

2.15 Wildfire

This section describes the existing conditions for wildfire in the unincorporated county and evaluates the potential effects that implementation of the project may have on wildfire. Specifically, this section evaluates the potential for the CAP Update to result in impacts regarding the project's potential to interfere with emergency response/evacuation, exacerbate wildfire risks, or expose people or structures to post-fire risks. Because this analysis is subsequent to the adopted 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 wildfire 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 2011 GPU PEIR. In 2018, Appendix G of the State CEQA Guidelines was updated to include a separate section with new questions associated with evaluating a project's potential impact related to wildfire. Because the Notice of Preparation (NOP) for the 2011 GPU PEIR was released prior to the 2018 update, the PEIR does not include a separate section for wildfire. Rather, wildland fire hazards and emergency evacuation and response plans are discussed in Section 2.7, "Hazards and Hazardous Materials," of the 2011 GPU PEIR. Topics that were added to the State CEQA Guidelines in 2018 and, therefore, not addressed in the 2011 GPU PEIR include the project's potential to expose occupants to pollutants or spread of wildfire, install infrastructure that exacerbates fire risk, and expose people or structures to risks from post-wildfire hazards in or near State Responsibility Areas (SRAs) or land classified as Very High Fire Hazard Severity Zones (FHSZs).

Table 2.15-1 summarizes the wildfire impact conclusions reached in the 2011 GPU PEIR and identifies if a new or more severe significant impact would occur with implementation of the proposed project. As indicated, implementation of the proposed project would not result in new or more severe significant impacts on wildfire.

During the NOP scoping process, the County received comments regarding wildfire. The commenters recommended that the County consider wildfire and brush management strategies, quantify and identify measures to reduce carbon emissions from wildfires, and collaborate with transportation agencies regarding evacuation routes during wildfire events. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this ~~draft~~ SEIR.

Table 2.15-1 Summary of Wildfire-Related Impacts

Issue Number	Issue Topic	Determination from 2011 GPU PEIR	CAP Update SEIR Determination	
			New or More Severe Significant Impact Prior to Mitigation	New or More Severe Significant Impact After Mitigation
1	Exacerbate Wildfire Risks	Not evaluated ¹	CAP Update Only: Yes	CAP Update Only: No
			CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: No
2	Install Infrastructure That Exacerbates Fire Risk	Not evaluated ¹	CAP Update Only: Yes	CAP Update Only: No
			CAP Update Cumulative Contribution: Yes	CAP Update Cumulative Contribution: No
3	Expose People or Structures to Post-Fire Risks	Not evaluated ¹	CAP Update Only: Yes	CAP Update Only: No
			CAP Update Cumulative Contribution: Yes	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 Issues reflect updated sample questions in Appendix G of the State CEQA Guidelines.

Source: Compiled by Ascent Environmental in 2023.

2.15.1 Existing Conditions

The 2011 GPU PEIR includes a discussion of existing conditions within the unincorporated county related to wildland fire hazards and emergency response and evacuation plans in Section 2.7, “Hazards and Hazardous Materials,” on pages 2.7-14 through 2.7-16 and 2.7-18 through 2.7-20. No substantial changes have occurred to the existing conditions described in the 2011 GPU PEIR. Therefore, the existing conditions in the 2011 GPU PEIR remain applicable and are incorporated by reference. The following discussion summarizes the information in the 2011 GPU PEIR and provides supplemental discussion of recent wildfire events.

As described in the 2011 GPU PEIR, the majority of the unincorporated county is within an SRA, as identified by the California Department of Forestry and Fire Protection (CAL FIRE). Most lands within the unincorporated county are classified as High and Very High FHSZs (CAL FIRE 2007). CAL FIRE released updated maps of FHSZs within SRAs for public comment in 2022. These maps show an overall reduction in lands within High FHSZs and an increase in lands within the Very High FHSZ designation in the unincorporated county. ~~However, these~~ These ~~designations are proposed and have yet to be been adopted and became effective on April 1, 2024.; the 2007 maps remain the most current adopted maps at this time.~~

The unincorporated county also includes many wildland-urban interface (WUI) areas, which are areas where development is located close to lands prone to brush fires. The unincorporated county has a long history of wildland fires. The 2018 West Fire burned 505 acres within the county and the 2020 Valley Fire burned 76,067 acres of land within the county. There were 11 wildfire incidents that occurred in the county in 2021 (totaling 9,082 acres) and 10 wildfire incidents in 2022 (totaling 5,609 acres) (CAL FIRE 2023a, 2023b).

Table S-2 of the General Plan Safety Element lists the relevant fire incidents in San Diego County, including the unincorporated county.

2.15.2 Regulatory Framework

The County of San Diego General Plan Safety Element addresses natural hazards and human activities that may pose a threat to public safety, including fire protection and emergency response. The Safety Element also provides policy direction that supports laws and regulations related to safety hazards, such as wildfires. The 2011 GPU PEIR includes a summary of the regulatory framework related to hazards and hazardous materials in Section 2.7, “Hazards and Hazardous Materials,” pages 2.7-20 through 2.7-28, that is incorporated by reference. Specific regulations discussed in the 2011 GPU PEIR and the General Plan Safety Element that are applicable to the project include the following:

2.15.2.1 Federal

- International Fire Code

2.15.2.2 State

- Title 14 Division 1.5 of the California Code of Regulations (CCR)
- California Fire Code
- State fire regulations
- California Emergency Services Act

The above regulatory framework discussed in the 2011 GPU PEIR continues to apply to the unincorporated county and is incorporated into this section by reference. Additional regulations that apply to the CAP Update but were not included in the 2011 GPU PEIR are described below.

California Public Utilities Commission General Order 95: Rules for Overhead Transmission Line Construction

California Public Utilities Commission General Order 95 was initially adopted in 1941 and was most recently updated in 2009 for Southern California. General Order 95 governs the design, construction, and maintenance of overhead electrical lines. Rule 31.1 generally states that design, construction, and maintenance of overhead electrical lines should be done in accordance with accepted good practices for the given location conditions known at the time by the persons responsible for the design, construction, and maintenance of the overhead electrical lines and equipment. Rule 35 of General Order 95 (Tree Trimming) requires the following:

- four feet radial clearance for any conductor of a line operating at 2,400 volts or more, but less than 72,000 volts

- six feet radial clearance for any conductor of a line operating at 72,000 volts or more, but less than 110,000 volts
- 10 feet radial clearance for any conductors of a line operating at 110,000 volts or more, but less than 300,000 volts
- 15 feet radial clearances for any conductor of a line operating at 300,000 volts or more

California Department of Forestry and Fire Protection

CAL FIRE is responsible for enforcing State of California fire safety codes included in the CCR and California Public Resources Code. Public Resources Code Section 4291 states generally that any person operating any structure located on brush-covered lands or land covered with flammable material is required to maintain defensible space around the structure. CCR Title 14 Section 1254 identifies minimum clearance requirements required around utility poles. In SRAs within the jurisdiction of CAL FIRE, the Fire Safety Inspection Program is an important tool for community outreach and enforcement of state fire codes.

CAL FIRE also inspects utility facilities and makes recommendations regarding improvements in facility design and infrastructure. Joint inspections of facilities by CAL FIRE and the utility owner are recommended by CAL FIRE so that each entity may assess the current state of the facility and successfully implement fire prevention techniques and policies. Violations of state fire codes discovered during inspections are required to be brought into compliance with the established codes. If a CAL FIRE investigation reveals that a wildfire occurred as a result of a violation of a law or negligence, the responsible party could face criminal and/or misdemeanor charges. In cases where a violation of a law or negligence has occurred, CAL FIRE has established the Civil Cost Recovery Program, which requires parties liable for wildfires to pay for wildfire-related damages.

