2.13 Transportation

This section describes existing conditions related to transportation and evaluates the potential effects that implementation of the CAP Update may have on this issue. Because this analysis is subsequent to the certified 2011 GPU PEIR, the evaluation of impacts focuses on the potential for implementation of the CAP Update to result in new or substantially more severe impacts than presented in the 2011 GPU PEIR, given the changes to the General Plan proposed by the CAP Update and changes in environmental and regulatory conditions that have occurred since the certification of the 2011 GPU PEIR.

This section incorporates by reference the transportation setting and impact analysis from the 2011 GPU PEIR as it applies to the CAP Update and supplements with relevant setting conditions that have changed since certification of the GPU PEIR. Senate Bill (SB) 743, passed in 2013, required the Governor's Office of Planning and Research (OPR) to develop new State CEQA Guidelines that address transportation metrics under CEQA. In 2018, Appendix G of the State CEQA Guidelines was amended to include additional significance criteria to evaluate a project's potential impact on vehicle miles traveled (VMT). Because the amended significance criteria addressing VMT was not yet adopted in 2008, when the Notice of Preparation (NOP) for the 2011 GPU PEIR was released, an evaluation of potential impacts on VMT was not included in the 2011 GPU PEIR. Additionally, SB 743 discusses impacts from parking, stating that "the adequacy of parking for a project shall not support a finding of significance." (See Public Resources Code Section 21099(b)(3).) Therefore, parking capacity is not considered in this analysis.

Table 2.13-1 summarizes the impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the CAP Update. As indicated in Table 2.13-1, implementation of the CAP Update would not result in new or more severe significant impacts on transportation.

Comments received in response to the NOP related to transportation included suggestions to encourage telecommuting; increase development near transit; implement complete streets strategies to reduce VMT; and coordinate between the County and other partner agencies to ensure consistency between policies, projects, and plans. Copies of the NOP and comment letters received in response to the NOP are included in Appendix A of this ~~draft~~ SEIR.

Table 2.13-1 Summary of Transportation-Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			Potential New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System	General Plan Only: Less Than Significant with Mitigation Incorporated	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Not Cumulatively Considerable	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
2	Exceed Threshold for Vehicle Miles Traveled	Not Applicable[1]	CAP Update Only: No	CAP Update Only: No
		Not Applicable[1]	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
3	Increase Hazards Due to a Design Features[2]	General Plan Only: Significant and Unavoidable	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Cumulatively Considerable	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No
4	Result in Inadequate Emergency Access	General Plan Only: Less Than Significant with Mitigation Incorporated	CAP Update Only: No	CAP Update Only: No
		General Plan Cumulative Contribution: Not Cumulatively Considerable	CAP Update Cumulative Contribution: No	CAP Update Cumulative Contribution: No

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

[1] The 2011 GPU PEIR determined significance based on level of service (LOS). However, Section 15064.3 of the State CEQA Guidelines was adopted in December 2018 and provides that vehicle miles traveled (VMT) is the "most appropriate measure of transportation impacts" and mandated analysis of VMT impacts effective July 1, 2020. LOS, or other measures of automobile delay, are no longer considered significant environmental impacts under CEQA (Public Resources Code Section 21009[b][2]). Therefore, LOS is no longer considered an appropriate metric for analyzing transportation impacts on the environment; and thus, is not considered in this analysis.

[2] The 2011 GPU PEIR determined transportation hazard significance based on rural road safety. The transportation hazards analysis contained herein incorporates rural road safety. The 2011 GPU PEIR findings related to rural road safety are summarized in Section 2.15.3.5, Issue 3.

Source: Compiled by Ascent Environmental in 2023.

2.13.1 Existing Conditions

This section describes the existing roadway network, transit services, and bicycle and pedestrian facilities in the unincorporated county. Section 2.15.1 of the 2011 GPU PEIR includes a discussion of the existing conditions related to transportation and traffic in the unincorporated county based on level of service (LOS). In 2013, SB 743 was enacted, with

an implementation date of July 1, 2020, requiring public agencies to no longer use LOS for traffic analysis and instead use VMT.

2.13.1.1 Roadway Network

The County Roadway Register Report classifies the existing roadway network in the unincorporated county by seven categories: interstates, freeways or expressways, principal arterials, minor arterials, major collectors, minor collectors, and local roads (County of San Diego 2023). The General Plan groups roadways by similar types, the four groups being state highways, Mobility Element roadways, local public roads, and private roads. “Mobility Element roadways” refers to the portion of the County Mobility Element roadway system that have been constructed. The County of San Diego Department of Public Works Road Section is responsible for maintaining nearly 2,000 miles of County Mobility Element roadways and other transportation facilities, such as bridges and guardrails, signs, traffic signals and crosswalks. Within the unincorporated county, there are approximately 5 miles of principal arterial roads, 146 miles of minor arterials roads, 481 major collector roads, 198 minor collector roads, and 1,117 local roads (County of San Diego 2023).

2.13.1.2 Transit Services

The San Diego Metropolitan Transit System (MTS) and the North County Transit District (NCTD) are the two agencies responsible for providing bus, rail, and paratransit services within the San Diego region. Additionally, the Amtrak Pacific Surfliner provides intercity rail service along the Los Angeles–San Diego–San Luis Obispo Rail Corridor. Other specialized transit services are offered through the Consolidated Transportation Service Agency (CTSA) for the San Diego region.

Bus Service

MTS offers over 100 fixed bus routes throughout its service area, including traditional urban shuttle-type routes, express routes, and bus rapid transit routes, as well as paratransit services. Bus services are provided in the unincorporated county by the San Diego Transit Corporation (SDTC), which is owned by MTS. SDTC serves the Cities of San Diego, El Cajon, La Mesa, and National City, in addition to the unincorporated communities of Julian, Desert, Central Mountain, Lakeside, Alpine, Mountain Empire, Crest, Valle de Oro, Spring Valley, Sweetwater, and Otay. SDTC bus service provides connections to light and heavy rail services and offers local service and express service (MTS 2020).

NCTD operates a bus system referred to as the BREEZE, which serves the unincorporated north county. BREEZE serves eight north county cities, in addition to the unincorporated communities of Pendleton/De Luz, Fallbrook, Ramona, Pala/Pauma Valley, Valley Center, North County Metro, and San Dieguito. BREEZE operates approximately 30 different bus routes, many of which provide connections to light rail systems and tourist attractions (NCTD 2022).

Rail Service

There are five railroad providers that operate on two railroad corridors within the San Diego region. Many of these rail lines are located within the incorporated areas of the county; however, some unincorporated residents use these systems. Railroad providers for San Diego County include NCTD, MTS, BNSF, Carrizo Gorge Railway, and San Diego and Imperial Valley Railroad. The two railroad corridors that cross the county are the Los Angeles–San Diego–San Luis Obispo Rail Corridor and the San Diego & Arizona Eastern Railway Corridor.

MTS operates the San Diego Trolley, which runs along the San Diego & Arizona Eastern Railroad Corridor. The entire system encompasses 54.3 total miles (107.6 total track miles) of light rail transit on three routes serving 53 transit centers. Although the entire trolley line is located within the incorporated areas of the county, many residents from the unincorporated areas of the county use its service. Fiscal Year 2022 ridership for the MTS trolley system reached approximately 30 million trips, and bus ridership totaled approximately 28 million trips (MTS 2022).

NCTD operates the SPRINTER Light Rail system between Oceanside and Escondido on a rail line that runs approximately parallel to State Route 78. The Buena Creek SPRINTER Station is the only site in the unincorporated county that is served by high-frequency light rail transit. The SPRINTER rail line is 22 miles long and runs 455 trains every week. The NCTD COASTER rail line is 41 miles long. More than 190 COASTER trains operate each week along the coastal corridor between Oceanside and downtown San Diego.

Paratransit and Other Specialized Transit Services

MTS Access is an origin-to-destination, shared ride, advanced reservation public transit service provided in accordance with the Americans with Disabilities Act. Consistent with the Americans with Disabilities Act, MTS Access is comparable to MTS's fixed-route bus system including in terms of service characteristics (such as on-time performance and travel time) and service area (providing service within three-quarters of a mile of a regular MTS fixed bus route). The service is intended to complement the fixed bus and trolley routes and times. Similarly, NCTD LIFT provides paratransit services at a level that is comparable to NCTD's fixed-route bus service. The NCTD LIFT service is provided to areas that are within three-quarters of a mile of an NCTD BREEZE bus route and/or SPRINTER rail station.

Facilitating Access to Coordinated Transportation, operated by CTSA, provides access to transportation for seniors, persons with disabilities, veterans, and the income disadvantaged and fills gaps in existing transit services, acting as a mobility manager by referring individuals to the most appropriate transportation mode. Transportation referrals are provided in person, over the phone, and through a web-based trip planner (511 San Diego Region).

2.13.1.3 Bicycle and Pedestrian Systems

Of the roughly 2,000 miles of County-maintained roadways, less than half include sidewalks, and less than 1 percent include a bicycle route or lane.

The County of San Diego Active Transportation Plan (ATP) classifies bike lanes in the following four types:

- Class I Bike Path: A completely separated right-of-way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.
- Class II Bike Lanes: A striped lane for one-way bike travel on a street or highway.
- Class III Bike Route: Provides for shared use with vehicular traffic within the travel lane.
- Class IV Separated Bikeway: A physically separated bikeway for the exclusive use of bicycles. The separation may include, but is not limited to, grade separation, flexible posts, inflexible posts, inflexible barriers, or on-street parking.

As of 2018, the unincorporated county had 1 mile of Class I, 145 miles of Class II, and 9 miles of Class III bicycle facilities, totaling 155 miles of existing bicycle facilities. There are currently no Class IV bicycle facilities in the unincorporated county (County of San Diego 2018: 3-3).

Pedestrian facilities in the unincorporated county include sidewalks, pathways, and trails. Results from a County Pedestrian Gap Analysis and evaluation of existing facilities revealed that roughly 53 percent, or 401 miles, of the assessment roadways have no sidewalk or pedestrian facility (County of San Diego 2018: 3-3).

2.13.2 Regulatory Framework

Section 2.15.2 of the 2011 GPU PEIR describes the regulatory framework related to transportation and is incorporated herein by reference. SB 743 was signed into effect in 2013 with an implementation date set for July 1, 2020. While the 2011 GPU PEIR included VMT numbers for the unincorporated county, it did not include analysis for VMT as currently required under SB 743. Therefore, a discussion of SB 743 is provided below. The majority of the local regulatory discussion in the 2011 GPU PEIR regarding transportation remains applicable to the proposed project; however, several legislative regulations, policy guidance documents, and funding mechanisms related to transportation have been authorized or updated since the adoption of the 2011 GPU PEIR. Therefore, a discussion of each is provided below.

2.13.2.1 Federal

Specific regulations discussed in the 2011 GPU PEIR and applicable to the CAP Update include the following:

- Americans with Disabilities Act
- Title 23, Code of Federal Regulations, Section 450.220

In addition to the above, the following regulation related to transportation has been adopted and/or updated since certification of the 2011 GPU PEIR.

Highway Capacity Manual, 7th Edition (2022)

The Highway Capacity Manual is the fundamental reference for concepts, performance measures, and analysis techniques for evaluating the multimodal operation of streets, highways, freeways, and off-street paths. The 7th edition was published in 2022 and contains new information, including new planning-level methods for connected and automated vehicles; a completely revised procedure for analyzing two-lane highways; a new procedure for evaluating systems of freeways and arterials with queue spillback; and updated methodologies for pedestrian operations at uncontrolled and signalized crossings.

2.13.2.2 State

Specific regulations discussed in the 2011 GPU PEIR and applicable to the CAP Update include the following:

- California Department of Transportation (Caltrans) Standards
- Statewide Transportation Improvement Program
- Transportation Development Act

In addition to the above, the following regulations related to transportation have been adopted and/or updated since certification of the 2011 GPU PEIR.

Senate Bill 375

Governor Arnold Schwarzenegger signed SB 375, the 2008 Sustainable Communities and Climate Protection Act, on September 30, 2008, with the purpose of reducing greenhouse gas (GHG) emissions from passenger vehicles through coordinated transportation and land use planning strategies. The legislation is two-fold requiring the California Air Resources Board (CARB) to set and regularly update per capita was a metric used extensively in the transportation industry at the time the 2011 GPU PEIR was prepared for a variety of purposes including, but not limited to highway cost allocation, determining user fee structures, and estimating air quality and GHG emissions; thus, VMT related to the build out of the general plan was a known concept at the time.

