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

**Mitigation Measures:** No feasible mitigation is available.

**Facts in Supporting Findings:** The policies applicable to GHG emissions that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-10.7, COS-15.1, COS-15.2, COS-15.3, COS-17.1, COS-17.5, COS-18.2, COS-20.1, COS-20.2, and COS-20.4 (Final SEIR p. 2.7-10 to 2.7-11). The mitigation measures applicable to GHG emissions that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include CC-1.1, CC-1.2, CC-1.3, CC-1.4, CC-1.5, CC-1.6, CC-1.7, CC-1.8, CC-1.9, CC-1.10, CC-1.11, CC-1.12, CC-1.13, CC-1.14, CC-1.15, CC-1.16, CC-1.17, CC-1.19, and CC-1.19 (Final SEIR p. 2.7-11 to 2.7-15).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-GHG-1, GHG Reduction Measures and supporting efforts would not achieve the long-term 2050 goal for GHG emissions reductions and it would be speculative to demonstrate achievement of the goal with the information and science available today. No other feasible mitigation is available. For the reasons stated in Section 2.7.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable. (Final SEIR p. 2.7-36 to 2.7-40).

**Reference:** Final SEIR Section 2.7 and 4.3; GHG-related response to comments in Chapter 8 of the Final SEIR, and all other GHG-related evidence in the administrative record.

## G. Hazards and Hazardous Materials

**19. Significant Effect: Wildland Fires:** Implementation of GHG Reduction Measures E-2.1, E-2.3, and E-2.4 which would result in the development of new small-scale wind turbines could potentially result in direct and cumulative impacts related to wildland fires because of construction and operational components which include mechanical equipment and electrical components adjacent to vegetation (HAZ-1, HAZ-2). Implementation of GHG Reduction Measures E-2.1 which would result in the development of new large-scale renewable energy projects could potentially result in direct and cumulative impacts related to wildland fires because of construction and

operational components which include mechanical equipment and electrical components adjacent to vegetation (HAZ-3, HAZ-4) (Final SEIR 2.8-24 through 2.8-31; p. 4-69).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

**Mitigation Measures:**

**CAP Mitigation Measure M-HAZ-1:** During the environmental review process for future discretionary permits for all renewable energy projects, the County Guidelines for Determining Significance for Wildland Fire & Fire Protection shall be applied. When impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: installation of fire suppression systems; sufficient on-site water storage; inclusion of fire management zones; and funded agreements with fire protection districts (Final SEIR 2.8-32 to 2.8-33).

**Facts in Supporting Findings:** The policies applicable to hazards and hazardous materials that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-6.11, S-1.3, S-3.1, S-3.2, S-3.3, S-3.4, S-3.6, S-4.1, S-15.1, S-15.2, S-15.3, M-1.2, M-3.3, M-7.1 (Final SEIR p. 2.8-3 to 2.8-4). The mitigation measures applicable to hazards and hazardous materials that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Haz-1.2, Haz-1.3, Haz-1.4, Haz-1.5, Haz-2.1, Haz-3.1, Haz-3.2, Haz-3.3, Haz-4.1, Haz-4.2, Haz-4.3, and Haz-4.4 (Final SEIR p. 2.8-4 to 2.8-6).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures and CAP Mitigation Measure M-HAZ-1, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures E-2.1, E-2.3, and E-2.4 and supporting efforts has not yet been identified, they could occur adjacent to vegetation and areas susceptible to wildland fires, and it is unknown how many projects would be required to meet the GHG reduction goals of the CAP, it is not possible to guarantee that significant wildfire impacts would not occur. No other feasible mitigation is available. For the reasons stated in Section 2.8.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.8 and 4.3; hazards and hazardous materials related response to comments in Chapter 8 of the Final SEIR, and all other hazards and hazardous materials related evidence in the administrative record.

## H. Hydrology and Water Quality

**20. Significant Effect: Water Quality Standards:** Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to water quality standards because of construction activities and the uncertainty about the types of projects that would be undertaken (HYD-1, HYD-2) (Final SEIR p. 2.9-16 to 2.9-18; p. 4-71 to 4-72).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR. Effects remain significant and unavoidable.

**Mitigation Measures:** No feasible mitigation available.

**Facts in Supporting Findings:** The policies applicable to hydrology and water quality that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-6.5, LU-6.9, LU-6.10, LU-6.12, LU-8.1, LU-8.2, LU-13.1, LU-13.2, LU-14.1, LU-14.2, LU-14.3, LU-14.4, COS-4.1, COS-4.2, COS-4.3, COS-4.4, COS-5.1, COS-5.2, COS-5.3, COS-5.5, S-8.1, S-8.2, S-9.1, S-9.2, S-9.3, S-9.4, S-9.5, S-9.6, S-10.1, S-10.2, S-10.3, S-10.4, S-10.5, and S-10.6 (Final SEIR p. 2.9-2 to 2.9-6). The mitigation measures applicable to hydrology and water quality that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-1.6, Hyd-1.7, Hyd-1.8, Hyd-1.9, Hyd-1.10, Hyd-2.1, Hyd-2.2, Hyd-2.3, Hyd-2.4, Hyd-2.5, Hyd-3.1, Hyd-3.2, Hyd-3.3, Hyd-4.1, Hyd-4.2, Hyd-4.3, Hyd-6.1, Hyd-8., and Hyd-8.2 (Final SEIR p. 2.9-6 to 2.1-9).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measure T-4.1 and supporting efforts has not yet been identified, it is not possible to guarantee that significant water quality impacts would not occur. No other feasible mitigation is available. For the reasons stated in Section 2.9.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.9 and 4.3; hydrology and water quality related response to comments in Chapter 8 of the Final SEIR, and all other hydrology and water quality related evidence in the administrative record.

**21. Significant Effect: Groundwater Supplies:** Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to groundwater resources because of the potential need for additional groundwater resources (HYD-3, HYD-4). Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to groundwater resources because of construction and operational activities and the uncertainty about the types of projects that would be undertaken (HYD-5, HYD-6) (Final SEIR p. 2.9-18 to 2.9-24; p. 4.-72).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR. Effects remain significant and unavoidable.

**Mitigation Measures:** No feasible mitigation is available.

**Facts in Supporting Findings:** The policies applicable to hydrology and water quality that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-6.5, LU-6.9, LU-6.10, LU-6.12, LU-8.1, LU-8.2, LU-13.1, LU-13.2, LU-14.1, LU-14.2, LU-14.3, LU-14.4, COS-4.1, COS-4.2, COS-4.3, COS-4.4, COS-5.1, COS-5.2, COS-5.3, COS-5.5, S-8.1, S-8.2, S-9.1, S-9.2, S-9.3, S-9.4, S-9.5, S-9.6, S-10.1, S-10.2, S-10.3, S-10.4, S-10.5, and S-10.6 (Final SEIR p. 2.9-2 to 2.9-6). The mitigation measures applicable to hydrology

and water quality that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-1.6, Hyd-1.7, Hyd-1.8, Hyd-1.9, Hyd-1.10, Hyd-2.1, Hyd-2.2, Hyd-2.3, Hyd-2.4, Hyd-2.5, Hyd-3.1, Hyd-3.2, Hyd-3.3, Hyd-4.1, Hyd-4.2, Hyd-4.3, Hyd-6.1, Hyd-8., and Hyd-8.2 (Final SEIR p. 2.9-6 to 2.1-9).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures E-2.1 and T-4.1 and supporting efforts has not yet been identified, it is not possible to guarantee that significant groundwater impacts would not occur because of the nature of the projects and the potential demand for large amounts of water. No other feasible mitigation is available. For the reasons stated in Section 2.9.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.9 and 4.3; hydrology and water quality related response to comments in Chapter 8 of the Final SEIR, and all other hydrology and water quality related evidence in the administrative record.

22. **Significant Effect: Alter Drainage Pattern of a Site Resulting in Erosion, Siltation, or Flooding:** Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to drainage patterns because of construction and operational activities and the uncertainty about the types of projects that would be undertaken (HYD-7, HYD-8) (Final SEIR p. 2.9-24 to 2.9-29; p. 4-72 to 4-73).

    **Finding:** Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. Effects remain significant and unavoidable.

    **Mitigation Measures:** No feasible mitigation available.

    **Facts in Supporting Findings:** The policies applicable to hydrology and water quality that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-6.5, LU-6.9, LU-6.10, LU-6.12, LU-8.1, LU-8.2, LU-13.1, LU-13.2, LU-14.1, LU-14.2, LU-14.3, LU-14.4, COS-4.1, COS-4.2, COS-4.3, COS-4.4, COS-5.1, COS-5.2, COS-5.3, COS-5.5, S-8.1, S-8.2, S-9.1, S-9.2, S-9.3, S-9.4, S-9.5, S-9.6, S-10.1, S-10.2, S-10.3, S-10.4, S-10.5, and S-10.6 (Final SEIR p. 2.9-2 to 2.9-6). The mitigation measures applicable to hydrology and water quality that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-1.6, Hyd-1.7, Hyd-1.8, Hyd-1.9, Hyd-1.10, Hyd-2.1, Hyd-2.2, Hyd-2.3, Hyd-2.4, Hyd-2.5, Hyd-3.1, Hyd-3.2, Hyd-3.3, Hyd-4.1, Hyd-4.2, Hyd-4.3, Hyd-6.1, Hyd-8., and Hyd-8.2 (Final SEIR p. 2.9-6 to 2.1-9).

    Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measure T-4.1 and supporting efforts has not yet been identified, it is not possible to guarantee that significant drainage impacts would not occur because the design and siting characteristics of these project vary widely. No other feasible mitigation is available. For the reasons stated in Section 2.9.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.9 and 4.3; hydrology and water quality related response to comments in Chapter 8 of the Final SEIR, and all other hydrology and water quality related evidence in the administrative record.

## I. Land Use and Planning

**23. Significant Effect: Physically Divide Established Community:** Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to physical division of communities because of the potential need for road improvements (LU-1, LU-2). Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to physical division of communities because of the uncertainty about the types of projects that would be undertaken and locations of projects (LU-3, LU-4) (Final SEIR p. 2.10-11 to 10-16; p. 4-73 to 4-74).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR. Effects remain significant and unavoidable.

**Mitigation Measures:** No feasible mitigation available.

**Facts in Supporting Findings:** The policies applicable to land use and planning that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-2.1, LU-9.3, LU-9/10, LU-11.2, LU-12.4, H-2.1 (Final SEIR p. 2.10-6). The mitigation measures applicable to land use and planning that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Lan-1.1, Lan-1.2, Lan-1.3 (Final SEIR p. 2.10-6 to 2.10-7).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures E-2.1 and T-4.1 and supporting efforts has not yet been identified, it is not possible to guarantee that community division impacts would not occur because projects could result in the construction of roads that divide existing communities. No other feasible mitigation is available. For the reasons stated in Section 2.10.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.10 and 4.3; land use and planning related response to comments in Chapter 8 of the Final SEIR, and all other land use and planning related evidence in the administrative record.

## J. Noise

**24. Significant Effect: Excessive Noise Levels:** Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to excessive noise levels because of possible low-frequency noise associated with large wind turbines (NOI-1, NOI-2).Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to

excessive noise levels because of construction activities and the uncertainty about the types of projects that would be undertaken and locations of projects (NOI-3, NOI-4) (Final SEIR p. 2.11-9 to 2.11-17; p. 4-74 through 4-75).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR. Effects remain significant and unavoidable.

