CHAPTER 1 PROJECT DESCRIPTION

The County of San Diego (County) adopted the *San Diego County General Plan* (General Plan) in August of 2011, which provides a framework for land use and development decisions in the unincorporated county. The probable environmental impacts of implementing the update to the General Plan, including "potential future development in the unincorporated county based on build-out of the General Plan, as well as associated updates to plans, programs and policies that support the General Plan" (County of San Diego 2011: 1-17) were evaluated in a program environmental impact report (PEIR) certified in 2011. The *San Diego County General Plan Update Final Environmental Impact Report* (hereafter 2011 GPU PEIR) identifies feasible mitigation measures, one of which calls for the preparation of a Climate Action Plan (CAP) designed to reach specified greenhouse gas (GHG) reduction targets from community and local government operations, modifications to the County's guidance on the evaluation of GHG impacts and determining a project's consistency with the CAP, and adoption of a GHG threshold to reduce GHG emissions[1].

In response to this requirement, the County prepared a CAP in 2012 and a revised version in 2018, but the related California Environmental Quality Act (CEQA) documents for both were litigated and the 2018 CAP Supplemental EIR (SEIR) was decertified. Pursuant to the 2020 Appellate Court ruling on the validity of the 2018 SEIR and subsequent Superior Court order and to meet current California legislative emissions reductions requirements, the County has prepared a CAP Update. This SEIR analyzes the environmental impacts of the proposed CAP Update and associated actions. Additional details regarding project background and the relationship of this document to the 2020 Appellate Court decision are discussed in more detail later in this chapter. A summary of the primary issues identified in the 2020 Appellate Court ruling is included below in Section 1.3.1.1, and Table 1-1 at the end of this chapter identifies where each issue is addressed in this ~~draft~~ SEIR.

This chapter describes the proposed CAP Update; an associated amendment to the General Plan (GPA) to revise Goal Conservation and Open Space (COS)-20: Reduction of community-wide and County operations greenhouse gas emissions; Policy COS-20.1: Climate Change Action Plan; revisions to GPU PEIR Mitigation Measure (MM) CC-1.2 (Prepare a County Climate Change Action Plan), MM CC-1.7 (County Guidelines for Determining Significance for Climate Change, which includes a threshold of significance for GHG emissions[2]); and MM CC-1.8 (Revise County Guidelines for Determining Significance based on the Climate Change Action Plan). All revisions to General Plan goal, policy, and GPU PEIR mitigation measures are to make these components consistent with the CAP Update and current state law. All components of the CAP Update

[1] GPU PEIR Mitigation Measure (MM) CC-1.2 (Prepare a County Climate Change Action Plan).

[2] Revisions to GPU Mitigation Measure CC-1.7 will include a Greenhouse Gas Emission threshold through compliance with the CAP Consistency Checklist. This threshold of significance and CAP Consistency Checklist will be adopted for general use through this CAP Update process following public review of the CAP and SEIR. The requirements to adopt a threshold of general use are detailed in State CEQA Guidelines Section 15064.7(b).

listed above and discussed further in Section 1.4 constitute the "project."[3] Because approval of the CAP Update, GPA, GHG threshold, and *County of San Diego Guidelines for Determining Significance: Climate Change* require discretionary approval by the County, these actions are subject to CEQA. The County is the lead agency for the project.

The CAP Update establishes a target of 43.6 percent below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045, along with a goal of net zero by 2045. To do that, the CAP establishes nine strategies, 21 measures, and 70 implementing actions that the County must take to reduce GHG emissions from five emissions reduction sectors: Built Environment and Transportation; Energy; Solid Waste; Water and Wastewater; and Agriculture and Conservation. CAP Update measures also include supporting actions that would put the County on a path to the long-term goal of net zero emissions.

The County's CAP serves two purposes: first, and more broadly, it reflects the County's attempts to reduce its share of statewide GHG emissions; second, and more specifically, it is required by the General Plan PEIR as a CEQA mitigation measure to reduce GHG impacts from the General Plan. Because the CAP mitigates for the General Plan, it cannot and does not make land use changes (although some of those changes are analyzed as Alternatives and can be directed by the Board along with CAP approval). Because of the limited scope of the CAP tool, the County is also simultaneously working on a range of other programs to address climate change: a Sustainable Land Use Framework to address potential land use changes; a Regional Decarbonization Framework to provide a voluntary regional framework for governments and private entities to reduce carbon emissions; and a Transportation Program that will address VMT mitigation measures for development within the unincorporated county.

1.1 Project Location

San Diego County is in the southwestern corner of California. It is bordered by the Pacific Ocean to the west, Riverside County to the north, Imperial County to the east, Orange County at the northwest corner, and the Republic of Mexico to the south (Figure 1-1, presented at the end of this chapter).

The unincorporated area of the county is characterized by its vast size, rural nature and dispersed development patterns, and diverse natural habitats. San Diego County is recognized as one of the most biologically diverse counties in the United States due to the wide variety of vegetation, animals, and habitats found across the region's microclimates, topography, soils, and other natural features. In the unincorporated area, inland valleys and hills blanketed with chaparral and oak woodlands give way to mountains that rise more than 5,000 feet above sea level before dropping into the desert.

The unincorporated county is home to 28 distinct communities that vary in land use and density. In general, these communities include a core of local-serving commercial uses, services, schools, and public facilities surrounded by residential neighborhoods. They

[3] As described further below, while all of these CAP Update components constitute the "project" for CEQA purposes, the focus of the analysis in this SEIR is on the proposed GHG reduction strategies, measures, and actions, because these are the components that would result in physical impacts on the environment.

range from semi-suburban residential neighborhoods that transition in scale and density from adjoining, incorporated cities to low-density rural communities surrounded by hillsides, deserts, and agricultural lands.

In total, the unincorporated area encompasses approximately 2.3 million acres. Much of the unincorporated county, in excess of 90 percent, is open space or undeveloped and contains several large federal, state, and regional parklands in the eastern portion of the county. In addition, the San Diego region is home to 18 federally recognized tribes located across the eastern portions of the county. Only 35 percent, or about 772,239 acres of the unincorporated county, is within County land use jurisdiction.

Approximately 35 percent of the total land area in the county is within the County's land use jurisdiction. Incorporated cities and federal, state, and tribally owned lands (including Marine Corps Base Camp Pendleton) are outside of the County's jurisdiction. The remaining approximately 772,239 acres of land and County facilities (regardless of location) are within the County's jurisdiction and comprise the planning area for both the San Diego County General Plan, as evaluated in the 2011 GPU PEIR, and the CAP Update (Figure 1-2, presented at the end of this chapter).

1.2 Project Objectives

Section 15124 of the State CEQA Guidelines requires an environmental impact report (EIR) to include a statement of objectives sought to be achieved by the proposed project. The project's objectives help public agencies and the general public understand the underlying purpose of the proposed project. Because the objectives establish the purpose of the project, they also assist the County, as lead agency, in developing a reasonable range of alternatives to be evaluated in the SEIR. Alternatives are developed so they can potentially meet most project objectives while reducing significant effects. Alternatives must be feasible, which means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. The project objectives also aid the County in preparing findings if the project is to be approved and, if necessary, a statement of overriding considerations.

The underlying purpose of the project is to reduce GHG emissions that could be generated by development under the General Plan, and to reduce those emissions consistent with state legislative requirements and the requirement to prepare a CAP pursuant to Mitigation Measure CC-1.2 of the 2011 GPU PEIR. This mitigation measure sets out to reduce GHG emissions from community-wide sources and County local government operations (County operations) that are consistent with the General Plan.

The following objectives have been developed to assist in achieving the underlying fundamental purpose of the proposed project while implementing the Guiding Principles of the General Plan and supporting sustainability efforts in the region:

- Reduce community-related GHG emissions within the unincorporated county and County operations-related GHG emissions to meet and exceed the County's GHG

reduction targets for 2030 and 2045, as aligned with state reduction targets (as set forth in Senate Bill (SB) 32 [2016] and Assembly Bill (AB) 1279 [2022]), that does not rely on the purchase of carbon offsets to meet emission reduction targets.

- Incorporate feasible and effective GHG reduction strategies, measures, and actions that reduce GHG emissions from community-wide activities in the unincorporated county and from County operations to establish actions to meet a goal of net zero carbon emissions by 2045 as aligned with AB 1279.
- Implement 2011 GPU PEIR Mitigation Measure CC-1.2 to prepare a CAP to reduce GHG impacts from implementation of the General Plan, and update Mitigation Measure CC-1.2 to be consistent with changes in state law, and the State CEQA Guidelines.
- Develop a CAP that supports the sustainability principles found in the County of San Diego General Plan Guiding Principles by doing the following: support a reasonable share of projected regional growth; promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in compact development patterns to the extent feasible; promote environmental stewardship that protects and/or enhances natural resources and habitats; ensure development that accounts for physical constraints and natural hazards; provide and support a multi-modal transportation network that enhances connectivity; maintain environmentally sustainable communities and reduce GHG emissions; and preserve agriculture as an integral component of the region's economy, character, and open space network.
- Develop a CAP that sets clear goals and identifies metrics (i.e., co-benefits and equity-based outcomes) to guide implementation to make substantial progress toward attaining environmental justice and equity.
- Develop a CAP that includes sufficiently adaptable long-term strategies that will consider and incorporate, as feasible, additional GHG reduction strategies that embrace continued innovation, technological advances, and the creation of high-quality jobs in the County.
- Accomplish the foregoing objectives in a manner that minimizes undue and unnecessary economic impacts on businesses and property owners, and that avoids regulatory takings under the federal and state constitutions.

1.3 Project Background

The County adopted the current General Plan in August of 2011, which was an update to the 1979 General Plan. The General Plan update made modifications to the County's land use designations and influenced future development of the county by locating 80 percent of the future dwelling unit capacity in the western third of the unincorporated areas, within the San Diego County Water Authority boundary; focusing development within the village core areas away from rural areas; and reducing the overall land use capacity by 15 percent.

In conjunction with the General Plan, the County prepared and certified the 2011 GPU PEIR, which assessed the potential environmental effects of future development anticipated with implementation of the General Plan. A total of 19 separate mitigation

measures were adopted to reduce the GHG emissions of County operations and from activities within the unincorporated county to below a level of significance. One of the 19 measures, designated CC 1.2, called for the preparation of a CAP. Mitigation Measure CC-1.2 was incorporated into the General Plan as Goal COS-20 and Policy COS-20.1. Specifically, Goal COS-20 in the Conservation and Open Space Element of the General Plan requires reduction of community and County operations GHG emissions and Policy COS-20.1 requires preparation, maintenance, and implementation of a CAP. Further, the mitigation measures identified in the 2011 GPU PEIR called for the preparation of a CAP designed to reach specified GHG reduction targets from community and local government operations, modifications to the *County of San Diego Guidelines for Determining Significance: Climate Change* to provide guidance on the evaluation of GHG impacts and determine a project's consistency with the CAP, and adoption of a GHG threshold to reduce GHG emissions.

With the adoption of the General Plan, the County committed to reducing GHG emissions while seeking to balance environmental, social, and economic interests. The General Plan recognized that GHG reductions can be achieved in multiple ways, including growing in a compact and efficient manner, using energy more efficiently, harnessing renewable energy to power buildings, improving waste recycling, and improving access to sustainable transportation.

In June 2012, the County adopted the 2012 CAP and an Addendum to the 2011 GPU PEIR. On November 7, 2013, staff approved the *County of San Diego Guidelines for Determining Significance: Climate Change*. Following the approval of the 2012 CAP, the Sierra Club filed suit challenging the approval and the adequacy of the associated environmental review. In a ruling issued on October 29, 2014 (*Sierra Club v. County of San Diego*, 231 Cal. App. 4th 1152 [2014]), the Fourth District Court of Appeal held that the 2012 CAP did not meet the description set forth in the adopted mitigation measure (2011 GPU PEIR Mitigation Measure CC-1.2) and that an SEIR was needed for the plan. In response to the court's decision and considering state legislative changes that had occurred since preparation of the 2012 CAP, the County prepared the 2018 CAP and 2018 SEIR.