For the purpose of forecasting GHG emissions from growth anticipated under the adopted General Plan, VMT GHG emissions reduction targets by region as well as mandating each of California's 18 metropolitan planning organizations to include a Sustainable Communities Strategy in their federally mandated long-range Regional Transportation Plan to demonstrate how the region plans to meet CARB's GHG emission reduction targets.

Senate Bill 743

SB 743, passed in 2013, required OPR to develop new State CEQA Guidelines that address transportation metrics under CEQA. As stated in the legislation, upon adoption of the new guidelines, "automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any."

OPR published its proposal for the comprehensive updates to the State CEQA Guidelines in November 2017, which included proposed updates related to analyzing transportation impacts pursuant to SB 743. These updates indicated that VMT would be the primary metric used to identify transportation impacts. In December of 2018, OPR published the most recent version of the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR Technical Advisory) which provides guidance for VMT analysis (OPR 2018). The OPR Technical Advisory recommends that a per capita or per employee VMT that is fifteen percent below that of existing development, measured against the region or city, may indicate a less-than-significant transportation impact. As used in the OPR Technical Advisory, "regional" refers to the full geography within the jurisdictional borders of a metropolitan planning organization or a regional transportation planning agency. Comparing a project's VMT per capita or VMT per employee to that of the entire region or entire city allows a lead agency to better align with the state's climate commitments. Comparison to only a portion of the region or city could result in a less environmentally protective significance threshold, potentially disconnecting significance determinations from those commitments (OPR 2023). In December 2018, OPR and the state Natural Resources Agency submitted the updated State CEQA Guidelines to the Office of Administrative Law for final approval to implement SB 743. The Office of Administrative Law subsequently approved the updated State CEQA Guidelines, and local agencies had an opt-in period until July 1, 2020, to implement the updated guidelines. As of July 1, 2020, implementation of Section 15064.3 of the updated State CEQA Guidelines applies statewide.

Vehicle Miles Traveled-Focused Transportation Impact Study Guide

The Vehicle Miles Traveled-Focused Transportation Impact Study Guide was prepared by Caltrans to provide guidance to Caltrans districts, lead agencies, tribal governments, developers, and consultants regarding Caltrans's review of a land use project or plan's transportation analysis using the VMT metric for evaluating transportation impacts. It replaces the *Guide for the Preparation of Traffic Impact Studies* (2002) and is for use with local land use projects.

Interim Local Development and Intergovernmental Review Safety Review Practitioners Guidance

The Interim Local Development and Intergovernmental Review Safety Review Practitioners Guidance was released by Caltrans in December 2020 to provide instruction to Caltrans staff, lead agencies, and consultants regarding safety impact review expectations under CEQA and can be used as a guide at the local review level for assessing safety impacts of projects and plans on local right-of-way. It supports the implementation of SB 743 which uses VMT as a measure for transportation impact analyses over LOS with special consideration of vulnerable users and communities.

Transportation Analysis Framework: Evaluating Transportation Impacts of State Highway System Projects and Transportation Analysis under CEQA

Caltrans released the Transportation Analysis Framework: Evaluating Transportation Impacts of State Highway System Projects and Transportation Analysis under CEQA in September 2020 to serve as additional guidance in the implementation of SB 743. The Transportation Analysis Framework establishes changes to Caltrans procedures for the analysis of transportation impacts of projects on the State Highway System, primarily induced demand and provides direction for the preferred approach for analyzing the VMT attributable to proposed projects in various project settings. Transportation Analysis under CEQA provides information to support Caltrans's CEQA practitioners in making CEQA significance determinations for transportation impacts of projects on the State Highway System.

Mobile Source Strategy

The Mobile Source Strategy, updated by CARB every 5 years, demonstrates how the state can simultaneously meet air quality standards, achieve GHG emissions reduction targets, decrease health risk from transportation emissions, and reduce petroleum consumption. Statewide, the concepts in the 2020 Strategy could achieve criteria pollutant NO_x reductions of over 590 tons per day in 2037 and reduce mobile source fuel consumption by 9.5 billion gallons of gasoline and 3.0 billion gallons of diesel equivalent in 2045. This equates to a well-to-wheel GHG emissions reduction of approximately 94 million metric tons of carbon dioxide equivalent in 2045 (CARB 2021: 4).

California Transportation Plan

The 2050 California Transportation Plan, approved in February 2021, is a federal and state-mandated state transportation plan that ties several internal and external inter-related plans and programs and "provides a common framework for guiding transportation decisions and investments by all levels of government and the private sector" (Caltrans 2016). It is updated every 5 years and demonstrates how the state will achieve state targets for GHG reductions.

Active Transportation Program

Governor Jerry Brown signed legislation on September 26, 2013, creating the Active Transportation Program. The program consolidated several federal and state programs in an effort to promote biking and walking across California. The Active Transportation Program encourages increased use of active transportation through the promotion of environmental, equitable, economic, and public health-related goals. An amount of $100,000,000 of SB 1 funding is dedicated to the Active Transportation Program annually.

Solutions of Congested Corridors Program

The Solutions of Congested Corridors Program makes $250 million available annually to projects that implement specific transportation performance improvements and are part of a comprehensive corridor plan, by providing more transportation choices while preserving the character of local communities and creating opportunities for neighborhood enhancement. Eligible projects may include improvements to state highways, local streets, rail facilities, public transit facilities, bicycle and pedestrian facilities, and preservation of critical local habitat and open spaces.

Local Partnership Program

The Local Partnership Program supports investment by local communities by providing matching funds for voter-approved transportation tax measures. Projects under the program include road maintenance and rehabilitation efforts as well as other infrastructure improvements. Funds are allocated on both a formula and competitive basis, which helps ensure smaller jurisdictions receive funding through the program. This program is intended to balance the need to direct increased revenue to the highest transportation needs while distributing the impact of increased funding.

2.13.2.3 Local

Specific regulations discussed in the 2011 GPU PEIR and applicable to the CAP Update include the following:

- Community Plans
- County Zoning Ordinance, Parking Regulations, Sections 6750–6799
- San Diego County Public Road Standards
- San Diego County Private Road Standards
- County of San Diego Consolidated Fire Code
- County of San Diego Regulatory Ordinances, Sections 77.201–77.220, Transportation Impact Fee
- County Community Right-of-Way Development Standards

Discussed below in *County of San Diego Transportation Study Guidelines*, to comply with SB 743, the County of San Diego adopted the updated Transportation Study Guidelines

(TSG) on September 24, 2022, that identifies VMT analysis methodologies, establishes VMT thresholds for CEQA transportation impacts, and identifies initial mitigation strategies. The TSG provides guidance for the methodology and thresholds utilized to evaluate transportation-related impacts.

In addition to the above, the following regulations related to transportation have been adopted and/or updated since certification of the 2011 GPU PEIR.

San Diego Forward: The 2021 Regional Plan

The San Diego Association of Governments (SANDAG) Board of Directors adopted San Diego Forward: The 2021 Regional Plan (2021 Regional Plan) in December 2021. The 2021 Regional Plan combines the Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan. It anticipates the growth that will occur in the region and provides a blueprint for a regional transportation system, while also establishing the region's sustainable community strategy with the overarching vision of promoting sustainability and offering more mobility options for people and goods. The 2021 Regional Plan strategies are organized around the 5 Big Moves: Next Operating System, Complete Corridors, Transit Leap, Mobility Hubs, and Flexible Streets. The three primary goals guiding the 2021 Regional Plan are the efficient movement of people and goods; access to affordable, reliable, and safe mobility options; and healthier air and reduced GHG emissions.

2023 Regional Transportation Improvement Program

The 2023 Regional Transportation Improvement Program (2023 RTIP) is a multi-billion-dollar 5-year program of major transportation projects funded by federal, state, TransNet local sales tax, and other local and private funding covering fiscal year 2023 to fiscal year 2027. The program development process, which includes the air quality emissions analysis for all regionally significant projects, requires approval by the Federal Highway Administration and the Federal Transit Administration.

The 2023 RTIP is a prioritized program designed to implement the region's overall strategy for providing mobility and improving the efficiency and safety of the transportation system, while reducing transportation-related air pollution in support of efforts to attain federal and state air quality standards for the region. The program also incrementally implements the 2021 Regional Plan, which is the long-range transportation plan for the San Diego region. The final 2023 RTIP was adopted by the SANDAG Board of Directors on September 12, 2022, and approved by the Federal Highway Administration and the Federal Transit Administration in December 2022.

County of San Diego Transportation Study Guidelines

The County Board of Supervisors approved the updated TSG in September 2022. The TSG was developed as a guide for analyzing the transportation impacts of proposed projects in the unincorporated county addressing the manner in which transportation impacts under CEQA are measured due to SB 743, which shifts the focus from LOS to VMT. VMT is the total number of miles traveled by motor vehicles, including trips to/from

and within the planning area. The TSG provides CEQA VMT Screening Criteria for projects that are presumed to result in a less-than-significant VMT impact and are, thus, not required to perform a VMT analysis. Projects that do not meet the screening criteria are subject to a detailed evaluation of the VMT produced by the project. Typically, transportation VMT analysis for CEQA should be conducted using the SANDAG Regional Travel Demand Model; however, other tools for conducting VMT analysis may be preferred depending on the project characteristics and the sensitivity of the SANDAG model in the project location and for the project type.

The TSG provides metrics to determine whether a project surpasses the County's VMT Thresholds of Significance. The VMT generated under the current General Plan establishes the baseline in which planned development is compared to identify cumulative transportation-related impacts. The current General Plan conditions represent buildout of the land uses and mobility network assumed within the County's current General Plan.

The TSG establishes thresholds for large land use plans and states that land use plans should be compared to the region overall. Comparison to the region is appropriate because large land use plans can have an effect on regional VMT (County of San Diego 2022). The thresholds apply to large land use plans:

- Residential: Aggregate all residential land uses for the build-out year of the plan and compare the resulting build-out year VMT per resident to the existing regional average. The threshold is 15 percent below the existing regional average VMT per resident.
- Employment: Aggregate all employment land uses for the build-out year of the plan and compare the resulting build-out year VMT per employee to the existing regional average. The threshold is 15 percent below the existing regional average VMT per employee.
- Retail/Service: Evaluate the effect that adding these land uses has on regional VMT. The threshold is any increase in regional VMT.

County of San Diego Regulatory Ordinances, Sections 77.201–77.220, Transportation Impact Fee

The County of San Diego Regulatory Ordinances, Sections 77.201–77.220, Transportation Impact Fee program provides funding for mitigation of cumulative impacts and for proportional construction of transportation facilities needed to support traffic generated by new development to meet state law requirements. Per the County Board of Supervisors ordinance, effective December 31, 2012, the County will collect the fee at or before building permit issuance for projects that generate new trips.

County of San Diego 2020 Consolidated Fire Code

The 2020 Consolidated Fire Code (County Fire Code) includes the County amendments to the 2019 California Fire Code and the ordinances of the 13 unincorporated county fire protection districts. The County Fire Code is adopted for the protection of public health

and safety and applies to both ministerial and discretionary projects. It includes definitions, requirements for permits and inspection for installing or altering systems, regulations for the erection, construction, enlargement, alteration, repair, moving, removal, conversion, demolition, equipment use and maintenance of buildings, structures, and premises, including the installation, alteration or repair of new and existing fire protection systems and their inspection and provides penalties for violation of this code. It applies to new construction and to any alterations, repairs, or reconstruction. Section 503 of the County Fire Code includes provisions and regulations applicable to roadway design and emergency vehicle access.

San Diego County Fire Authority Emergency Vehicle Turnaround, Section 503

The San Diego County Fire Authority provides regulatory standards and design guidance regarding emergency vehicle turnaround. Fire apparatus access roads, except private residential driveways, shall be provided and maintained for purposes of rapid and reliable fire apparatus access and for unobstructed traffic circulation for evacuation or relocation of civilians during a wildfire or other emergency (San Diego County Fire Authority 2016).

County of San Diego Department of Public Works Traffic Control Permit

After obtaining an encroachment, excavation, and/or construction permit from the County, a traffic control permit is necessary for any work on a County-maintained roadway or in the County right-of-way. It is the responsibility of those performing work on or adjacent to a public road in the unincorporated area of the county to install and maintain appropriate traffic control in accordance with an approved traffic control plan. An approved traffic control plan is necessary to provide the motoring public safe passage through the construction zone, as well as to safeguard construction workers (County of San Diego Department of Public Works n.d.).