**Mitigation Measures:** No feasible mitigation available.

**Facts in Supporting Findings:** The policies applicable to noise that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-2.8, M-2.4, N-1.4, N-1.5, N-2.1, N-2.2, N-3.1, N-4.1, N-4.2, N-4.3, N-4.5, N-6.1, N-6.2, N-6.3, N-6.4, N-6.5, N-6.6, and S-15.1(Final SEIR p. 2.11-2 to 2.11-3). The mitigation measures applicable to noise that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Noi-1.1, Noi-1.2, Noi-1.3, Noi-1.4, Noi-1.5, Noi-1.7, Noi-1.8, Noi-1.9, Noi-2.1, Noi-2.2, Noi-2.4, Noi-3.1, Noi-3.2, Noi-4.1, Noi-4.2, Noi-5.1, Noi-5.2, and Noi-5.3 (Final SEIR p. 2.11-4 to 2.11-6).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures E-2.1 and T-4.1 and supporting efforts has not yet been identified, and noise waivers could be granted, it is not possible to guarantee that noise impacts would not occur because it cannot be determined with certainty that impacts would be reduced below a level of significance. No other feasible mitigation is available. For the reasons stated in Section 2.11.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.11 and 4.3; noise related response to comments in Chapter 8 of the Final SEIR, and all other noise related evidence in the administrative record.

**25. Significant Effect: Permanent Increase in Ambient Noise Levels**: Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to permanent increase in ambient noise levels because of possible low-frequency noise associated with large wind turbines (NOI-5, NOI-6).Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to permanent increase in ambient noise levels because of construction activities and the uncertainty about the types of projects that would be undertaken and locations of projects (NOI-7, NOI-8) (Final SEIR p. 2.11-20 to 2.11-24; p. 4-75 to 4-76).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR. Effects remain significant and unavoidable.

**Mitigation Measures:** No feasible mitigation available.

**Facts in Supporting Findings:** The policies applicable to noise that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-2.8, M-2.4, N-1.4, N-1.5, N-2.1, N-2.2, N-3.1, N-4.1, N-4.2, N-4.3, N-4.5, N-6.1, N-6.2, N-6.3, N-6.4, N-6.5, N-6.6, and S-

15.1(Final SEIR p. 2.11-2 to 2.11-3). The mitigation measures applicable to noise that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Noi-1.1, Noi-1.2, Noi-1.3, Noi-1.4, Noi-1.5, Noi-1.7, Noi-1.8, Noi-1.9, Noi-2.1, Noi-2.2, Noi-2.4, Noi-3.1, Noi-3.2, Noi-4.1, Noi-4.2, Noi-5.1, Noi-5.2, and Noi-5.3 (Final SEIR p.2.11-4 to 2.11-6).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures E-2.1 and T-4.1 and supporting efforts has not yet been identified, and noise waivers could be granted, it is not possible to guarantee that noise impacts would not occur because it cannot be determined with certainty that impacts would be reduced below a level of significance. No other feasible mitigation is available. For the reasons stated in Section 2.11.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.11 and 4.3; noise related response to comments in Chapter 8 of the Final SEIR, and all other noise related evidence in the administrative record.

**26. Significant Effect: Temporary or Periodic Increase in Ambient Noise Levels:** Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to periodic increase in ambient noise levels because of possible low-frequency noise associated with large wind turbines (NOI-9, NOI-10).Implementation of GHG Reduction Measure T-4.1 which would result in the development of local direct investment projects would potentially result in direct and cumulative impacts to periodic increase in ambient noise levels because of construction activities and the uncertainty about the types of projects that would be undertaken and locations of projects (NOI-11, NOI-12**)** (Final SEIR p. 2.11-24 to 2.11-30; p. 4-76 to 4-77).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR. Effects remain significant and unavoidable.

**Mitigation Measures:** No feasible mitigation available.

**Facts in Supporting Findings:** The policies applicable to noise that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-2.8, M-2.4, N-1.4, N-1.5, N-2.1, N-2.2, N-3.1, N-4.1, N-4.2, N-4.3, N-4.5, N-6.1, N-6.2, N-6.3, N-6.4, N-6.5, N-6.6, and S-15.1 (Final SEIR p. 2.11-2 to 2.11-3). The mitigation measures applicable to noise that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Noi-1.1, Noi-1.2, Noi-1.3, Noi-1.4, Noi-1.5, Noi-1.7, Noi-1.8, Noi-1.9, Noi-2.1, Noi-2.2, Noi-2.4, Noi-3.1, Noi-3.2, Noi-4.1, Noi-4.2, Noi-5.1, Noi-5.2, and Noi-5.3 (Final SEIR p. 2.11-4 to 2.11-6).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measures E-2.1 and T-4.1 and supporting efforts has not yet been identified, and noise waivers could be granted, it is not possible to guarantee that noise impacts would not occur because it cannot be determined with certainty that impacts would be reduced below a level of significance. No other feasible mitigation is available. For the reasons stated in Section

2.11.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.11 and 4.3; noise related response to comments in Chapter 8 of the Final SEIR, and all other noise related evidence in the administrative record.

## K. Transportation and Traffic

**27. Significant Effect: LOS and Conflicts with Plans, Policies, or Ordinances:** Implementation of GHG Reduction Measure E-2.1 which would result in the development of large-scale renewable energy projects would potentially result in direct and cumulative impacts to LOS and conflicts with circulation management because of temporary construction activities (TRA-1, TRA-2) (Final SEIR p. 2.12-14 to 2.12-19; p. 4-77 to 4-78).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR. Effects remain significant and unavoidable.

**Mitigation Measures:**

**CAP Mitigation Measure M-TRAF-1:** During the environmental review process for future Major Use Permits for all large-scale renewable energy projects, the County Guidelines for Determining Significance for Transportation and Traffic shall be applied. When traffic impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated. Examples of standard mitigation measures within the County Guidelines include: traffic signal improvements; physical road improvements; street re-striping and parking prohibitions; fair share contributions toward identified, funded and scheduled projects; and transportation demand management programs (Final SEIR p. 2.12-27 to 2.12-28).

**Facts in Supporting Findings:** The policies applicable to transportation and traffic that were adopted as part of the 2011 GPU and are applicable to the project include Policy LU-2.8, LU-5.1, LU-5.4, LU-5.5, LU-6.9, LU-6.10, LU-9.8, LU-10.4, LU-11.6, LU-11.8, LU-12.2, M-1.1, M-1.2, M-1.3, M-2.1, M-2.2, M-2.3, M-3.1, M-3.2, M-3.3, M-4.2, M-4.3, M-4.4, M-4.5, M-4.6, M-5.1, M-5.2, M-8.1, M-8.2, M-8.3, M-8.4, M-8.5, M-8.6, M-8.7, M-8.8, M-9.1, M-9.2, M-9.3, M-9.4, M-10.1, M-10.2, M-10.3, M-10.4, M-11.1, M-11.2, M-11.3, M-11.4, M-11.5, M-11.6, M-11.7, S-3.4, S-3.5, and S-14.1 (Final SEIR p. 2.12-3 to 2.12-9). The mitigation measures applicable to transportation and traffic that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Tr-1.1, Tra-1.2, Tra-1.3, Tra-1.4, Tra-1.5, Tra-1.6, Tra-1.7, Tra-2.1, Tra-3.1, Tra-4.1, Tra-4.2, Tra-4.3, Tra-4.4, Tra-5.1, Tra-5.2, Tra-5.3, Tra-6.1, Tra-6.2, Tra-6.3, Tra-6.4, Tra-6.5, Tra-6.6, Tra-6.7, Tra-6.8, and Tra-6.9 (Final SEIR p. 2.12-9 to 2.1-11).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, and CAP Mitigation Measure M-TRAF-1, because the specific sizes and locations of facilities and projects implemented under GHG Reduction Measure E-2.1 has not yet been identified, it is not possible to guarantee that traffic impacts would not occur because it cannot be determined with certainty that impacts would be reduced below a level of significance. No

other feasible mitigation is available. For the reasons stated in Section 2.12.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.9 and 4.3; traffic related response to comments in Chapter 8 of the Final SEIR, and all other traffic related evidence in the administrative record.

## L. Tribal Cultural Resources

**28. Significant Effect: Tribal Cultural Resources:** Implementation of GHG Reduction Measures T-2.1, T-4.1, E-2.1, SW-1.1 and Supporting Efforts which would result in the development of bicycle, pedestrian, park-and-ride facilities, local direct investment projects, large-scale renewable energy projects, and waste facilities would potentially result in direct and cumulative impacts related to tribal cultural resources because at a programmatic level it is not possible to ensure that significant impacts can be fully mitigated due to speculation regarding location, size, and magnitude of future projects (TCR-1, TCR-2) (Final SEIR p. 2.13-6 to 2.13-9; p. 4-78 to 4-79).

**Finding:** Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR. Effects remain significant and unavoidable.

**Mitigation Measures:**

**CAP Mitigation Measure M-TCR-1:** Facilitate the identification of tribal cultural resources through field studies, collaboration with agencies, tribes, and institutions, such as the South Coastal Information Center, while maintaining the confidentiality of sensitive cultural information (Final SEIR p. 2.13-9).

**CAP Mitigation Measure M-TCR-2:** Require development to avoid tribal cultural resources, if feasible. If complete avoidance is not possible, require development to mitigate impacts to tribal cultural resources pursuant to Assembly Bill 52 (Final SEIR p. 2.13-9).

**CAP Mitigation Measure M-TCR-3:** Support the dedication of easements that protect tribal cultural resources (Final SEIR p. 2.13-9).

**CAP Mitigation Measure M-TCR-4:** Protect significant tribal cultural resources through regional coordination and consultation with the Native American Heritage Commission and local tribal governments, including Senate Bill 18 and Assembly Bill 52 consultation (Final SEIR p. 2.13-9).

**Facts in Supporting Findings:** The policies applicable to tribal cultural resources that were adopted as part of the 2011 GPU and are applicable to the project include Policy COS-7.4 and COS-7.6 (Final SEIR p. 2.13-2). The mitigation measures applicable to tribal cultural resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project include Cul-2.1, Cul-2.2, Cul-2.4, and Cul-2.6 (Final SEIR p. 2.13-2 to 2.13-3).

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, and CAP Mitigation Measure M-TCR-1, M-TCR-2, M-TCR-3, and M-TCR-4, because the specific sizes and locations of facilities and projects implemented under GHG Reduction

Measure T-2.1, T-4.1, E-2.1, and SW-1.1 supporting efforts has not yet been identified, it is not possible to guarantee that tribal cultural resources impacts would not occur. No other feasible mitigation is available. For the reasons stated in Section 2.12.5 and 4.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

**Reference:** Final SEIR Section 2.13 and 4.3; tribal cultural resources related response to comments in Chapter 8 of the Final SEIR, and all other hydrology and tribal cultural resources in the administrative record.

## IV. FINDINGS REGARDING SPECIFIC MITIGATION MEASURES

The Final SEIR identifies mitigation measures that the County has determined to be infeasible as listed below.

- As discussed in Sections 2.1.5 of the Final SEIR, other mitigation was considered to reduce aesthetic impacts but was ultimately determined to be infeasible (e.g., development cap, Wind Energy Ordinance mitigation).

- As discussed in Sections 2.2.5 of the Final SEIR, other mitigation was considered to reduce agriculture and forestry impacts but was ultimately determined to be infeasible (e.g., development cap, Wind Energy Ordinance mitigation).

- As discussed in Sections 2.3.5 of the Final SEIR, other mitigation was considered to reduce air quality impacts but was ultimately determined to be infeasible (e.g., development cap, Wind Energy Ordinance mitigation).

- As discussed in Sections 2.4.5 of the Final SEIR, other mitigation was considered to reduce biological resources impacts but was ultimately determined to be infeasible (e.g., development cap, Wind Energy Ordinance mitigation).

- As discussed in Sections 2.5.5 of the Final SEIR, other mitigation was considered to reduce cultural and historical resources impacts but was ultimately determined to be infeasible (e.g., development cap, Wind Energy Ordinance mitigation).

- As discussed in Sections 2.8.5 of the Final SEIR, other mitigation was considered to reduce hazards and hazardous material impacts but was ultimately determined to be infeasible (e.g., development cap, Wind Energy Ordinance mitigation).

- As discussed in Sections 2.10.5 of the Final SEIR, other mitigation was considered to reduce land use and planning impacts but was ultimately determined to be infeasible (e.g., development cap, Wind Energy Ordinance mitigation).