After the County adopted the 2018 CAP and certified the 2018 SEIR on February 14, 2018, the Sierra Club, Center for Biological Diversity, Cleveland National Forest Foundation, Climate Action Campaign, Endangered Habitats League, Environmental Center of San Diego, and Preserve Wild Santee filed a petition challenging the 2018 CAP as violating CEQA. In a separate action, Golden Door Properties, LLC, also challenged the 2018 CAP as violating CEQA. On December 24, 2018, the Superior Court ruled that the 2018 CAP approval did not comply with CEQA. The Superior Court ordered the County to decertify the 2018 SEIR. This decision was later affirmed in part by the California Court of Appeal, Fourth Appellate District (Appellate Court), on June 12, 2020, in *Golden Door Properties, LLC, v. County of San Diego*, 50 Cal. App. 5th 467. Specifically, the Appellate Court affirmed the Superior Court's decision that the 2018 CAP and 2018 SEIR failed to adequately account for potential environmental impacts of GPA projects due to reliance on Mitigation Measure M-GHG-1, which allowed for use of carbon offset credits. The Appellate Court also held that the 2018 SEIR should have included at least one project alternative focused on substantially reducing vehicle miles traveled (VMT), and that the document failed to

adequately address the cumulative impacts of probable future projects requiring GPAs. Consistent with the Appellate Court's final judgement the trial court issued a writ of mandate directing the County to rescind approval of the 2018 CAP and certification of the 2018 SEIR. As a result, the County Board of Supervisors rescinded the 2018 CAP and 2018 SEIR, and associated approvals, on September 30, 2020. An update to the CAP was required.

The 2020 appellate court ruling included discussion of five primary concerns: the adequacy of 2018 SEIR Mitigation Measure M-GHG-1, cumulative impacts from projects in early stages of environmental review that could result in land use changes (referred to as "in-process GPAs"), potential for conflicts with SANDAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), consideration of a "smart growth" alternative, and analysis of environmental justice. This SEIR is being prepared in response to the writ and to analyze the impacts of the proposed CAP Update. Table 1-1, "Summary of SEIR Response to 2020 Appellate Court Ruling," indicates the location in this ~~draft~~ SEIR where specific court direction is addressed. The table is presented at the end of this chapter.

As described in further detail below, the foundation of the CAP Update is a comprehensive inventory of GHG emissions, which identifies and quantifies the sources and amounts of GHG emissions that are generated from current and future activities within the County. The County's base inventory of GHG emissions evaluated activities within the unincorporated county in the year 2019, the most recent year data is available. The following sections discuss prior GHG inventories conducted for the unincorporated county, including the 2014 inventory, which was used as the baseline for the 2018 CAP.

1.3.1.1 Previous Greenhouse Gas Inventories

An inventory for the San Diego Region was developed by the Energy Policy Initiatives Center (EPIC) at the University of San Diego for 1990. EPIC's 1990 inventory was developed before the *US Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions* was available in 2010 as guidance to help local governments develop effective community GHG emissions inventories. The County's GHG analysis in the 2011 GPU PEIR reported 1990 and 2006 emissions by scaling emissions from EPIC's regional inventory to apply to the unincorporated areas. The scaling was done on a simplified per-capita or per-VMT basis. At that time, the reported emissions were based on prevailing standards. For example, for the electricity sector, all emissions in the San Diego region (from electricity use in the residential, commercial, industrial, mining, agriculture, transportation, communication and utilities, and street lighting) were divided by the region's population to derive a per-capita electricity-related emissions figure. This per-capita metric was then multiplied by the unincorporated areas' population to derive electricity-related emissions. It is now known that this method, while reducing the complexity of the inventory, loses accuracy in the process for various reasons. First, it assumes that all consumers of electricity (e.g., residential, commercial, industrial) are uniformly distributed in the San Diego region. In reality, the unincorporated area is rural in nature and does not have the same density of commercial and industrial uses as the urban areas. Second, it assumes that all consumers of electricity are directly proportional

to population. While this may be roughly applicable for residential uses, electricity use in commercial, industrial, mining and agricultural uses would not be dependent on population directly. This methodology was followed for other sectors and is not as accurate as using activity data for the unincorporated areas.

While the 1990 EPIC inventory was based on the best available regional data at that time, applying the inventory and scaling its data to the unincorporated area now would be problematic for the reasons described above. For the same reasons, data reported in the 2011 GPU PEIR are now outdated and not as reliable as the current baseline and methods. However, while inventory methodologies and data collection techniques have evolved since certification of the 2011 GPU PEIR, the overall framework of reduction targets is inherently based on state legislation as reflected in proposed updates to Mitigation Measure CC-1.2, described below.

An updated inventory was completed in 2014 that was based on actual activities and reported consumption data. The 2014 inventory reported lower base emissions than calculated for 2006 in the 2011 GPU PEIR. This is attributable to state and local actions to reduce GHG emissions, but also reflects improvements in data and methods to develop inventories. This inventory was used as the baseline for the 2018 CAP.

The inventory has again been updated using a base year of 2019 to reflect current conditions in the unincorporated county.[4] The 2019 inventory represents the most complete data available that are unaffected by COVID-19 impacts (e.g., reduced traffic patterns) and was used as the baseline for the CAP Update. The CAP Update 2019 inventory is discussed in Section 1.4.1.1.

1.3.2 Regulatory Background

Climate action planning requires action from all levels of government. Federal and state climate regulations and goals guide and provide examples for local government actions to reduce GHG emissions. At the national level, Executive Order 14057: Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability, signed by President Biden in December 2021, sets goals of reaching 100 percent carbon pollution-free electricity by 2035 and a net zero emissions economy by 2050 for federal operations. In addition, federal investments to tackle climate change such as the Inflation Reduction Act and Bipartisan Infrastructure Law are leading the push to advance environmental justice, strengthen energy security and green the grid, lower energy costs for households, strengthen the nation's resilience, and reduce air pollution.

In California, AB 32 (known as the Global Warming Solutions Act of 2006) established the country's first comprehensive, long-term approach to addressing climate change, and led to the development of state programs and standards, such as the Advanced Clean Car Standard and Renewable Portfolio Standard, that target GHG emission reductions from cars and trucks, electricity production, fuels, and other sources. Since the passage of AB 32, the state has continued to enact complementary legislation that addresses GHG

4 The methods used for both the 1990 and 2014 inventories use the best-practice pursuant to the *U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions*.

emissions from specific sectors including land use, transportation, energy, and water, as well as environmental justice and public health issues. This includes SB 32, signed in 2016, that sets the state's 2030 GHG emissions reduction target of 40 percent below 1990 levels and AB 1279, signed in 2022, requiring the state to achieve net zero GHG emissions no later than 2045, and requiring that statewide anthropogenic GHG emissions are reduced to at least 85 percent below 1990 levels by 2045. California's commitment to reduce GHG emissions and improve climate resiliency extends responsibilities to local governments to help achieve these ambitious targets, opens new markets, and establishes climate planning as a core principle for business practices.

The California Air Resources Board (CARB) released the *Final 2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on November 16, 2022, as directed by AB 1279. The 2022 Scoping Plan traces the pathway for the state to achieve its carbon neutrality and an 85 percent reduction in anthropogenic emissions below 1990 levels by 2045. CARB adopted the 2022 Scoping Plan on December 16, 2022.

1.3.2.1 County Climate Leadership

Regional action and collaboration are needed to solve the climate emergency. Ambitious climate targets at the state level have made climate action planning at the local level more challenging than ever. The County actively works with other local governments and public agencies, local nonprofits, universities, and businesses to prepare plans and implement programs that complement state efforts to reduce GHG emissions and combat climate change. The County partners with these stakeholders through outreach, education, advocacy, and collaboration. Through this collaboration and coordination, the County can bring funding and resources to the region to support future long-range emissions reduction efforts within the unincorporated county, as well as highlight the climate action efforts that are occurring across the San Diego region.

Examples of existing County programs that reduce GHG emissions and advance sustainability include:

- **Multiple Species Conservation Program.** Conserves open space and natural habitats.
- **General Plan.** Focuses development in villages and closer to services in western portion of unincorporated area.
- **Purchase of Agricultural Conservation Easement Program.** Preserves land for long-term agricultural use.
- **Green Fleet Action Plan.** Reduces emissions from the County fleet.
- **Solar and EV Ready Ordinance.** Increases installation of solar and EV charging stations.
- **Strategic Energy Plan.** Reduces energy use in County operations.
- **EV Charger Permit Program.** Streamlines EV charger permit applications.

- ***Live Well San Diego* Food System Initiative.** Supports a robust and resilient local food system.
- **Strategic Plan to Reduce Waste.** Establishes goal of 90 percent waste diversion from landfills by 2040.
- **Zero Net Energy Portfolio Plan.** Cuts County facility energy use by 50 percent by 2030.
- **Active Transportation Plan.** Increases active transportation options.
- **Electric Vehicle Roadmap.** Increases EV ownership and charging stations.
- **Borrego Valley Groundwater Sustainability Plan.** Sustainably manages groundwater.
- **Construction and Demolition Debris Recycling Ordinance.** Increases recycling and diversion of construction debris from landfills.
- **Landscape Ordinance Update.** Requires tree planting and outdoor water use reductions.
- **Accelerate-to-Zero Emissions Collaboration.** Increases regional collaboration to support the transition to ZEVs.
- **County Building Reach Code.** Requires energy and water efficient fixtures and appliances.
- **Office of Equity and Racial Justice.** Leads the County's efforts to address systemic bias and disparities.
- **Environmental Justice and Safety Element of the General Plan.** Addresses and evaluates pollution, vulnerability to climate change impacts, and other hazards that disproportionately impact low-income and communities of color.
- **Office of Sustainability and Environmental Justice.** Leads the County's efforts to reduce community exposures to health hazards.
- **Solid Waste Ordinance and Non-Exclusive Franchise Agreement.** Expands organic materials recycling.
- **Organic Materials Ordinance Update.** Expands composting standards to help divert organic materials from landfills.
- **Community Choice Aggregation Program.** Joined San Diego Community Power in 2021 and committed to 100 percent renewable electricity by 2030.
- **Green Streets Clean Water Plan.** Identifies and prioritizes green street project opportunities.
- **Zero Carbon Portfolio Plan.** Reduces operational emissions at County facilities.
- **Organic Materials Ordinance Update.** Expands access to organic materials composting.

- **San Diego County Native Landscape Program.** Increases native plant landscaping across the region.
- **Butterflies Habitat Conservation Plan.** Protects sensitive butterfly species and habitats.
- **Integrated Regional Decarbonization Framework.** Identifies local policy opportunities to support decarbonization.
- **Sustainable Land Use Framework.** Identifies principles of sustainable development to inform future land use decisions.
- **North County Multiple Species Conservation Plan.** Conserves open space and natural habitats in North County.
- **Equity-Driven Tree Planting Program.** Increases tree planting in frontline communities.
- **Carbon Farming Pilot Program.** Reduces and sequesters GHG emissions through carbon farming efforts.
- **Department Sustainability Plans.** Creates a comprehensive strategy to achieve sustainability in internal and external County operations.

Additionally, the County's "Framework for our Future for Bold Climate Action" establishes actions to achieve a goal of net zero carbon emissions by 2035-2045, which means addressing as many emissions as are being produced. This goal requires the pursuit of all opportunities to reduce and avoid GHG emissions from waste generation, water and energy use, and the burning of fossil fuels, among other sources, as well as opportunities to remove GHGs or capture and store GHGs that have already been emitted through practices like planting trees or habitat restoration.