In the CAL FIRE SRAs, the requirement for clearances around poles and towers is contained in Public Resources Code Section 4292. This section requires clearing of flammable fuels for a minimum 10-foot radius from the outer circumference of certain poles and towers (non-exempt or subject poles and towers). The distances for clearance requirements must be measured horizontally, not along the surface of the sloping ground. More detailed descriptions of the applicable codes and regulations and images of exempt and non-exempt power line structures may be found in CAL FIRE's *California Power Line Fire Prevention Field Guide* (CAL FIRE 2021).

2.15.2.3 Local

Operational Area Emergency Operations Plan

The Operational Area Emergency Operations Plan (OA EOP), also known as the San Diego County Emergency Operations Plan, is a comprehensive emergency plan in the county. The OA EOP was updated and approved by the County Board of Supervisors in August 2022 (Unified San Diego County Emergency Services Organization and County of San Diego 2022). The OA EOP contains 16 annexes (as listed in Section 2.9.14, "Emergency Response and Evacuation Plans"). The OA EOP is used by San Diego County and all the cities within the county to respond to major emergencies and disasters.

Specifically, the OA EOP describes a comprehensive emergency management system that provides for a planned response to disaster situations associated with technological incidents, terrorism, nuclear-related incidents, and natural disasters, such as wildland fires. The OA EOP has the following five objectives:

1. To provide a system for the effective management of emergency situations.
2. To identify lines of authority and relationships.
3. To assign tasks and responsibilities.
4. To ensure adequate maintenance of facilities, services and resources.
5. To provide a framework for adequate resources for recovery operations.

The stand-alone emergency plans for the OA in the county include the following:

- San Diego County Nuclear Power Plant Emergency Response Plan
- San Diego County OA Oil Spill Contingency Element of the Area Hazardous Materials Plan
- San Diego County OA Emergency Water Contingencies Plan
- Unified San Diego County Emergency Services Organization OA Energy Shortage Response Plan
- Unified San Diego County Emergency Services Organization Recovery Plan
- San Diego County Multi-Jurisdictional Hazard Mitigation Plan
- San Diego Urban Area Tactical Interoperable Communications Plan
- San Diego County Draft Terrorist Incident Emergency Response Protocol

The OA EOP and San Diego County Multi-Jurisdictional Hazard Mitigation Plan are the primary emergency response and evacuation plans for the county. Ground transportation is the primary means of evacuation in the county. Primary evacuation routes include major ground transportation corridors.

Regulatory requirements applicable to fire protection are as follows:

- County of San Diego General Plan Safety Element policies related to wildlife hazards and Exhibit S-3: Potential Evacuation Routes
- County of San Diego Code of Regulatory Ordinances Sections 68.401-68.406, Combustible Vegetation and Other Flammable Materials Ordinance
- County of San Diego Code of Regulatory Ordinances Sections 96.1.005 and 96.1.202, Removal of Fire Hazards
- County of San Diego Consolidated Fire Code
- County Department of Planning and Land Use Fire Prevention in Project Design Standards

The regulatory framework discussed in the 2011 GPU PEIR continues to apply to the unincorporated county and is incorporated into this section by reference. Regulations that have been updated or introduced since adoption of the General Plan in August 2011 are described in the following sections.

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The Multi-Jurisdictional Hazard Plan is a countywide plan that identifies risk and ways to minimize damage by natural and human-caused disasters. The plan has been incorporated into the General Plan Safety Element. Safety Element Policy S-1.4 identifies the County's intent to review and update this plan every five years. This plan was last revised in February 2023 to reflect changes to both the hazards threatening San Diego County, as well as the programs in place to minimize or eliminate those hazards. The 2023 plan combined wildfire and structure fire as one hazard category and determined that it is highly likely for future wildfire events to occur in 75–100 percent of the planning area.

2023 Consolidated Fire Code

Effective April 13, 2023, the Consolidated Fire Code includes the County amendments to the 2022 California Fire Code and the ordinances of the 12 unincorporated county fire protection districts (County of San Diego 2023). Because of the county's changing climatic, geological, and topographical conditions, the County Fire Code is amended every 3 years when the State of California repeals, revises, and republishes the California Building Standards Code. The County Fire Code is contained in Title 24, Part 9 of the CCR. It 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. The County Fire Code applies to all new construction and to any alterations, repairs, or reconstruction, except as otherwise provided for in Title 9, Division 6, Chapter 1 of the County Code.

San Diego County Fire Authority Water Tank Standards for Fire Protection

The San Diego County Fire Authority Water Tank Standards for Fire Protection provides standards for the minimum water storage needed to provide protection for dwellings and other structures where adequate public and private water supply is not available. The standards specify minimum water flow and capacity requirements based on building square footage, as well as requirements for water tank location (San Diego County Fire Authority 2018).

2011 San Diego County General Plan

The General Plan policies addressing wildfire that are applicable to the CAP Update include the following:

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-6.11: Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.

Policy LU-10.2: Development—Environmental Resource Relationship. Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.

Policy S-1.3: Risk Reduction Programs. Support efforts and programs that reduce the risk of natural and manmade hazards and that reduce the time for responding to these hazards.

Policy S-4.1: Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.

Policy S-4.2: Development in Hillside and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.

Policy S-4.3: Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.

Policy S-4.4: Service Availability. Plan for development where fire and emergency services are available or planned.

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, and lengths of fire apparatus access roads shall meet the requirements of the State Fire Code and the 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 threat areas implement measures in a Fire Plan that reduce the risk of structural and human loss due to wildfire.

Policy S-4.7: Fire Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire hazards areas.

Policy S-5.1: Fuel Management Programs. Support programs and plans, such as Strategic Fire Plans, consistent with state law that require fuel management/modification within established defensible space boundaries and when strategic fuel modification is necessary outside of defensible space, balance fuel management needs to protect structures with the preservation of native vegetation and sensitive habitats.

Policy S-9.1: Landslide Risks. Direct development away from areas with high landslide, mudslide, or rock fall potential when engineering solutions have been determined by the County to be infeasible.

Policy S-9.2: Risk of Slope Instability. Prohibit development from causing or contributing to slope instability.

Policy S-10.3: Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal floodproofing standards and siting criteria to prevent flow obstruction.

Policy S-10.4: Development in Flood Hazard Areas. Require development within mapped flood hazard areas to be sited and designed to minimize on and off-site hazards to health, safety, and property due to flooding.

Policy S-10.6: Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single-family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.

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

In addition, the General Plan Safety Element identifies major freeways and state routes (SRs) as potential evacuation routes within the county, including Interstate 5 (I-5), I-15, I-8, I-805, SR-52, SR-54, SR-56, SR-67, SR-75, SR-76, SR-78, SR-84, SR-125, SR-163, and SR-905.

2011 San Diego County GPU PEIR

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

Adopted Mitigation Measure Haz-3.1: Facilitate coordination between DPLU and the Office of Emergency services to implement and periodically update the Hazard Mitigation Plan.

Adopted Mitigation Measure Haz-3.2: Implement the CEQA Guidelines for Determining Significance to ensure that discretionary projects do not adversely impact emergency response or evacuation plans. Also implement the County Public Road Standards and County Private Road Standards during these reviews and ensure that road improvements are consistent with Emergency Response and Evacuation Plans. Apply appropriate mitigation when impacts are significant.

Adopted Mitigation Measure Haz-3.3: Prepare Fire Access Road network plans and include in Community Plans or other document as appropriate. Also implement the County Fire Code and require fire apparatus access roads and secondary access for projects.

Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

2.15.3 Analysis of Effects and Significance Determinations

2.15.3.1 Significance Criteria

Based on guidance provided in Appendix G of the State CEQA Guidelines and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Wildland Fire and Fire Protection* (County of San Diego 2022), if located in or near SRAs or lands classified as Very High FHSZ, the proposed project would result in a significant impact if it would:

- substantially impair an adopted emergency response plan or emergency evacuation plan;
- due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
- require the installation or maintenance of associated infrastructure (such as roads, fuel break, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment;
- expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Impacts related to impairing an adopted emergency response plan or emergency evacuation plan are discussed in Section 2.9.3.5, “Issue 3: Impair or Interfere with Emergency Response and Evacuation Plans,” of this SEIR.

2.15.3.2 Approach to Analysis

Appendix G of the State CEQA Guidelines requires that wildfire impacts be evaluated for projects that are located in or near SRAs or lands classified as Very High FHSZ. As discussed in Section 2.15.1, “Existing Conditions,” the majority of the unincorporated county is within an SRA, and most lands within the unincorporated county are classified as ~~High and~~ Very High FHSZs in SRAs (CAL FIRE ~~2007~~2024).

Impacts related to wildfire were analyzed qualitatively 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 was analyzed in the context of existing laws and regulations, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with the 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 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 established greenhouse gas (GHG) reduction targets. Because these measures and actions represent the components of the CAP Update that could result in physical environmental effects within the unincorporated county, this analysis focuses on the impacts of their implementation. Given the broad scope of the CAP Update (i.e., covering the entire unincorporated county) and its role as a planning document designed to guide future decision-making related to the reduction of GHG emissions within the unincorporated county, the study area for the following analysis is the unincorporated area of the county within the County's jurisdiction (i.e., excluding tribal lands, state and federally owned lands, and military installations).

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

Impacts related to future development of wind turbine projects as a result of renewable energy demand generated by Action E-3.3 also are examined in light of the conclusions in the 2013 Wind Energy Ordinance Amendment Final EIR, which analyzes the effects of wind energy infrastructure within the unincorporated county (County of San Diego 2013). The Wind Energy Ordinance exempts small scale wind turbine projects, which could occur in Very High FHSZs within the unincorporated county, from discretionary review.

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 measures and actions with the potential to affect wildfire risks are summarized below.

Solid Waste Measures and Actions. This category includes strategies to achieve zero solid waste in County operations and within the unincorporated county. These measures and actions would not typically increase wildfire risks. Measures and actions with potential to result in new or expanded solid waste facilities (e.g., SW-4.1) may result in new or more severe impacts related to wildfire.

Water and Wastewater Measures and Actions. This category includes strategies to decrease water consumption and increase wastewater and stormwater treatments. Measures W-1, W-2, and W-3 could result in new or more severe impacts related to wildfire.

Agriculture and Conservation Measures and Actions. This category includes strategies to preserve natural land and agricultural land. This category also includes an action that would evaluate opportunities for the construction of farmworker housing (Action A-4.1b). Through Measure A-1, the County would acquire and manage conservation lands to preserve natural lands and maximize carbon storage potential in the unincorporated area. Through Measure A-2, the County would develop a tree planting program that expands canopy across the unincorporated area. These measures and actions could result in new or more severe impacts related to wildfire.

Energy Measures and Actions. This category includes a strategy to develop policies and programs to increase energy efficiency and renewable energy use. Key measures and actions with potential to result in new or more severe impacts related to wildfire include Actions E-3, E-3.2, 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 vehicle fleet, install electric vehicle charging stations, incentivize the use of alternative fuels and landscaping practices, and support transit and ridesharing. Generally, a shift from gas powered cars to electric engines and alternative modes of transportation would not result in increased wildfire hazard. However, actions with the potential to result in construction of new or improved facilities (e.g., Actions T-5.1 and T-6.2) may result in new or more severe impacts related to wildfire.

2.15.3.3 Issue 1: Exacerbate Wildfire Risks

This section describes potential project impacts related to exposing occupants to pollutants or spread of wildfire 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: Wildland Fire and Fire Protection* (County of San Diego 2022), the project would have a significant impact if it would be located in or near an SRA or Very High FHSZ and:

- Exacerbate wildfire risks due to slope, prevailing winds, and other factors and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Impact Analysis

2011 GPU PEIR Determination

Impacts related to the exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold is derived from the State CEQA Guidelines Appendix G checklist, which was amended to include new questions related to wildfire subsequent to the General Plan's adoption. However, Section 2.7, "Hazards and Hazardous Materials," of the 2011 GPU PEIR addresses impact associated with wildland fire risk and is incorporated by reference. Implementation of the General Plan could result in future development in areas susceptible to wildfires, which could exacerbate wildfire risks leading to the exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. However, the General Plan policies listed in Section 2.15.2, "Regulatory Framework," would reduce these potential impacts by locating development in areas with adequate emergency services and outside of areas with higher susceptibility to wildfire hazard or spread. In addition, development would be designed and constructed to provide adequate defensibility to wildfires. Furthermore, wildfire risk and risk of pollutant exposure would be minimized by adherence to the International Fire Code, California Fire Code, the County Consolidated Fire Code, and other regulations listed in Section 2.15.2, "Regulatory Framework."

CAP Update Impact Analysis

The following sections describe the potential for implementation of CAP Update measures and actions to exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Solid Waste Measures and Actions

Implementation of CAP Update solid waste measures and associated implementing actions (e.g., Action SW-4.1) could result in potential construction of new or expanded solid waste facilities in unincorporated county. These new or expanded facilities would not be intended for occupancy. During construction and operation, there would be increased human activities and ignition sources in the new or expanded solid waste facilities, including equipment that could create a spark or be a source of heat.

As noted in Section 2.15.1, "Existing Conditions," the unincorporated county contains lands that are classified as Very High FHSZs and in SRAs. Heat or sparks have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low humidity and high wind speeds that are typically experienced in the summer and fall but could also occur year-around in the unincorporated county. However,

development of new or expanded facilities would be required to obtain an approval on a Fire Serve Availability form for fire services and would be required to conform to the adopted General Plan policies related to fire risk reduction, including the following: Policy LU-6.10 requiring development to be protected from hazards; Policy LU-6.11 minimizing development in high fire threat areas; Policy S-4.1 requiring adequate defensible development; Policy S-4.2 requiring development to be designed to account for topography to reduce fire risk; Policy S-4.3 requiring development to be designed to minimize wildfire spreading; Policy S-4.6 requiring implementation of measures to reduce wildfire risk if development is proposed within fire threat areas; and Policy S-4.7 requiring all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes. Additionally, development of new or expanded facilities would be required to implement 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7, which require compliance with the Building and Fire Code and require site and/or building designs to include features that reduce fire hazards; Mitigation Measure Pub-1.5, which requires discretionary project applications to include commitments from available fire protection districts; and Mitigation Measure Pub-1.6, which identifies fire prone areas and ensures that development proposals meet the applicable fire authority's requirements. Furthermore, future discretionary projects would be subject to an environmental review process to evaluate potential fire hazards and would be required to comply with the County's Consolidated Fire Code, along with any project specific mitigation measures proposed to avoid or minimize impacts related to the exacerbation of wildfire risks. Therefore, development of new or expanded solid waste facilities would not exacerbate wildfire risks. The impact would be less than significant with implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency, which would not include development of structures for human occupancy. Measures W-1 and W-2 include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water capture systems. Implementation of Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. Development of the proposed water and wastewater infrastructure improvements is not likely to introduce new uses in areas of high fire risk, including uses that would bring increased population into areas of high fire risk. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, planting and protecting trees, and providing incentive to encourage carbon farming. As noted above, the

unincorporated county contains lands that are classified as Very High FHSZs or in SRAs that could be affected by implementation of these measures and actions.