- As discussed in Sections 2.11.5 of the Final SEIR, other mitigation was considered to reduce noise impacts but was ultimately determined to be infeasible (e.g., development cap).

- As discussed in Sections 2.12.5 of the Final SEIR, other mitigation was considered to reduce traffic impacts but was ultimately determined to be infeasible (e.g., development cap, Wind Energy Ordinance mitigation).

All the mitigation measures identified in the Final SEIR are feasible and will be adopted. No alternative mitigation measures for impacts identified as significant in the Final SEIR were suggested during public review of the Final SEIR and were determined to be feasible. Except for those mitigation measures set forth in the adopted Mitigation Monitoring and Reporting Program, discussed in the Final SEIR, and explained in these findings, the County of San Diego finds that there are no feasible mitigation measures that would substantially lessen or avoid any significant effect that the project would have on the environment.

## V. FINDINGS REGARDING ALTERNATIVES

Section 15126.6(a) of the State CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Section 15126.6(f) further states that the "range of alternatives in an EIR is necessary to permit a reasoned choice." Thus, the following discussion focuses on project alternatives that are capable of eliminating significant environmental impacts or substantially reducing them as compared to Modified Option 3, even if the alternative would impede the attainment of some project objectives or would be costlier. Consistent with the California Supreme Court Ruling in *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings*, however, the County's analysis of alternatives is limited to the consideration of projects that could achieve the project's fundamental project objectives. (*In re Bay-Delta, 43 Cal.4th 1143, 1165* "an EIR need not study in detail an alternative that is infeasible or that the lead agency has reasonable determined cannot achieve the project's underlying fundamental purpose."]; see also, *San Diego Citizenry Group v. County of San Diego (2013) 219 Cal. App. 4th 1, 14.)*

Four alternatives to the Project were analyzed, including the No Project Alternative, Enhanced Direct Investment Alternative, 100% Renewable Energy Alternative, and the Increased Solid Waste Diversion Alternative. A comparison of those alternatives is presented in Table 1 below. Modified Option 3, which is the Increased Solid Waste Diversion Alternative, with removal of GHG Reduction Measures T-3.1 (alternative fuel in new residential and non-residential construction), E-1.1 (improve building efficiency in new residential development), E-1.3 (improve building energy efficiency in existing development), E-2.2 (increase renewable electricity in non-residential) and a revision to T-1.3 which would result in updating 15 community plans by 2030 will be presented to the decision makers for adoption. In implementing Modified Option 3, the direct investments required under GHG Reduction Measure T-4.1 would be reduced to 176,614 $MTCO_2e$. In addition, GHG Reduction Measure E-1.2 has been updated to be a requirement that all new and replacement water heaters in residential development be either solar, electrically-powered, or tankless gas by 2020, and will include a subsidy for replacement water heaters for participants meeting certain income criteria. Analysis of the components of this option is included in the Final SEIR (see Final SEIR 4.3.3.4) and is the project being considered for approval based on a consideration of the alternatives, project objectives, project benefits, environmental impacts, stakeholder input, and numerous other factors. In addition, several alternatives were considered

and rejected, as described in Section 4.2.1 of the Final SEIR, pursuant to CEQA Guidelines Section 15126.6(c).

These findings contrast and compare the alternatives where appropriate to demonstrate that the selection of Modified Option 3, while still causing certain unavoidable significant environmental impacts, would result in substantial environmental, planning, public safety, economic, and other benefits. In rejecting the balance of the alternatives that were analyzed in the Final SEIR, the County of San Diego has examined the project objectives and weighed the ability of each of the various alternatives to meet the objectives. The County finds that Modified Option 3 best meets the project objectives with the least environmental impact. The objectives that were adopted by the County, and which set the framework for the Project, are as follows:

1) reduce community and County operations GHG emissions to meet the County's GHG reduction targets for 2020 and 2030, and provide a mechanism to meet the County's projected 2050 goal;

2) identify GHG reduction strategies and measures that reduce GHG emissions from activities in the unincorporated areas and address the challenges of a changing climate and improve resilience over the long term;

3) update the County's General Plan and General Plan Update PEIR to incorporate and reflect the GHG reduction targets, strategies, and measures of the CAP for the reduction of GHG emissions because of buildout of the General Plan;

4) provide Guidelines that include a GHG threshold for determining significance related to GHG emissions and provide guidance to the community on how to achieve consistency with the CAP and utilize CEQA streamlining tools for analysis of GHG emissions pursuant to the requirements of CEQA Guidelines Section 15183.5(b)(2) or as subsequently amended;

5) prepare a County baseline GHG emissions inventory, which includes community and County operations emissions, and analyze the potential growth of these emissions over time; and

6) establish a comprehensive approach to reduce County GHG emissions by incorporating feasible and effective GHG emission reduction measures.

The following provides a summary of Modified Option 3 and each alternative fully analyzed in Chapter 4.0 of the Final SEIR. The summary includes rationale as to why Modified Option 3 is preferred over each of the other alternatives and why an alternative has been rejected.

**No Project Alternative**

Description

The No Project Alternative (refer to Section 4.3.1 of the Final SEIR) assumes that the CAP, GPA, GHG Threshold, and Guidelines would not be adopted or implemented. As a result, the County would not adopt strategies, measures, and supporting efforts to reduce GHG emissions in accordance with state-legislated reduction targets.

Finding

The No Project Alternative has been rejected because it fails to meet any of the six project objectives and would result in substantially greater environmental impacts when compared to Modified Option 3. Therefore, the No Project Alternative has been rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

Facts in Support of the Finding

Under the No Project Alternative, none of the GHG reduction measures or supporting efforts set forth by this CAP would be implemented to reduce GHG emissions from buildout of the 2011 GPU. While new development in the County would continue to be reviewed for project consistency with screening levels established by the guidance provided by California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change White Paper (2008), energy efficiency and GHG reduction measures at the level anticipated under the CAP would likely not be implemented without the CAP requiring them. While individual projects would need to demonstrate compliance with applicable regulations, a mechanism by which the County could enforce reductions (i.e., CAP Consistency Checklist) and ensure communitywide targets could be met, would not be in place. The County also would not have a tracking and monitoring system in place to monitor its progress towards achieving state reduction targets. Without a CAP, individual projects would be responsible for demonstrating GHG reductions on a project-by-project basis through a variety of mechanisms (e.g., design features, offsets, incentives). Also, as stated in the CAP, Chapter 3, the County is projected to meet the 2020 target as required in the 2011 GPU. Under the No Project Alternative, the County would not have a program in place to meet the legislative reduction targets in SB 32 of 40% below 1990 levels by 2030. In addition, without a CAP in place, the No Project Alternative would not achieve any of the SEIR's project objectives and would not provide a streamlining mechanism for future development projects to evaluate their GHG impacts.

Modified Option 3 would meet the AB 32 and SB 32 reduction targets for 2020 and 2030 and would meet all Project objectives. The No Project Alternative has been rejected because it fails to meet any of the six project objectives and would result in substantially greater environmental impacts when compared to Modified Option 3.

References

Final SEIR Section 4; alternatives related response to comments; and all other alternatives related evidence in the administrative record.

**CAP Project**

Description

The CAP Project was analyzed as the Proposed Project in the SEIR (Final SEIR Section p. 1-1 to 1-71). The CAP Project consists of the CAP, an associated General Plan Amendment to the County's General Plan and revision to the associated mitigation monitoring and reporting program, a threshold of significance for GHG, and a revised Guidelines for Determining

Significance for Climate Change.

Finding

The CAP Project has been rejected because it would have a greater reliance on local direct investment projects and slightly greater construction-related impacts associated with implementing renewable energy improvements in new development, the significance of which would remain significant and unavoidable even with implementation of mitigation. In addition, Modified Option 3 would better encourage development that would create jobs and would better support housing affordability by eliminating requirements that add cost to housing. Therefore, the CAP Project has been rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

Facts in Support of the Finding

The CAP Project would result in similar types and significance of impacts for most issue areas as Modified Option 3 including for aesthetic resources, agriculture and forestry resources, cultural resources, hazardous materials, hydrology and water quality, land use, and tribal cultural resources. Under Modified Option 3, reliance on direct investment projects would be reduced to 176,614 $MTCO_2e$ because a greater amount of reductions would come from enhanced solid waste facilities. However, Modified Option 3 would remove 4 GHG reduction measures, which would eliminate the reductions offered by those measures. To balance this, Modified Option 3 would modify GHG Reduction Measure T-1.3, which would increase the number of community plans updated by 2030 to 15 resulting in additional GHG reductions (i.e., 6,974 $MTCO_2e$ of additional reductions). Nonetheless, both the CAP Project and Modified Option 3 would achieve the 2030 reduction target. Modified Option 3 would, however, slightly reduce the construction-related impacts associated with implementing renewable energy improvements in new development as a result of elimination of the 4 GHG reduction measures.

Both the CAP Project and Modified Option 3 would equally meet all six project objectives because both would reduce community and County operations GHG emissions to meet the County's GHG reduction targets for 2020 and 2030 and provide a mechanism to meet the County's projected 2050 goal (Objective 1); would adopt GHG reduction measures and strategies to improve resilience over the long term (Objective 2); would update the County's General Plan and General Plan Update PEIR to incorporate and reflect the GHG reduction targets, strategies, and measures of the CAP (Objective 3); would provide Guidelines that include a GHG threshold for determining significance related to GHG emissions (Objective 4); would prepare a County baseline GHG emissions inventory, which includes community and County operations emissions, and analyze the potential growth of these emissions over time (Objective 5); and would establish a comprehensive approach to reduce County GHG emissions by incorporating feasible and effective GHG emission reduction measures.

Because Modified Option 3 would reduce reliance on local direct investment projects and slightly reduce the construction-related impacts associated with implementing renewable energy improvements in new development and non-residential development because of elimination of the 4 GHG reduction measures, the CAP Project has been rejected. In addition, Modified Option 3 would better encourage development that would create jobs, would better support housing

affordability by eliminating requirements that add cost to housing and would reduce costs to develop non-residential projects to a greater extent than the CAP Project.

References

Final SEIR Section 4; alternatives related response to comments; and all other alternatives related evidence in the administrative record.

**Enhanced Direct Investment Alternative**

Description

The Enhanced Direct Investment Alternative (see Final SEIR p. 4-13 to 4-19) would result in the adoption of a CAP, GPA, GHG Threshold, and Guidelines, similar to the project. However, this alternative would pursue a greater level of direct investment projects in exchange for eliminating the renewable energy program component of GHG Reduction Measure E-2.1.

Finding

Subsequent to publication of the Draft SEIR, the County prepared the "Preliminary Assessment of the Local Direct Investment Program." The preliminary assessment confirms that GHG Reduction Measure T-4.1 can achieve the entire 190,262 MT $CO_2e$ of emission reductions as stated in the Draft CAP and could achieve only up to 198,800 $MTCO_2e$ in the unincorporated county. As a result, because this alternative would rely on greater GHG reductions from local direct investment projects than would be feasible, this alternative would no longer be feasible. In addition, Modified Option 3 would better encourage development that would create jobs and would better support housing affordability by eliminating requirements that add cost to housing. Therefore, the Enhanced Direct Investment Alternative has been rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

Facts in Support of the Finding

The Enhanced Direct Investment Alternative would result in similar types and significance of impacts for most issue areas as Modified Option 3 including for aesthetic resources, agriculture and forestry resources, air quality, biological resources, cultural resources, hazardous and hazardous materials, hydrology and water quality, noise, and tribal cultural resources. Under Modified Option 3, reliance on direct investment projects would be reduced to 176,614 $MTCO_2e$ because a greater amount of reductions would come from enhanced solid waste facilities. In comparison, the Enhanced Direct Investment Alternative would require a total of 405,312 $MTCO_2e$ (i.e., 229,852 $MTCO_2e$ from removal of the large-scale renewable energy component plus 175,460 $MTCO_2e$ from GHG Reduction Measure T-4.1) in GHG reductions from direct investment projects. While both the CAP Project and Modified Option 3 would achieve the 2030 reduction target, Modified Option 3 would result in a 5% increase in the diversion rate of solid waste in the unincorporated county by 2030. With removal of 4 GHG Reduction Measures, Modified Option 3 would eliminate the approximately 56,731 $MTCO_2e$ of GHG reductions from these measures, which would be made up from increased solid waste diversion facilities, modification of GHG Reduction Measure T-1.3, and other measures. Modified Option 3 would slightly reduce the construction-related impacts associated with implementing renewable energy improvements in

new development.