1.3.2.2 The County's General Plan

The County's General Plan, updated in 2011, provides a policy framework and long-range vision for growth in the unincorporated area. It establishes goals, policies, and programs to foster healthy, livable, and sustainable communities and provides a guide for future land use, housing, and economic development. When the General Plan was updated in 2011, it included changes that shifted growth capacity from the eastern backcountry areas to western communities, guiding development closer to existing infrastructure and services and helping to protect the county's natural resources and maintain the character of its communities. The General Plan includes specific goals and policies aimed at reducing GHG emissions by encouraging growth in a compact and efficient manner, using renewable energy to power buildings, improving waste recycling, and increasing access to sustainable transportation.

As discussed further in Chapter 5, "Alternatives," the 2011 General Plan included the following environmentally sustainability accomplishments:

- reduced Land Use Capacity by 46,363 units (15 percent) to 239,984 units,
- focused development in village cores to retain the county's rural character,
- shifted 20 percent of the remaining dwelling unit capacity to the most western portions of the unincorporated area, and
- located 80 percent of the dwelling unit capacity where water can be imported and distributed by the County Water Authority.[5]

1.4 Project Elements

The proposed CAP Update is shaped by community input, utilizes the latest data and modeling scenarios available, does not rely on the purchase of carbon offsets, and is comprehensive and legally enforceable. In implementation of the CAP Update, investments will prioritize environmental justice and advance equitable outcomes for communities and populations in San Diego that have been historically left behind and are most impacted by climate change.

As described in further detail below, the CAP Update is a multi-objective plan that sets policy and programmatic commitments to reduce GHG emissions through the implementation of measures and actions to reach net zero carbon emissions in the unincorporated area of the county and in County operations. In addition to GHG emission reductions, CAP measures also provide important benefits to the environment and our residents, including preserving the environment, reducing health disparities, increasing access to green jobs, improving quality of life, and advancing environmental and social justice. The CAP Update aligns with multiple County initiatives that, collectively taken, will make the unincorporated area and County operations more sustainable, healthy, and resilient.

The following sections describe the project, including the contents of the CAP, and the scope of the associated GPA, GHG Threshold amendment, and *County of San Diego Guidelines for Determining Significance: Climate Change* amendment.

1.4.1 Climate Action Plan

The CAP Update establishes strategies and measures to reduce GHG emissions generated from current and future activities within the county's unincorporated areas and emissions generated by County facilities and operations. The CAP Update is structured to meet state mandates to reduce GHG emissions and advance the vision and guiding principles of the County's General Plan, which accommodates future growth while retaining or enhancing the County's rural character, economy, environmental resources, and unique communities. The CAP Update includes a GHG emissions inventory to provide a baseline of major sources of GHG emissions, an estimate of existing and future carbon stored in vegetation and soils on natural and working lands, a projection of future

[5] To track the progress towards implementing the General Plan, visit the Housing Production and Capacity Portal, which illustrates housing production and land use capacity since the General Plan update in 2011. Accessed July 2023 here: https://www.sandiegocounty.gov/content/sdc/pds/HPCP-UA.html.

GHG emissions expected to occur in the unincorporated area and from County operations, targets for future GHG emission levels, and strategies and measures to reduce GHG emissions to meet the targets.

The CAP Update addresses equity through preparation of a cost analysis, which was prepared to understand how populations and communities may experience disproportionate costs or impacts from climate change, and through development of an Equity Implementation Framework, to prioritize climate action in frontline communities. Frontline communities are defined in the CAP Update as EJ communities that experience the most immediate and worst impacts of climate change and other injustices. Climate actions in the CAP Update would be prioritized in frontline communities by utilizing the Equity Implementation Framework to ensure equity-based outcomes and co-benefits are realized equitably throughout the unincorporated county. Co-benefits to EJ communities are addressed in greater detail in Section 2.7, "Environmental Justice," of this SEIR.

The CAP Update would be regularly monitored to track and annually report progress toward achieving its GHG emissions reductions targets. The CAP Update is intended to be a living document and would continuously evolve and be refined as new legislation is adopted, science and technology advances, and progress towards GHG reduction targets is evaluated. Implementation would require long-term commitment and ongoing collaboration with private and public sector partners, as well as the community-at-large.

In summary, the CAP identifies:

- a summary of baseline GHG emissions and the potential increase of these emissions over time for the unincorporated county (community) and County operations (local government facilities);
- GHG emissions reduction targets for 2030 and 2045, and a net zero 2045 goal to reduce the County's contribution to global GHG emissions; and
- strategies, measures, and actions to comply with established 2030 and 2045 GHG reduction targets and the net zero 2045 GHG reduction goal.

1.4.1.1 CAP Contents

The CAP contains five chapters, which are briefly summarized below:

- Executive Summary: Summarizes the key information contained in the CAP.
- Chapter 1, "Introduction": This chapter introduces the document, describes the purpose and context of the plan, and identifies the regulatory framework related to global GHG emissions.
- Chapter 2, "Outreach and Engagement": This chapter describes how the CAP was developed through engagement with residents, community organizations, and regional stakeholders.
- Chapter 3, "GHG Emissions Inventory, Projections, and Reduction Targets": This chapter provides detailed accounting of GHG emissions from activities within the

unincorporated areas, and from County local government operations. It includes a discussion of the primary sources and annual levels of GHG emissions and establishes a 2019 baseline inventory. Projections of GHG emissions and reduction targets are described and the resultant emissions gap between projected emissions and reduction targets is calculated.

- Chapter 4, "GHG Reduction Measures": This chapter outlines overarching GHG reduction strategies and details specific strategies and supporting measures to be implemented by the County to achieve its GHG reduction targets. The strategies and measures focus on locally based actions to reduce GHG emissions in various categories as a complement to legislative actions taken by the state or federal government.
- Chapter 5, "Implementation and Monitoring": This chapter describes the set of actions that comprise the implementation strategy, possible funding mechanisms, the monitoring and compliance program, and an overview of the CEQA tiering/streamlining options for future projects.

Each key component of the CAP Update is discussed below.

GHG Emissions Inventory

The foundation of the CAP is a comprehensive inventory of GHG emissions, which identifies and quantifies the sources and amounts of GHG emissions that are generated from activities within the county. Conducting an inventory of emissions allows reduction targets to be established and reduction measures to be quantified. The County's base inventory of GHG emissions evaluated activities within the unincorporated county in the year 2019, the most recent year data is available. The 2019 inventory is organized into GHG Emissions Categories, which represent a distinct subset of a market, society, industry, or economy whose components share similar characteristics. The nine major GHG Emissions Categories are shown in order of contribution, which include the following:

1. *On-Road Transportation*: On-road transportation emissions associated with gasoline and diesel consumption from driving that occurs on roadways, in addition to emissions from County fleet operations and employee commute.
2. *Electricity Use*: Emissions associated with electricity generation because of electricity consumption in residential, commercial, industrial, and agricultural facilities. This includes electricity consumption at local government facilities such as County buildings, streetlights, and stormwater pumps.
3. *Natural Gas Use*: Emissions associated with natural gas consumption in residential, commercial, industrial, and agricultural facilities. This includes natural gas use at County facilities located outside the unincorporated areas.
4. *Solid Waste*: Waste emissions associated with landfills in the county (including County-operated closed landfills) and waste generated by the unincorporated county, discounting any overlap. Solid waste generated by local government facilities is also included in this category.

5. *Agriculture*: Agricultural emissions associated with livestock, fertilizer use, soil management, and agricultural equipment. No agricultural emissions are attributed to local government operations.
6. *Propane Use*: Emissions associated with propane consumption in residential, commercial, industrial, and agricultural facilities. This includes propane use at County facilities located outside the unincorporated areas.
7. *Off-Road Transportation*: Off-road vehicle and equipment emissions associated with gasoline and diesel consumption in the unincorporated areas. This includes County government operations off-road vehicle use.
8. *Water*: Water-related emissions associated with energy and fuel used to convey, extract, treat, and distribute water used in the unincorporated areas for domestic, irrigation, and industrial purposes. This includes a small amount of water use at County facilities located outside the unincorporated areas.
9. *Wastewater*: Wastewater treatment emissions associated with the energy consumed and emissions produced to process domestic sewage and industrial wastewater either at on-site septic systems or centralized wastewater treatment plants. This includes a small amount of wastewater generation at County facilities located outside the unincorporated county.

The GHG inventory includes both emissions attributable to the activities within the unincorporated areas as well as emissions generated by County-operated facilities, even if they are located outside of the unincorporated areas. The inventory excludes emissions from activities on lands under tribal and military jurisdiction.

Carbon dioxide (CO_2) is the largest contributor to global warming and the most recognized GHG; however, there are two additional primary GHGs that must be addressed to meet state-mandated reduction targets: methane (CH_4) and nitrous oxide (N_2O). To simplify discussion of these emissions collectively, CAPs use a measurement known as carbon dioxide equivalent (CO_2e). The CO_2e measurement translates each GHG to CO_2 by weighting it by its relative global warming potential. For example, according to the Intergovernmental Panel on Climate Change, CH_4 and N_2O are 25 and 298 times more potent, respectively, than CO_2 in their ability to trap heat in the atmosphere (IPCC 2007). Converting these gases into CO_2e allows consideration of all the gases in comparable terms and makes it easier to communicate how various sources and types of GHG emissions contribute to global warming. A metric ton of carbon dioxide equivalent ($MTCO_2e$) is the standard measurement of the amount of GHG emissions produced and released into the atmosphere.

In 2019, activities in the unincorporated county and County operations accounted for 2,984,000 $MTCO_2e$. Most of the emissions were due to on-road vehicle activity and building energy use. Emissions from gasoline and diesel consumption in on-road transportation accounted for 45 percent of the County's emissions in 2019. Approximately 40 percent of the County's emissions were due to electricity, natural gas, and propane used for heating and cooling applications, powering devices, equipment, and other energy loads. The contributions from community activities and County operations are summarized below for the nine major GHG Emissions Categories.

1. On-Road Transportation (45 percent)
2. Electricity (20 percent)
3. Natural Gas (16 percent)
4. Solid Waste (6 percent)
5. Agriculture (4 percent)
6. Propane (4 percent)
7. Off-Road Transportation (2 percent)
8. Water (1 percent)
9. Wastewater (1 percent)

GHG Emissions Projections

The 2019 GHG emissions were projected through 2050 based on population, housing, and job growth in the county and the future impact of adopted federal and California regulations, policies, and programs and in place in 2022 that reduce GHG emissions. For details, see Appendix 3 (Unincorporated County of San Diego 2019 Greenhouse Gas Emissions Inventory and Projections) to the CAP Update.

The County's emissions projections are:

- 2,397,000 $MTCO_2e$ by 2030,
- 1,947,000 $MTCO_2e$ by 2035,
- 1,693,000 $MTCO_2e$ by 2040,
- 1,678,000 $MTCO_2e$ by 2045, and
- 1,705,000 $MTCO_2e$ by 2050.

GHG Emissions Reduction Targets and Net Zero Goal

The County's GHG reduction targets were developed in the context of the County Board of Supervisors' direction, and statewide plans and laws addressing statewide limits. On January 13, 2021, the Board of Supervisors approved the Framework for the Future, "Actions to Achieve Bold Climate Action at the County of San Diego," which created policy recommendations for the CAP Update that include achieving at a minimum Senate Bill 32 GHG emissions reductions of 40 percent below 1990 levels by 2030 and establishing actions to meet a goal of net zero carbon emission by 2035-2045. In addition, the California Climate Crisis Act (Assembly Bill 1279, adopted 2022), enacted policy to achieve net zero emissions as soon as possible, but no later than 2045, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below 1990 levels as a pathway to the net zero goal. In 2022, CARB released an updated Scoping Plan to address AB 1279 emissions limits. The Scoping Plan reports statewide GHG emissions for eight economic sectors: agriculture, residential and commercial, electric power, high global warming potential (GWP) gases, industrial, recycling and

waste, transportation, and carbon dioxide removal (CARB 2022a). The Scoping Plan identifies a path to keep California on track to meet its SB 32 reduction target of at least 40 percent below 1990 emission levels by 2030 but concludes that additional reductions are needed by 2030 – to 48 percent below 1990 levels – for the state to stay on track to achieve net zero emissions no later than 2045 pursuant to AB 1279. Additionally, the Scoping Plan shows that it is economically and technologically feasible to reduce anthropogenic emissions to 85 percent below 1990 levels by 2045 but that mitigation of 100 percent of anthropogenic emissions by 2045 is not feasible and that carbon dioxide removal should be utilized to achieve California's carbon neutrality target.