Implementation of Actions A-2.1 and A-2.2 would involve planting drought tolerant and low-fire potential trees on County-owned lands and on private property. Planting trees would result in increased fuel load in WUI areas and Very High FHSZs, which could exacerbate wildfire risks in the unincorporated county. Adopted General Plan Goal S-4 aims to create managed vegetation fuel loads in WUI areas and Policy S-4.1 supports programs consistent with state law that require fuel management/modification within established defensible space boundaries. Compliance with the adopted General Plan goals and policies would ensure that newly planted trees would not become unmanageable fuel loads in WUI areas and Very High FHSZs.

Implementation of Action A-4.1.b could result in the identification of opportunities for new farmworker housing. Humans cause the majority of wildfires, either directly or through failure of transmission lines. Introducing a new population to the WUI or in Very High FHSZs has the potential to exacerbate wildfire risk. The impact would be potentially significant. However, future development of farmworker housing would be required to conform with the adopted General Plan Policy S-4.1 to include adequate defensible space for new development, Policy S-4.2 to account for topography for development near hillsides and canyons, Policy S-4.3 to minimize flammable vegetation around development, Policy S-4.4 to locate development in areas where fire and emergency services are available, Policy S-4.5 to provide additional access roads for safe access of emergency equipment and civilian evacuation concurrently, Policy S-4.6 to implement measures to mitigate fire risk, and Policy S-4.7 to meet current ignition resistance construction codes. In addition, development of new farmworker housing would be required to implement 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 to comply with Building and Fire Code and to require incorporation of building features into design to reduce fire hazards, Mitigation Measure Pub-1.5 to require discretionary project applications to include commitments from available fire protection districts, and Mitigation Measure Pub-1.6 to identify fire prone areas and ensure that development proposals meet applicable fire authority's requirements.

Planting trees or future development of farmworker housing within or adjacent to areas designed as Very High FHSZ or WUI areas would have the potential to exacerbate wildfire risk, particularly if these actions occur in areas with steep topography and/or prevailing winds as these conditions contribute to the spread of wildfires and make it more difficult to contain wildfires. With compliance with applicable adopted General Plan policies and implementation of applicable 2011 GPU PEIR mitigation measures, the agriculture and conservation measures and actions would not exacerbate wildfire risk due to slope, prevailing winds, and other factors or expose project occupants to pollutant concentrations from a wildfire. This impact would be less than significant with implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions 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. These policies and programs could have the potential to result in development of various renewable energy projects, which would not include structures for human occupancy.

Implementation of renewable energy projects have the potential to result in vegetation ignitions and wildfires from equipment failure during construction and operation. Construction activities that may result in ignition sources would include vegetation clearing and piling, grading, site preparation, soil disturbances, concrete pouring and preparation, pole and turbine placement, and construction and refueling. These construction activities may include presence of vehicles, heavy equipment, heat-generating equipment and activities, and sparks from various sources, as well as use of fuels and combustible materials during construction and infrastructure installation. Implementation of CAP Update Measures E-2 and E-3 and Actions E-2.2, E-3.2, and E-3.3 could result in small-scale energy efficiency retrofits on existing residential and non-residential structures and County facilities and large-scale renewable energy systems. The small-scale retrofits could include rooftop or ground-mounted photovoltaic (PV) solar arrays or small wind turbines, upgraded mechanical systems, energy storage systems, and other similar development. Large-scale renewable energy systems could include PV solar, concentrated solar, and wind turbines. However, based on industry standards, it is assumed that future renewable energy development would mainly involve the use of steel, aluminum, or glass, which are materials that have low potential to result in vegetation ignitions and wildfires. Additionally, compliance with adopted General Plan policies would ensure that the proposed development would not exacerbate wildfire risk and would not expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. These policies include Policy S-4.1, which requires development to be located, designed, and constructed to provide adequate defensibility; Policy S-4.7, which requires all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes; and Policy S-5.1, which requires fuel management within established defensible space boundaries. In addition, the 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 require compliance with Building and Fire Code and require site designs to incorporate features to reduce fire hazards; Mitigation Measure Pub-1.5 requires discretionary project applications to include commitments from available fire protection districts; and Mitigation Measure Pub-1.6 identifies fire prone areas and ensures that development proposals meet the applicable fire authority's requirements. Compliance with applicable adopted General Plan policies and implementation of 2011 GPU PEIR mitigation measure would reduce the potential for development of small-scale energy efficiency retrofits to exacerbate wildfire risks. The impact would be less than significant with mitigation.

Built Environment and Transportation Measures and Actions

Implementation of CAP Update Measures T-3 and T-5 would result in new or expanded pedestrian and bicycle improvements and electric vehicle charging stations. Future projects that implement these measures and actions would not involve the construction of new structures intended for human occupancy. Accordingly, the construction of these projects would not result in the exacerbation of wildfire risks that could expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire that were not explicitly evaluated in the 2011 GPU PEIR. The impact would be less than significant.

Summary

The CAP Update may result in development of small-scale infrastructure, large-scale renewable energy systems, and other improvements to reduce countywide GHG emissions. It is assumed that most of the new and improved structures would be small in scale and generally would not be intended for extended occupancy, except for potential farmworker housing and large-scale renewable energy systems. There is limited potential for implementation of the CAP Update to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Where habitable structures and large-scale renewable energy systems are constructed, they would be unlikely to exacerbate wildfire risk due to slope, prevailing winds, and other factors because all development would be consistent with adopted General Plan policies and would implement 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7 to address the potential for development to exacerbate wildfire hazards. In addition, the CAP Update would create co-benefits that reduce wildfire risk, thereby helping to make the county more adaptive and resilient to the impacts of climate change. For these reasons, the CAP Update is not expected to expose project occupants to pollutant concentrations due to exacerbation of wildfire risk. Impacts would remain less than significant with mitigation incorporated. This conclusion is consistent with the conclusions in the 2011 GPU EIR to the extent that it evaluated wildfire risk. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.15.3.4 Issue 2: Install Infrastructure That Exacerbates Fire Risk

This section describes potential project impacts related to installation or maintenance of infrastructure that could exacerbate wildfire risk.

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: Wildland Fire and Fire Protection (County of San Diego 2022), the project would have a significant impact if it would be located in or near an SRA or Very High FHSZ and:

- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

Impact Analysis

2011 GPU PEIR Determination

Impacts related to the exacerbation of fire risk from the installation or maintenance of infrastructure resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold is derived from the State CEQA Guidelines Appendix G checklist, which was amended to include new questions related to wildfire subsequent to the General Plan's adoption. However, infrastructure necessary to support buildout of the General Plan was within the scope of development evaluated in the 2011 GPU PEIR. Section 2.7, "Hazards and Hazardous Materials," of the 2011 GPU PEIR addresses impacts associated with wildland fire risk and is incorporated by reference. The General Plan could result in future development that would require the installation or maintenance of infrastructure in areas susceptible to wildfires. However, the General Plan policies listed in Section 2.15.2, "Regulatory Framework," reduce the potential impacts by ensuring that future development is located in areas with adequate emergency services and infrastructure and outside of areas with higher susceptibility to wildfire hazard or spread. Furthermore, all development would comply with applicable regulations listed in Section 2.15.2, "Regulatory Framework," including the International Fire Code, California Fire Code, State fire regulations, County of San Diego Consolidated Fire Code, and applicable County of San Diego ordinances.