Both the Enhanced Direct Investment Alternative and Modified Option 3 would equally meet all six project objectives because both would reduce community and County operations GHG emissions to meet the County's GHG reduction targets for 2020 and 2030 and provide a mechanism to meet the County's projected 2050 goal (Objective 1); would adopt GHG reduction measures and strategies to improve resilience over the long term (Objective 2); would update the County's General Plan and General Plan Update PEIR to incorporate and reflect the GHG reduction targets, strategies, and measures of the CAP (Objective 3); would provide Guidelines that include a GHG threshold for determining significance related to GHG emissions (Objective 4); would prepare a County baseline GHG emissions inventory, which includes community and County operations emissions, and analyze the potential growth of these emissions over time (Objective 5); and would establish a comprehensive approach to reduce County GHG emissions by incorporating feasible and effective GHG emission reduction measures (Objective 6).

Subsequent to publication of the Draft SEIR, the County prepared the "Preliminary Assessment of the Local Direct Investment Program." The preliminary assessment confirms that GHG Reduction Measure T-4.1 can achieve the entire 190,262 $MTCO_2e$ of emission reductions as stated in the Draft CAP and could achieve only up to 198,800 $MTCO_2e$ in the unincorporated county. As a result, because the Enhanced Direct Investment alternative would rely on greater GHG reductions from local direct investment projects than would be feasible (i.e., 405,312 $MTCO_2e$), this alternative would no longer be feasible. Further, Modified Option 3 would better encourage development that would create jobs, would better support housing affordability by eliminating requirements that add cost to housing and would reduce costs to develop non-residential projects in the unincorporated County.

References

Final SEIR Section 4; alternatives related response to comments; and all other alternatives related evidence in the administrative record.

**100% Renewable Energy Alternative**

Description

The 100% Renewable Energy Alternative (see Final SEIR p. 4-19 to 4-23) would result in the adoption of a CAP, GPA, GHG Threshold, and Guidelines, like Modified Option 3. However, this alternative assumes that 100% of the energy consumed in the unincorporated County would be produced from renewable resources. This would be achieved through increased reliance on large-scale solar photovoltaic, wind, and geothermal facilities, and small-scale residential wind and solar structures.

Finding

The 100% Renewable Energy Alternative would result in greater environmental impacts in most resource areas, would result in a reduced solid waste diversion rate by 5%, and would result in a less reliance on direct investments compared to Modified Option 3. In addition, because it would eliminate 4 GHG Reduction Measures, Modified Option 3 would better encourage development

that would create jobs, would better support housing affordability by eliminating requirements that add cost to housing, would reduce costs to develop non-residential projects, and would result in slightly less construction-related impacts associated with implementing renewable energy improvements in new development and non-residential development. Therefore, the 100% Renewable Energy Alternative has been rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

Facts in Support of the Finding

The 100% Renewable Energy Alternative would result in greater impacts for most issue areas compared to Modified Option 3 including for aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, hazardous and hazardous materials, hydrology and water quality, land use, noise, traffic and transportation, and tribal cultural resources. The 100% Renewable Energy Alternative would achieve increased GHG reductions through the increase in the amount of renewable energy consumed in the unincorporated county from 90% to 100%. This alternative would result in an increased demand for large-scale renewable energy facilities, the construction of which would increase impacts for all resources areas except Energy and GHG. With removal of 4 GHG Reduction Measures, Modified Option 3 would eliminate the approximately 56,731 $MTCO_2e$ of GHG reductions from these measures, which would be made up from primarily additional reductions from increased solid waste diversion and modification of GHG Reduction Measure T-1.3.

Both the 100% Renewable Energy Alternative and Modified Option 3 would equally meet all six project objectives because both would reduce community and County operations GHG emissions to meet the County's GHG reduction targets for 2020 and 2030 and provide a mechanism to meet the County's projected 2050 goal (Objective 1); would adopt GHG reduction measures and strategies to improve resilience over the long term (Objective 2); would update the County's General Plan and General Plan Update PEIR to incorporate and reflect the GHG reduction targets, strategies, and measures of the CAP (Objective 3); would provide Guidelines that include a GHG threshold for determining significance related to GHG emissions (Objective 4); would prepare a County baseline GHG emissions inventory, which includes community and County operations emissions, and analyze the potential growth of these emissions over time (Objective 5); and would establish a comprehensive approach to reduce County GHG emissions by incorporating feasible and effective GHG emission reduction measures (Objective 6).

Modified Option 3 would result in reduced environmental impacts in most resource areas compared to the 100% Renewable Energy Alternative. Modified Option 3 would also implement the increased solid waste diversion alternative, which would reduce reliance on direct investment projects and result in a 5% increase in the diversion of solid waste within the unincorporated County. Therefore, the 100% Renewable Energy Alternative has been rejected. Further, Modified Option 3 would better encourage development that would create jobs, would better support housing affordability by eliminating requirements that add cost to housing and would reduce costs to develop non-residential projects in the unincorporated County. Therefore, the 100% Renewable Energy Alternative has been rejected.

References

Final SEIR Section 4; alternatives related response to comments; and all other alternatives related

evidence in the administrative record.

**Increased Solid Waste Diversion Alternative**

Description

The Increased Solid Waste Diversion Alternative (see Final SEIR p. 4-48 to 4-79) would result in the adoption of a CAP, GPA, GHG Threshold, and Guidelines, like Modified Option 3. Like Modified Option 3, this alternative assumes that the County would achieve a 5% increase in the diversion rate of solid waste in the unincorporated areas by 2030. To achieve this increased diversion rate, the County would devote additional resources to expanding the capacity of its solid waste diversion facilities. This could require the expansion of existing facilities or the construction of new facilities to handle the solid waste to meet the increased diversion rate. However, this alternative would continue to implement GHG Reduction Measures T-3.1, E-1.1, and E-1.3, and E-2.2, and would not modify GHG Reduction Measure T-1.3.

Finding

The Increased Solid Waste Diversion Alternative has been rejected because it would slightly increase the construction-related impacts associated with implementing renewable energy improvements in new development, would result in reduced job creation, and would not support housing affordability to the same extent as Modified Option 3 by eliminating requirements that add cost to housing in the unincorporated County. Modified Option 3 would better encourage development that would create jobs and would better support housing affordability by eliminating requirements that add cost to housing in the unincorporated County. Further, Modified Option 3 would result in a greater number of community plans (GHG Reduction Measure T-1.3) that would be updated leading to increased GHG reductions. Therefore, the Increased Solid Waste Diversion Alternative has been rejected because specific economic, legal, social, technological or other considerations make the alternative infeasible.

Facts in Support of the Finding

The Increased Solid Waste Diversion Alternative would result in similar to slightly increased impacts for most issue areas compared to Modified Option 3 including for aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, hazardous and hazardous materials, hydrology and water quality, land use, noise, traffic and transportation, and tribal cultural resources. Like Modified Option 3, the Increased Solid Waste Alternative would achieve increased GHG reductions through the increase in the amount of solid waste diversion from 75% to 80%. However, Modified Option 3 would slightly reduce the construction-related impacts associated with implementing renewable energy improvements in new development and non-residential development because 4 GHG reduction measures would be removed from implementation.

The Increased Solid Waste Diversion Alternative and Modified Option 3 would achieve and equally meet all six of the project objectives because both would reduce community and County operations GHG emissions to meet the County's GHG reduction targets for 2020 and 2030, and provide a mechanism to meet the County's projected 2050 goal (Objective 1); adopt GHG reduction measures and strategies to improve resilience over the long term (Objective 2); would

update the County's General Plan and General Plan Update PEIR to incorporate and reflect the GHG reduction targets, strategies, and measures of the CAP (Objective 3); would provide Guidelines that include a GHG threshold for determining significance related to GHG emissions (Objective 4); would prepare a County baseline GHG emissions inventory, which includes community and County operations emissions, and analyze the potential growth of these emissions over time (Objective 5); and would establish a comprehensive approach to reduce County GHG emissions by incorporating feasible and effective GHG emission reduction measures.

Modified Option 3 would implement all project objectives while reducing significant impacts to a slightly greater extent than the Enhanced Solid Waste Alternative. Further, the Enhanced Solid Waste Alternative would result in reduced job creation and would not support housing affordability to the same extent as Modified Option 3 by eliminating requirements that add cost to housing and non-residential projects in the unincorporated County. Therefore, the Increased Solid Waste Diversion Alternative has been rejected.

References

Final SEIR Section 4; alternatives related response to comments; and all other alternatives related evidence in the administrative record.

**Table 1 CAP Alternatives Comparison of Impacts**

| Issue Areas of Significance | Modified Option 3 | Alternatives to the Modified Option 3 | | | | |
|---|---|---|---|---|---|---|
| | | *1* | *2* | *3* | *4* | *5* |
| | | No Project | Enhanced Direct Investment | 100% Renewable Energy | Increased Solid Waste Diversion | CAP Project |
| 2.1 Aesthetics | SU | ▼ | — | ▲ | ▲ | — |
| 2.2 Agricultural Resources | SU | ▼ | — | ▲ | ▲ | — |
| 2.3 Air Quality | SU | ▼ | — | ▲ | ▲ | ▲ |
| 2.4 Biological Resources | SU | ▼ | — | ▲ | ▲ | — |
| 2.5 Cultural Resources | SU | ▼ | — | ▲ | ▲ | — |
| 2.6 Energy | LTS | ▲ | — | ▼ | — | — |
| 2.7 Greenhouse Gas Emissions | SU | ▲ | — | ▼ | — | — |

| | | | | | | |
|---|---|---|---|---|---|---|
| 2.8 Hazards and Hazardous Materials | SU | ▼ | — | ▲ | — | — |
| 2.9 Hydrology and Water Quality | SU | ▼ | — | ▲ | — | — |
| 2.10 Land Use | SU | ▼ | — | ▲ | — | — |
| 2.11 Noise | SU | ▼ | — | ▲ | ▲ | — |
| 2.12 Transportation | SU | ▼ | — | ▲ | ▲ | — |
| 2.13 Tribal Cultural Resources | SU | ▼ | — | ▲ | ▲ | — |

▲ Alternative is likely to result in greater impacts to issue when compared to Modified Option 3.
— Alternative is likely to result in similar impacts to issue when compared to Modified Option 3.
▼ Alternative is likely to result in reduced impacts to issue when compared to Modified Option 3.
LTS Less than Significant with mitigation measures
SU Potentially significant and unavoidable impact

## VI. FINDINGS RELATED TO THE 2011 GPU PEIR MITIGATION MEASURE CC-1.2

The County of San Diego Board of Supervisors hereby finds that the County has satisfied all requirements outlined in the updated General Plan Update (GPU) PEIR Mitigation Measure CC-1.2, as described in Chapter 1, Project Description, of the Final SEIR. Specifically, the County has prepared a CAP that contains GHG Reduction Measures that would reduce community-wide and County Operations GHG emissions consistent with state-legislative targets as reflected in updated 2011 GPU Goal COS-20. Additionally, the CAP and the Final SEIR fully satisfies the requirements of Section 15183.5 of the CEQA Guidelines, which outlines the requirements for a qualified plan for the reduction of GHG emissions. Specifically, community-wide and County Operational GHG emissions were quantified and presented in Chapter 2 of the CAP. GHG baseline emissions were projected for the County both with and without legislative adjustments (See Section 1.2.2.1 of the Final SEIR and Chapter 2 of the CAP). County-specific 2020 and 2030 GHG reduction targets were set consistent with state-legislative targets as described in Section 1.2.2.1 of the Final SEIR and Chapter 2 of the CAP. GHG strategies, supporting efforts, and measures were identified, quantified, and evaluated within the CAP and Final SEIR with supporting substantial evidence demonstrating that identified 2020 and 2030 reduction targets would be achieved. The CAP has also identified the process by which its implementation would be monitored (Chapter 5 of the CAP) to ensure compliance and achievement of identified performance standards including preparing an annual implementation monitoring report, preparing an updated GHG inventory every two years, and updating the CAP every 5 years. Finally, the County has engaged in an extensive public outreach process that consisted of over 50 stakeholder groups in the environmental, business, and community sectors, with over 100 public events held to discuss matters surrounding the CAP. The CAP and Final SEIR has been considered by the County of San Diego Board of Supervisors through a public discretionary review process.