County of San Diego Active Transportation Plan

The ATP promotes active transportation through pedestrian and bicycle improvements throughout the unincorporated county. The ATP consists of an update to the County's Bicycle Transportation Plan (dated 2008) and the Pedestrian Area Plans (prepared for Alpine, Borrego Springs, Fallbrook Town Center, Lakeside Town Center and Spring Valley) into one combined ATP. The ATP was approved by the Board of Supervisors on October 31, 2018. The ATP identifies goals, objectives, and actions related to improving safety to reduce auto collisions with cyclists and pedestrians, increasing accessibility and connectivity with an active transportation network, and improving public health by encouraging walking and biking.

2011 San Diego County General Plan

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

> Policy LU-2.8: Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that

cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.

Policy LU-5.1: Reduction of Vehicle Trips within Communities. Incorporate a mixture of uses within Villages and Rural Villages and plan residential densities at a level that support multi-modal transportation, including walking, bicycling, and the use of public transit, when appropriate.

Policy LU-5.4: Planning Support. Undertake planning efforts that promote infill and redevelopment of uses that accommodate walking and biking within communities.

Policy LU-5.5: Projects That Impede Non-Motorized Travel. Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts to existing planned routes would occur, ensure that impacts are mitigated and acceptable alternative routes are implemented.

Policy LU-6.9: Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.

Policy LU-6.10: Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.

Policy LU-9.8: Village Connectivity and Compatibility with Adjoining Areas. Require new development within Villages to include road networks, pedestrian routes, and amenities that create or maintain connectivity; and site, building, and landscape design that is compatible with surrounding areas. *[See applicable community plan for possible relevant policies.]*

Policy LU-10.4: Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

Policy LU-11.6: Office Development. Locate new office development complexes within Village areas where services are available, in proximity to housing, and along primary vehicular arterials (ideally with transit access) with internal vehicular and pedestrian linkages that integrate the new development into the multi-modal transportation network where feasible.

Policy LU-11.8: Permitted Secondary Uses. Provide a process where secondary land uses may be permitted when appropriate and compatible with the primary commercial, office, and light industrial uses, in order to better serve the daily needs of employees and to reduce the frequency of related automobile trips. This policy is not intended for high impact industrial uses.

Policy M-1.1: Prioritized Travel within Community Planning Areas. Provide a public road network that accommodates travel between and within community planning areas rather than accommodating overflow traffic from State highways and freeways that are unable to meet regional travel demands.

Policy M-1.2: Interconnected Road Network. Provide an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies.

Policy M-1.3: Treatment of High-Volume Roadways. Consider narrower rights-of-way, flexibility in design standards, and lower design speeds in areas planned for substantial development in order to avoid bisecting communities or town centers. Reduce noise, air, and visual impacts of new freeways, regional arterials, and Mobility Element roads, through landscaping, design, and/or careful location of facilities.

Policy M-2.2: Access to Mobility Element Designated Roads. Minimize direct access points to Mobility Element roads from driveways and other non-through roads to maintain the capacity and improve traffic operations.

Policy M-3.1: Public Road Rights-of-Way. Require development to dedicate right-of-way for public roads and other transportation routes identified in the Mobility Element roadway network (see Mobility Element Network Appendix), Community Plans, or Road Master Plans. Require the provision of sufficient right-of-way width, as specified in the County Public Road Standards and Community Trails Master Plan, to adequately accommodate all users, including transit riders, pedestrians, bicyclists, and equestrians.

Policy M-3.2: Traffic Impact Mitigation. Require development to contribute its fair share toward financing transportation facilities, including mitigating the associated direct and cumulative traffic impacts caused by their project on both the local and regional road networks. Transportation facilities include road networks and related transit, pedestrian and bicycle facilities, and equestrian.

Policy M-3.3: Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes in conformance with state law and local regulations.

Policy M-4.1: Walkable Village Roads. Encourage multi-modal roads in Villages and compact residential areas with pedestrian-oriented development patterns that enhance pedestrian safety and walkability, along with other non-motorized modes of travel, such as designing narrower but slower speed roads that increase pedestrian safety.

Policy M-4.2: Interconnected Local Roads. Provide an interconnected and appropriately scaled local public road network in Village and Rural Villages that reinforces the compact development patterns promoted by the Land Use Element and individual community plans.

Policy M-4.3: Rural Roads Compatible with Rural Character. Design and construct public roads to meet travel demands in Semi-Rural and Rural Lands that are consistent with rural character while safely accommodating transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Where feasible, utilize rural road design features (e.g., no curb and gutter improvements) to maintain community character. [*See applicable community plan for possible relevant policies.*]

Policy M-4.4: Accommodate Emergency Vehicles. Design and construct public and private roads to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.

Policy M-4.5: Context Sensitive Road Design. Design and construct roads that are compatible with the local terrain and the uses, scale and pattern of the surrounding development. Provide wildlife crossings in road design and construction where it would minimize impacts in wildlife corridors.

Policy M-4.6: Interjurisdictional Coordination. Coordinate with adjacent jurisdictions so that roads within Spheres of Influence (SOIs) or that cross jurisdictional boundaries are designed to provide a consistent cross-section and capacity. To the extent practical, coordinate with adjacent jurisdictions to construct road improvements concurrently or sequentially to optimize and maintain road capacity.

Policy M-5.1: Regional Coordination. Coordinate with regional planning agencies, transit agencies, and adjacent jurisdictions to provide a transportation system with the following:

- Sufficient capacity consistent with the County General Plan Land Use Map;
- Travel choices, including multiple routes and modes of travel to provide the opportunity for reducing vehicle miles traveled;
- Facilities sited and designed to be compatible with the differing scales, intensities, and characteristics of the unincorporated communities while still accommodating regional, community, and neighborhood travel demands; and
- Maximized efficiency to enhance connectivity between different modes of travel.

Policy M-5.1 Regional Coordination. Coordinate with regional planning agencies, transit agencies, and adjacent jurisdictions to provide a transportation system with the following:

- Sufficient capacity consistent with the County General Plan Land Use Map
- Travel choices, including multiple routes and modes of travel to provide the opportunity for reducing vehicle miles traveled
- Facilities sited and designed to be compatible with the differing scales, intensities, and characteristics of the unincorporated communities while still accommodating regional, community, and neighborhood travel demands
- Maximized efficiency to enhance connectivity between different modes of travel

Policy M-5.2: Impact Mitigation for New Roadways and Improvements. Coordinate with Caltrans to mitigate negative impacts from existing, expanded, or new state freeways or highways and to reduce impacts of road improvements and/or design modifications to state facilities on adjacent communities.

Policy M-8.1: Maximize Transit Service Opportunities. Coordinate with San Diego Association of Governments (SANDAG), the CTSA, NCTD, and MTS to provide capital facilities and funding, where appropriate, to:

- Maximize opportunities for transit services in unincorporated communities;
- Maximize the speed and efficiency of transit service through the development of transit priority treatments such as transit signal priority, transit queue jump lanes, and dedicated transit only lanes;
- Provide for transit-dependent segments of the population, such as the disabled, seniors, low income, and children, where possible; and
- Reserve adequate rights-of-way to accommodate existing and planned transit facilities including bus stops.

Policy M-8.2: Transit Service to Key Community Facilities and Services. Locate key County facilities, healthcare services, educational institutions, and other civic facilities so that they are accessible by transit in areas where transit is available. Require those facilities to be designed so that they are easily accessible by transit, whenever possible.

Policy M-8.3: Transit Stops That Facilitate Ridership. Coordinate with SANDAG, NCTD, and MTS to locate transit stops and facilities in areas that facilitate transit ridership, and designate such locations as part of planning efforts for Town Centers, transit nodes, and large-scale commercial or residential development projects. Ensure that the planning of Town Centers and Village Cores incorporates uses that support the use of transit, including multi-family residential and mixed-use transit–oriented development, when appropriate.

Policy M-8.4: Transit Amenities. Require transit stops that are accessible to pedestrians and bicyclists; and provide amenities for these users' convenience.

Policy M-8.5: Improved Transit Facilities. Require development projects, when appropriate, to improve existing nearby transit and/or park and ride facilities, including the provision of bicycle and pedestrian facilities, provisions for bus transit in coordination with NCTD and MTS as appropriate including, but not limited to, shelters, benches, boarding pads, and/or trash cans, and to provide safe, convenient, and attractive pedestrian connections.

Policy M-8.7: Inter-Regional Travel Modes. Coordinate with SANDAG, Caltrans, and the California High-Speed Rail Authority, where appropriate, to identify alternative methods for inter-regional travel to serve the unincorporated county residents.

Policy M-8.8: Shuttles. Coordinate with Tribal governments, the Reservation Transportation Authority, and other large employers to provide shuttles and other means of connecting transit stops with job locations, civic, and commercial uses, where appropriate.

Policy M-9.1: Transportation Systems Management. Explore the provision of operational improvements (i.e. adding turn lanes, acceleration lanes, intersection improvements, etc.) that increase the effective vehicular capacity of the public road network prior to increasing the number of road lanes. Ensure operational improvements do not adversely impact the transit, bicycle, and pedestrian networks.

Policy M-9.2: Transportation Demand Management. Require large commercial and office development to use TDM programs to reduce single-occupant vehicle traffic generation, particularly during peak periods to maximize the capacity of existing or improved road facilities.

Policy M-9.3: Preferred Parking. Encourage and provide incentives for commercial, office, and industrial development to provide preferred parking for carpools, vanpools, electric vehicles and flex cars. [Refer also to Policy COS-16.3 (Low-Emission Vehicles) in the Conservation and Open Space Element.] Encourage parking cash out programs to reimburse employees for the cost of "free" on-site parking to provide incentives to use alternate modes of travel and to reduce parking requirements (see also Policy M-10.5).

Policy M-9.4: Park-and-Ride Facilities. Require developers of large projects to provide, or to contribute to, park-and-ride facilities near freeway interchanges and other appropriate locations that provide convenient access to congested regional arterials. Require park-and-ride facilities that are accessible to pedestrians and bicyclists, and include bicycle lockers and transit stops whenever feasible.

Policy M-10.1: Parking Capacity. Require new development to:

- Provide sufficient parking capacity for motor vehicles consistent with the project's location, use, and intensity;
- Provide parking facilities for motorcycles and bicycles; and
- Provide staging areas for regional and community trails.

Policy M-10.2: Parking for Pedestrian Activity. Parking in a commercial area in Fallbrook Require the design and placement of on-site automobile, motorcycle, and bicycle parking in Villages and Rural Villages that encourages pedestrian activity by providing a clear separation between vehicle and pedestrian areas and prohibit parking areas from restricting pedestrian circulation patterns.

Policy M-10.3: Maximize On-street Parking. Encourage the use of on-street parking in commercial and/or high-density residential town center areas to calm traffic and improve pedestrian interaction. Traffic operations and pedestrian safety must not be compromised.

Policy M-10.4: Shared Parking. Support town center plans, when desired by the community, that incorporate on-street and/or shared vehicular parking facilities to reduce on-site parking requirements.

Policy M-10.5: Reduced Parking. Accommodate appropriate reductions in on-site parking requirements in situations such as:

- Development of low-income and senior housing
- Development located near transit nodes
- Employment centers that institute Transportation Demand Management programs
- Development that integrates other parking demand reductions techniques such as parking cash out, when ensured by ongoing permit conditions

Policy M-11.1: Bicycle Facility Design. Support regional and community-scaled planning of pedestrian and bicycle networks.

Policy M-11.2: Bicycle and Pedestrian Facilities in Development. Require development and Town Center plans in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation, such as comprehensive bicycle and pedestrian networks and facilities, including both on-street facilities as well as off-street bikeways, to safely serve the full range of intended users, along with areas for transit facilities, where appropriate and coordinated with the transit service provider.

Policy M-11.3: Bicycle Facilities on Roads Designated in the Mobility Element. Maximize the provision of bicycle facilities on County Mobility Element roads in

Semi-Rural and Rural Lands to provide a safe and continuous bicycle network in rural areas that can be used for recreation or transportation purposes, while retaining rural character.