CAP Update Impact Analysis

Solid Waste Measures and Actions

Implementation of the CAP Update solid waste measures and actions would result in potential development of new or expanded solid waste facilities, including expanded biogas capture and composting. The new or expanded facilities would likely be located within or near existing solid waste facilities and landfills with existing infrastructure and utilities services. It is unlikely that infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities would be required for the construction and operation of new or expanded solid waste facilities. If such infrastructure is required, General Plan policies would be implemented to avoid or minimize impacts. These policies include Policy LU-10.2, which ensures development avoids hazard areas; Policy S-4.4, which ensures development occurs in areas with fire and emergency services; Policy S-4.6, which ensures development located within fire threat areas includes measures to reduce risk of structural and human loss due to wildfire; and Policy S-4.7, which requires all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes. 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7, which would enforce Building and Fire Code compliance, would also be implemented to reduce wildfire risk. Adopted Mitigation Measure Pub-1.5, which requires discretionary project applications to include commitments from the applicable fire protection district, and Adopted Mitigation

Measure Pub-1.6, which identifies fire prone areas and ensures that development proposals meet applicable fire authority's requirements, would ensure adequate fire services are available to serve the project area. Therefore, implementation of solid waste measures and associated implementation actions would not require construction or maintenance of infrastructure that might exacerbate fire risk. The impact would be less than significant.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Implementation of CAP Update Measures W-1 and W-2 would have the potential to result in installation of water efficient appliances, smart irrigation systems, and stormwater and greywater capture systems. Implementation of CAP Update Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site, so that the stormwater and greywater would be treated and reused for landscaping. However, no infrastructure related to roads, fuel breaks, emergency water sources, power lines, or other utilities would be anticipated for the construction and operation of water efficient appliances, smart irrigation systems, stormwater and greywater capture systems, and stormwater and wastewater treatment systems. Therefore, no infrastructure that might exacerbate fire risk would need to be operated or maintained because of the implementation of water and wastewater measures and actions. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, planting and protecting trees, and providing incentives to encourage carbon farming and transition to cleaner fuels. These measures would result in new conservation lands, preservation of existing natural and agricultural lands, new trees, identification of opportunities for new farmworker housing, and the use of cleaner fuels in the unincorporated county. No infrastructure or other substantial new structural development would be anticipated for preserving or managing conservation, natural, and agricultural lands; carbon farming; preserving trees; or the use of cleaner fuels. New trees would be planted within County-owned lands, right-of-way, and residential areas and would not require installation of roads, fuel breaks, emergency water sources, power lines, or other utilities.

Implementation of Action A-4.1.b would evaluate opportunities to increase farmworker housing, and thus may result in future development of new farmworker housing in the unincorporated county. New farmworker housing development would be required to conform to the adopted General Plan policies. These policies include Policy LU-6.10, which requires new development to be located and designed to protect property and residents from hazards; Policy LU-10.2, which requires development to avoid hazard areas; Policy S-4.1, which requires development to be located, designed, and constructed to provide adequate defensibility; Policy S-4.2, which requires development to account for topography that would affect its susceptibility to wildfires; Policy S-4.3, which requires

site and design development to minimize the likelihood of a wildfire spreading to structures; Policy S-4.4, which requires development to be planned in areas where fire and emergency services are available or planned; Policy S-4.6, which requires implementation of measures to reduce wildfire risk to structural and human loss; and Policy S-4.7, which requires all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes. In addition, 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 require compliance with Building and Fire Code to ensure adequate fire protection in place; Mitigation Measure Pub-1.5 requires discretionary project applications to include commitment from applicable fire protection districts; and Mitigation Measure Pub-1.6 requires compliance with applicable requirements from local fire authority. Compliance with applicable adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that the farmworker housing and associated infrastructure would be located, designed, and constructed to avoid hazard areas and to minimize wildfire risk to structural and human loss. Therefore, the farmworker housing and associated infrastructure would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. The impact would be less than significant.

Energy Measures and Actions

Implementation of the CAP Update could result in energy efficiency retrofits on existing residential and non-residential structures and County facilities, and the project could include rooftop or ground-mounted solar arrays or small wind turbines, modern mechanical systems, energy storage systems, large-scale PV solar, concentrated solar, and wind turbines that have potential to result in direct and indirect impacts related to wildland fire that were not explicitly evaluated within the 2011 GPU PEIR.

Energy efficiency retrofits and associated improvements would occur on existing structures and County facilities and would not require installation or maintenance of roads, fuel breaks, and emergency water sources. However, implementation of CAP Update Measure E-3, Action E-3.2, and Action E-3.3 would have the potential to result in development of new renewable energy systems, such as small-scale PV solar arrays and wind turbines and large-scale PV solar, concentrated solar, and wind turbines. These new renewable energy systems would also require connection to power lines and/or construction of new substations. Specific locations for the potential renewable energy system projects are unknown; however, they could result in placement of structures adjacent to wildland vegetation. Construction activities that may result in ignition sources would include vegetation clearing and piling, grading, site preparation, soil disturbances, concrete pouring and preparation, pole and turbine placement, and refueling. These construction activities may include presence of vehicles, heavy equipment, heat-generating equipment and activities, and sparks from various sources, as well as use of fuels and combustible materials during construction and infrastructure installation. Additionally, the projects would result in the generation and transmission of electric current which would be potentially susceptible to equipment failure. Maintenance activities also could result in additional presence of humans and equipment. Large-scale solar systems would include the use of lithium-ion batteries (typically enclosed to reduce fire risk), which would pose a risk for overheating and potential ignition of nearby vegetation. Therefore, implementation of renewable energy system project infrastructure could exacerbate fire risk.

In accordance with the County's Zoning Ordinance, small-scale solar PV systems (under 500 square feet) and up to three small wind turbines are permitted without a discretionary permit if specific zoning criteria are met in accordance with the ordinance. Even though there is a lack of discretionary oversight for small-scale renewable energy projects, all projects would be required to comply with federal, state, and local regulations to minimize or prevent wildfire. The small-scale renewable energy projects would also be required to implement the adopted General Plan policies listed in Section 2.15.2, "Regulatory Framework," which would aid in the efforts to prevent wildfire in the county by managing vegetation, preparing for the threat of wildfire based on weather conditions, and staffing fire service providers appropriately. Furthermore, implementation of 2011 GPU PEIR mitigation measures would reduce impact related to infrastructure development. These measures include Mitigation Measures Haz-4.3 and Pub-1.7, which would require compliance with the Building and Fire Code to ensure there are adequate fire service levels and would require site designs to incorporate features that reduce fire hazards, and Mitigation Measure Pub-1.6, which requires compliance with applicable requirements from the local fire authority. Compliance with existing regulations and the adopted 2011 GPU PEIR policies and implementation of Mitigation Measures Haz-4.3, Pub-1.6, and Pub-1.7 would ensure that future small-scale renewable energy projects would not exacerbate fire risk or result in temporary or ongoing impacts to the environment.

Future large-scale renewable energy projects and associated infrastructure (e.g., power lines, power poles, and battery storage systems) would result in potential ignition sources during construction and operation activities. Potential ignition sources during construction could include heat sources or sparks from power tools, heated exhaust from worker vehicles, and improper electrical connections. During operation, the primary wildfire ignition risks could include electrical shorts, employee and maintenance vehicles, collapse of supporting structures (e.g., power lines and power poles) causing electrical shorts and fire, and overgrown fuel under and around structures. Implementation of large-scale renewable energy projects could exacerbate fire risk due to installation of renewable energy systems and associated infrastructure. However, future large-scale renewable energy projects would be designed to prevent this infrastructure from exacerbating fire risk to the extent feasible. The large-scale renewable energy projects and associated infrastructure would be required to be designed and constructed in accordance with current fire codes. Defensible space and fuel management required by the California Public Utilities Commission and CAL FIRE for utilities infrastructure development would also be implemented as discussed in Section 2.15.2.2, above.