## VII. NO RECIRCULATION REQUIRED

The County of San Diego Board of Supervisors hereby finds that the responses to comments made on the Draft SEIR and any revisions reflected in the Final SEIR merely clarify and amplify the analysis presented in the documents and do not trigger the need to recirculate the EIR under CEQA Guidelines section 15088.5(b), which provides that "[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

Pursuant to CEQA Guidelines section 15088.5(a), "[a] lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification….New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)

The County recognizes that new information has been added to the SEIR since circulation of the Draft SEIR, but the new information serves simply to clarify or amplify information already found in the Draft SEIR or improve the Project and its protection of the environment. It does not rise to the level of "significant new information".

None of the new information added to the Final SEIR raises important new issues about significant adverse effects on the environment without providing corresponding mitigation to maintain the proper finding that the impact is below the level of significance. The ultimate conclusions about the project's significant impacts do not change in light of any new information added to the SEIR. Therefore, any new information in the EIR is insignificant for purposes of recirculation, particularly as set forth in Section 15088.5(b) of the CEQA Guidelines.

The County also finds that the Draft SEIR, which includes analysis supported by numerous technical reports and expert opinion, was not inadequate or conclusory such that the public was deprived of a meaningful opportunity to review and comment on the EIR. Additional analyses are not required to comply with the requirements of CEQA prior to certifying the Final EIR for the Project. Accordingly, the County finds that recirculation is not required pursuant to CEQA.

In support of the foregoing, it is relevant to point out some of the key policies of CEQA set forth by the Legislature:

> "To provide more meaningful public disclosure, reduce the time and cost required to prepare an environmental impact report, and focus on potentially significant effects on the environment of a proposed project, lead agencies shall, in accordance with Section 21000, focus the discussion in the environmental impact report on those potential effects on the environment of a proposed project which the lead agency has determined are or may be significant. Lead agencies may limit discussion on other effects to a brief explanation as to why those effects are not potentially significant." Pub. Res. Code 21002.1(e);
>
> "The legislature further finds and declares that it is the policy of the state that:…(f) All persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward mitigation of actual significant effects on the environment." Pub. Res. Code 21003(f).

The CEQA Guidelines (Section 15003) also expressly summarizes some of the key policies under CEQA as recognized by the Courts

> "(g) The purpose of CEQA is not to generate paper, but to compel government at all levels to make decisions with environmental consequences in mind. (Bozung v. LAFCO (1975) 13 Cal. 3d 263.)
>
> (i) CEQA does not required technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure. A court does not pass upon the correctness of an EIR's environmental conclusions, but only determines if the EIR is sufficient as an informational document. (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692)
>
> (j) CEQA requires that decisions be informed and balanced. It must not be subverted into an instrument for the oppression and delay of social, economic, or recreational development or advancement. (*Laurel Heights Improvement Assoc. v. Regents of U.S.* (1993) 6 Cal. 4th 1112 and *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553)" See 15003 ((g), (i) and (j)).

Keeping in mind the policies expressed above, the County has provided a good faith effort to analyze the environmental impacts of the Project using sound methodologies with the assistance of experts in environmental analysis. Having given careful consideration to that process and the requirements of CEQA, the County concludes that public comment through a recirculation is not warranted, but that public comments through the public hearing process will be given due consideration.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15088.5(a), the County of San Diego is required to recirculate an Environmental Impact Report (EIR) when significant new information is added to the EIR after public review, but before certification. Significant new information can include changes in the project or environmental setting, as well

as additional data or other information. New information added to an EIR is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including feasible alternatives) that the project's proponents have declined to implement.

**Changes to the Draft SEIR**

A complete presentation of changes made to the Draft SEIR subsequent to the public review period has been prepared and is included within the Final SEIR. While an exhaustive list of changes is not included here, the following provides a table that summarizes where changes were made in the Final SEIR. Revisions to the Final SEIR were made in response to comments made during public review and during the numerous hearings on the project. Modified Option 3 reflects these public comments.

As described above, Modified Option 3 is the Increased Solid Waste Diversion Alternative with the removal of 4 GHG reduction measures and a revision to GHG Reduction Measure T-1.3 which would result in updating 15 community plans by 2030. Measure E-1.2 is now listed as a requirement with a subsidy. The environmental impacts of this alternative have been evaluated in detail in the Final SEIR. Under Modified Option 3, no new or substantially more severe environmental impacts would occur in comparison to the CAP Project evaluated in the Final SEIR. However, for some areas, some reductions in construction-related impacts may occur associated with the removal of requirements associated with installation of renewable infrastructure for new development. For the reasons outlined in Master Response 1 in the Final SEIR, information that clarifies or expands on information in the Draft SEIR does not require recirculation. None of the conditions warranting recirculation of the Draft SEIR, as specified in State CEQA Guidelines Section 15088.5 and described above, has occurred. The responses to comments and the addition of information do not result in or show any new significant impacts; there is no increase in the severity of a significant impact identified in the Draft SEIR, following application of existing mitigation; no feasible alternatives have been recommended that would avoid a significant impact, or that the County has refused to adopt; and as to the Draft SEIR adequacy, the County believes the Final SEIR is complete and fully compliant with CEQA.

| Section (Page) | Change | Reason for Change |
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| Global Change | A global change was made throughout the Final SEIR to remove references to “north” and “east” as it pertains to the Multi-Species Conservation Plan (MSCP). | Clarification |
| Global Change | The “Direct Investment Program” has been renamed to the “Local Direct Investment Program” throughout the Final SEIR | Clarification |
| Summary, S.5.2 (Page 14 through 15) | Updated reduction from large-scale renewable energy projects from 227,423 to 229,852. | Update |
| Summary, Table S-1 (Page 18 – 34) | Delete references to Measure E-1.1 | Update |

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| Summary, Table S-1 (Page 21 through 38) | Revised phrase "local carbon offset projects" to "local <u>direct investment</u> projects" | Clarification |
| Summary, Table S-1 (Page 25 – 34) | Delete references to Measure E-2.2 | Update |
| Summary, Table S-1 (Page 29) | Corrected Greenhouse Gas Emissions Significance After Mitigation for Issue 1. Revised from Less Than Significant to <u>Significant and Unavoidable</u> to reflect the impact conclusion described on page 2.7-36. | Clarification |
| Summary, Table S-1 (Page 18-38) | Clarified naming convention with regard to CAP Mitigation Measure M-GHG-1. Revised reference to "direct investment projects and programs" to "<u>carbon offset credits</u>". | Clarification |
| Summary, Table S-1 (Page 18-38) | Replace instances of "GHG Reduction Measure SW-1.1" and replace with "Increased Solid Waste Diversion Alternative." Additionally, update correlating descriptors | Update |
| Chapter 1 (Page 1-8) | BAU projections without legislative reductions changed to<br>• ~~3,407,223~~ <u>3,407,168</u> $MTCO_2e$ by 2020,<br>• ~~3,723,742~~ <u>3,723,596</u> $MTCO_2e$ by 2030, and<br>• ~~3,961,754~~ <u>4,220,560</u> $MTCO_2e$ by 2050.<br>BAU projections with legislatively-adjusted BAU changed to<br>• ~~3,018,716~~ <u>3,018,671</u> $MTCO_2e$ by 2020,<br>• ~~2,824,140~~ <u>2,824,049</u> $MTCO_2e$ by 2030, and<br>• ~~2,871,824~~ <u>2,991,507</u> $MTCO_2e$ by 2050 | Update |
| Chapter 1 (Page 1-11) | Updated emissions reduction to meet 2050 target to reflect new BAU targets: emissions would need to reduce <u>1,363,147</u> $MTCO_2e$ by 2050 as opposed to 1,378,966. | Update |
| Chapter 1 (Page 1-11) | Updated number of GHG reduction measures from 29 to <u>26</u> | Update |
| Chapter 1 (Page 1-11) | Revised San Diego Gas & Electric (SDG&E) to the term "<u>the local utility</u>" | Clarification |

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| Chapter 1 (Page 1-37) | Added reference to chapter 8: "Chapter 8, *"Responses to Comments and Master Responses"* which includes comment letters received during the public review period and responses to those comments. | Update |
| Chapter 1 (Page 1-40) | Revised Measure T-1.3 to include additional updates to community plans by 2030. Revision states: Focus growth in the county villages to achieve mixed-use, transit-oriented village centers by updating ~~10~~ 15 community plans by 2030 and an additional ~~9~~ 4 community plans between 2031 and 2040. | Update |
| Chapter 1 (Page 1-41) | Clarified Measure T-2.1 to include funding information. Addition includes: "funded by the increased gas tax generated by SB-1". | Clarification |
| Chapter 1 (Page 1-43) | Delete Measure T-3.1 from table. | Update |
| Chapter 1 (Page 1-44) | Updated Measure T-3.3, the development of a local vehicle retirement program, to retire 1,600 late-vehicle models from previously used 800. | Update |
| Chapter 1 (Page 1-45) | Clarified Measure T-3.4 to include background on County's fleet emissions. Addition includes: "The County of San Diego operates a fleet of approximately 4,200 vehicles and equipment, of which 2,500 vehicles are considered light duty. These assets vary in type and operating requirements greatly. Through implementation of the Green Fleet Action Plan Implementation Strategy, the County will expand use of alternative fuels, encourage vehicle reductions, and make improvements in departmental efficiencies.<br>Of the County's 2,500 light duty vehicles, 1,100 vehicles are eligible to be considered for conversion to PHEV/EV based on current available market technologies. A subset of the eligible vehicles cannot be converted to PHEV/EV due to operational constraints; therefore, to achieve the 2030 target, 23% of the eligible vehicles (or 10% of the entire light duty fleet) will be transitioned to EVs and PHEVs by | Clarification |

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| | 2025. In addition, the County will convert 50% of all new vehicle purchases to their target green vehicle replacement standard by 2020 and 75% by 2030; transition from petroleum diesel to renewable diesel; reduce County fleet by 20 vehicles by 2020 and by 40 vehicles by 2025; and implement tools and technologies that assist departments to increase operational efficiency and decrease fuel consumption." | |
| Chapter 1 (Page 1-46) | Added Measure T-3.5, Built Environment: Install Electric Vehicle Charging Stations. Install a total of 2,040 Level 2 electric vehicle charging stations (EVCS) through public-private partnerships at priority locations in the unincorporated county by 2030. Updated correlating description, physical changes, and environmental issues. | Update |
| Chapter 1 (Page 1-47) | Revised Strategy T-4 to Local Direct Investment Program | Clarification |
| Chapter 1 (Page 1-47) | Updated GHG emissions from Strategy T-4 target gap to 179,090 $MTCO_2e$. | Update |
| Chapter 1 (page 1-47) | Revised phrase "Carbon Offset Program" to "local direct investment program" | Clarification |
| Chapter 1 (Page 1-49) | Added supporting effort for the built environment and transportation category: "Explore funding opportunities and collaborations to provide information about the impact of food choices through public outreach and education. "<br><br>Potential physical changes and environmental issues updated as well. | Update |
| Chapter 1 (Page 1-49) | Added supporting effort for the built environment and transportation category: "Implement and explore funding opportunities and collaborations to track the Eat Well Practices with an emphasis on less carbon-intense foods and more plant-based meals. "<br><br>Potential physical changes and environmental issues updated as well. | Update |
| Chapter 1 (Page 1-51) | Clarified how the County can help resident's better access farmer's markets through "working with Farmer's Markets to accept EBT cards to | Clarification |