Policy M-11.4: Pedestrian and Bicycle Network Connectivity. Require development in Villages and Rural Villages to provide comprehensive internal pedestrian and bicycle networks that connect to existing or planned adjacent community and countywide networks.

Policy M-11.5: Funding for Bicycle Network Improvements. Seek outside funding opportunities for bicycle and pedestrian network improvement projects, particularly those that provide safe and continuous pedestrian and bicycle routes to schools, town centers, parks, park-and-ride facilities, and major transit stops.

Policy M-11.6: Coordination for Bicycle and Pedestrian Facility Connectivity. Coordinate with Caltrans to provide alternate connections for past, existing, or planned bicycle and pedestrian routes that were or would be severed by state freeway and highway projects that intersect pathways or divide communities.

Policy M-11.7: Bicycle and Pedestrian Facility Design. Promote pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village.

Policy S-2.7: Evacuation Access. All development proposals are required to identify evacuation routes at the Community Plan level and identify and facilitate the establishment of new routes needed to ensure effective evacuation. Evacuation routes should be incorporated into existing Community Wildfire Protection Plans where available.

Policy S-4.5: Access Roads. Require development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently. The width, surface, grade, radius, turnarounds, turnouts, bridge construction, vegetative management and brush clearance around roadways, and lengths of fire apparatus access roads shall meet the requirements of the State and San Diego County Consolidated Fire Codes. All requirements and any deviations will be at the discretion of the Fire Code Official.

Policy S-4.6: Fire Protection Plans. Ensure that development located within fire hazard areas implement measures in a Fire Protection Plan that reduce the risk of structural and human loss due to wildfire.

Policy S-12.6: Resilient Transportation Systems. Increase the resilience of transportation systems and protect critical transportation infrastructure from climate change.

Policy S-16.1: Vehicular Access to Development. Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Tra-1.3: Implement the County Public Road Standards during review of new development projects. Also revise the Public Road Standards to include a range of road types according to Regional Category context.

Adopted Mitigation Measure Tra-1.4: Implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Adopted Mitigation Measure Tra-4.4: Implement and revise as necessary the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards.

2.13.3 Analysis of Effects and Significance Determinations

2.13.3.1 Significance Criteria

The significance criteria used to evaluate the project impacts to transportation under CEQA are based on Appendix G of the State CEQA Guidelines, the County of San Diego TSG, and State CEQA Guidelines Section 15064.3. Impacts to the transportation system would be significant if implementation of the project would:

- conflict with a program, plan, ordinance or policy addressing the circulation system;
- exceed threshold for VMT;
- substantially increase hazards due to a design feature;
- result in inadequate emergency access.

2.13.3.2 Approach to Analysis

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

measures are applicable to the proposed project as needed to avoid or minimize project impacts and are considered part of the proposed CAP Update.

Scope of SEIR Impact Analysis

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

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

Proposed CAP Update Strategies

As described in Chapter 1, "Project Description," the overarching strategies and associated measures and actions proposed in the CAP Update (see Table 1-2) have been grouped into categories for the purpose of analysis, based on the sector they target (e.g., solid waste, water/wastewater). CAP Update actions and measures with the potential result in effects to transportation are summarized below. CAP Update measures and actions that would involve development of policies and programs that would not result in direct physical effects or those that would result in limited physical improvements to existing development are not discussed further because these actions and measures would not have potential to result in new or more severe impacts related to all transportation impact analyses except for VMT. The analysis of VMT consistent with State CEQA Guidelines Section 15064.3 considers all policies and programs that could affect VMT.

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

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

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices. Key actions with potential to result in new or more severe impacts related to transportation include those that would result in the construction and maintenance of restoration and conservation projects (Action A-1.2). This category also includes an action that would evaluate opportunities for the construction of farmworker housing (Action A-4.1.b).

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

Built Environment and Transportation Measures and Actions. This category includes strategies to decarbonize the County's vehicle fleet, support active transportation, and reduce single-occupancy vehicle trips. Key actions with potential to result in new or more severe impacts related to transportation include those that would result in the construction of new electric vehicle charging stations (EVCSs) (Action T-3.1), hydrogen fueling infrastructure (Action T-3.1.a), active transportation facilities (Action T-5.1), and transit-supportive roadway treatments (Action T-6.2).

2.13.3.3 Issue 1: Conflict with a Program, Plan, Ordinance or Policy Addressing the Circulation System

This section describes potential project impacts on programs, plans, ordinances, or policies addressing the circulation system with implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* (County of San Diego 2011), the project would result in a significant impact if it would:

- conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Impact Analysis

2011 GPU PEIR Determination

As discussed in Section 2.15, "Transportation and Traffic," the 2011 GPU PEIR evaluated impacts related to transit, roadway, bicycle, and pedestrian facilities with the adoption of the goals and policies contained within the General Plan and buildout of the unincorporated county at the planning horizon. The discussion of impacts can be found in Section 2.15, "Transportation and Traffic" (pages 2.15-36 through 2.15-39) and is hereby incorporated by reference. The 2011 GPU PEIR determined that there would be inconsistencies between the General Plan and existing alternative transportation plans and policies at that time, thus resulting in potentially significant impacts.

The 2011 GPU PEIR determined that the impacts to alternative transportation would be reduced through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; and adopted General Plan policies. The General Plan Policies LU-5.1, LU-6.3, LU-5.4, LU-5.5, LU-9.8, LU-11.6, M-3.1. M-3.3. M-4.3, M-8.1, M-8.2, M-8.3, M-8.4, M-8.5, M-8.6, M-8.7, M-9.2, M-9.4, M-11.2, M-11.3, M-11.4, M-11.5. M-11.6, and M-11.7 would promote provisions for alternative modes of transportation, including bike lanes, bus stops, trails, and sidewalks. Additionally, the 2011 GPU PEIR determined that the impacts to alternative transportation would be further reduced with the implementation of Mitigation Measures Tra-6.1, Tra-6.2, Tra-6.3, Tra-6.4, Tra-6.5, Tra-6.6, Tra-6.7, Tra-6.8, and Tra-6.9. Impacts to alternative transportation were determined to be less than significant with implementation of adopted General Plan policies and the 2011 GPU PEIR mitigation measures referenced above.

CAP Impact Analysis

The following sections describe the potential for implementation of the proposed CAP Update measures and actions to result in impacts to alternative transportation.

As noted above, SANDAG's *2021 Regional Plan* combines the Regional Transportation Plan, Sustainable Communities Strategy, and Regional Comprehensive Plan. The 2021 Regional Plan anticipates the growth that will occur in the region and provides a blueprint for a regional transportation system, while also establishing the region's sustainable community strategy with the overarching vision of promoting sustainability and offering more mobility options for people and goods. The Regional Plan provides a framework for coordinated land use and transportation planning strategies by identifying policies and

programs developed to achieve the goals of efficiently moving people and goods; providing access to affordable, reliable, and safe mobility options for everyone; and providing healthier air and reduced GHG emissions regionwide. The Regional Plan also includes recommendations for funding and implementation of transit, roadway, bicycle, and pedestrian facilities that would improve the transportation circulation system countywide. The measures and actions proposed under the CAP Update and described below are intended to further statewide and regional goals, including those of the Regional Plan, by promoting policies and actions that reduce GHG emissions by improving solid waste and water/wastewater use and management, increasing the availability of renewable sources of energy, promoting sustainable agricultural practices, and promoting transportation and built environment improvements that encourage the development of multi-modal transportation options - including bicycle and pedestrian facilities - and associated vehicular emissions reductions.

An important goal of the Regional Plan is to promote healthier air, including reduced GHG emissions, through reductions in local and regional VMT. A number of CAP Update measures and actions in support of the overall strategy of supporting active transportation and reducing single-occupancy vehicle trips would support this goal by promoting programs and policies to support alternative modes of transportation within the unincorporated county, consistent with the goal of the Regional Plan of improving the transportation circulation system countywide. The degree to which CAP Update implementation not only does not conflict with the Regional Plan but would reduce VMT-related GHG emissions, such that it would be substantially consistent with the GHG reduction strategies of the Regional Plan, is further discussed below under “Issue 2: Exceed Threshold for VMT.”

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and within the unincorporated county. Implementing CAP Update measures and actions (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b) could result in potential construction of new or expanded solid waste facilities. Specific locations for new and expanded facilities have not been identified.

Construction of solid waste facilities would be localized and temporary. Although construction of solid waste facilities and associated off-site improvements could occur within the roadway or along pedestrian and bicycle facilities potentially resulting in lane closures, minor detours, and/or delays due to the movement of construction vehicles and equipment, all projects within County right-of-way would be required to develop and implement a traffic control plan during construction to maintain a safe environment for all modes of transportation.

Once constructed, these projects would not have an impact on the operation of the circulation system. Implementation of CAP Update Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b would not damage or alter any existing bicycle, pedestrian, or transit facilities resulting in an adverse effect to existing or planned facility usage and/or service. All

projects would be subject to review by County staff to ensure all applicable regulations are met, and individual new or expanded solid waste infrastructure projects would need to remain consistent with County policies, plans, and ordinances related to alternative transportation. Therefore, implementation of these projects would not result in conflicts with programs, plans, policies, or ordinances addressing the circulation system.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded solid waste facilities would be required to implement adopted General Plan goals and policies related to alternative transportation. Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that if impacts to planned routes would occur, any such impacts would be mitigated. Policy LU-9.8 requires that development within Villages include connected pedestrian routes and amenities. Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists. Policy M-4.3 calls for the design and construction in Semi-Rural and Rural Lands to safely accommodate transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Policies M-11.2 through M-11.4 require development in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks. Implementation of these policies would minimize impacts related to alternative transportation by ensuring that proposed improvements prioritize connectivity, safety, compatibility with surrounding uses. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Therefore, potential impacts to alternative transportation would be less than significant through implementation of the applicable General Plan policies and completion of subsequent project-level planning and environmental review.

Water and Wastewater Measures and Actions

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

Construction of water and wastewater facilities would be localized and temporary. Although construction of water and wastewater facilities and associated off-site improvements could occur within the roadway or along pedestrian and bicycle facilities potentially resulting in lane closures, minor detours, and/or delays due to the movement of construction vehicles and equipment, all projects within County right-of-way would be

required to develop and implement a traffic control plan during construction to maintain a safe environment for all modes of transportation.

Once constructed, these projects would not have an impact on the operation of the circulation system. Implementation of CAP Update Actions W-1.1, W-2.2, W-2.3, and W-2.4 would not damage or alter any existing bicycle, pedestrian, or transit facilities resulting in an adverse effect to existing or planned facility usage and/or service. All projects would be subject to review by County staff to ensure all applicable regulations are met, and individual new or expanded water and wastewater infrastructure projects would need to remain consistent with County policies, plans, and ordinances related to alternative transportation. Therefore, implementation of these projects would not result in conflicts with programs, plans, policies, or ordinances addressing the circulation system.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded water and wastewater facilities would be required to implement adopted and applicable General Plan goals and policies related to alternative transportation. The implementation of Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that if impacts to planned routes would occur, ensures that they are mitigated. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Therefore, potential impacts to alternative transportation would be less than significant through implementation of the applicable General Plan policies and completion of subsequent project-level planning and environmental review.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-4 would preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices in the unincorporated county.

Implementation of these actions, other than Action A-4.1.b, would not result in impacts to alternative transportation because no new or expanded development would be anticipated from their associated agriculture and conservation activities. However, implementation of Action A-4.1.b would have the potential to result in the construction of new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. It is anticipated that new farmworker housing would be low density and in proximity to existing agricultural operations, which are generally in more rural areas of the unincorporated county. The development of new farmworker housing would have the potential to result in the construction of new roadways or improvements to existing roadways, which would be required to meet local design standards. All projects would be subject to review by County staff to ensure all applicable regulations are met, and individual new or expanded roadway projects would need to remain consistent with County policies, plans, and ordinances related to alternative transportation. Therefore, implementation of these projects would not result in conflicts with programs, plans, policies, or ordinances addressing the circulation system.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded roadway projects associated with increased farmworker housing would be required to implement adopted General Plan goals and policies related to alternative transportation. Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that impacts to planned routes would occur, ensures that they are mitigated. Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists. Policy M-4.3 calls for the design and construction in Semi-Rural and Rural Lands to safely accommodate transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Policies M-8.3 through M-8.5 promotes the use of public transit including requiring development projects to improve existing nearby transit and/or park and ride facilities. Policy M-9.1 ensures that operational roadway improvements do not adversely impact transit, bicycle, and pedestrian networks. Policy M-11.2 through M-11.4 requires development in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Therefore, potential impacts to alternative transportation would be less than significant through implementation of the applicable General Plan policies and completion of subsequent project-level planning and environmental review.