In addition, future large-scale renewable energy projects would be subject to discretionary review and would be evaluated for project-specific impacts under CEQA at the time of application. Project-specific mitigation would reduce and minimize impacts related to the exacerbation of fire risk to the extent feasible in compliance with State CEQA Guidelines Section 15126.4. Adopted General Plan Policy S-4.1, which requires development to be located, designed, and constructed to provide adequate defensibility; Policy S-4.7, which requires all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes; and Policy S-5.1, which requires fuel management within established defensible space boundaries, would reduce wildfire risk. Implementation of 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 would ensure that the Building and Fire

Code is implemented to provide adequate fire protection, Mitigation Measure Pub-1.5 would ensure that discretionary projects include commitments from the applicable fire protection district, and Mitigation Measure Pub-1.6 would ensure compliance with applicable requirements from the local fire authority. Even through implementation of large-scale renewable energy projects would introduce potential ignition sources and additional electrical equipment that do not currently exist in the county, compliance with the adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce fire risk to a less-than-significant level. The impact would be less than significant.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update built environment and transportation measures and actions could result in future infrastructure development that would result in wildfire-related impacts in the unincorporated county. More specifically, implementation of CAP Update Measures T-3 and T-5 would result in new or expanded pedestrian and bicycle improvements, electric vehicle charging stations, and other measures and actions to promote sustainable transportation options. Development of pedestrian and bicycle improvements would occur on existing roadways and electric vehicle charging stations would be installed in existing parking lots and garages. Implementation of the proposed transportation infrastructure projects would be connected to existing roadways and located within existing facilities, which would not require installation or maintenance of new infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk. Compliance with the adopted General Plan Policy S-4.1, which requires development to be located, designed, and constructed to provide adequate defensibility; Policy S-4.7, which requires all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes; and Policy S-5.1, which requires fuel management within established defensible space boundaries, would ensure that the potential development would not exacerbate wildfire risk. Further, 2011 GPU EIR Mitigation Measures Haz-4.3 and Pub-1.7, which would enforce Building and Fire Code compliance, would be implemented to reduce wildfire risk. Therefore, implementation of CAP Update built environment and transportation measures and actions would not substantially increase wildfire risk associated with infrastructure development. The impact would be less than significant.

Summary

Federal, state, and local regulations exist to minimize or prevent wildfire. In addition, implementation of the adopted General Plan policies listed in Section 2.15.2, "Regulatory Framework," would aid in the efforts to prevent wildfire in the county by managing vegetation, preparing for the threat of wildfire based on weather conditions, and staffing fire service providers appropriately. Implementation of the 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7 would require compliance with the Building and Fire Code, require site designs to incorporate features to reduce fire hazards, and ensure there are adequate fire service providers available to serve potential development. Therefore, impacts related to small-scale renewable energy systems would be reduced to less than significant with mitigation incorporated. This conclusion is consistent with the conclusions in the 2011 GPU PEIR to the extent that it evaluated wildfire

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

2.15.3.5 Issue 3: Expose People or Structures to Post-Fire Risks

This section describes potential project impacts related to exposing people to post-fire risks, such as flooding or landslides, 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: Wildland Fire and Fire Protection* (County of San Diego 2022), the project, if located in or near an SRA or lands classified as Very High FHSZ, would have a significant impact if it would:

- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Impact Analysis

2011 GPU PEIR Determination

Impacts related to the exposure of people or structures to post-fire risks resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold is derived from the State CEQA Guidelines Appendix G checklist, which was amended to include new questions related to wildfire subsequent to the General Plan's adoption. However, Section 2.7, "Hazards and Hazardous Materials," of the 2011 GPU PEIR addresses impact associated with wildland fire risk and is incorporated by reference. The General Plan would result in development in areas susceptible to wildfires. However, several General Plan policies listed in Section 2.15.2, "Regulatory Framework," would reduce the potential impacts by limiting development in hillsides and canyons where flooding or slope instability could occur. Furthermore, post-wildfire hazard risk is also mitigated by adherence to the County of San Diego OA EP, the County Consolidated Fire Code, and other regulations listed in Section 2.15.2, "Regulatory Framework."

CAP Update Impact Analysis

Implementation of the CAP Update measures and associated implementing actions has the potential to result in future development, such as expansion of facilities, identification of opportunities for farmworker housing, and development of small-scale and large-scale renewable energy projects. These potential developments could expose people or structures to significant risks. The following sections describe the potential wildfire-related impacts that could result from implementation of CAP Update measures and actions.

Solid Waste Measures and Actions

Implementation of CAP Update solid waste measures and actions (e.g., Action SW-4.1) could result in potential construction of new or expanded solid waste facilities in the unincorporated county. Specific locations for these facilities have not been identified, though gas capture at existing landfills likely would occur at the Borrego and Otay landfills. As discussed in Sections 2.15.3.3 and 2.15.3.4, above, construction of new or expanded solid waste facilities would increase human activities and ignition sources in the area, which would have the potential to create a spark to cause fire and expose people or structures to wildfire risks and flooding or landslides resulting from post-fire slope instability or drainage changes. However, future development would be required to conform with the adopted General Plan policies related to wildfire protection. These policies include Policy LU-6.11 to direct development away from hazardous wildfire areas; Policy S-4.1 to locate, site, design, and construct new development to enhance defensibility and to minimize the risk of structural loss and life safety resulting from wildfire; Policy S-4.3 to site and design new developments to minimize the likelihood of a wildfire spreading to structures; Policy S-4.4 to locate new developments to where fire and emergency services are available; Policy S-4.6 to implement measures to mitigate wildfire risks to structures and humans; and Policy S-4.7 to require new development to meet current ignition resistance construction codes. Complying with these adopted General Plan policies would minimize wildfire risk to new development. In addition, complying with Policy LU-6.10, which protects property and residents from natural and human-induced hazards; Policy S-4.2, which requires development located on ridgelines, top of slopes, saddles or other topographic areas to be sited and designed to account for topography in wildland areas that pose a greater fire risk; Policy S-9.1, which directs development away from areas with high landslide potential; Policy S-9.2, which prohibits development from causing or contributing to slope instability; and Policies S-10.3, S-10.4, and S-10.6, which limit development in flood hazard areas, would minimize wildfire risk and reduce landslide or flooding hazards from post-fire associated with slope destabilization and drainage changes. In addition, future development would be required to implement the 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7, which require compliance with the Building and Fire Code and requires site and building designs to incorporate features that reduce fire hazards. Compliance with these policies and implementation of Adopted Mitigation Measures Haz-4.3 and Pub-1.7 would reduce the potential for projects constructed as part of CAP Update implementation to expose people or structures at new or expanded facilities to significant post-fire risks, including downslope or downstream flooding or landslides due to post-fire slope instability or drainage changes. The impact would be less than significant.

Water and Wastewater Measures and Actions

Implementation of CAP Update Measures W-1 through W-3 and associated implementing actions would involve development of policies and programs to encourage water conservation and increase water and wastewater efficiency. Measures W-1 and W-2 include implementing actions to develop policies and programs to increase water efficiency. Implementation of these measures would generally result in installation of water efficient appliances, smart irrigation systems, and stormwater and grey water

capture systems. Implementation of Measure W-3 would have the potential to result in installation of stormwater and wastewater treatment systems on-site so that the stormwater and greywater would be treated and reused for landscaping. Implementation of these measures would not result in new population growth or construction of new structures; therefore, implementation of CAP Update water and wastewater measures and actions would not expose people or structures to significant risks, including downslope or downstream flooding or landslides due to post-fire slope instability or drainage changes. The impact would be less than significant.