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| | make access for our vulnerable populations available. " | |
| Chapter 1 (Page 1-51) | Added supporting effort to the built environment and transportation category "Promote the adoption of the Eat Well Practices by outside organizations to support climate beneficial practices."<br><br>Potential physical changes and environmental issues updated as well. | Update |
| Chapter 1 (Page 1-52) | Added supporting effort to the built environment and transportation category: "Monitor State efforts related to the California Road Charge Pilot Program through the Department of Planning & Development Services" | Update |
| Chapter 1 (Page 1-53 through 1-54) | Revised San Diego Gas & Electric (SDG&E) to the term "the local utility" | Clarification |
| Chapter 1 (Page 1-54) | Added supporting effort to the built environment and transportation category: "Provide education and marketing related to the purchase of electric vehicles (EVs), available charging infrastructure, and existing EV resources and programs"<br><br>Potential physical changes and environmental issues updated as well. | Update |
| Chapter 1 (Page 1-54) | Added supporting effort to the built environment and transportation category: "Develop and implement a local EV Incentive Program."<br><br>Potential physical changes and environmental issues updated as well. | Update |
| Chapter 1 (Page 1-54) | Added supporting effort to the built environment and transportation category: "Collaborate with regional partners to encourage installation of EVCS in new residential and non-residential developments. "<br><br>Potential physical changes and environmental issues updated as well. | Update |
| Chapter 1 (Page 1-54) | Added supporting effort to the built environment and transportation category: "Promote the State's Electric Vehicle Climate Credit." | Update |

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| | Potential physical changes and environmental issues updated as well. | |
| Chapter 1 (Page 1-54) | Added supporting effort to the built environment and transportation category: "Support programs from the local utility to install EVCS."<br><br>Potential physical changes and environmental issues updated as well. | Update |
| Chapter 1 (Page 1-56) | Delete Measure E-1.1 from table | Update |
| Chapter 1 (Page 1-60) | Delete Measure E-2.2 from table | Update |
| Chapter 1 (Page 1-56) | Revised phrase "carbon offset projects" to projects locally to capture the co-benefits | Clarification |
| Chapter 1 (Page 1-57) | Add subsidy to measure E-1.2. Revise Description and Actions to include development of a subsidy for replacement water heaters for participants meeting certain income criteria | Update |
| Chapter 1 (Page 1-57) | Delete Measure E-1.3 | Update |
| Chapter 1 (Page 1-57) | Revised term "natural gas" to gas | Clarification |
| Chapter 1 (Page 1-58) | Updated Measure E-1.4 to reduce energy use intensity at County facilities by 20% below 2014 levels by 2030 (from 15%) | Update |
| Chapter 1 (Page 1-60) | Delete references to Measure E-1.1 | Update |
| Chapter 1 (Page 1-60) | Delete references to Measure E-2.2 | Update |
| Chapter 1 (Page 1-61) | Updated County electricity generation from solar PV from 2.6% to 2.8% | Correction |
| Chapter 1 (Page 1-61) | Revised San Diego Gas & Electric (SDG&E) to the term "the local utility" | Clarification |
| Chapter 1 (Page 1-62) | Deleted supporting energy measure "continue to provide affordable housing near service areas" | Update |
| Chapter 1 (Page 1-64) | Replace "Strategy SW-1.1 Increase Solid Waste Diversion" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |

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| Chapter 1 (Page 1-65 through 1-66) | Clarified measure language to show outdoor water use requires a 40% reduction <u>from 2014</u> outdoor water use <u>budgets</u>. Further clarifies with addition of "<u>this measure applies only to potable water use in outdoor landscaping and not all outdoor applications."</u> | Clarification |
| Chapter 1 (Page 1-66) | Clarified Measure W-1.2 language to estimate effective reductions that would be required under this measure. Addition includes "<u>Based on the County's 2016 Landscape Ordinance, this measure would effectively require residential and non-residential landscape to use 18% and 4% less potable water than currently required by the State, respectively.</u>" | Clarification |
| Chapter 2 Section 1 (Page 2.1-7) | Added <u>Strategy T-3: Decarbonize On-Road and Off-Road Vehicle Fleet</u> | Update |
| Chapter 2 Section 1 (Page 2.1-7) | Revised Strategy T-4 to <u>Local</u> Direct Investment Program | Clarification |
| Chapter 2 Section 1 (Page 2.1-7) | Updated GHG emissions from Strategy T-4 target gap to <u>179,090</u> $MTCO_2e$. | Update |
| Chapter 2 Section 1 (Page 2.1-8) | Delete Strategy E-1 and Measure E-1.1 | Update |
| Chapter 2 Section 1 (Page 2.1-8) | Delete Measure E-2.2 | Update |
| Chapter 2 Section 1 (Page 2.1-9) | Replace Strategy SW-1: Increase Solid Waste Diversion in the Unincorporated County with "Increased Solid Waste Diversion Alternative". Update measure language to read "Achieve ~~75~~ <u>80</u> percent solid waste diversion by 2030" | Update |
| Chapter 2 Section 1 (Page 2.1-9) | Updated Measure E-2.4: Increase ~~Use of~~ <u>On-Site</u> Renewable Electricity <u>Generation</u> for County Operations. | Update |
| Chapter 2 Section 1 (Page 2.1-11 through 2.1-23) | Updated impacts to aesthetics include electric vehicle charging stations (EVCS) | Update |
| Chapter 2 Section 1 (Page 2.1-12) | Updated cumulative impacts of bicycle, pedestrian, park-and-ride, and solid waste expansion infrastructure improvements to include implementation of <u>GHG Reduction Measure T-3.5</u> | Update |

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| Chapter 2 Section 1 (Page 2.1-12) | Replace "SW-1.1" with "Increased Solid Waste Diversion Alternative" | Update |
| Chapter 2 Section 1 (Page 2.1-13-2.1-21) | Delete reference to Measure E-1.1 | Update |
| Chapter 2 Section 1 (Page 2.1-13-2.1-15) | Delete reference to Measure E-2.2 | Update |
| Chapter 2 Section 1 (Page 2.1-37-2.1-41) | Clarification and text edits CAP Mitigation Measure M-AES-1 | Clarification |
| Chapter 2 Section 1 (Page 2.1-41) | Deleted reference to 2012 Wind Energy EIR and qualifier that Mitigation measures are modified for the CAP. | Clarification |
| Chapter 2 Section 2 (Page 2.2-7) | Revised Measure T-4.1 to establish Local Direct Investment Program | Clarification |
| Chapter 2 Section 2 (Page 2.2-12 through 2.2-16) | Revised text error Mitigation Measure M-AGR-1 | Correction |
| Chapter 2 Section 2 (Page 2.2-18) | Revised text error Mitigation Measures M-AGR-1 and M-AGR-2 | Correction |
| Chapter 2 Section 2 (Page 2.2-22) | Revised text error incorporating Mitigation Measure M-AGR-1 into the ~~2011~~ MMRP. | Clarification |
| Chapter 2 Section 2 (Page 2.2-22) | Revised such that implementation of CAP Mitigation Measure M-AGR-1 is referenced instead of 2012 Wind Energy EIR | Clarification |
| Chapter 2 Section 2 (Page 2.2-23) | Revised text error incorporating Mitigation Measure M-AGR-1 into the ~~2011~~ MMRP. | Clarification |
| Chapter 2 Section 3 (Page 2.3-10) | Delete Strategy E-1 and Measure E-1.1 | Update |
| Chapter 2 Section 3 (Page 2.3-10) | Added Strategy T-3 Decarbonize On-Road and Off-Road Vehicle Fleet | Update |
| Chapter 2 Section 3 (Page 2.3-10) | Updated Strategy T-4: Establish Local Direct Investment Program. Updated 2030 GHG target emissions gap to 179,090 $MTCO_2e$ | Update |
| Chapter 2 Section 1 (Page 2.1-13-2.1-15) | Delete reference to Measure E-2.2 | Update |
| Chapter 2 Section 3 (Page 2.3-11 through 2.3-63) | Replace "Strategy SW-1.1 Increase Solid Waste Diversion" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |

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| Chapter 2 Section 3 (Page 2.3-17 through 2.3-55) | Delete references to Measure E-1.1 | Update |
| Chapter 2 Section 3 (Page 2.3-17 through 2.3-55) | Delete references to Measure E-2.2 | Update |
| Chapter 2 Section 3 (Page 2.3-61) | Updated Measure E-2.4: Increase ~~Use of~~ On-Site Renewable Electricity Generation for County Operations. | Update |
| Chapter 2 Section 3 (Page 2.3-14-2.3-45) | Updated impacts to air quality to include electric vehicle charging stations (EVCS) | Update |
| Chapter 2 Section 3 (Page 2.3-16 through 2.3-54) | Revised "Direct Investment Program" to "Local Direct Investment Program" | Update |
| Chapter 2 Section 3 (Page 2.3-23) | Updated cumulative impacts of bicycle, pedestrian, park-and-ride, and solid waste expansion infrastructure improvements to include implementation of GHG Reduction Measure T-3.5 | Update |
| Chapter 2 Section 3 (Page 2.3-60) | Added abbreviation for Mitigation Monitoring and Reporting Program (MMRP) | Clarification |
| Chapter 2 Section 3 (Page 2.3-61) | Corrected titles of CAP Mitigation Measures M-AQ-1 and M-AQ-2 | Correction |
| Chapter 2 Section 3 (Page 2.3-63) | Corrected titles of CAP Mitigation Measures M-AQ-1 and M-AQ-2, M-AQ-3, and M-AQ-4 | Correction |
| Chapter 2 Section 4 (Page 2.4-8) | Added Strategy T-3 Decarbonize On-Road and Off-Road Vehicle Fleet | Update |
| Chapter 2 Section 4 (Page 2.4-8) | Updated Strategy T-4: Establish Local Direct Investment Program. Updated 2030 GHG target emissions gap to 179,090 $MTCO_2e$ | Update |
| Chapter 2 Section 4 (Page 2.4-9) | Delete Strategy E-1 and Measure E-1.1 | Update |
| Chapter 2 Section 4 (Page 2.4-10) | Updated Measure E-2.4: Increase ~~Use of~~ On-Site Renewable Electricity Generation for County Operations. | Update |
| Chapter 2 Section 4 (Page 2.4-10 through 2.4-12) | Replace "Strategy SW-1.1 Increase Solid Waste Diversion" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |

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| Chapter 2 Section 4 (Page 2.4-9) | Delete Measure E-2.2 | Update |
| Chapter 2 Section 4 (Page 2.4-12 through 2.4-34) | Revised "Direct Investment Program" to "Local Direct Investment Program" | Update |
| Chapter 2 Section 4 (Page 2.4-12) | Updated impacts of bicycle, pedestrian, park-and-ride, and solid waste expansion infrastructure improvements to include implementation of GHG Reduction Measure T-3.5 | Update |
| Chapter 2 Section 4 (Page 2.4-12 through 2.4-38) | Updated impacts to biological resources to include electric vehicle charging stations (EVCS) | Update |
| Chapter 2 Section 4 (Page 2.4-15 through 2.4-17) | Delete reference to Measure E-1.1 | Update |
| Chapter 2 Section 4 (Page 2.4-15 through 2.4-17) | Delete reference to Measure E-2.2 | Update |
| Chapter 2 Section 5 (Page 2.5-7) | Added Strategy T-3 Decarbonize On-Road and Off-Road Vehicle Fleet | Update |
| Chapter 2 Section 5 (Page 2.5-7) | Updated Strategy T-4: Establish Local Direct Investment Program. Updated 2030 GHG target emissions gap to 179,090 $MTCO_2e$ | Update |
| Chapter 2 Section 5 (Page 2.5-8) | Delete Strategy E-1 and Measure E-1.1 | Update |
| Chapter 2 Section 5 (Page 2.5-8) | Delete Measure E-2.2 | Update |
| Chapter 2 Section 5 (Page 2.5-8) | Updated Measure E-2.4: Increase ~~Use of~~ On-Site Renewable Electricity Generation for County Operations. | Update |
| Chapter 2 Section 5 (Page 2.5-9 through 2.5-14) | Replace "Strategy SW-1.1 Increase Solid Waste Diversion" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |
| Chapter 2 Section 5 (Page 2.5-10 through 2.5-31) | Updated impacts to cultural and historical resources to include electric vehicle charging stations (EVCS) | Update |
| Chapter 2 Section 5 (Page 2.5-17 through 2.5-34) | Delete reference to Measure E-1.1 | Update |