Energy Measures and Actions

Implementation of the CAP Update would involve strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Implementing CAP Update Actions E-1.1 and E-3.3 would have the potential to result in construction of new infrastructure to promote renewable energy use and electrification.

Specifically, implementation of proposed CAP Update Action E-3.3 could result in the construction of new large-scale renewable energy systems, including large-scale photovoltaic (PV) solar, concentrated solar, and wind turbines. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this ~~draft~~ SEIR evaluates the potential for impacts at the program level. Specific locations for projects have not been identified. While the potential for the construction of large-scale renewable energy infrastructure was not evaluated in the 2011 GPU PEIR, potential wind energy impacts were evaluated in the 2012 Wind Energy EIR, and a summary of that analysis is provided below and is hereby incorporated by reference.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating renewable energy source. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure which relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Solar fields and wind turbines typically

require large swaths of land and may require multiple access points and/or new access roads.

Construction of energy related infrastructure would be localized and temporary. Although construction of energy infrastructure facilities and associated off-site improvements could occur within the roadway or along pedestrian and bicycle facilities potentially resulting in lane closures, minor detours, and/or delays due to the movement of construction vehicles and equipment, all projects within County right-of-way would be required to develop and implement a traffic control plan during construction to maintain a safe environment for all modes of transportation.

Once constructed, these projects would not have an impact on the operation of the circulation system. Implementation of CAP Update Actions E-1.1 and E-3.3 would not damage or alter any existing bicycle, pedestrian, or transit facilities resulting in an adverse effect to existing or planned facility usage and/or service. All projects would be subject to review by County staff to ensure all applicable regulations are met, and individual energy infrastructure projects would need to remain consistent with County policies, plans, and ordinances related to alternative transportation.

Future discretionary large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to conflicts with plans, policies, and regulations intended to manage circulation and the functionality of pedestrian and bicycle infrastructure to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Additionally, all large-scale renewable energy projects are required to obtain a Major Use Permit (MUP) which requires projects to undergo the County's discretionary review process. Therefore, implementation of these projects would not result in conflicts with programs, plans, policies, or ordinances addressing the circulation system.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded energy infrastructure projects, including large-scale renewable energy projects, would be required to implement adopted General Plan goals and policies related to alternative transportation. Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that impacts to planned routes would occur, ensures that they are mitigated. Policy LU-9.8 requires that development within Villages include connected pedestrian routes and amenities. Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists. Policy M-4.1 encourages multi-modal roads in Villages and residential areas to enhance pedestrian safety and walkability, along with other non-motorized modes of travel. Policy M-4.3 calls for the design and construction in Semi-Rural and Rural Lands to safely accommodate transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Policies M-8.3 through M-8.5 promotes the use of public transit including requiring development projects to improve existing nearby transit and/or park and ride facilities. Policy M-9.1 ensures that operational roadway improvements do not adversely impact transit, bicycle, and pedestrian networks. Policy M-10.1 requires development to provide bicycle parking facilities. Policy M-11.2 through M-11.4 requires development in

Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Therefore, potential impacts to alternative transportation would be less than significant through implementation of the applicable General Plan policies and completion of subsequent project-level planning and environmental review.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update would involve policies and programs to increase the use of alternative forms of transportation in the unincorporated county. Implementing CAP Update Actions T-3.1, T-5.1, and T-6.2 could result in the construction of new EVCSs, transit-supportive roadway treatments, and bicycle and pedestrian facilities.

Construction of roadway infrastructure projects such as bicycle, pedestrian, and transit improvement projects would be localized and temporary. Although construction within the roadway or along pedestrian and bicycle facilities could result in lane closures, minor detours, and/or hinder the movement of bicyclists and pedestrians, all projects within County right-of-way would be required to develop and implement a traffic control plan during construction to maintain a safe environment for all modes of transportation.

Once constructed, these projects would only enhance the environment for pedestrians and bicyclists by expanding facilities for alternative modes of transportation encouraging use and increasing safety. Additionally, implementation of CAP Update Actions T-3.1, T-5.1, and T-6.2 would not damage or alter any existing bicycle, pedestrian, or transit facilities resulting in an adverse effect to existing or planned facility usage and/or service. Alternatively, the implementation of CAP Update built environment and transportation measures and actions would benefit alternative transportation. All projects would be required to meet County design standards and would be subject to review by County staff to ensure all applicable regulations are met. Therefore, implementation of these projects would not result in conflicts with programs, plans, policies, or ordinances addressing the circulation system.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded EVCSs, transit-supportive roadway treatments, and bicycle and pedestrian facilities would be required to implement adopted General Plan goals and policies related to alternative transportation. Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that impacts to planned routes would occur, ensures that they are mitigated. Policy LU-9.8 requires that development within Villages include connected pedestrian routes and amenities. Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists. Policy M-4.1 encourages multi-modal roads in Villages and residential areas to enhance pedestrian safety and walkability, along with other non-motorized modes of travel. Policy M-4.3 calls for the design and construction in Semi-Rural and Rural Lands to safely accommodate transit stops when deemed necessary, along with bicyclists,

pedestrians, and equestrians. Policies M-8.3 through M-8.5 promotes the use of public transit including requiring development projects to improve existing nearby transit and/or park and ride facilities. Policy M-9.1 ensures that operational roadway improvements do not adversely impact transit, bicycle, and pedestrian networks. Policy M-9.4 requires developers of large development projects to provide, or to contribute to, park-and-ride facilities that are accessible to pedestrians and bicyclists and include bicycle lockers and transit stops whenever feasible. Policy M-10.1 requires development to provide bicycle parking facilities. Policy M-11.2 through M-11.4 requires development in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Implementation of Policy LU-5.5 of the General Plan ensures development does not impede bicycle or pedestrian facilities and that if impacts to planned routes would occur, ensures that they are mitigated. Additionally, the implementation of transit-supportive roadway treatments and bicycle and pedestrian facilities would enhance the availability, efficiency, and safety of alternative transportation facilities while increasing the comfort of users. Therefore, potential impacts to alternative transportation would be beneficial through implementation of the applicable General Plan policies and completion of subsequent project-level planning and environmental review.

Summary

Based on the discussion above, implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions would result in a less-than-significant impact related to alternative transportation and the circulation system. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.3.4 Issue 2: Exceed Threshold for VMT

This section describes the effect of the CAP Update on countywide VMT.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines, the County TSG, and the OPR Technical Advisory, the project would result in a significant impact if it would:

- conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Impact Analysis

2011 GPU PEIR Determination

Section 15064.3 of the State CEQA Guidelines was adopted in December 2018 and provides that VMT is the “most appropriate measure of transportation impacts” and mandates analysis of VMT impacts effective July 1, 2020. Given that this change to the CEQA Guidelines occurred after certification of the 2011 GPU PEIR, the 2011 GPU PEIR

did not evaluate impacts to VMT. VMT was a metric used extensively in the transportation industry at the time the 2011 GPU PEIR was prepared, but its use was generally limited to highway cost allocation, determining user fee structures, and estimating air quality and GHG emissions; thus, VMT related to the build out of the General Plan was a known concept at the time. However, it was not the metric used to assess transportation impacts.

Because VMT was not estimated for the growth in the unincorporated county under the General Plan in the 2011 GPU PEIR, the VMT modeling of anticipated growth under the adopted General Plan prepared as part of the forecasting for the CAP Update is used in this analysis to understand anticipated VMT without the proposed project. VMT was modeled using an origin-destination method of modeling that was established by a CARB-appointed Regional Targets Advisory Committee to evaluate transportation plan consistency with SB 375 requirements and is based on the premise that each jurisdiction is responsible for the air emissions within its boundaries. This methodology is used throughout California and is the ICLEI (ICLEI-Local Governments for Sustainability) recommended methodology. Total VMT produced using this methodology includes all internal VMT, half of internal to external VMT, and half of external to internal VMT. For example, all VMT originating from trips that start and end in the unincorporated area are included. One half of the VMT that originates in the unincorporated county but ends in one of the region's cities is included and one half of the VMT that originates in one of the cities but ends in the unincorporated area is included.[1] No revisions to model outputs were made to reflect potential VMT reductions that would result from implementation of policies and actions in the adopted General Plan. In addition, adjustments were made to account for military and tribal land, which is not within the County's jurisdiction.

The most recent version of the SANDAG activity-based model (SANDAG ABM 2+) was used to calculate VMT associated with anticipated growth under the General Plan for the years 2035 and 2050. Table 2.13-2 provides the forecast VMT per resident and VMT per employee in comparison to the regional average VMT per resident and VMT per employee. The VMT per population metric is a transportation efficiency metric that is used to identify potential impacts associated with implementation of the General Plan and is consistent with CARB guidance. This metric helps depict whether people are traveling more or less by vehicle over time, across different areas, or across different planning scenarios.

As detailed in the Regulatory Setting, the TSG establishes VMT thresholds for large land use plans as 15 percent below the existing regional average VMT per resident and 15 percent below the existing regional average VMT per employee for residential and employment uses, respectively. As shown in Table 2.13-2, an increase in both unincorporated county VMT per employee and VMT per resident is anticipated under the General Plan; therefore, growth consistent with the General Plan would exceed the TSG thresholds for land use plans, and would result in a significant VMT impact.

[1] Note that this methodology differs from the VMT modeling typically applied to VMT analyses based on the *Technical Advisory on Evaluating Transportation Impacts in CEQA* released by the Governor's Office of Planning and Research in December 2018. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household, and whether a qualitative or quantitative analysis is appropriate.

CAP Update Impact Analysis

The following sections describe the effects to VMT that could result from the implementation of the proposed GHG reduction measures and actions.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and within the unincorporated county. Implementing CAP Update measures and actions (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b) could result in potential construction of new or expanded solid waste facilities. Specific locations for new and expanded facilities have not been identified.

As noted above, VMT is a metric used to evaluate the amount of driving that would occur in a region, either in total or on a per capita basis. The types of projects with potential to increase VMT are those that establish a regional attractant, make driving single-occupancy vehicles more convenient (i.e., roadway widening), or increase total population. Implementation of the CAP Update Solid Waste Measures and Actions would not increase the number of residents or visitors in the unincorporated county. Operations and maintenance of expanded solid waste facilities may result in some additional employment opportunities; however, the increase would be minimal and, therefore, is not expected to result in a substantial increase in employee commute VMT.

Therefore, given the nature of the CAP Update Solid Waste Measures and Actions which would not increase residential or commercial uses and only result in minimal numbers of employees, potential impacts to VMT would be less than significant.

Water and Wastewater Measures and Actions

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

Implementation of the CAP Update Water and Wastewater Measures and Actions would not increase the number of residents or visitors in the unincorporated county. Operations and maintenance of expanded water and wastewater facilities may result in some additional employment opportunities; however, the increase would be minimal and, therefore, is not expected to result in a substantial increase in employee commute VMT.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded water and wastewater facilities would be required to implement adopted and applicable General Plan goals and policies related to alternative transportation. The implementation of Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities.

Therefore, given the nature of the CAP Update Water and Wastewater Measures and Actions which would not increase residential or commercial uses and only result in minimal numbers of employees, potential impacts to VMT would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-4 would preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices in the unincorporated county.

With the exception of Action A-4.1.b, implementation of these measures and actions, would not result in impacts to VMT because no new or expanded development would be anticipated from their associated agriculture and conservation activities. However, implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. Implementation of new farmworker housing would be expected to reduce VMT by locating housing on-site or near agricultural lands where those residents would work, therefore reducing the distance farmworkers commute.

Modeling was conducted to evaluate VMT reductions from the implementation of CAP Update Measures and Actions that have the potential to affect VMT within the unincorporated county. Table 2.13-3 shows the potential VMT reductions associated with the implementation of the CAP Update agriculture and conservation measures and actions over time.