Emissions reduction targets for 2030 and 2045 were developed based on the most current guidance from CARB. For 2030, the CAP's target is aligned with the 2022 Scoping Plan, which concludes that statewide GHG emissions levels need to be reduced to 48 percent below 1990 levels by 2030 for the state to stay on track to achieve net zero GHG emissions no later than 2045 (as required by AB 1279). This is a steeper reduction than set forth in SB 32, which establishes a statutory limit of reducing statewide emissions to 40 percent below 1990 levels by 2030. For 2045, the CAP Update's target is aligned with AB 1279, which requires that the State's target of net zero emissions by 2045 include reducing statewide anthropogenic emissions by at minimum 85 percent below 1990 levels by 2045. Anthropogenic emissions include the primary sources and activities within the County's GHG emissions categories: On-road Transportation, Electricity, Natural Gas, Waste, Agriculture, Propane, Off-road Transportation, Water, and Wastewater. To go beyond an 85 percent anthropogenic emissions reduction and achieve statewide net zero emissions by 2045, the 2022 Scoping Plan relies on large-scale deployment of CCS technologies and mechanical CDR strategies like direct air capture machines. The County government does not have the jurisdiction or other ability to construct and operate CCS and mechanical CDR strategies at the pace and scale needed to achieve net zero emissions by 2045. The 2022 Scoping Plan also assumes that additional reduction in anthropogenic emissions beyond 85 percent by 2045 would not be cost-effective or technologically feasible. As a result, the CAP's 2045 target is aligned with the AB 1279 target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045.

To develop County-specific target percentages for the CAP that align with statewide targets, the 2022 Scoping Plan was reviewed to identify the emissions sectors in this statewide plan that are relevant and applicable to the County of San Diego. The emissions reduction trajectory of each applicable sector in the 2022 Scoping Plan is then applied to the County's emissions levels to calculate reduction levels and target percentages for the CAP. Review of the 2022 Scoping Plan demonstrates that the County has direct or indirect jurisdiction over activities that generate emissions and contribute to reductions in six of the eight emissions sectors included in the statewide emissions inventory: agriculture, residential and commercial, electric power, industrial, recycling and waste, and transportation. The high global warming potential (GWP) gases and carbon dioxide removal (CDR) sectors are excluded for the following reasons. First, the County has limited to no ability to control or influence emissions of high GWP gases because it has limited or no jurisdiction or influence over the following activities in the unincorporated area: substitution of ozone-depleting substances with high GWP gas substitutes; emissions of sulfur hexafluoride (SF_6) from electricity transmission lines; and

semiconductor manufacturing processes. Second, the state's CDR sector identifies significant reductions from engineered strategies to remove significant levels of emissions from the atmosphere using technologies like direct air capture and carbon capture and storage (CCS). Constructing and operating direct air capture machines to remove GHG emissions from the atmosphere is outside the scope of local governments in California, including the County. In addition, the unincorporated area does not include large-scale petroleum refineries, GHG-emitting electric power plants, cement manufacturing facilities, or other large-scale industrial facilities that could have their GHG emissions reduced using CCS technologies. By excluding these sectors under this approach, GHG reduction targets for the County can be established in proportion with statewide reductions for all sectors relevant to County jurisdiction to the extent feasible using available data. This target setting approach is consistent with the California Supreme Court decision in Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming (2015) 62 Cal.4th 204, which determined that the approach of assessing a project's consistency with statewide emissions reduction goals must include a "reasoned explanation based on substantial evidence" that links the project's emissions (in this case, the project is the CAP) to statewide GHG reduction goals.

Statewide target percentages are then translated to the unincorporated area. The analysis uses 2019 data from the State's emission inventory and future emissions reductions in 2030, 2035, 2040, and 2045 from the 2022 Scoping Plan (CARB 2022b and 2022c). The future emissions targets in the 2022 Scoping Plan are 48 percent below statewide 1990 levels in 2030 and 85 percent below 1990 levels in 2045. Statewide emissions in future years from the applicable sectors are compared to 2019 statewide emissions from applicable sectors to determine the percentage reduction for the unincorporated area. Data for 2019 are used because 1990 emissions data are not available for the unincorporated county and because 2019 is the baseline year of the GHG emissions inventory prepared for the CAP Update.

Thus, consistent with CARB's Scoping Plan, the following adjusted reduction targets should be achieved in the county:

- 43.6 percent below 2019 levels by 2030, and
- 85.4 percent below 2019 levels by 2045.

The CAP also includes an aspirational goal to achieve net zero carbon emissions by 2045, consistent with the Board of Supervisors' Framework for the Future. This goal is in addition to the 2045 target aligned with reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. By including a goal for net zero carbon emissions in the CAP Update, the County can demonstrate how it is going above and beyond reductions in anthropogenic emissions and working towards net zero emissions in the unincorporated area, for example through measures to increase carbon stored in natural and working (e.g., agricultural) lands and through actions that do not result in quantified reductions but contribute towards net zero efforts.

Attaining a 43.6 percent reduction in GHG emissions would require that annual emissions be reduced to approximately 1,683,156 $MTCO_2e$ in 2030, which is approximately 1,300,844 $MTCO_2e$ lower than 2019 levels. To achieve long-term GHG reductions, the County would need to reduce emissions to 434,185 $MTCO_2e$ by 2045, or approximately 2,549,815 $MTCO_2e$ (85.4 percent) below 2019 GHG emissions levels.

As described in Chapter 3 of the CAP, the County has established 2030 and 2045 GHG emissions reduction targets (43.6 percent and 85.4 percent below 2019 levels, respectively), and a 2045 net zero emissions goal (100 percent below 2019 levels) to reduce annual emissions levels, consistent with state regulations and guidelines and Board of Supervisors' direction. To meet the County's 2030 and 2045 targets, the County would need to achieve an annual reduction of 713,844 $MTCO_2e$ by 2030 and 1,243,815 $MTCO_2e$ by 2045 beyond emissions projections.

To close the emissions gap, the CAP proposes nine GHG Reduction Strategies, 21 GHG reduction measures, and 35 quantified implementing actions that the County would implement to reduce GHG emissions to reach emission reduction targets. Of the 35 quantified implementing actions, four of these implementing actions reduce emissions in natural and working lands through measures that increase carbon storage, and an additional 35 unquantified "Path to Net Zero" actions outline steps the County will take to reach the 2045 net zero emissions goal. These GHG reduction strategies, measures, and actions are discussed in further detail below and described in full in Table 1-2, "Proposed GHG Reduction Strategies, Measures, and Actions," presented at the end of this chapter.

GHG Emissions Reductions Strategies

The CAP Update includes strategies, measures, and actions intended to reduce GHG emissions from five emissions sectors, as described below. To put the County on a pathway to net zero emissions, measures and actions within each sector are guided by a vision statement that describes what an equitable, net zero emissions future would look like. Vision statements were formed by the public through robust community outreach and engagement as described in Chapter 2 of the CAP Update.

The strategies, measures, and actions are defined in detail in Table 1-2, below. Strategies describe the overall approach and expected results to achieve the sector's vision statement and focus efforts to improve equitable outcomes by prioritizing complimentary benefits such as clean air and access to sustainable energy and efficient water supplies. Measures detail the specific programs and actions that the County will carry out to achieve the strategies and reduce GHG emissions. As implementation of the measures and actions associated with each overarching strategy represents the element of the CAP Update that could result in physical impacts to the environment, this project component is the focus of this SEIR analysis. As described in Chapter 2, "Environmental Effects of the Project," of this SEIR, the analysis of impacts that would result from implementation of the CAP Update is conducted at a program level; therefore, many of the specific projects that would be implemented consistent with the CAP Update strategies, measures, and actions (as detailed in Table 1-2, below) would require subsequent CEQA review. Following is a summary of the types of activities that would occur under each grouping of strategies.

Solid Waste

Measures and actions in this group would increase waste diversion and reduce waste generation. Although the County does not collect solid waste from the community, it influences and supports waste diversion through solid waste management agreements with waste collectors, zero waste policies and programs for County operations and the community, and ordinances that direct material separation and diversion. By advancing waste reduction, reuse, recycling, and composting, the County strives for zero-waste (90-percent diversion) from County operations by 2030 and in the unincorporated area by 2045. The County would continue to implement and expand upon the Strategic Plan to Reduce Waste by employing the concepts of a circular economy, which includes reducing and reusing materials and recapturing waste as a resource to create new materials and products. Additionally, the County would expand education campaigns around zero-waste, increase evaluation of recycling streams to ensure only recyclable products are in the recycling stream, and provide more opportunities for community members to participate in reuse events.

Although the County-operated, closed landfills and former refuse burning sites no longer accept municipal solid waste, the County's Landfill Management Unit monitors and maintains these sites to minimize impacts to the environment and to protect public health and safety. Action SW-3.1 would expand upon existing waste management practices (e.g., cover improvement, and system upgrades) to reduce surface and fugitive emissions at County landfills. These practices would also be incentivized at privately managed landfills to reduce surface and fugitive emissions in the unincorporated county. In addition, measures and actions would incentivize the development of new composting/anaerobic digestion facilities and on-farm digesters (e.g., amend zoning ordinance to pre-zone or permit land for composting/anaerobic digestion, provide technical assistance) to divert compostable waste from landfills in the unincorporated area. Any new composting/anaerobic digestion facilities would be located in areas of the county zoned for industrial land use or subject to a use permit and subject to future discretionary action.

Water and Wastewater

This category includes measures to decrease potable water consumption and increase stormwater collection and reuse. Through implementation of these measures and actions, the County would ensure that all County facilities are installing water efficiency and water reuse systems wherever feasible; new development meets certain water efficiency standards and explores reuse opportunities; existing development is mandated and/or incentivized to increase water efficiency and reuse (through building permits); and County programs are expanded to reduce emissions associated with wastewater. Measures and actions would increase water savings and reuse through incentives, policy changes, and expansion to existing County-led programs.

Agriculture and Conservation

This category includes agricultural programs, carbon farming, and natural lands restoration. The CAP Update includes measures and actions that would support the agricultural community and have important co-benefits such as water conservation and associated savings on utility bills and improved air and soil quality. Opportunities for the construction of farmworker housing also would be explored through the CAP Update. Measures and actions would reduce emissions from agricultural off-road equipment, energy, and water use by incentivizing replacements of diesel-powered farm equipment to lower emission, or electric, equipment and water and energy efficiency improvements. In addition, a carbon farming program would be developed to incentivize a variety of techniques on natural and working lands that reduce GHG emissions and provide co-benefits such as water and land conservation.