Agriculture and Conservation Measures and Actions

Implementation of CAP Update Measures A-1 through A-2 and associated implementing actions would involve acquiring and managing conservation lands, preserving natural and agricultural lands, planting and protecting trees, and providing incentive to encourage carbon farming. No new population growth would occur as a result of these measures and actions, and it is assumed that construction of new structures would not be required for managing and preserving conservation, natural, and agricultural lands; promoting carbon farming; and protecting and planting trees. However, implementation of Action A-4.1.b could result in the identification of opportunities to increase farmworker housing in the unincorporated county. The unincorporated county contains many WUI areas, areas classified as Very High FHSZs, and areas in SRAs. Construction of new farmworker housing in WUI areas or a Very High FHSZ would have the potential to expose people and structures to significant risks during and after a wildfire event. Specific locations for potential farmworker housing have not been identified. Future farmworker housing development that results from evaluations conducted through implementation of the CAP Update would be required to conform to the adopted General Plan policies related to wildfire protection, including Policy LU-6.11 to direct development away from hazardous wildfire areas; Policy S-4.1 to locate, site, design, and construct new development to enhance defensibility and to minimize the risk of structural loss and life safety resulting from wildfire; Policy S-4.2 to require new development located on ridgelines, top of slopes, saddles or other topographic areas to be sited and designed to account for topography in areas that pose a greater fire risk; Policy S-4.3 to site and design new developments to minimize the likelihood of a wildfire spreading to structures; Policy S-4.4 to locate new developments in areas where fire and emergency services are available; Policy S-4.6 to implement measures to mitigate wildfire risks to structures and humans; and Policy S-4.7 to require new development to meet current ignition resistance construction codes. Compliance with these adopted policies would limit risks associated with the construction of new farmworker housing in areas prone to wildfire.

Post-wildfire risks to new development would also be minimized through adherence to the General Plan Safety Element policies, which include Policy S-9.1 to direct development away from areas with high landslide potential; Policy S-9.2 to prohibit development from causing or contributing to slope instability; and Policies S-10.3, S-10.4, and S-10.6 to limit development in flood hazard areas. New development would also adhere to the following: the County's OA EOP, which includes strategies, procedures, recommendations, and organizational structures to respond to natural disasters; the Multi-Jurisdictional Hazard Mitigation Plan, which includes goals, objectives, and actions

to reduce the possibility of damage and loss due to wildfire; and other existing regulations related to wildfire protection listed in Section 2.15.2, “Regulatory Framework.” Compliance with the adopted General Plan policies and existing regulations would ensure development in or near SRAs and Very High FHSZs would not expose people or structures to substantial post-fire risks. The impact would be less than significant.

Energy Measures and Actions

Implementation of CAP Update energy measures and actions would involve implementation of policies, programs, and mechanisms to increase building energy efficiency, increase the use of renewable energy, and increase electrification in the unincorporated county and County operations. These policies and programs could have the potential to result in development of various renewable energy projects, such as new small-scale PV solar arrays and wind turbine projects and large-scale PV solar, concentrated solar, and wind turbines that could be located in downslope or downstream flood or landslide areas within the county. Impacts related to the exposure of people or structures due to post-fire slope instability were not explicitly evaluated within the 2011 GPU PEIR.

Implementation of the CAP Update would result in new small-scale PV solar arrays and small-scale wind turbine projects that could include ground-mounted infrastructure. If new renewable energy equipment is installed in areas subject to flooding or landslides within the county, there is a potential to result in the exposure of people or structures to post-wildfire risk. However, given the nature and small scale of renewable energy projects that would be implemented consistent with the CAP Update, it is unlikely that occupied structures or a substantial increase in people would be introduced into the project area. Small-scale wind and solar projects generally do not include the development of new structures and maintenance of these facilities requires limited presence of employees that could be affected by post-fire risks.

Furthermore, future wind and solar projects would be required to be constructed according to applicable fire code requirements and County ordinances that govern grading, flammable materials, and fire hazards. Additionally, small-scale wind and solar projects would be required to comply with the adopted General Plan policies listed in Section 2.15.2, “Regulatory Framework,” including Policy 4-3.1, which requires that development in areas susceptible to wildfires be designed with adequate defensibility and emergency access to minimize the risks to people and structures; Policy S-4.2, which requires development in hillsides and canyons where flooding or slope instability could occur to be designed to account for topography; and Policy S-4.4, which restricts development in areas with a high fire threat and in areas where emergency services are unavailable. In addition, the 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 would require compliance with the Building and Fire Code and would require site designs to incorporate features to reduce fire hazards. Compliance with adopted General Plan policies and implementation of Adopted Mitigation Measures Haz-4.3 and Pub-1.7 would ensure that future small-scale wind and solar projects would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes.

Large-scale renewable energy infrastructure would generally be constructed in primarily undeveloped locations that are productive for generating renewable energy. 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 that relies on large amounts of land unencumbered by buildings or shadowed by buildings or trees. If the large-scale renewable energy projects are located in flood zones, landslide susceptible areas, or unstable slopes, the impacts related to exposing people or structures to post-fire landslides, slope instability, or flooding could be significant. However, future large-scale renewable energy projects would be subject to discretionary review and would be evaluated for project-specific impacts under CEQA at the time of application. Project-specific mitigation would be proposed to reduce and minimize post-fire risks to the extent feasible in compliance with State CEQA Guidelines Section 15126.4.

Future large-scale renewable energy projects would also conform to design requirements associated with proper site preparation and grading practices to address erosion and runoff. In addition, future large-scale renewable energy projects would be required to comply with adopted General Plan Policy S-9.1, which directs development away from areas with high landslide, mudslide, or rock fall potential; Policy S-10.3, which requires development to conform to federal floodproofing standards; Policy S-9.2, which prohibits development from causing or contributing to slope instability; Policy S-10.4, which requires development within mapped flood hazard areas be sited and designed to minimize on-site and off-site hazards; Policy S-10.6, which allows new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. Implementation of 2011 GPU PEIR Mitigation Measures Haz-4.3 and Pub-1.7 would ensure that the Building and Fire Code is enforced to provide adequate fire protection; Mitigation Measure Pub-1.5 would ensure that discretionary project applications would include commitment from available fire protection districts; and Mitigation Measure Pub-1.6 would identify fire prone areas and ensure development proposals meet the requirements set forth by the applicable fire jurisdiction. Compliance with State CEQA Guidelines Section 15126.4, adopted General Plan policies, and 2011 GPU PEIR mitigation measures would ensure that future large-scale renewable energy projects would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes. The impact would be less than significant.

Built Environment and Transportation Measures and Actions

Implementation of the CAP Update built environment and transportation measures and associated implementing actions could result in future development that would result in wildfire-related impacts in the unincorporated county.

Implementation of CAP Update Measures T-3 and T-5 would result in new or expanded pedestrian and bicycle improvements and electric vehicle charging stations. Park-and-ride facilities would be located in existing parking lots or vacant lots near existing

roadways; pedestrian and bicycle infrastructure improvements would be located on or near existing roadways; and electric vehicle charging stations would be installed in existing parking lots or parking garages. Development of pedestrian and bicycle improvements and installation of electric vehicle charging stations would not increase wildfire risk or alter slopes or drainage patterns in a manner that would increase the risk of post-fire downslopes or downstream flooding or landslides. The impact would be less than significant.