New or expanded roadways may be required to accommodate future farmworker housing. Consistent with the General Plan, development of new or expanded roadway projects associated with farmworker housing would be required to implement adopted General Plan goals and policies related to alternative transportation. Policy LU-5.5 ensures development does not impede bicycle or pedestrian facilities and that impacts to planned routes would occur, ensures that they are mitigated. Policy M-3.1 requires development to dedicate right-of-way to adequately accommodate all users including transit riders, pedestrians, and bicyclists. Policy M-4.3 calls for the design and construction in Semi-Rural and Rural Lands to safely accommodate transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Policies M-8.3 through M-8.5 promote the use of public transit including requiring development projects to improve existing nearby transit and/or park and ride facilities. Policy M-9.1 ensures that operational roadway improvements do not adversely impact transit, bicycle, and pedestrian networks. Policy M-11.2 through M-11.4 requires development in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation and provide comprehensive internal pedestrian and bicycle networks. There are no 2011 GPU PEIR mitigation measures that are applicable to this impact.

Overall, CAP Update agriculture and conservation measures and actions would reduce VMT in the unincorporated county by locating farmworker housing on or near worksites and reducing commute distance. Any new or expanded roadways to accommodate such housing would be required to implement applicable General Plan policies and develop mitigation as necessary to minimize any related impacts. Therefore, potential impacts related to VMT would be less than significant.

Energy Measures and Actions

Implementation of the CAP Update would involve strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the unincorporated county. Implementing CAP Update Actions E-1.1 and E-3.3 would have the potential to result in construction of new infrastructure to promote renewable energy use and electrification.

Implementation of the CAP Update Energy Measures and Actions would not increase the number of residents or visitors in the unincorporated county. New roadways may be necessary to access large-scale renewable energy facilities, and operations and maintenance of these systems may result in some additional employment opportunities; however, the increase would be minimal and, therefore, is not expected to result in a substantial increase in employee commute VMT.

Therefore, given the nature of the CAP Update Energy Measures and Actions which would not increase residential or commercial uses and only result in minimal numbers of employees, potential impacts to VMT would be less than significant.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update would involve policies and programs to increase the use of alternative forms of transportation in the unincorporated county. Implementing CAP Update Actions T-3.1, T-4.1, T-4.1a, T-4.2, T-5.1, T-5.1a, T-5.1b, T-5.2, T-6.1, T-6.2, T-6.2a, T-6.2b, and T-6.3 could result in the construction of new transit-supportive roadway treatments and bicycle and pedestrian facilities, the implementation of transportation demand management programs to reduce the use of single occupancy vehicles, and educational initiatives to encourage increased alternative transportation in the unincorporated county.

Once implemented, these projects and efforts would increase the use of pedestrian and bicycle facilities as well as transit service by expanding facilities for alternative modes of transportation, increasing roadway safety, and providing incentives. The benefits these measures and actions would provide to alternative transportation would result in decreased vehicular use and, thus, reduced VMT.

Modeling was conducted to evaluate VMT reductions from the implementation of the Built Environment and Transportation Measures and Actions. Table 2.13-4 shows the potential reductions associated with implementation of the CAP Update built environment and transportation measures and actions over time.

Therefore, CAP Update built environment and transportation measures and actions would help reduce VMT in the unincorporated county by constructing new transit-supportive roadway treatments and bicycle and pedestrian facilities and implementing transportation demand management programs and educational initiatives to encourage increased alternative transportation use in the unincorporated county. Thus, potential impacts related to VMT would be less than significant.

Summary

Implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions under the CAP Update would result in a less-than-significant impact related to VMT. Therefore, implementation of the CAP Update **would not result in any new or substantially more severe impacts** beyond what was disclosed in the 2011 GPU PEIR.

2.13.3.5 Issue 3: Substantially Increase Hazards due to a Design Feature

This section describes impacts related to hazards because of a design feature with implementation of the project.

Guidelines for Determination of Significance

Appendix G of the State CEQA Guidelines establishes the following guidelines for determining significance of effects related to transportation hazards:

- substantially increase hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

In addition, the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* (County of San Diego 2011) establishes the following guidelines for determining significance of effects related to transportation hazards:

- Design features/physical configurations of access roads may adversely affect the safe movement of all users along the roadway.
- The percentage or magnitude of increased traffic on the road due to the proposed project may affect the safety of the roadway.
- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, may result in conflicts with other users or stationary objects.
- Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable.

- Design features/physical configurations on a road segment or at an intersection that may adversely affect the visibility of pedestrians or bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The amount of pedestrian activity at the project access points that may adversely affect pedestrian safety.
- The preclusion or substantial hindrance of the provision of a planned bike lane or pedestrian facility on a roadway adjacent to the project site.
- The percentage or magnitude of increased traffic on the road due to the proposed project that may adversely affect pedestrian and bicycle safety.
- The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers that may result in vehicle/pedestrian, vehicle/bicycle conflicts.
- Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable.
- The potential for a substantial increase in pedestrian or bicycle activity without the presence of adequate facilities.

Impact Analysis

2011 GPU PEIR Determination

As discussed in Section 2.15, “Transportation and Traffic,” the 2011 GPU PEIR evaluated impacts related to transportation design hazards with the adoption of the goals and policies contained within the General Plan and buildout of the unincorporated county at the planning horizon. The discussion of impacts, including those related to rural road safety, can be found in Section 2.15, “Transportation and Traffic” (pages 2.15-30 through 2.15-32), and is hereby incorporated by reference.

The 2011 GPU PEIR determined that the General Plan would result in the adoption of a Mobility Element network that includes existing roadways with horizontal and vertical curves that are sharper than existing standards. Additionally, it was determined that the General Plan could pose an increased risk to pedestrians and bicyclists by increasing and/or redistributing traffic patterns and would also have the potential to result in hazards from at-grade rail crossings. Thus, 2011 GPU PEIR determined that implementation of the General Plan would result in potentially significant impacts.

The 2011 GPU PEIR determined that the impacts to transportation hazards and rural road safety would be reduced through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; and adopted General Plan policies. The General Plan includes Policies LU-2.8, LU-6.10, M-4.3. M-4.4. M-4.5, and M-9.1, which are intended to reduce hazards associated with rural roadways. Additionally, the 2011 GPU PEIR determined that the impacts to transportation hazards would be further reduced with the implementation of Mitigation Measures Tra-1.3, Tra-1.4, Tra-1.6, and Tra-3.1. However, even with these programs in place, the impacts would not be

reduced to a less-than-significant level. The 2011 GPU PEIR identified additional mitigation measures that would reduce impacts to below a level of significance; however, the County determined that their implementation would be infeasible. These infeasible mitigation measures included requiring all roadway facilities with horizontal and vertical curves that are sharper than existing standards undergo construction improvements to be brought into compliance with existing safety standards and retrofitting all transportation facilities within the unincorporated county to provide safe bicycle and pedestrian movement corridors. Mitigation rejected as infeasible within the 2011 GPU PEIR is described in detail in Section 2.15, "Transportation and Traffic," on page 2.15-49.

CAP Impact Analysis

The following sections describe the effects of transportation hazards that could result from the implementation of the proposed CAP Update measures and actions.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and in the unincorporated county. Implementing CAP Update measures and actions (Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b) could result in potential construction of new or expanded solid waste facilities and associated roadway improvements.

The CAP Update would apply to the entire unincorporated county. Construction transportation impacts would be localized and temporary; however, during construction of each project, traffic operations could be degraded. For this reason, the project would be required to follow all local protocols to ensure safety and minimize traffic disturbance during construction activities including the development of a traffic control plan for any work on a County-maintained roadway or in the County right-of-way. Additionally, future discretionary projects would be subject to review by County staff to ensure hazards during construction are minimized and that all safety standards are met.

Once constructed, these projects would not exacerbate inadequate road widths, or construct new roadways with sharp curves or inadequate sight distances. All projects would be required to meet County design standards and would be subject to review by County staff to ensure all applicable regulations are met. Therefore, implementation of these projects would not result in increased design hazards across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded solid waste facilities would be required to implement adopted General Plan goals and policies related to transportation hazards. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-5.5 would ensure that development projects would not impede non-motorized forms of travel. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Within the Mobility Element, Goal M-4 encourages roads designed to be safe for all users and compatible with their context.

Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access. Goal M-9 encourages the effective use of the existing transportation network. Policy M-9.1 supports this goal by encouraging operational improvements that do not adversely impact the transit, bicycle, and pedestrian networks. Policy M-11.7 promotes pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village.

Development associated with the County CAP also would be required to implement the following applicable mitigation measure identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Therefore, potential impacts to transportation hazards would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Water and Wastewater Measures and Actions

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

The CAP Update would apply to the entire unincorporated county. Construction transportation impacts would be localized and temporary; however, during construction of each project, traffic operations could be degraded. For this reason, the project would be required to follow all local protocols to ensure safety and minimize traffic disturbance during construction activities including the development of a traffic control plan for any work on a County-maintained roadway or in the County right-of-way. Additionally, future discretionary projects would be subject to review by County staff to ensure hazards during construction are minimized and that all safety standards are met.

Once constructed, these projects would not exacerbate inadequate road widths, or construct new roadways with sharp curves or inadequate sight distances. All projects would

be required to meet County design standards and would be subject to review by County staff to ensure all applicable regulations are met. Therefore, implementation of these projects would not result in increased design hazards across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, construction of new recycled water and stormwater capture and reuse infrastructure also would be required to implement adopted General Plan goals and policies related to transportation hazards. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Within the Mobility Element, Goal M-4 encourages roads designed to be safe for all users and compatible with their context. Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access.

Additionally, development associated with the County CAP would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Therefore, potential impacts to transportation hazards would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-4 would preserve natural and agricultural lands, improve land management practices, and support climate-friendly farming practices in the unincorporated county.

Implementation of these actions, other than Action A-4.1.b, would not result in impacts to alternative transportation because no new or expanded development would be anticipated from their associated agriculture and conservation activities. However, implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. It is anticipated that new farmworker housing would be low density and in proximity to existing agricultural operations, which are generally in more rural areas of the unincorporated county. The development of new farmworker housing would have the potential to result in the construction of new roadways which would be required to meet local design standards. Additionally, all projects would be subject to review by County staff to ensure all applicable regulations are met.

Once constructed, these projects would not exacerbate inadequate road widths, or construct new roadways with sharp curves or inadequate sight distances. All projects would be required to meet County design standards and would be subject to review by County staff to ensure all applicable regulations are met. Therefore, implementation of these projects would not result in increased design hazards across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded transportation facilities would be required to implement adopted General Plan goals and policies related to transportation hazards. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-5.5 would ensure that development projects would not impede non-motorized forms of travel. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Within the Mobility Element, Goal M-4 encourages roads designed to be safe for all users and compatible with their context. Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access. Goal M-9 encourages the effective use of the existing transportation network. Policy M-9.1 supports this goal by encouraging operational improvements that do not adversely impact the transit, bicycle, and pedestrian networks. Policy M-11.7 promotes pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village. Additionally, all construction projects occurring within County right-of-way would be required to obtain an encroachment and traffic control permit from the County Department of Public Works to ensure proper precautions are implemented during construction to maintain safety in and around each project site for all modes of transportation.

Construction and development associated with the County CAP would also be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Therefore, potential impacts to transportation hazards would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Energy Measures and Actions

Implementation of the CAP Update would involve strategies to increase building energy efficiency, renewable energy, and electrification in County operations and the

unincorporated county. Implementing CAP Update Actions E-1.1 and E-3.3 would have the potential to result in construction of new infrastructure to promote renewable energy use and electrification.

The implementation of new infrastructure related to energy including associated infrastructure such as roads and accessory uses could result in transportation hazards during construction. Typical construction activities would require the use of trucks, staging areas for supplies and equipment, parking for workers, and signage and grading. Construction transportation impacts would be localized and temporary; however, during construction of each project, traffic operations could be degraded.

For this reason, the project would be required to follow all local protocols to ensure safety and minimize disturbance to the transportation system during construction activities including the development of a traffic control plan for any work on a County-maintained roadway or in the County right-of-way. Additionally, future discretionary projects would be subject to review by County staff to ensure hazards during construction are minimized and that all safety standards are met.

As described above, implementation of CAP Update Action E-3.3 could indirectly result in the construction of new large-scale renewable energy systems, including large-scale PV solar, concentrated solar, and wind turbines. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this ~~draft~~ SEIR evaluates the potential for impacts at the program level.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating the renewable energy source. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure which relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Solar fields and wind turbines typically require large swaths of land and may require multiple access points and/or new access roads. Depending on the location of future projects, it is possible that road improvements would be required, however, all roadway improvements would be implemented in accordance with existing County regulations. The projects would be prohibited from placing any incompatible uses near roadways.