The County would also acquire conservation land and develop a framework for restoring these lands to their natural state. Acquisition of conservation land reduces emissions that would have occurred if the land were developed (as assumed in the 2011 GPU PEIR) and prevents loss of the region's unique, native habitats and wildlife biodiversity. A Habitat Restoration Resource Management Framework would guide the restoration and management of lands to increase carbon storage within the conserved areas. Measures and actions would also promote the preservation and expansion of tree canopy in the unincorporated area through the implementation of an Equity Driven Tree Planting Program to improve air and water quality, and community health. Tree planting requires increased water use to establish trees. The GHG emissions associated with this water demand are factored into the GHG benefits reported for this measure in the CAP Update. Ultimately, tree planting enriches local ecosystems, supports biodiversity, provides shade, prevents soil erosion, and buffers against wind and noise. Tree planting would be consistent with the County's established tree ordinance policies related to the types of trees (e.g., requiring drought tolerant, native species).

Energy

Measures and actions in this category would increase building energy efficiency, renewable energy, and electrification. This category includes ground or roof-mounted photovoltaic solar, and energy efficiency requirements for new construction. Through implementation of measures within this sector, County facilities would reduce emissions through zero net energy construction, building electrification, and on-site renewable energy generation. For new and existing development, the County would develop policies and programs to transition to renewable energy powered buildings and electrification and support workforce training opportunities. Modifications to the County's building codes would require subsequent action and would be developed in a manner consistent with federal preemption, allowing for appropriate exemptions.

Built Environment and Transportation

This category of measures would include strategies to decarbonize the on-road and off-road vehicle fleet, support active transportation, and reduce single occupancy vehicle trips. This category includes enhancements to bicycle and pedestrian infrastructure, modifications to existing roadways, and transportation demand programs. Through implementation of CAP Update measures and actions within this sector, the County would prioritize clean transportation by supporting and incentivizing access to electric vehicles and charging infrastructure, converting the County fleet to zero-emission vehicles, and reducing transportation emissions from commercial and industrial development. The County would also influence commute trips, both in the community and in its own operations, by implementing transportation strategies and incentive programs that encourage non-vehicle mode choices, teleworking, and non-traditional work schedules. Measures and actions would implement roadway infrastructure improvements that improve transit service efficiencies and create incentive programs that expand transit access and affordability for children, seniors, and low-income families. The County would also emphasize opportunities to transition landscaping, construction, and other off-road equipment fuel types from fossil fuels to zero-emission and clean fuel options.

Implementation and Monitoring

Implementation of the CAP Update includes a combination of regulations, programs, incentives, and outreach and educational activities to reduce GHG emissions. This includes existing County initiatives such as the Multiple Species Conservation Program, Purchase of Agricultural Conservation Easement Program, and Strategic Plan to Reduce Waste, as well as the creation of new programs and efforts like an equity-driven tree planting program. County efforts complement and build upon other federal and state efforts. As noted above, a cost analysis was prepared to understand how some populations or local communities may experience disproportionate costs or impacts from CAP Update implementation. The CAP Update then applies the Equity Implementation Framework to prioritize climate action and ensure outcomes and co-benefits are realized equitably throughout the unincorporated area.

The CAP Update would be a living document that is regularly updated at least every 5 years to reflect and respond to changing technology, federal and state regulations, demographics, and market conditions. County staff would evaluate and monitor plan performance over time and make recommendations to alter or amend the plan if it is not achieving the proposed reduction targets. This would include conducting periodic GHG emissions inventory updates at least every 2 years and analyzing measure performance. Measures and actions would be annually assessed and continuously monitored to ensure that:

- all measures include clearly defined steps necessary for implementation,
- individual measures are contributing to the overall GHG reduction targets and net zero goal,
- the CAP is on track to achieve its overall GHG reduction targets, and
- equity-based outcomes are attained.

Consistent with the requirements of State CEQA Guidelines Section 15183.5(b)(1)(E), an agency is required to monitor the CAP's progress and amend it if it is determined that the plan is not achieving its specified targets. Regular monitoring and performance measuring of CAP Update activities would allow the County to make timely adjustments to existing measures; replace ineffective or obsolete actions; or add new measures as technology, federal and state programs, and circumstances change. Adjustments would be made to the CAP Update if measures fall short of the target or additional measures become available. If amendments to the CAP are required, they will be reviewed considering CEQA's requirements for subsequent environmental review as outlined in Sections 15162–15164.

Implementation Responsibilities

After adoption, the CAP Update would be maintained by the County's Planning & Development Services Department (PDS). PDS would coordinate with other County departments to facilitate and oversee implementation, including tracking and reporting on the progress of each measure. The County's Sustainability Task Force, an internal working group is comprised of representatives from multiple County departments who lead energy efficiency, solid waste reduction, and renewable energy, and other sustainability plans, policies, and programs across the County enterprise, would also support CAP implementation and monitoring. Staff would track progress relative to the expected quantified outcomes of each GHG reduction measure and action using the Implementation and Monitoring Program described and summarized in Chapter 5 of the CAP Update. All measures and actions that would contribute to the achievement of the County's reduction targets and goals are identified. Measurable outcomes, implementation timelines, County department lead, enforcement mechanism, estimated GHG reduction potential, relative cost, and potential funding sources are summarized in a tabular format.

CAP Annual Monitoring Report

The County would conduct annual monitoring beginning 1 year after the approval of the CAP Update to track progress and identify where further efforts and additional resources may be needed. Monitoring reports would be published annually and would include the status of measure implementation using monitoring metrics to show progress in meeting the reduction targets.

Public Outreach Strategy

The County facilitated and participated in a variety of community outreach and engagement strategies throughout the development of the CAP Update as detailed in the Community Outreach and Engagement Plan (see Appendix One of the CAP). The goals of the outreach and engagement efforts were to engage the County's stakeholders early in the process to raise public awareness, solicit feedback, and provide an avenue to communicate information throughout the development of the CAP Update. The Community Outreach and Engagement Plan provides a timeline of outreach activities during the CAP Update and SEIR development process and identifies milestones during which the County has committed to engage stakeholders and to receive feedback. Further, the accompanying Outreach Plan provides contact information for responsible

County staff and provides a link to the project website for ease of access to all current events related to the CAP and this ~~draft~~ SEIR. If the CAP Update is adopted, the County would continue its public outreach efforts so that County departments, external stakeholders, and the general public can monitor the progress and effectiveness of each CAP Update measure.

1.4.2 Consistency Modifications to the General Plan and 2011 GPU PEIR

The proposed CAP would be consistent with current regulatory standards that supersede the regulatory basis for the goals, policies, and mitigation measures in the San Diego County General Plan and 2011 GPU PEIR. The General Plan and 2011 GPU PEIR do not address GHG reductions or GHG reduction goals beyond 2020 for community emissions or County operations. Amendments to the San Diego County General Plan and revisions to mitigation measures adopted in the 2011 GPU PEIR would be required to achieve consistency among the County's planning documents and modernize the adopted targets.

Mitigation Measures CC-1.2, CC-1.7, and CC-1.8 identified in the 2011 GPU PEIR called for the preparation of a Climate Change Action Plan designed to reach specified GHG reduction targets from community and local government operations, modifications to the *County of San Diego Guidelines for Determining Significance: Climate Change* to provide guidance on the evaluation of GHG impacts considering current regulatory requirements and determine a project's consistency with the CAP, and adoption of a GHG Threshold. The proposed modifications to these mitigation measures would update the regulatory requirements and goals that would be achieved by each of these actions to make them current with existing regulatory requirements. As described below, the modifications would continue to require the same or more stringent requirements for the reduction of GHG emissions.

Specifically, Goal COS-20 in the San Diego County General Plan sets a target to reduce local GHG emissions to 1990 levels by 2020 to be consistent with the statewide goal established by AB 32. To meet this goal, the County adopted Policy COS-20.1 (County of San Diego 2011a: 5-38 and 5-39). The 2011 GPU PEIR incorporated a mitigation measure (MM CC-1.2) which, in combination with other identified mitigation measures, would achieve General Plan Goal COS-20 and Policy COS-20.1 to reduce cumulative GHG emissions within the unincorporated county to 1990 levels by 2020. The same mitigation measure also established a 2020 target for County operations (County of San Diego 2011b: 2.17-30).

2011 GPU PEIR MM CC-1.7 requires the County to incorporate CARB's recommendations for climate change CEQA thresholds into the *County of San Diego Guidelines for Determining Significance: Climate Change*. If CARB does not release the recommendations, then the County is required to prepare its own threshold(s).

2011 GPU PEIR MM CC-1.8 requires the County to revise the *County of San Diego Guidelines for Determining Significance: Climate Change* based on the CAP.

The County has determined that Goal COS-20 and Policy COS- 20.1, and 2011 GPU PEIR Mitigation Measure CC-1.2 need to be updated to reflect the requirements of SB 32 (as amended, Pavley California Global Warming Solutions Act of 2006: emissions limit), which requires statewide GHG emission reductions to 40 percent below the 1990 levels by 2030 and AB 1279, which requires net zero emissions no later than 2045. Further, modifications to the 2011 GPU PEIR Mitigation Measures CC-1.7 and CC-1.8 are needed. The proposed changes are shown below in underline (underline) for new text and strikeout (~~strikeout~~) for deleted text.

General Plan Goal COS-20 (Governance and Administration)

Reduction of ~~local~~ community-wide (i.e., unincorporated county) and County operations GHG emissions contributing to climate change that meet or exceed requirements of the Global Warming Solutions Act of 2006, as amended by Senate Bill 32 (as amended, Pavley. California Global Warming Solutions Act of 2006: emissions limit) and Assembly Bill 1279 (2022) to achieve net zero greenhouse gas emissions no later than 2045.

General Plan Policy COS-20.1 (Climate ~~Change~~ Action Plan)

Prepare, maintain, and implement a ~~climate change action plan with a baseline inventory of GHG emissions from all sources; GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures.~~ Climate Action Plan for the reduction of community-wide (i.e., unincorporated county) and County operations GHG emissions consistent with the California Environmental Quality Act (CEQA) Guidelines Section 15183.5 (or as amended).

2011 GPU PEIR Mitigation Measure (MM) CC-1.2

Prepare a ~~County Climate Change Action Plan with an updated baseline inventory of GHG emissions from all sources, more detailed GHG emissions reduction targets and deadlines; and a comprehensive and enforceable GHG emissions reduction measures that will achieve a 17% reduction in emissions from County operations from 2006 by 2020 and a 9% reduction in community emissions between 2006 and 2020. Once prepared, implementation of the plan will be monitored and progress reported on a regular basis.~~ Climate Action Plan for the reduction of community-wide (i.e., unincorporated county) and County operations greenhouse gas emissions consistent with state-legislative targets, as described in General Plan Goal COS-20, and consistent with State CEQA Guidelines Section 15183.5 or as amended, as referenced in General Plan Policy COS-20.1. As described in Section 15183.5, the key elements of the Climate Action Plan would include:

"State CEQA Guidelines Section 15183.5(b)(1):

(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;

(F) Be adopted in a public process following environmental review."

Once prepared, implementation of the Climate Action Plan will be monitored and progress reported on a regular basis, as follows:

- Implementation Monitoring Report – prepared annually;
- Greenhouse Gas Emissions Inventory – updated every two years; and
- Climate Action Plan – updated at least every five years.

2011 GPU PEIR MM CC-1.7

~~Incorporate the California ARB's recommendations for a climate change CEQA threshold into the County Guidelines for Determining Significance for Climate Change. These recommendations will include energy, waste, water, and transportation performance measures for new discretionary projects in order to reduce GHG emissions. Should the recommendation not be released in a timely manner,~~ T~~t~~he County will prepare and adopt its own threshold for GHG emissions and shall include this threshold in the *County of San Diego Guidelines for Determining Significance: Climate Change*.

2011 GPU PEIR MM CC-1.8

~~Revise~~ Prepare *County of San Diego Guidelines for Determining Significance: Climate Change* ~~based on the Climate Change Action Plan~~. The ~~revisions~~ guidelines will ~~include guidance for~~ identify the specific actions proposed discretionary projects will need to take to ~~achieve greater energy, water, waste, and transportation efficiency~~ demonstrate consistency with the Climate Action Plan pursuant to Section 15183.5 of the State CEQA Guidelines or as amended, as

described in the 2011 General Plan Update Program EIR Mitigation Measure CC-1.2, as amended.