Summary

Post-wildfire risks to new development would be minimized through adherence to the County's OA EOP, which includes strategies, procedures, recommendations, and organizational structures to respond to natural disasters; the Multi-Jurisdictional Hazard Mitigation Plan, which includes goals, objectives, and actions to reduce the possibility of damage and loss due to wildfire; and other existing regulations related to wildfire protection listed in Section 2.15.2, "Regulatory Framework." Additionally, compliance with the adopted General Plan policies and existing regulations would ensure development in or near SRAs and Very High FHSZs would not expose people or structures to substantial post-fire risks. This impact would be less than significant with mitigation incorporated. This conclusion is consistent with the conclusions in the 2011 GPU PEIR to the extent that it evaluated wildfire risk. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.15.3.6 Cumulative Impact Analysis

The cumulative impact analysis study area for the wildfire-related risks is the San Diego Association of Governments (SANDAG) region. 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: Exacerbate Wildfire Risks

Impacts related to the exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold was introduced to the State CEQA Guidelines subsequent to the General Plan's adoption. As discussed in Section 2.15.3.3, "Issue 1: Exacerbate Wildfire Risks," future development associated with the CAP Update would be evaluated to determine whether it is within the scope of this SEIR or if it would require subsequent CEQA review; would be required to conform with adopted General Plan policies; and would be required to implement applicable 2011 GPU PEIR mitigation measures. As indicated in Section 2.15.1, "Existing Conditions," the unincorporated county contains lands that are classified as Very High FHSZs. Because of the amount of Very High FHSZs in the unincorporated county, it is reasonable to assume that there is a significant cumulative impact related to the exacerbation of wildfire risks. However, implementation of the CAP Update would not result in the exacerbation of wildfire risks with compliance with adopted General Plan

policies and implementation of 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7.

While a significant cumulative impact related to the exacerbation of wildfire risk may result from cumulative development within the SANDAG region, it is foreseeable that future projects proposed in the unincorporated county would be required to comply with adopted General Plan policies and 2011 GPU PEIR mitigation measures, resulting in the mitigation of impacts associated with General Plan buildout; therefore, future projects would not result in a considerable contribution to an existing significant cumulative impact. Further, implementation of the CAP Update would not result in the exacerbation of wildfire risks that could expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, the project would not result in a substantial incremental effect that would result in a new significant impact related to the exacerbation of wildfire risk. The impact would be less than significant. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

Issue 2: Install Infrastructure That Exacerbates Fire Risk

Impacts related to the exacerbation of fire risk from the installation or maintenance of infrastructure resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold was introduced to the State CEQA Guidelines subsequent to the General Plan's adoption. As discussed in Section 2.15.3.4, "Issue 2: Install Infrastructure That Exacerbates Fire Risk," impacts would be less than significant with implementation of applicable 2011 GPU PEIR mitigation measures and compliance with the General Plan policies and other applicable regulations included in Section 2.15.2, "Regulatory Framework."

Similar to Issue 1, discussed above, a significant cumulative impact related to exacerbation of wildfire risk from installation and maintenance of infrastructure would occur in the cumulative context due to the large amount of Very High FHSZs in the unincorporated county. However, while a significant cumulative impact related to the exacerbation of wildfire risk may result from cumulative development within the unincorporated county, it is foreseeable that future projects proposed in the unincorporated county would be required to comply with the same General Plan policies and 2011 GPU PEIR mitigation measures, resulting in the mitigation of impacts associated with General Plan buildout.

Further, given the nature of the projects that would be implemented consistent with the CAP Update, and the fact that impacts resulting from the proposed CAP Update measures and actions would not result in the exacerbation of wildfire risk associated with the installation of infrastructure, the project would not result in a substantial incremental effect that would result in considerable contribution to a new significant cumulative impact. The impact would be less than significant. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

Issue 3: Expose People or Structures to Post-Fire Risks

Impacts related to exposing people or structures to post-fire risks from the installation or maintenance of infrastructure resulting from implementation of the General Plan were not addressed explicitly in the 2011 GPU PEIR because this threshold was introduced to the State CEQA Guidelines subsequent to the General Plan's adoption. As discussed in Section 2.15.3.5, "Issue 3: Expose People or Structures to Post-Fire Risks," impacts would be less than significant with implementation of applicable 2011 GPU PEIR mitigation measures and with compliance with the General Plan policies and other applicable regulations included in Section 2.15.2, "Regulatory Framework."

Similar to Issue 1, discussed above, a significant cumulative impact related to exposing people or structures to post-fire risks is anticipated to occur as a result of General Plan buildout due to the large amount of Very High FHSZs in the unincorporated county. However, while a potentially significant cumulative impact related to the exposure of people or structures to post-fire risks may result from cumulative development within the unincorporated county, it is foreseeable that future projects proposed in the unincorporated county would be required to comply with adopted General Plan policies and 2011 GPU PEIR mitigation measures, resulting in the mitigation of impacts associated with General Plan buildout. Further, given the nature of the projects required to implement the CAP Update, and the fact that impacts resulting from the proposed CAP Update measures and actions would not result in a significant impact related to exposing people or structures to post-fire risks, the project would not result in a substantial incremental effect that would result in a new significant cumulative impact. The impact would be less than significant. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.15.4 Summary of New or More Severe Significant Impacts

Implementation of the CAP Update would not result in new or more severe impacts related to emergency response or evacuation plans, exacerbation of fire risk, or exposure of people or structures to post-fire risks.

2.15.5 Mitigation Measures

2.15.5.1 Issue 1: Exacerbate Wildfire Risks

The following mitigation measures adopted as a part of the 2011 GPU PEIR would reduce potential impacts related to the exacerbation of wildfire risk to less than significant. Therefore, no new mitigation measures would be required.

Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

2.15.5.2 Issue 2: Install Infrastructure That Exacerbates Fire Risk

The following mitigation measures adopted as a part of the 2011 GPU PEIR would reduce potential impacts related to the installation of infrastructure that exacerbates fire risk to less than significant. Therefore, no new mitigation measures would be required.

Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the

construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

2.15.5.3 Issue 3: Expose People or Structures to Post-Fire Risks

The following mitigation measures adopted as a part of the 2011 GPU PEIR would reduce potential impacts related to the exposure of people or structures to post-fire risks to less than significant. Therefore, no new mitigation measures would be required.

Adopted Mitigation Measure Haz-4.3: Enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. Also implement the General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas.

Adopted Mitigation Measure Pub-1.5: Implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. These commitments shall also demonstrate that the distance between the projects and the fire service facilities do not result in unacceptable travel times.

Adopted Mitigation Measure Pub-1.6: Maintain and use the County GIS and the County Guidelines for Determining Significant impacts in order to identify fire prone areas during the review of development projects. Once identified, ensure that development proposals meet requirements set by the FAHJ and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review.

Adopted Mitigation Measure Pub-1.7: Implement the Building and Fire code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the local fire district, and other critical issues.

2.15.6 Significance Conclusions

2.15.6.1 Issue 1: Exacerbate Wildfire Risks

Compliance with existing regulations related to wildfire protection and implementation of adopted General Plan policies and 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7 would ensure that project and cumulative impacts associated with exacerbation of wildfire risks would be **less than significant** and **would not result in a considerable contribution** such that no new significant cumulative impact would occur. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.15.6.2 Issue 2: Install Infrastructure That Exacerbates Fire Risk

Compliance with existing regulations related to wildfire protection and implementation of adopted General Plan policies and 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7 would ensure that project and cumulative impacts associated with exacerbation of wildfire risks from installation and maintenance of new infrastructure would be **less than significant** and **would not result in a considerable contribution** such that no new significant cumulative impact would occur. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

2.15.6.3 Issue 3: Expose People or Structures to Post-Fire Risks

Compliance with existing regulations related to wildfire protection and implementation of adopted General Plan policies and 2011 GPU PEIR Mitigation Measures Haz-4.3, Pub-1.5, Pub-1.6, and Pub-1.7 would ensure that project and cumulative impacts associated with exposing people or structures to post-fire risks would be **less than significant** and **would not result in a considerable contribution** such that no new significant cumulative impact would occur. Implementation of the CAP Update **would not result in new or more severe impacts** than disclosed in the 2011 GPU PEIR.

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