As described on pages 2.9-12 through 2.9-14 of the 2012 Wind Energy EIR, construction and operation of large turbine projects would result in less-than-significant impacts with regard to roadway design hazards because projects would be mitigated through the discretionary review process.

These projects would not exacerbate inadequate road widths or construct new roadways with sharp curves or inadequate sight distances. All projects would be required to meet County design standards and would be subject to review by County staff to ensure all applicable regulations are met. Future discretionary large-scale renewable energy

projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to emergency access to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Additionally, all large-scale renewable energy projects are required to obtain an MUP, which requires projects to undergo the County's discretionary review process.

Consistent with the 2011 GPU PEIR determinations, development of new infrastructure to promote renewable energy use and electrification would be required to implement adopted General Plan goals and policies related to transportation hazards. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-5.5 would ensure that development projects would not impede non-motorized forms of travel. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Within the Mobility Element, Goal M-4 encourages roads designed to be safe for all users and compatible with their context. Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access.

Construction and development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Therefore, potential impacts to transportation hazards would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update would involve policies and programs to increase the use of alternative forms of transportation in the unincorporated county. Implementing CAP Update Actions T-3.1, T-5.1, and T-6.2 could result in the construction of new EVCSs, transit-supportive roadway treatments, and bicycle and pedestrian facilities.

Construction of roadway infrastructure projects such as bicycle, pedestrian, and transit improvement projects would be localized and temporary; however, travel for all modes of transportation could be degraded due to vehicular lane closures, minor detours, and/or the movement of construction equipment. All projects within County right-of-way would be required to develop and implement a traffic control plan during construction to maintain a safe environment for all modes of transportation.

Once constructed, these projects would not exacerbate inadequate road widths, or construct new roadways with sharp curves or inadequate sight distances. All projects would be required to meet County design standards and would be subject to review by County staff to ensure all applicable regulations are met. Therefore, implementation of these projects would not result in increased design hazards across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded transportation facilities would be required to implement adopted General Plan goals and policies related to transportation hazards. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-5.5 would ensure that development projects would not impede non-motorized forms of travel. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Within the Mobility Element, Goal M-4 encourages roads designed to be safe for all users and compatible with their context. Policies M-4.3, M-4.4, and M-4.5 support this goal by requiring roads to have safe and adequate emergency access. Goal M-9 encourages the effective use of the existing transportation network. Policy M-9.1 supports this goal by encouraging operational improvements that do not adversely impact the transit, bicycle, and pedestrian networks. Policy M-11.7 promotes pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village. Additionally, all construction projects occurring within County right-of-way would be required to obtain an encroachment and traffic control permit from the County Department of Public Works to ensure proper precautions are implemented during construction to maintain safety in and around each project site for all modes of transportation.

Construction and development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Therefore, potential impacts to transportation hazards would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Summary

Based on the discussion above, implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures

and actions under the CAP Update would result in a less-than-significant impact with mitigation incorporated related to transportation hazards. The 2011 GPU PEIR concluded that the impact related to transportation hazards would be significant and unavoidable. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.3.6 Issue 4: Result in Inadequate Emergency Access

This section describes potential project impacts related to emergency access with implementation of the project.

Guidelines for Determination of Significance

Based on Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* (County of San Diego 2011), the project would result in a significant impact if it would:

- result in inadequate emergency access.

Impact Analysis

2011 GPU PEIR Determination

As discussed in Section 2.15, "Transportation and Traffic," the 2011 GPU PEIR evaluated impacts related to emergency access with the adoption of the goals and policies contained within the General Plan and buildout of the unincorporated county at the planning horizon. The discussion of impacts can be found in Section 2.15, "Transportation and Traffic" (pages 2.15-32 through 2.15-34) and is hereby incorporated by reference.

The 2011 GPU PEIR determined that the under the General Plan, existing inadequate roadway widths, dead end roads, one-way roads, and gated communities would continue to occur in the unincorporated county, all of which have the potential to impair emergency access. Thus, 2011 GPU PEIR determined that implementation of the General Plan would result in a potentially significant impact to emergency access.

The 2011 GPU PEIR determined that the impacts to emergency access would be reduced through the implementation of a combination of federal, state, and local regulations; existing County regulatory processes; and adopted General Plan policies. The General Plan includes Policies LU-2.8, LU-6.10, LU-12.2, M-1.2, M-3.3, M-4.4. S-3.4, S-3.5, and S-14.1, which are intended to reduce impacts associated with the provision of emergency access. Additionally, the 2011 GPU PEIR determined that the impacts to emergency access would be further reduced with the implementation of Mitigation Measures Tra-4.1, Tra-4.2, Tra-4.3, and Tra-4.4. Impacts to emergency access were determined to be less than significant with implementation of adopted General Plan policies and the 2011 GPU PEIR mitigation measures referenced above.

CAP Impact Analysis

The following sections describe the effects to emergency access that could result from the implementation of the proposed CAP Update measures and action.

Solid Waste Measures and Actions

Implementation of the CAP Update would include implementation of measures and actions to increase solid waste diversion and availability of solid waste facilities in County operations and in the unincorporated county. Implementing CAP Update Actions SW-1.1, SW-2.1, SW-4.1a, and SW-4.1b could result in potential construction of new or expanded solid waste facilities.

The CAP Update would apply to the entire unincorporated county. Construction transportation impacts would be localized and temporary; however, during construction of each project, traffic operations could be degraded including emergency vehicle access. For this reason, the project would be required to follow all local protocols to ensure safety and minimize traffic disturbance during construction activities including the development of a traffic control plan for any work on a County-maintained roadway or in the County right-of-way. Additionally, future discretionary projects would be subject to review by County and emergency service staff to ensure emergency access is maintained.

All projects would be required to meet County design standards and would be subject to review by County staff and applicable emergency service agencies to ensure all applicable regulations related to emergency access are met. Therefore, implementation of these projects would not result in inadequate emergency access across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded solid waste facilities would be required to implement adopted General Plan goals and policies related to emergency access. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Policy M-1.2 calls for an interconnected road network that provides both primary and secondary access/egress routes that support emergency services during fire and other emergencies. Policy M-4.4 requires that the design and construction of public and private roads allows for access of fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents. Policy S-4.5 requires development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently to meet state and San Diego County Consolidated Fire Codes. Policy S-16.1 requires development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

Development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3, Tra-1.4, and Tra-4.4. Mitigation Measure Tra-1.3 requires the implementation of

County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. Mitigation Measure Tra-4.4 requires the implementation and revisions as necessary of the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards.

Therefore, potential impacts to emergency access would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Water and Wastewater Measures and Actions

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

The CAP Update would apply to the entire unincorporated county. Construction transportation impacts would be localized and temporary; however, during construction of each project, emergency access could be degraded due to the obstruction of roadways if not adequately planned for. For this reason, the project would be required to follow all local protocols to ensure safety and minimize traffic disturbance during construction activities including the development of a traffic control plan for any work on a County-maintained roadway or in the County right-of-way. Additionally, future discretionary projects would be subject to review by County staff to ensure emergency access is maintained during construction and that all safety standards are met.

Additionally, all projects would be required to meet County design standards and would be subject to review by County staff and applicable emergency service agencies to ensure all applicable regulations related to emergency access are met. Therefore, implementation of these projects would not result in inadequate emergency access across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new or expanded water and wastewater facilities would be required to implement adopted General Plan goals and policies related to emergency access. Policy LU-2.8 requires measures that

minimize impacts that are detrimental to human health and safety. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Policy M-1.2 calls for an interconnected road network that provides both primary and secondary access/egress routes that support emergency services during fire and other emergencies. Policy M-4.4 requires that the design and construction of public and private roads allows for access of fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents. Policy S-4.5 requires development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently to meet state and San Diego County Consolidated Fire Codes. Policy S-16.1 requires development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

Development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. Implementation of these policies and mitigation measures would ensure that emergency access is maintained during construction and operation of future required to implement the CAP Update. Therefore, potential impacts to emergency access would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-4 would involve acquiring and managing conservation lands, planting and protecting trees, and providing incentives to encourage carbon farming. These measures would result in the preservation of natural and agricultural lands in the unincorporated county. Implementation of these measures would not result in impacts to emergency access because no new or expanded development would be anticipated from those agriculture and conservation activities. However, implementation of Action A-4.1.b would have the potential to result in new farmworker housing in the unincorporated county if opportunities to increase farmworker housing in the unincorporated area are identified. It is anticipated that new farmworker housing would be low density and in proximity to existing agricultural operations, which are generally in more rural areas of the unincorporated county. The development of new farmworker housing would have the potential to result in the construction of new roadways which would be required to meet local design standards. All projects would be subject to review by County staff to ensure all applicable regulations are met.

Thus, there would be no change to the existing roadway network as a result of implementing CAP Update Measures A-1 through A-4. Therefore, no impacts to emergency access would occur.

Energy Measures and Actions

Implementation of the CAP Update would involve development of policies and programs to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. Implementing CAP Update Actions E-1.1 and E-3.3 would have the potential to result in development of various renewable energy projects including energy efficiency retrofits on existing residential and non-residential structures and County facilities as well as new large-scale renewable energy systems including solar PV, solar concentrator, and wind turbines.

The CAP Update would apply to the entire unincorporated county. Construction transportation impacts would be localized and temporary; however, during construction of each project, traffic operations could be degraded including emergency vehicle access. For this reason, the project would be required to follow all local protocols to ensure safety and minimize traffic disturbance during construction activities including the development of a traffic control plan for any work on a County-maintained roadway or in the County right-of-way. Additionally, future discretionary projects would be subject to review by County and emergency service staff to ensure emergency access is maintained.

As described in detail above in Section 2.13.3.3, implementation of CAP Update Action E-3.3 could result in the construction of new large-scale renewable energy systems, including large-scale PV solar, concentrated solar, and wind turbines. Because the amount of demand generated by such a program and the mix of renewable energy types that would be constructed to satisfy demand is unknown, this ~~draft~~ SEIR evaluates the potential for impacts at the program level.

Large-scale renewable energy infrastructure would generally be constructed in undeveloped locations that are productive for generating renewable energy sources. Specific locations that may be chosen for these large-scale utility projects are unknown; however, it is likely that suitable locations would include areas that are not highly developed with residential and commercial uses because of the size, massing, coverage, and scale of this type of infrastructure which relies upon large amounts of land unencumbered by buildings or shadowed by buildings or trees. Solar fields and wind turbines typically require large swaths of land and may require multiple access points and/or new access roads.

As described on pages 2.9-14 through 2.9-15 of the 2012 Wind Energy EIR, construction and operation of large turbine projects would result in less-than-significant impacts regarding emergency access because projects would be mitigated through the discretionary review process.

Future discretionary large-scale renewable energy projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts related to emergency access to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Additionally, all large-scale renewable energy projects are required to obtain an MUP which requires projects to undergo the County's discretionary review process. Therefore, implementation of these projects would not result in inadequate emergency access across the county's roadway network.

Consistent with the 2011 GPU PEIR determinations, development of new infrastructure to promote renewable energy use and electrification would be required to implement adopted General Plan goals and policies related to emergency access. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Policy M-1.2 calls for an interconnected road network that provides both primary and secondary access/egress routes that support emergency services during fire and other emergencies. Policy M-4.4 requires that the design and construction of public and private roads allows for access of fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents. Policy S-4.5 requires development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently to meet state and San Diego County Consolidated Fire Codes. Policy S-16.1 requires development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

Development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

Implementation of these policies and mitigation measures would ensure that emergency access is maintained during construction and operation of future projects required to implement the CAP Update.

Therefore, potential impacts to emergency access would be less than significant with implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update would involve policies and programs to increase the use of alternative forms of transportation in the unincorporated county. Implementing CAP Update Actions T-3.1, T-5.1, and T-6.2 could result in the construction of new EVCSs, transit-supportive roadway treatments, and bicycle and pedestrian facilities. Implementation of roadway infrastructure projects such as bicycle, pedestrian, EVCS, and transit projects may result in temporary construction-related impacts or minor detours but would not result in conflicts or impediments to emergency access within the county. These projects would also not exacerbate inadequate road widths, result in dead-end roads, one-way roads, or gated communities, nor would they result in any other obstruction to emergency access. The intent of the projects would be to provide expanded or new multi-modal transportation infrastructure that would accommodate non-automotive forms of transportation and reduce the number of vehicles on the road; therefore, fewer vehicles traveling along the roadway network may be beneficial to emergency access.