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| Chapter 2 Section 5 (Page 2.5-17 through 2.5-34) | Delete reference to Measure E-2.2 | Update |
| Chapter 2 Section 6 (Page 2.6-13 through 2.6-18) | Delete reference to Measure T-3.1 | Update |
| Chapter 2 Section 6 (Page 2.6-13 through 2.6-18) | Delete reference to Measure E-1.1 | Update |
| Chapter 2 Section 6 (Page 2.6-15) | Updated to include Measure T-3.5: Install Electric Vehicle Charging Stations | Update |
| Chapter 2 Section 6 (Page 2.6-15) | Revised "Direct Investment Program" to "Local Direct Investment Program" | Update |
| Chapter 2 Section 6 (Page 2.6-16) | Delete Measure E-1.1 | Update |
| Chapter 2 Section 6 (Page 2.6-16) | Delete Measure E-2.2 | Update |
| Chapter 2 Section 6 (Page 2.6-17 through 2.6-18) | Replace "Strategy SW-1.1 Increase Solid Waste Diversion" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |
| Chapter 2 Section 6 (Page 2.6-18) | Delete reference to Measure E-2.2 | Update |
| Chapter 2 Section 6 (Page 2.6-17) | Updated Measure E-2.4: Increase ~~Use of~~ On-Site Renewable Electricity Generation for County Operations. | Update |
| Chapter 2 Section 6 (Page 2.6-17) | Updated Cap Impact Analysis to include Measure T-3.5 | Update |
| Chapter 2 Section 7 (Page 2.7-17) | Added Strategy T-3 Decarbonize On-Road and Off-Road Vehicle Fleet | Update |
| Chapter 2 Section 7 (Page 2.7-17) | Updated Strategy T-4: Establish Local Direct Investment Program. Updated 2030 GHG target emissions gap to 179,090 $MTCO_2e$ | Update |
| Chapter 2 Section 7 (Page 2.7-18) | Delete Strategy E-1 and Measure E-1.1 | Update |
| Chapter 2 Section 7 (Page 2.7-19) | Delete Measure E-2.2 | Update |
| Chapter 2 Section 7 (Page 2.7-19 through 2.7-35) | Replace "Strategy SW-1.1 Increase Solid Waste Diversion" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |

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| Chapter 2 Section 7 (Page 2.7-22 through 2.7-41) | Revised "CAP measures" to read "GHG reduction measures" | Clarification |
| Chapter 2 Section 7 (Page 2.7-23 through 2.7-33) | Updated impacts to greenhouse gas emissions to include electric vehicle charging stations (EVCS) | Update |
| Chapter 2 Section 7 (Page 2.7-26 through 2.7-33) | Updated the emissions reduction from GHG Reduction Measure T-4.1 to 179,090 $MTCO_2e$ | Update |
| Chapter 2 Section 7 (Page 2.7-26 through 2.7-34) | Revised "Direct Investment Program" to "Local Direct Investment Program" | Clarification |
| Chapter 2 Section 7 (Page 2.7-27 through 2.7-33) | Delete reference to Measure E-1.1 | Update |
| Chapter 2 Section 7 (Page 2.7-27 through 2.7-33) | Delete reference to Measure E-2.2 | Update |
| Chapter 2 Section 7 (Page 2.7-38 through 2.7-40) | Revised phrases "carbon offset project" and "direct investment projects and programs" to read "carbon offset credit" | Clarification |
| Chapter 2 Section 7 (Page 2.7-41) | Revised "Mitigation Measure" to read "CAP Mitigation Measure" | Clarification |
| Chapter 2 Section 7 (Page 2.7-42) | Updated Table 2.7-1: County Greenhouse Gas Emissions by Category (2014) | Update |
| Chapter 2 Section 7 (Page 2.7-43) | Updated Table 2.72: County Emissions Forecasts, Reduction Targets and CAP Reductions ($MTCO_2e$/year) | Update |
| Chapter 2 Section 8 (Page 2.8-8) | Added Strategy T-3 Decarbonize On-Road and Off-Road Vehicle Fleet | Update |
| Chapter 2 Section 8 (Page 2.8-8) | Updated Strategy T-4: Establish Local Direct Investment Program. Updated 2030 GHG target emissions gap to 179,090 $MTCO_2e$ | Update |
| Chapter 2 Section 8 (Page 2.8-9) | Delete Strategy E-1 and Measure E-1.1 | Update |
| Chapter 2 Section 8 (Page 2.8-9) | Delete Measure E-2.2 | Update |
| Chapter 2 Section 8 (Page 2.8-10 through 2.8-30) | Replace "Strategy SW-1.1 Increase Solid Waste Diversion" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |

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| Chapter 2 Section 8 (Page 2.8-10) | Updated Measure E-2.4: Increase ~~Use of~~ On-Site Renewable Electricity Generation for County Operations. | Update |
| Chapter 2 Section 8 (Page 2.8-10) | Updated applicable GHG reduction measures to include T-3.5 | Update |
| Chapter 2 Section 8 (Page 2.8-12 through 2.8-24) | Delete reference to Measure E-1.1 | Update |
| Chapter 2 Section 8 (Page 2.8-12 through 2.8-24) | Delete reference to Measure E-2.2 | Update |
| Chapter 2 Section 8 (Page 2.8-12 through 2.8-15) | Updated impacts to hazards and hazardous materials to include electric vehicle charging stations (EVCS) | Update |
| Chapter 2 Section 8 (Page 2.8-21) | Corrected reference to title of chapter 2 "Aesthetics ~~and Visual Resources~~" | Correction |
| Chapter 2 Section 8 (Page 2.8-22 through 2.8-27) | Revised "Direct Investment Program" to "Local Direct Investment Program" | Clarification |
| Chapter 2 Section 9 (Page 2.9-11) | Added Strategy T-3 Decarbonize On-Road and Off-Road Vehicle Fleet | Update |
| Chapter 2 Section 9 (Page 2.9-11) | Updated Strategy T-4: Establish Local Direct Investment Program. Updated 2030 GHG target emissions gap to 179,090 $MTCO_2e$ | Update |
| Chapter 2 Section 9 (Page 2.9-12 through 2.9-26) | Replace "Strategy SW-1.1 Increase Solid Waste Diversion" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |
| Chapter 2 Section 9 (Page 2.9-15) | Updated applicable GHG reduction measures to include T-3.5 | Update |
| Chapter 2 Section 9 (Page 2.9-15 through 2.9-32) | Updated impacts to hazards and hazardous materials to include electric vehicle charging stations (EVCS) | Update |
| Chapter 2 Section 9 (Page 2.9-17 through 2.9-34) | Revised "Direct Investment Program" to "Local Direct Investment Program" | Clarification |
| Chapter 2 Section 10 (Page 2.10-9) | Updated Strategy T-4: Establish Local Direct Investment Program. Updated 2030 GHG target emissions gap to 179,090 $MTCO_2e$ | Update |

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| Chapter 2 Section 10 (Page 2.10-10) | Delete Strategy E-1 and Measure E-1.1 | Update |
| Chapter 2 Section 10 (Page 2.10-10) | Delete Measure E-2.2 | Update |
| Chapter 2 Section 10 (Page 2.10-11) | Updated Measure E-2.4: Increase ~~Use of~~ On-Site Renewable Electricity Generation for County Operations. | Update |
| Chapter 2 Section 10 (Page 2.10-19) | Delete reference to Measure E-1.1 | Update |
| Chapter 2 Section 10 (Page 2.10-19) | Delete reference to Measure E-2.2 | Update |
| Chapter 2 Section 10 (Page 2.10-12 through 2.10-21) | Replace "Strategy SW-1.1 Increase Solid Waste Diversion" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |
| Chapter 2 Section 10 (Page 2.10-15 through 2.10-29) | Revised "Direct Investment Program" to "Local Direct Investment Program" | Clarification |
| Chapter 2 Section 11 (Page 2.11-8) | Added Strategy T-3 Decarbonize On-Road and Off-Road Vehicle Fleet | Update |
| Chapter 2 Section 11 (Page 2.11-8) | Updated Strategy T-4: Establish Local Direct Investment Program. Updated 2030 GHG target emissions gap to 179,090 $MTCO_2e$ | Update |
| Chapter 2 Section 11 (Page 2.11-9 through 2.11-14) | Replace "Strategy SW-1.1 Increase Solid Waste Diversion" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |
| Chapter 2 Section 11 (Page 2.11-8 through 2.11-16) | Revised "Direct Investment Program" to "Local Direct Investment Program" | Update |
| Chapter 2 Section 11 (Page 2.11-10 through 2.11-31) | Updated impacts to noise to include electric vehicle charging stations (EVCS) | Update |
| Chapter 2 Section 11 (Page 2.11-12) | Corrected reference to title of chapter 2 "Aesthetics ~~and Visual Resources~~" | Correction |
| Chapter 2 Section 12 (Page 2.12-13) | Added Strategy T-3 Decarbonize On-Road and Off-Road Vehicle Fleet | Update |
| Chapter 2 Section 12 (Page 2.12-15 through 2.12-25) | Updated impacts to transportation and traffic to include electric vehicle charging stations (EVCS) | Update |

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| Chapter 2 Section 12 (Page 2.12-28) | Corrected text "CAP Mitigation Measure M-TRAF-1" | Correction |
| Chapter 2 Section 13 (Page 2.13-5) | Added Strategy T-3 Decarbonize On-Road and Off-Road Vehicle Fleet | Update |
| Chapter 2 Section 13 (Page 2.13-5) | Updated Strategy T-4: Establish Local Direct Investment Program. Updated 2030 GHG target emissions gap to 179,090 $MTCO_2e$ | Update |
| Chapter 2 Section 13 (Page 2.13-6) | Replace "Strategy SW-1.1 Increase Solid Waste Diversion" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |
| Chapter 3 (Page 3-7 through 3-8) | Replace "GHG Reduction Measure SW-1.1" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |
| Chapter 4 (Page 4-6 through 4-78) | Replace "GHG Reduction Measure SW-1.1" with "Increased Solid Waste Diversion Alternative." Update correlating descriptors as well. | Update |
| Chapter 4 (Page 4-9) | Corrected amount of non-residential roof space available in the unincorporated County to 18.7 million square feet. | Correction |
| Chapter 4 (Page 4-9 through 4-10) | Delete reference to Measure E-2.2 | Update |
| Chapter 4 (Page 4-10) | Clarification of Measure E-2.4: "Measure E-2.4, a Distributed Generation Alternative could ~~also~~ require additional renewable energy generation from County facilities, ~~the feasibility of which is not known and~~ which would require an amendment to the County's 2015 – 2020 Strategic Energy Plan" | Clarification |
| Chapter 4 (Page 4-10) | Clarification of the County's 2015-2020 Strategic Energy Plan: "The County's 2015-2020 Strategic Energy Plan identifies the feasible actions the County can take to increase renewable energy facilities on its buildings. Currently, 2.8% of the County's operational electricity is provided by onsite renewable sources. As defined in the County's 2015-2020 Strategic Energy Plan, increasing onsite renewable generation is one of the County's top sustainability priorities and efforts are already underway to increase onsite generation to meet both the goals of the 2015- | Clarification |