1.4.3 GHG Threshold, Guidelines for Determining Significances

The project includes the preparation of the *County of San Diego Guidelines for Determining Significance: Climate Change* document, which includes the following components:

a) GHG Threshold: Establishes the County's Threshold of Significance for evaluation of GHG impacts as noted below. Adoption of a GHG Threshold is considered as a separate discretionary action.

b) CAP Requirements: This section discusses the requirements for projects to demonstrate compliance with the CAP and the streamlining provisions that may be applicable under CEQA.

c) CAP Consistency Review Checklist: An appendix to the *County of San Diego Guidelines for Determining Significance: Climate Change* would contain a checklist that would include reduction measures to be implemented by proposed discretionary projects and would be used to determine consistency with the CAP.

The *County of San Diego Guidelines for Determining Significance: Climate Change* would be brought forward to the County Board of Supervisors for approval as a separate document from the CAP Update, but are to be considered concurrently with the CAP Update. The guidelines would include a GHG Threshold of Significance of general applicability to be considered for approval by the Board of Supervisors per State CEQA Guidelines Section 15064.7. The proposed threshold of significance is "consistency with the CAP," which would be determined through the CAP Consistency Review Checklist (Checklist). Consistency with the CAP Update would be the only threshold of significance for County projects.

All discretionary projects that are subject to CEQA, no matter the size of the project, would be evaluated for consistency with the CAP Update. The Checklist has been incorporated as an appendix to the *County of San Diego Guidelines for Determining Significance: Climate Change* and would be the mechanism that is utilized to demonstrate compliance with the CAP Update.

1.5 Type and Intended Uses of This Supplemental Environmental Impact Report

1.5.1 Type of Document

An EIR is used to inform public agency decision makers and the public of the significant environmental effects of a project, identify ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of

the significant environmental effects. CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before acting on those projects (Public Resources Code [PRC] Section 21000 et seq.). According to State CEQA Guidelines Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental effect. The County, acting as lead agency, has prepared this SEIR based on direction from the Board of Supervisors to provide the public and responsible and trustee agencies with information about the potential environmental effects of the proposed project. Public agencies are charged with the duty to consider and minimize environmental impacts of projects, where feasible, and an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

1.5.1.1 Program Environmental Impact Report

The 2011 GPU PEIR is a programmatic document. As a programmatic EIR, this document enables the County to consider broad environmental implications on a conceptual basis, recognizing that a series of actions, potentially including additional CEQA review, will occur prior to development of specific projects. The 2011 GPU PEIR identifies and mitigates the effects of the overall program of development within the county, and the County incorporates feasible mitigation measures and alternatives developed in the PEIR into subsequent actions to implement the General Plan. Once a PEIR has been prepared, subsequent activities within the program must be evaluated to determine if additional CEQA documentation is required to address the potentially significant impacts of such activities. Subsequent activities could be found to be within the PEIR scope if impacts of the subsequent activities are covered in the PEIR and additional environmental documents may not be required (State CEQA Guidelines Section 15168[c]).

1.5.1.2 Supplemental Environmental Impact Report

State CEQA Guidelines Sections 15162–15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously certified EIR covering the project for which a subsequent discretionary action is required. This EIR has been prepared as a Supplement to the 2011 GPU PEIR consistent with the State CEQA Guidelines.

If a subsequent activity could result in effects not within the scope of the PEIR, including the potential for new or more severe significant impacts than identified in the PEIR, the lead agency must prepare a negative declaration, mitigated negative declaration, or an EIR. Pursuant to State CEQA Guidelines Section 15163, an SEIR should be prepared if an EIR has been certified for a project, but one or more of the following conditions from State CEQA Guidelines Section 15162 are met:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration.

B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The County certified the 2011 GPU PEIR (State Clearinghouse No. 2002111067) and adopted the General Plan. As noted above, the proposed CAP Update is a comprehensive plan that identifies strategies, measures, and actions for addressing state GHG legislation and implementing the 2011 GPU PEIR mitigation; the GPA for the CAP is related to a limited set of policies of the County's General Plan; and the *County of San Diego Guidelines for Determining Significance: Climate Change* establish the regulatory framework for determining significance in compliance with existing 2011 GPU PEIR mitigation including the adoption of a GHG Threshold. Due to the proposed modifications to the adopted General Plan, and pursuant to the Appellate Court decision requiring the County to rescind certification of the 2018 SEIR, the County has determined that preparation of an SEIR is appropriate, per the requirements of State CEQA Guidelines Section 15163. This document will address whether the CAP Update, GPA, *County of San Diego Guidelines for Determining Significance: Climate Change*, and GHG Threshold (including the CAP Consistency Review Checklist) would result in any new or substantially more severe environmental impacts than those previously evaluated in the certified 2011 GPU PEIR.

Throughout Chapter 2, "Environmental Effects of the Project," of this ~~draft~~ SEIR, the resource evaluations rely on pertinent information that is provided in the 2011 GPU PEIR, including the existing conditions and regulatory framework discussions and impact conclusions, to determine whether the proposed CAP Update would result in any new or

more significant impacts as compared to the conclusions of the 2011 GPU PEIR. Where necessary, setting and regulatory information is updated with any changes that have occurred since the adoption of the General Plan. Where potentially significant impacts would occur with implementation of the CAP Update, a determination is made with respect to whether there would be any new or more significant impacts after application of relevant 2011 GPU PEIR mitigation measures. The approach to the SEIR analysis is discussed in further detail in the introduction to Chapter 2, "Environmental Effects of the Project."

In accordance with Section 15150 of the State CEQA Guidelines, information from the 2011 GPU PEIR is hereby incorporated by reference into this ~~draft~~ SEIR. The 2011 GPU PEIR can be accessed online at:

http://www.sandiegocounty.gov/content/sdc/pds/gpupdate/environmental.html

Also incorporated by reference, the General Plan, as amended, is available online at:

https://www.sandiegocounty.gov/pds/generalplan.html

As an informational document for decision makers, a draft SEIR is not intended to recommend either approval or denial of a project. CEQA requires the decision makers to balance the benefits of a project against its unavoidable environmental impacts. If environmental impacts are identified as significant and unavoidable (i.e., no feasible mitigation is available to reduce the impact to a less-than-significant level), the County may still approve the project if it believes that social, economic, or other benefits outweigh the unavoidable impacts. The County would then be required to make findings and state, in writing, the specific reasons for approving the project, based on information in this ~~draft~~ SEIR and other information in the administrative record. In accordance with Section 15093 of the State CEQA Guidelines, the document containing such reasons is called a "statement of overriding considerations."

1.5.2 Future CEQA Streamlining of Greenhouse Gas Analyses

Under CEQA, projects that require discretionary approval must disclose whether they would generate GHG emissions that would have a significant impact on the environment, or if they would conflict with a plan or regulation adopted to reduce emissions. Recognizing that addressing GHG emissions may be best achieved through local government programs that approach the topic holistically, Section 15183.5 of the State CEQA Guidelines establishes a mechanism for agencies to prepare a plan for the reduction of GHG emissions that analyzes and mitigates the effects of GHG emissions at a programmatic level. Pursuant to State CEQA Guidelines Section 15182.5(b)(2), if adopted following certification of this SEIR, the CAP Update may then be used in the cumulative impacts analysis of later projects. Such "later activities" could include actions to implement CAP Update measures and actions, measures required of future discretionary projects, and actions to implement buildout of the General Plan through the planning horizon (e.g., wireless facilities, roadway improvements, County parks and libraries). These "later activities" that are consistent with the General Plan could show consistency with the CAP Update via the CAP Consistency Review Checklist and streamline future GHG analysis. Proposed or future GPAs would not be eligible for streamlining because they are not, by definition, consistent with the General Plan.

To use the tiering and streamlining provisions of Section 15183.5, agencies must prepare a plan that meets certain requirements described as follows in Section 15183.5(b)(1):

"(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;

(F) Be adopted in a public process following environmental review."

The CAP Update has been prepared in accordance with the plan elements described in State CEQA Guidelines Section 15183.5(b)(1). This ~~draft~~ SEIR provides the appropriate level of environmental review to allow future projects to tier from and streamline their analysis of GHG emissions pursuant to State CEQA Guidelines Section 15183.5(a) and (b)(2). An environmental document that relies on demonstrated CAP Update consistency to reduce GHG emissions would be required to identify those requirements specified in the CAP Update that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. Consistent with State CEQA Guidelines 15168, because this SEIR does not provide project-level review of specific development projects within the county, future discretionary activities may require subsequent CEQA analysis if their impacts are not adequately considered and mitigated, as necessary, within this SEIR.[6] If there is substantial evidence that the effects of a particular project may be cumulatively considerable notwithstanding the project's compliance with the specified requirements in the plan for the reduction of GHG emissions (i.e., the CAP), a CEQA analysis of GHG emissions would be prepared for the project.

Therefore, the qualified CAP Update, this SEIR, and the CAP's Guidelines for Determining Significance (including the Consistency Review Checklist) are based on substantial evidence and work together to provide the programmatic environmental review and streamlining mechanism for the evaluation of GHG emissions of future development projects.

[6] The Appellate Court ruling requires analysis of in-process GPAs considering what project-level information is available. The cumulative impacts analysis section will evaluate relevant information for in-process GPAs available at the time of writing this ~~draft~~ SEIR and prior to public review. This section on streamlining does not apply to GPAs.

1.5.2.1 Determining GHG Emissions at the Project Level

After adoption of the CAP Update, all discretionary projects that are subject to CEQA would be evaluated for consistency with the CAP Update. The CAP Consistency Review Checklist (Checklist) has been incorporated as an appendix to the *County of San Diego Guidelines for Determining Significance: Climate Change* and would be the mechanism that is used to demonstrate compliance with the CAP Update. The determination of consistency with the CAP would be evaluated utilizing the following two approaches:

- First Approach: If the project is consistent with the County's General Plan, then the project could use the CEQA streamlining provision, State CEQA Guidelines Section 15183.5, which would allow the project to tier from and incorporate by reference the GHG emissions analysis presented in the SEIR, upon certification. To show consistency with the CAP Update, the project would be required to implement applicable GHG reduction measures as adopted in the CAP Update and outlined in the Checklist.
- Second Approach: If the project is not consistent with the General Plan and would require a GPA, then the project would not qualify for the CEQA streamlining provision and would be required to prepare a project-specific GHG emissions analysis. If the project is requesting a GPA but not requesting an increase in density or intensity beyond what is allowed in the General Plan and GHG emission projections contained in the CAP Update, then the project could potentially achieve consistency with the CAP by implementing applicable GHG reduction measures as adopted in the CAP Update and outlined in the Checklist. The analysis conducted in the Checklist would need to demonstrate how the project would achieve consistency with the CAP through implementation of the measures outlined in the Checklist.

1.6 Required Approvals and Review Process

1.6.1 Required Project Approvals

The discretionary actions associated with the project are listed in Table 1-3, "Required Project Approvals," presented at the end of this chapter.

The SEIR is intended to apply to all listed project approvals as well as to any other approvals necessary or desirable to implement the project.

1.6.2 EIR Review Process

This section describes the environmental review process required under CEQA, including (1) the public and agency review requirements for this ~~draft~~ SEIR; (2) the required ~~draft~~ SEIR approvals; and (3) CEQA Findings, Mitigation Monitoring and Reporting Program (MMRP), and Statement of Overriding Considerations. The County of San Diego PDS is the custodian of all CAP Update and SEIR records.