Additionally, all construction projects occurring withing County right-of-way would be required to obtain an encroachment and traffic control permit from the County Department of Public Works to ensure proper precautions are implemented during construction to maintain emergency access in and around each project site. Furthermore, all development projects and associated off-site improvements would be required to meet the standards and regulations identified in the County Fire Code pertaining to the design of roadways and emergency access. All projects would be required to meet County design standards and would be subject to review by County staff and applicable emergency service agencies to ensure all applicable regulations related to emergency access are met. Therefore, implementation of these projects would not result in inadequate emergency access across the county's roadway network during operations.

Consistent with the 2011 GPU PEIR determinations, development of new transportation infrastructure would be required to implement adopted General Plan goals and policies related to emergency access. Policy LU-2.8 requires measures that minimize impacts that are detrimental to human health and safety. Policy LU-6.10 requires that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. Policy M-1.2 calls for an interconnected road network that provides both primary and secondary access/egress routes that support emergency services during fire and other emergencies. Policy M-4.4 requires that the design and construction of public and private roads allows for access of fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents. Policy S-4.5 requires development to provide additional access roads where feasible to provide for safe access of emergency equipment and civilian evacuation concurrently to meet state and San Diego County Consolidated Fire Codes. Policy S-16.1 requires development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

Development associated with the County CAP also would be required to implement the following mitigation measures identified in the 2011 GPU PEIR: Mitigation Measures Tra-1.3 and Tra-1.4. Mitigation Measure Tra-1.3 requires the implementation of County Public

Road Standards during review of new development projects. Mitigation Measure Tra-1.4 involves the implementation and revisions as necessary of the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Transportation and Traffic* to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. Implementation of these policies and mitigation measures would ensure that emergency access is maintained during construction and operation of future projects that implement the CAP Update.

Therefore, potential impacts to emergency access would be less than significant through implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review.

Summary

Based on the discussion above, implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions that would be implemented under the CAP Update would result in a less-than-significant impact with mitigation incorporated related to emergency access. The 2011 GPU PEIR concluded that the impact related to emergency access would be less than significant. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.3.7 Cumulative Impact Analysis

The cumulative impact analysis study area for transportation in the 2011 GPU PEIR includes traffic from projects on tribal land and in adjacent cities, as well as projects proposed in the general plans of surrounding jurisdictions. The cumulative environmental setting has been updated from the 2011 GPU PEIR and is based on the development forecasts in SANDAG's 2021 Regional Plan (SANDAG 2021). Therefore, the study area for this cumulative transportation impact analysis is the SANDAG region, which encompasses the unincorporated areas and 18 incorporated cities that make up the entire County of San Diego. The scope and approach to the cumulative impact analysis are described in the "Cumulative Impact Assessment Overview" section in the introduction to this chapter.

Issue 1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

Impacts would be cumulative in nature if construction or operational impacts associated with cumulative regional land use projects combined with the CAP Update measures and actions to conflict with plans, ordinances, or policies related to alternative transportation. The 2011 GPU PEIR concluded that cumulative development would result in less than significant cumulative impacts related to conflict with plans, ordinances, or policies related to alternative transportation.

Implementation of the projects associated with CAP Update measures and actions related to solid waste, water and wastewater, and energy would not have an impact on operation of the circulation system because they would not substantially alter or damage the existing roadway network. CAP Update measures and actions within the built environment and transportation category would enhance alternative transportation facilities; and would therefore, be beneficial to alternative transportation including bicyclists, pedestrians, and transit riders. However, during construction of each project, traffic operations could be degraded. For this reason, all projects would be required to follow local protocols to ensure safety and minimize traffic disturbance during construction activities including the development of a traffic control plan for any work on a County-maintained roadway or in the County right-of-way. Large-scale energy projects also could result in the need for new access roadways; however, design and construction of such new or expanded roadways would be compliant with relevant General Plan policies and other local regulations. Additionally, individual projects associated with the CAP Update would be required to be evaluated for project-specific impacts under CEQA at the time of application and would be required to comply with existing federal, state, and local regulations.

Further, with implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local regulations that regulate transportation; and completion of subsequent project-level planning and environmental review, cumulative impacts related to alternative transportation plans, ordinances, and policies would be less than significant.

Similar to the conclusions of the 2011 GPU PEIR, implementation of the CAP Update would not result in a substantial incremental effect that would result in a new significant cumulative impact related to conflicts with plans, ordinances, or policies addressing the circulation system**.** The CAP Update **would not result in new or more severe impacts** compared to the 2011 GPU PEIR.

Issue 2: Exceed Threshold for VMT

Cumulative VMT was not evaluated in the 2011 GPU PEIR. As detailed in Section 2.13.3.4, although the 2011 GPU PEIR did not evaluate VMT as a CEQA impact, VMT was a known metric that was used for a variety of purposes including forecasting GHG emissions from growth anticipated under the adopted General Plan. As shown in Table 2.13-2, under cumulative conditions (2050), build out of the General Plan exceeds the County's threshold for cumulative VMT which is 15 percent below existing regional VMT per capita and per employee (County of San Diego 2022: 27).

VMT is inherently a cumulative issue; thus, if an impact is not expected to substantially affect VMT at the project level, it can be presumed to result in a less than cumulatively considerable impact. As detailed in the OPR Technical Advisory, "a project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa" (OPR 2018: 6). Although the general plan

modeling indicates the per capita and per employee VMT would exceed thresholds established by the County (Table 2.13-2), the CAP Update measures and actions would not contribute to regional VMT. CAP Update agriculture and conservation and built environment and transportation measures and actions would result in quantifiable reductions in VMT in the unincorporated county. Therefore, the CAP Update **would not result in new or more severe impacts** compared to the 2011 GPU PEIR.

Issue 3: Substantially Increase Hazards Due to a Design Feature

The 2011 GPU PEIR concluded that cumulative development would result in significant cumulative impacts related to transportation hazards. The 2011 GPU PEIR concluded transportation impacts related to design hazards would be significant and unavoidable even with implementation of General Plan policies and 2011 GPU PEIR mitigation measures because the county's roadway network contains roads that do not meet existing roadway standards.

As discussed above, CAP Update measures and actions would result in new or expanded development of solid waste, wastewater, energy, and transportation infrastructure. Additionally, alternative transportation projects such as bicycle, pedestrian, and transit-supportive roadway improvements would result in some construction-related impacts but would enhance the overall functionality of the transportation network. Further, with implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local regulations that regulate transportation; and completion of subsequent project-level planning and environmental review, impacts from CAP Update implementation related to transportation hazards would be less than significant. Accordingly, implementation of the CAP Update would not result in a considerable contribution to cumulative transportation hazards impacts and **would not result in new or more severe impacts** compared to the 2011 GPU PEIR.

Issue 4: Result in Inadequate Emergency Access

Impacts would occur if the CAP Update, in combination with cumulative development, combined to create multiple obstructions to emergency access along the same road. The 2011 GPU PEIR concluded that cumulative impacts related to emergency access resulting from buildout of the General Plan would be less than significant with implementation of the adopted General Plan policies and 2011 GPU PEIR mitigation measures listed above.

As discussed above, CAP Update measures and actions would result in new or expanded development of solid waste, wastewater, energy, and transportation infrastructure. However, all projects related to the CAP would be required to meet state and local regulations related to emergency access and design. Additionally, all development projects would be subject to review by applicable emergency service agencies to ensure emergency access is maintained during construction and operations. Further, with implementation of the applicable General Plan policies and 2011 GPU PEIR mitigation measures; compliance with existing federal, state, and local regulations that regulate transportation; and completion of subsequent project-level planning and environmental

review, impacts related to emergency access would be less than significant. Similar to the conclusions of the 2011 GPU PEIR, implementation of the CAP Update would not result in a substantial incremental effect that would result in a new significant cumulative impact related to emergency access. The impact **would not result in new or more severe impacts** compared to the 2011 GPU PEIR.

2.13.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would not result in new or more severe significant impacts related to transportation.

2.13.5 Mitigation Measures

2.13.5.1 Issue 1: Conflict with a Program, plan, Ordinance or Policy Addressing the Circulation System

Implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions would result in a less-than-significant impact related to alternative transportation and the circulation system. No mitigation measures are required.

2.13.5.2 Issue 2: Exceed Threshold for VMT

Implementation of solid waste, water and wastewater, agriculture and conservation, energy, and built environment and transportation measures and actions under the CAP Update would result in a less-than-significant impact related to VMT. No mitigation measures are required.

2.13.5.3 Issue 3: Substantially Increase Hazards due to a Design Feature

The following adopted 2011 GPU PEIR mitigation measures are applicable to the project:

> Adopted Mitigation Measure Tra-1.3: Implement the County Public Road Standards during review of new development projects. Also revise the Public Road Standards to include a range of road types according to Regional Category context.
>
> Adopted Mitigation Measure Tra-1.4: Implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.

2.13.5.4 Issue 4: Result in Inadequate Emergency Access

The following adopted 2011 GPU PEIR mitigation measures are applicable to the project:

> Adopted Mitigation Measure Tra-1.3: Implement the County Public Road Standards during review of new development projects. Also revise the Public Road Standards to include a range of road types according to Regional Category context.
>
> Adopted Mitigation Measure Tra-1.4: Implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified.
>
> Adopted Mitigation Measure Tra-4.4: Implement and revise as necessary the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards.

2.13.6 Significance Conclusions

2.13.6.1 Issue 1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

As described above in Sections 2.13.3.3 and 2.13.3.7, measures and actions that would be implemented under the CAP Update would result in a **less-than-significant impact** related to conflict with programs, plans, ordinances, or policies addressing the circulation system and **would not result in a considerable contribution** to a significant cumulative impact on programs, plans, ordinances, or policies addressing the circulation system. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.6.2 Issue 2: Exceed Threshold for VMT

As described above in Sections 2.13.3.4 and 2.13.3.7, measures and actions that would be implemented under the CAP Update would result in a **less-than-significant impact** related to the VMT and **would not result in a considerable contribution** such that a new significant cumulative impact related to VMT would occur. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.6.3 Issue 3: Substantially Increase Hazards Due to a Design Feature

As described above in Sections 2.13.3.5 and 2.13.3.7, measures and actions that would be implemented under the CAP Update would result in a **less-than-significant impact** related to transportation hazards and **would not result in a considerable contribution** to a significant cumulative impact related to transportation hazards. Implementation of the

CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

2.13.6.4 Issue 4: Result in Inadequate Emergency Access

As described above in Sections 2.13.3.6 and 2.13.3.7, measures and actions that would be implemented under the CAP Update would result in a **less-than-significant impact** related to emergency access and **would not result in a considerable contribution** to a significant cumulative impact related to emergency access. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed the 2011 GPU PEIR.

Table 2.13-2 VMT for County General Plan

	Regional VMT per Employee	Unincorporated County VMT per Employee	Threshold (15% below Regional Average VMT)
2035	19.6	23.9	16.66
2050	19.8	24.5	16.83
	Regional VMT per Resident	**Unincorporated County VMT per Resident**	**Threshold (15% below Regional Average VMT)**
2035	19.7	27.4	16.75
2050	19.9	27.7	16.91

Source: Fehr & Peers 2023.

Table 2.13-3 VMT Reductions from Agriculture and Conservation Measures and Actions

	2030	2035	2040	2045	2050
General Plan Annual Total VMT	3,242,995,681	3,331,743,367	3,398,247,707	3,464,752,048	3,531,256,388
Annual VMT Reduction (total)	134,416,666	163,896,520	193,376,374	222,856,228	252,336,082
Annual reduction in VMT (percent change)	4%	5%	6%	6%	7%

Source: Modeling conducted by Ascent Environmental in 2023.

Table 2.13-4 VMT Reductions from Built Environment and Transportation Measures and Actions

	2030	2035	2040	2045	2050
General Plan Annual Total VMT	3,242,995,681	3,331,743,367	3,398,247,707	3,464,752,048	3,531,256,388
Annual VMT Reduction (total)	117,535,092	204,275,888	311,228,625	506,208,029	671,007,320
Annual VMT Reduction (percent change)	4%	6%	9%	15%	19%

Source: modeling conducted by Ascent Environmental in 2023