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| | 2020 Strategic Energy Plan and the targets in the CAP. Expansion of renewable energy generation at County facilities beyond what is currently identified may not be feasible due to the limited suitability and availability of eligible County sites. The balance of available sites include older facilities that would require significant upgrades to roofing or electrical systems, facilities that are not properly oriented to accommodate solar, buildings that are in locations planned to be redeveloped, or buildings that are in locations where the County cannot confirm its presence onsite for the next 25 years. Therefore, an alternative that would require expansion of renewable energy generation at County facilities may not be feasible without further study." | |
| Chapter 4 (Page 4-11) | Updated number of CAP reduction measures from 29 to 26 | Update |
| Chapter 4 (Page 4-14 through 4-15) | Changed the reduction from large-scale renewable energy component of the enhanced Direct Investment Program Alternative from ~~227,423~~ to 229,852 $MTCO_2e$ in 2030.<br><br>Clarified the total reductions required from this alternative by adding the following sentence: Therefore, the Enhanced Direct Investment Alternative would require a total of 405,312 $MTCO_2e$ (i.e., 229,852 $MTCO_2e$ from removal of the large-scale renewable energy component plus 175,460 $MTCO_2e$ from GHG Reduction Measure T-4.1) in GHG reductions from direct investment projects. | Clarification |
| Chapter 4 (Page 4-15) | Addition of Direct Investment Program mitigation update: "Since the release of the Draft EIR, the "Preliminary Assessment of the County of San Diego Local Direct Investment Program" was completed (see the attachment to the Planning Commission Hearing Report). The report estimates that the County could obtain 50,100 to 198,800 $MTCO_2e$ of reductions via a local direct investment program." | Update |
| Chapter 4 (Page 4-50 and 4-52 and 4-55 and 4-69) | Correction to indicate amount of GHG emissions that would occur if Solid Waste Diversion Alternative was implemented. Changed "~~74,572~~" to "79,052" and strike "~~additional~~". | Correction |

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| Chapter 4 (Page 4-23 through 4-48) | Addition of an Expanded Analysis of the 100% Renewable Energy Alternative. This expanded analysis provides the appropriate level of analysis, impact, conclusion, and mitigation that would be necessary should the County decide to take action and approve the 100% Renewable Energy Alternative that was provided in the Draft EIR. | Update |
| Chapter 4 (Page 4-53 through 4-79) | Addition of an Expanded Analysis of the Increased Solid Waste Diversion Alternative. This expanded analysis provides the appropriate level of analysis, impact, conclusion, and mitigation that would be necessary should the County decide to take action and approve the Increased Solid Waste Diversion Alternative that was provided in the Draft EIR. | Update |
| Chapter 7 Section 1.7 (Page 7-4 through 7-6) | Revise phrase "carbon offset project" to "carbon offset credit" | Clarification |
| Chapter 8, Table 8-1 (Pages 8-7 and 8-8) | Updated Table 8-1 with names of late commenters. | Update |
| Chapter 8 (Page 8-20) | Corrected the amount of GHG emissions reductions required by T-4.1 under Staff Recommended Project. Changed "~~167,592~~" to "175,460". | Correction |

## VIII. CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT, CEQA GUIDELINES § 15090

The Board of Supervisors certifies that the Final EIR, dated January 2018, on file with the Department of Planning & Development Services, as EIR # PDS2016-ER-16-00-003 has been completed in compliance with CEQA and the State CEQA Guidelines, that the SEIR was presented to the Board of Supervisors, and that the Board of Supervisors reviewed and considered the information contained therein before approving the Project, and that the SEIR reflects the independent judgment and analysis of the Board of Supervisors. State CEQA Guidelines § 15090.

## IX. STATEMENT OF OVERRIDING CONSIDERATIONS

The Findings required under the CEQA (Public Resources Code sections 21000 et seq.) and the CEQA Guidelines (California Code Regulations, title 14, section 15000 et seq.) supporting the approval of the County of San Diego ("County") Climate Action Plan (CAP) conclude that the County's approval of the Project would result in significant impacts that cannot be substantially

lessened or avoided. Despite these impacts, the County of San Diego Board of Supervisors chooses to approve the CAP because specific economic, social, and environmental benefits of the Project outweigh and override these significant and unavoidable impacts. The County has adopted all feasible mitigation measures with respect to the significant unavoidable environmental impacts listed below. In addition, the County has analyzed a reasonable range of alternatives to the proposed project. Based on the analysis, the County has determined that Modified Option 3 meets the objectives of the Project and is feasible and environmentally preferable to the proposed project. Therefore, the County is adopting the CAP (Modified Option 3), and sets forth this Statement of Overriding Considerations for its adoption despite the significant and unavoidable environmental impacts identified in the SEIR and noted below:

**Significant Unavoidable Environmental Impacts**

| Final SEIR Section | Subject/Issue |
|---|---|
| 2.1.4.1 | Scenic Vistas/Scenic Resources |
| 2.1.4.2 | Visual Character or Quality |
| 2.1.4.3 | Nighttime Lighting Effects to Dark Skies |
| 2.2.4.1 | Direct or Indirect Conversion of Agricultural Resources |
| 2.2.4.2 | Conflict with Agricultural or Forest Zoning |
| 2.2.4.3 | Direct or Indirect Conversion or Loss of Forest Land |
| 2.3.4.2 | Conformance to Federal and State Air Quality Standards |
| 2.3.4.3 | Non-Attainment Criteria Pollutants |
| 2.3.4.4 | Air Quality Effects to Sensitive Receptors |
| 2.3.4.5 | Odors |
| 2.4.4.1 | Candidate, Sensitive, or Special-Status Plant and Wildlife Species |
| 2.4.4.2 | Riparian Habitat and Other Sensitive Natural Communities |
| 2.4.4.4 | Wildlife Movement Corridors |
| 2.5.4.1 | Historical Resources |
| 2.5.4.2 | Archaeological Resources |
| 2.5.4.3 | Paleontological Resources |
| 2.5.4.4 | Human Remains |
| 2.7.4.1 | 2050 GHG Reduction Target |
| 2.8.4.4 | Wildland Fires |
| 2.9.4.1 | Water Quality Standards |
| 2.9.4.2 | Groundwater Supplies |
| 2.9.4.3 | Existing Drainage Patterns |
| 2.10.4.1 | Physical Division of Existing Communities |
| 2.11.4.1 | Excessive Noise Levels |
| 2.11.4.3 | Permanent Increase in Ambient Noise Levels |
| 2.11.4.4 | Temporary or Periodic Increase in Ambient Noise Levels |
| 2.12.4.1 | Level of Service Standards |
| 2.13.4.1 | Tribal Cultural Resources |

Each of the reasons for approval cited below is a separate and independent basis that justifies approval of the CAP. Thus, even if a court were to set aside any particular reason or reasons, the Board of Supervisors finds that it would stand by its determination that each reason, or any combinations of reasons, is a sufficient basis for approving the CAP notwithstanding the significant and unavoidable impacts that may occur. The substantial evidence supporting the

various benefits can be found in the CEQA Findings Regarding Significant Effects, the Final EIR and in the Record of Proceedings.

**Statement of Overriding Considerations**
The County finds that Modified Option 3 (hereinafter referred to as the "Project") would have the following specific economic, social, and environmental benefits:

1. The Project provides a strategic framework—through detailed strategies, measures, and supporting efforts focused on locally-based actions—to reduce the County's greenhouse gas (GHG) emissions in accordance with State-mandated targets and the County's 2011 General Plan Update (GPU).

2. The Project results in a reduction in GHG emissions throughout the County, thereby leading to overall improved quality of life and health for its residents, workers, and visitors.

3. The Project provides streamlining benefits for future development projects that are consistent with it. In accordance with Section 15183.5 of the CEQA Guidelines, the GHG analyses for these future projects will be simplified by completing the CAP Consistency Review Checklist.

4. The Project supports the Community Development Model concept by minimizing land consumption through the increase in purchase of lands by the County for the use of open space, habitat, and agriculture. This commitment improves air quality and water quality while also providing carbon sequestration.

5. The Project further supports the Community Development Model concept by committing to updating fifteen community plans by 2030 and four by 2050 for a total of 19 community plan updates. These updates will emphasize mixed-use and transit-oriented development within village centers, resulting in improved mobility and public health, as well as job generation.

6. The Project progresses State goals for cleaner vehicle emissions and decarbonizing vehicles by providing 2,040 electrical vehicle (EV) charging stations that will enhance charging capabilities for current EV owners while also incentivizing the purchase of non-gasoline-dependent vehicles.

7. The Project further decarbonizes the on-road and off-road vehicle fleet by implementing a local vehicle retirement program. This will improve air quality and public health.

8. The Project improves mobility by improving 700 centerline miles of roadway segments by 2030. This serves to reduce Vehicle Miles Traveled (VMT) and

encourage pedestrian and cyclist trips by creating a more comfortable and safer experience when traveling along public roads.

9. The Project further reduces VMT and related GHG emissions through requirements on new non-residential projects through the creation of a Transportation Demand Management (TDM) Ordinance and a shared or reduced parking requirement. It also reduces County employee commute VMT by increasing reliance on alternative modes of transportation and encouraging participation in alternative work schedules or telecommute options.

10. The Project creates a local direct investment program that will retire GHG emissions by investing in local projects. This program will generate jobs, sequester carbon, result in cost savings, and improve the local environment.

11. The Project reduces energy use through improvements at existing County facilities, and by improving existing building energy efficiency. This results in improved air quality and cost savings.

12. The Project increases renewable electricity generation by achieving 90% renewable electricity for the unincorporated county by 2030. This will lower GHG emissions by relying on cleaner electricity and will improve air quality and public health. It will also generate jobs through the inducement of additional renewable energy projects.

13. The Project further increases renewable electricity by providing an incentive to install solar photovoltaic (PV) systems in existing homes and increasing the County's use of renewables through on-site development. These measures will generate jobs and improve air quality and public health.

14. The Project increases solid waste diversion by achieving an 80% solid waste diversion target by 2030. The County will focus on reducing different waste types and sources, such as reducing food and other organic waste generated from residential and commercial uses. This measure will generate jobs, improve public health, and result in cost savings.

15. The Project reduces potable water consumption by requiring increased water efficiency in new residential development, a reduction in outdoor potable water use for all development and reducing potable water consumption at existing County facilities. These measures result in increased energy and cost savings, improved public health, and lessens the dependence on imported water sources.

16. The Project encourages agriculture by supporting the conversion of agricultural equipment to alternative fuels and increases carbon sequestration through tree planting requirements and a County-initiated tree planting program. These

measures serve to reduce noise, improve air quality and public health, and improve visual quality.

17. The Project supports housing affordability by eliminating requirements that add to the cost of housing.

18. The Project supports reducing costs to develop non-residential projects in the unincorporated County. The Project would encourage development of projects that would create jobs in the unincorporated County.

For the foregoing reasons, the County finds that the Project's unavoidable potential significant environmental impacts are outweighed by these considerable benefits.

## X. STATEMENT OF LOCATION AND CUSTODIAN OF DOCUMENTS OR OTHER MATERIALS THAT CONSTITUTE A RECORD OF PROCEEDINGS

Project Name: County of San Diego Climate Action Plan

Reference Case Numbers: EIR # PDS2016-ER-16-00-003;
SCH No. 2016101055

The CEQA [Section 21081.6(a)(2)] requires that the lead agency (in this case the County of San Diego) specify the location and custodian of the documents or other material that constitute the record of proceedings upon which its decision is based. It is the purpose of this statement to satisfy this requirement.

Location of Documents and Other Materials That Constitute the Record of Proceedings:

County of San Diego, Planning & Development Services
Project Processing Center
5510 Overland Avenue, Suite 110
San Diego, California 92123

County of San Diego, Clerk of the Board of Supervisors
1600 Pacific Highway, Room 402
San Diego, California 92101

Custodian:

County of San Diego, Planning & Development Services
Project Processing Center
5510 Overland Avenue, Suite 110
San Diego, California 92123

County of San Diego, Clerk of the Board of Supervisors
1600 Pacific Highway, Room 402
San Diego, California 92101