1.6.2.1 Public and Agency Review

In compliance with State CEQA Guidelines Section 15082, a Notice of Preparation (NOP) for this ~~draft~~ SEIR was distributed to the California State Clearinghouse; relevant responsible and trustee agencies; other local, state, and federal agencies; and interested individuals and organizations. The 57-day public comment period for the NOP began on December 10, 2020, and ended on February 4, 2021. The NOP was published in the San Diego Union-Tribune newspaper, posted to the project's webpage, and distributed to the CAP Update email notification list. The NOP was posted at the PDS Zoning Counter and distributed to all public libraries located within the unincorporated county. In addition, a scoping meeting was held virtually on January 28, 2021, to allow for input from the public, affected agencies, and interested organizations. The NOP and written comments received during the NOP review period are included in Appendix A of this ~~draft~~ SEIR. The review period for the draft SEIR concluded on January 5, 2024.

~~Comments on this draft SEIR should be sent to CAP@sdcounty.ca.gov or at the following address:~~

~~County of San Diego~~
~~ATTN: Meghan Kelly~~
~~Climate Action Plan SEIR~~
~~Planning & Development Services~~
~~5510 Overland Avenue, Suite 310~~
~~San Diego, CA 92123~~

~~This draft SEIR is available for public review at:~~

~~County of San Diego PDS~~
~~Project Processing Counter~~
~~5510 Overland Avenue, Suite 110~~
~~San Diego, CA 92123~~
~~(8:00 a.m. to 4:00 p.m., Monday through Friday).~~

~~The following County Public Library Branches~~
~~(Visit http://www.sdcl.org/locations_ALL-BRANCHES.html for locations and hours):~~

- ~~Fallbrook, 124 South Mission Road, Fallbrook, CA 92028, (760) 731-4650~~
- ~~Ramona, 1275 Main Street, Ramona, CA 92065, (760) 788-5270~~
- ~~Rancho San Diego, 11555 Via Rancho San Diego, El Cajon, CA 92019, (619) 660-5370~~
- ~~Rancho Santa Fe, 17040 Avenida de Acacias, Rancho Santa Fe, CA 92067, (858) 756-2512~~
- ~~Spring Valley, 836 Kempton Street, Spring Valley, CA 91977, (619) 463-3006~~

~~Online at http://www.sandiegocounty.gov/content/sdc/pds/ceqa_public_review.html and https://www.sandiegocounty.gov/content/sdc/sustainability/cap.html and https://engage.sandiegocounty.gov/cap.~~

~~A USB drive containing the draft SEIR can also be obtained by contacting Meghan Kelly at (619) 323-6462 or Meghan.Kelly@sdcounty.ca.gov.~~

1.6.2.2 SEIR Approvals

~~Written comments received on this draft SEIR during the 60-day public review period will be responded to in writing in a response to comments document. The response to comments document, together with this draft SEIR, will constitute the final SEIR. If any text changes are identified to address public comments received during the public review period for this draft SEIR, such changes will be reflected in the final SEIR.~~

The County Board of Supervisors will review and consider the final SEIR for the CAP Update, GPA, GHG Threshold, and *County of San Diego Guidelines for Determining Significance: Climate Change* to decide whether the final SEIR is consistent with the requirements of CEQA and conclude whether to certify the document.

1.6.2.3 CEQA Findings, Mitigation Monitoring and Reporting Program, and Statement of Overriding Considerations

Following certification of an EIR, CEQA requires that a lead agency make written findings for each of the potentially significant environmental effects associated with the project.

In addition, PRC Section 21081.6 requires that lead agencies adopt an MMRP for any project with significant environmental effects. An MMRP is required for the CAP Update, GPA, *County of San Diego Guidelines for Determining Significance: Climate Change*, and GHG Threshold, and will be prepared as part of the final SEIR. The MMRP will provide a list of all proposed mitigation measures; define the parties responsible for implementation and review/approval; and identify the timing for implementation of each measure. This information is contained in Chapter 8, “Mitigation Measures,” of this ~~draft~~ SEIR.

For significant unavoidable impacts (if required), a Statement of Overriding Considerations will be included in the Final SEIR for the project which will provide reasoning as to why the significant unavoidable environmental impacts are outweighed by the benefits that would result with implementation of the project.

1.6.2.4 Additional Review and Consultation Requirements

The project is subject to other review and consultation requirements in addition to the discretionary approvals identified in Table 1-3, “Required Project Approvals,” below. To date, the County has engaged in consultation with the following entities regarding the project:

- **Tribal Governments.** California Native American tribes culturally affiliated with the unincorporated county that had previously requested to be notified of projects subject to AB 52 consultation have been contacted for input regarding the potential impacts the project would have on TCRs. The following tribal representatives were contacted on June 21, 2021, by email and/or on June 23, 2021, by certified mail:
  - Barona Group of the Capitan Grande, Art Bunce
  - Campo Kumeyaay Nation, Jonathan Meza
  - Jamul Indian Village, Lisa Cumper, Tribal Historic Preservation Officer
  - Kwaaymii Band of Mission Indians, Carmen Lucas
  - Manzanita Band of the Kumeyaay Nation, Angela Elliott-Santos, Chairperson, and Lisa Haws
  - Pala Band of Mission Indians, Shasta Gaughen, Tribal Historic Preservation Officer
  - Pechanga Band of Mission Indians, Juan Ochoa, Assistant Tribal Historic Preservation Officer; Michele Fahley, Counsel; and Ebru Ozdil
  - Rincon San Luiseno Band of Mission Indians, Cheryl Madrigal
  - San Luis Rey Band of Mission Indians, Cami Mojado
  - San Pasqual Band of Mission Indians, Angelina Guitierrez
  - Iipay Nation of Santa Ysabel, Virgil Perez, Chairperson
  - Soboba Band of Mission Indians, Joseph Ontiveros
  - Sycuan Band of the Kumeyaay Nation, Cody Martinez, Chairperson; Adam Day, Chief Administrative Officer; and Kristie Orosco
  - Viejas Band of Kumeyaay Indians, Ernest Pingleton, and /Ray Teran

The Viejas Band of Kumeyaay Indians and the Rincon Band of Luiseño Indians have requested consultation. Meetings with the Viejas Band of Kumeyaay Indians took place on July 28, 2021; October 27, 2021; and September 21, 2022. Meetings with the Rincon Band of Luiseño Indians took place on September 2, 2021; December 2, 2021; March 15, 2022; October 12, 2022; March 20, 2023; April 24, 2023; June 20, 2023; and August 7, 2023. Both tribes have concluded consultation.

- **Planning and Sponsor Groups.** The County has engaged all 26 planning and sponsor groups within the County to obtain input on the project throughout the process.
- **Community and Stakeholder Groups.** In addition, the County provided over 112 meetings with various organizations and individuals to obtain input and provide updates on the CAP Update and smart growth alternative development process.
- **State and Federal Agencies.** The County has engaged the following agencies to obtain input on the project:
  - California Department of Forestry and Fire Protection;

- California Department of Transportation-District 11;
- California Coastal Commission;
- California Department of Conservation;
- California Energy Commission;
- California Department of Fish and Wildlife- South Coast Region 5;
- California Department of Food and Agriculture;
- California Department of Resources Recycling and Recovery Integrated Waste Management Board;
- Native American Heritage Commission;
- California Office of Emergency Services;
- California Office of Historic Preservation;
- California Department of Parks and Recreation;
- Regional Water Quality Control Board-Regions 7 and 9;
- California State Lands Commission; California Department of Water Resources;
- United States Fish and Wildlife Service.

- **Other.** The County sent the Notice of Completion of the availability of this draft SEIR to the State Clearinghouse on October 19, 2023, for distribution to all potential responsible and trustee agencies.

In addition to required consultation, the CAP Update process involved extensive public outreach, including over 300 organizations. The goals of the County's outreach efforts are to raise awareness and inform the public about the CAP Update, provide multiple opportunities for input at various stages of the CAP Update development, provide opportunities to influence decision-making on the CAP Update, and meet the requirements of CEQA. In recognition of the importance of public participation in the planning process, PDS undertook an effort to develop a Community Outreach and Engagement Plan to establish specific opportunities for the public to collaborate with staff on key strategies to achieve GHG reduction targets and reduce the effects of a changing climate in their local communities. Outreach efforts are summarized below and described in detail in Chapter 2 of the CAP Update.

1.7 Project Consistency with Applicable Plans

There are 19 jurisdictions in San Diego County, including the unincorporated County, with local land use authority and the responsibility for preparing their own general plans and general plan EIRs. Regional coordination is necessary to guide overall development and ensure an efficient allocation of infrastructure funding. The San Diego Association of Governments (SANDAG) serves as the region's Metropolitan Planning Organization responsible for area-wide coordination and the technical and informational resource for the region's local jurisdictions. SANDAG prepares regional transportation plans, which

provide a basis for allocating federal and state funds used for specific items such as land use incentives and transportation improvements. The County works with the San Diego County Regional Airport Authority on a regular basis to ensure land use compatibility with regional airports. Other agencies with regional plans that affect land use in the county are the San Diego Regional Water Quality Control Board, the San Diego Air Pollution Control District, the San Diego County Water Authority, the San Diego Metropolitan Transit System, the North County Transit District, and Marine Corps Base Camp Pendleton.

Additionally, the CAP Update must maintain internal consistency with the General Plan, community plans, specific plans, and other applicable countywide plans. The following represents a non-exhaustive list of applicable plans that are evaluated for consistency within the draft SEIR:

- General Plan goals and policies,
- General Plan elements,
- Community Plans,
- 2020-2030 County Operations Strategic Sustainability Plan Comprehensive Renewable Energy Plan,
- Multi-Jurisdictional Hazard Mitigation Plan,
- Local Coastal Program Land Use Plan, and
- Strategic Plan to Reduce Waste.

The project complies with all the above-named plans and programs and with the proposed GPA portion of the project which would amend Goal COS-20 and Policy COS-20.1 of the General Plan and Mitigation Measures CC-1.2, CC-1.7, and CC-1.8 adopted in the 2011 GPU PEIR. The project's compliance with plans and programs is specifically evaluated in Section 2.10, "Land Use and Planning," and throughout this ~~draft~~ SEIR, as applicable.

1.8 SEIR Organization

The content and organization of the ~~draft~~ SEIR is designed to meet the requirements of CEQA and the State CEQA Guidelines, as well as to present issues, analysis, mitigation, and other information in a logical and understandable way. This ~~draft~~ SEIR includes the following sections:

- "Summary" provides the project description and a summary of the environmental impacts that would result with CAP Update implementation, proposed mitigation measures, and the level of significance of impacts prior to and after mitigation. The section also describes the areas of controversy and issues to be resolved by the decision-making body; and identifies a summary of the CAP Update alternatives.
- Chapter 1, *"*Project Description*,"* provides CEQA compliance information; an overview of the environmental review and decision-making process; purpose of the CAP, GPA, *County of San Diego Guidelines for Determining Significance: Climate Change*, and GHG Threshold; a list of responsible and trustee agencies; a summary of relevant

documents incorporated by reference; a description of the project location, characteristics, and objectives; the relationship of the CAP Update to other plans and policies; the existing regional environmental setting; list of past, present, and reasonably anticipated future projects; and a discussion of growth inducing impacts.

- Chapter 2, *"*Environmental Effects of the Project*,"* contains a detailed analysis of the existing conditions; regulatory framework; direct, indirect, and cumulative impacts; and mitigation measures for each relevant environmental issue area. The analysis of each environmental category in Chapter 2 is organized as follows:
  - *"*Existing Conditions*"* describes the physical conditions that exist at the time of the 2011 GPU PEIR conditions if unchanged, or the NOP for this ~~draft~~ SEIR if the baseline changed, that may influence or affect the topic being analyzed.
  - *"*Regulatory Framework*"* provides federal, state, and local laws, including applicable San Diego County General Plan policies, that apply to the topic being analyzed.
  - *"*Analysis of Effects and Significance Determinations*"* discusses the impacts of the project in each category, including direct, indirect, and cumulative impacts and presents the *determination of the level of significance.*
  - *"*Summary of New or More Severe Significant Impacts*"* provides a brief summary of all new or substantially more severe impacts anticipated to result from implementation of the CAP Update.
  - *"*Mitigation Measures*"* provides a discussion of feasible mitigation measures to reduce any impacts.
  - *"*Significance Conclusions*"* reiterates the conclusions of the subsequent analysis considering the application of all feasible mitigation.
- Chapter 3, *"*Environmental Effects Found Not to Be Significant*,"* discusses effects found not to be significant during the NOP or the draft SEIR process.
- Chapter 4, *"*Other CEQA Sections*,"* discusses growth inducement, significant and unavoidable adverse impacts, and significant irreversible environmental changes. This chapter also includes a discussion of the cumulative impacts of in-process GPAs.
- Chapter 5, *"*Alternatives*,"* evaluates the range of alternatives to the CAP Update. The environmentally superior alternative is identified. This chapter includes the smart growth alternatives.
- Chapter 6, *"*References*,"* identifies reference sources for this ~~draft~~ SEIR.
- Chapter 7, *"*Preparers*,"* lists the organizations and persons contacted during preparation of this ~~draft~~ SEIR.
- Chapter 8, *"*Mitigation Measures*,"* lists applicable mitigation measures by topic.
- Chapter 9, "Comment Responses and Summary of Revisions," contains comment letters received during the public review period for the draft SEIR and written responses addressing comments on environmental issues received from reviewers of

the SEIR. This chapter also summarizes all revisions made to the CAP Update and SEIR since release of the draft documents.

1.9 Key Terminology

GHG Emissions Inventory. Using internationally established and accepted protocols for GHG accounting, the inventory identifies and measures the major sources of GHG emissions from activities occurring within the unincorporated area and from County operations. The 2019 inventory forms the basis of future projections and reduction targets.

Emissions Projections. Emissions projections illustrate what the County's GHG emissions would look like without implementation of the CAP Update. Projections show the scale of reductions needed to meet the established reduction targets and goal of achieving net zero emissions. The CAP Update's emissions projections estimate future emissions by considering forecasted growth in population, housing units, and employment, and the impact of adopted legislation and regulations on future emissions.

Emissions Reduction Targets. Emissions targets identify the level of emissions reductions that need to be achieved by the target year (i.e., level that emissions need to be reduced *to*). The CAP Update sets 2030 and 2045 emissions reduction targets for the County that are consistent with emission reduction targets established by the state.

CAP Update Measures and Actions. Measures and actions are the specific programs and activities that the County will carry out to implement the strategies in the CAP Update. Measures require that the County has jurisdiction to carry out the action, be additional to existing regulations from the state or federal government, be achievable, and be able to be monitored for progress over time. Measures reduce GHG emissions in three primary ways. First, some measures focus on creating new opportunities to avoid emissions, such as replacing gas-powered appliances with electric alternatives. Second, some measures seek to reduce emissions, such as implementing a County employee teleworking program that reduces the number of miles employees drive to work every week. Finally, some measures function to sequester, or capture and store carbon, such as in tree planting programs or other natural lands preservation and management. Measures include implementing actions that result in quantifiable GHG emissions reductions that provide other co-benefits like improved community health or air quality, new renewable energy and manufacturing jobs, and increased access to clean transportation, among others. Measures also include supporting, or "Path to Net Zero," actions that contribute to achievement of the sector's vision and put the County on a path to net zero emissions.

Table 1-1 Summary of SEIR Response to 2020 Appellate Court Ruling

Topic	Issue	SEIR Response
2018 SEIR Mitigation Measure M-GHG-1	M-GHG-1 violates CEQA because it contains unenforceable performance standards and improperly defers and delegates mitigation.	M-GHG-1 is a mitigation measure that was included in the 2018 SEIR. It provided two options for in-process and futures GPAs to "ensure that CAP emission forecasts are not substantially altered such that attainment of GHG reduction targets could not be achieved" - a "No Net Increase" option and a "Net Zero" option. These options included the potential to purchase carbon offset credits after all feasible onsite design features and mitigation measures had been incorporated. No equivalent mitigation is proposed in this SEIR for in-process or future GPAs, and the CAP Update and this SEIR do not provide a pathway for GPAs to comply with the CAP Update. In-process and future GPAs will have to conduct their own GHG analysis. See Chapter 4, "Other CEQA Sections." This SEIR includes documentation as to whether the County can meet its GHG reduction target through implementation of the CAP Update. The SEIR assumes that future projects consistent with the CAP Update, and which can rely upon such consistency to streamline the analysis of and mitigate their GHG impacts, consist of future projects anticipated in the General Plan and included in the CAP Update's GHG emission projections. This SEIR does not identify mitigation that includes an option to purchase carbon offset credits and the CAP Update does not rely upon offsets to meet established targets.
Cumulative Impacts from In-Process GPAs	The County abused its discretion in approving the CAP because the projected additional GHG emissions from projects requiring general plan amendments are not supported by substantial evidence.	This SEIR includes a discrete evaluation of the effect of all known, in-process GPAs on cumulative conditions in the unincorporated county. The discussion includes quantification of GHG emissions from the identified GPAs. See Chapter 4, "Other CEQA Sections."
Conflicts with Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)	Substantial evidence was not provided to support the determination that the CAP was consistent with RTP/SCS and SB 375 in that the impacts of in-process GPAs would be	M-GHG-1 is a mitigation measure that was included in the 2018 SEIR. It provided two options for in-process and futures GPAs to "ensure that CAP emission forecasts are not substantially altered such that attainment of GHG reduction targets could not be achieved" - a "No Net Increase" option and a "Net Zero" option. No equivalent mitigation is proposed in this SEIR. This SEIR includes evaluation of the CAP Update's consistency with the RTP/SCS. Section 2.6, "Energy," addresses consistency with RTP/SCS goals and strategies related to energy use in its analysis of

Topic	Issue	SEIR Response
	mitigated by M-GHG-1. GPAs are not included in SANDAG'S RTP/SCS land use forecasts.	whether the CAP Update would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Section 2.8, "Greenhouse Gas Emissions," addresses consistency/conflicts with the RTP/SCS in terms of the CAP Update's alignment with the overall goals of the RTP/SCS. Section 2.11, "Land Use and Planning," addresses the CAP Update's consistency with the projects, policies, and programs presented in the RTP/SCS. Section 2.13, "Transportation," addresses VMT impacts associated with the proposed CAP Update and the project's consistency with the RTP/SCS. Chapter 4, "Other CEQA Sections," provides an analysis of the cumulative effect of known, in-process GPA projects related to consistency with the RTP/SCS.
Smart Growth Alternatives	The County failed to include at least one "smart growth" alternative focused primarily on significantly reducing VMT.	Chapter 5, "Alternatives," of this SEIR includes an analysis of four smart growth alternatives to the project: a Fire Safe and VMT Efficient Alternative, a Village Support Areas Alternative, an alternative consistent with the RTP/SCS, and an alternative that includes potential amendments to General Plan goals and policies. These alternatives were crafted based on their ability to reduce VMT and on extensive stakeholder engagement.
Environmental Justice	The SEIR fails to address environmental justice (EJ).	Section 2.7, "Environmental Justice," has been included in the SEIR to address the potential for disproportionate effects of CAP Update implementation on EJ communities. This section identifies EJ populations within the unincorporated county, summarizes existing regulatory requirements, and evaluates the potential for CAP Update implementation to result in adverse environmental impacts that might be disproportionally borne by minority and low-income communities within the unincorporated county. Chapter 1, "Project Description," also describes climate actions in the CAP Update that would be prioritized in frontline communities by utilizing the Equity Implementation Framework to ensure equity-based outcomes and co-benefits are realized throughout the unincorporated county.

Source: Compiled by Ascent Environmental in 2023.

Table 1-2 Proposed GHG Reduction Strategies, Measures, and Actions

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
Solid Waste					
Increase Solid Waste Diversion in Unincorporated Area and in County Operations	SW-1: Achieve zero waste in County operations	SW-1.1	Adopt a County operations zero waste policy by 2030 to achieve zero waste (90% diversion).	Construction and operation of new and/or expanded solid waste processing facilities	All resource topics
		SW-1.1.a	Revise the County's Environmentally Preferred Purchasing policy (B-67) to increase the effectiveness and enforcement of the policy.	N/A	N/A
		SW-1.1.b	Educate County staff on zero waste practices to encourage greater participation and develop monitoring tools to track waste diversion.	N/A	N/A
	SW-2: Achieve zero waste within the unincorporated area	SW-2.1	Update the County's Strategic Plan to Reduce Waste by 2028 to include strategies to achieve 80% diversion by 2030 and zero waste (90% diversion) by 2045.	Construction and operation of new and/or expanded solid waste processing facilities	All resource topics
		SW-2.1.a	Monitor and evaluate contamination rates in waste, recycling, and organics containers, and establish educational programs to reduce contamination and increase the effectiveness of recycling efforts.	N/A	N/A
		SW-2.1.b	Support materials reuse events for the unincorporated area.	N/A	N/A
		SW-2.1.c	Educate the public about zero waste and encourage use of low carbon materials.	N/A	N/A
Increase Availability of Sustainable	SW-3: Improve waste management practices at County-	SW-3.1	Expand landfill gas systems at County-owned landfills to exceed State requirements by 5% by 2030 and 10% by 2045.	Construction related to alteration of existing facilities	Air quality, biological resources, hazards

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
Solid Waste Facilities in the Unincorporated Area and County Operations	owned solid waste facilities to reduce emissions				and hazardous material, noise
	SW-4: Improve waste management practices in the unincorporated area to reduce emissions and increase waste diversion	SW-4.1	Conduct a feasibility study by 2027 and implement a landfill gas system pilot project at privately managed landfills by 2030 to exceed State requirements by 10% by 2045 in the unincorporated area.	Construction related to alteration of existing facilities	Air quality, biological resources, hazards and hazardous material, noise
		SW-4.1.a	Incentivize the development of new composting/anaerobic digestion facilities and on-farm digesters to divert compostable waste from landfills in the unincorporated area.	Construction and operation of new facilities	All resource topics
		SW-4.1.b	Study options to expand existing and/or identify new opportunities to manage hard to recycle materials in the unincorporated area through additional hauler services, drop-off locations and/or a Center for Hard to Recycle Materials.	Operation of drop-off locations including new haul routes	Air quality, noise, transportation
Water and Wastewater					
Decrease Potable Water Consumption in the Unincorporated Area and County Operations	W-1: Develop policies and programs to increase water efficiency, retention, recycling, and reuse to reduce potable water consumption in County operations	W-1.1	Implement the County's Water Efficiency Plan to require water-efficiency measures in new and existing County buildings/operations to reduce potable water use intensity by ~~19~~28% by 2030.	Minor ground disturbing effects related to construction of purpose pipe	All resource topics

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
	W-2: Develop policies and programs to increase indoor and outdoor water conservation (including water efficiency, retention, recycling, and reuse) in new and existing development in the unincorporated area	W-2.1	Amend the County's Code of Regulatory Ordinances by 2026 to require (Tier 2) CALGreen or similar water efficiency requirements and reduced outdoor water use for landscaping requirements for new development to reduce potable water consumption from new development by 17% in the unincorporated area.	N/A	N/A
		W-2.2	Amend the County's Code of Regulatory Ordinances by 2026 to require (Tier 2) CALGreen or similar water efficiency requirements for existing development projects with qualifying improvements.	N/A	N/A
		W-2.3	Update the Green Building Incentive program by 2026 to include incentives for water efficiency, conservation, and reuse improvements for new and existing development to reduce potable water consumption by in the unincorporated area.	N/A	N/A
		W-2.3.a	Collaborate across County departments to streamline and simplify graywater capture permitting process to reduce potable water use in the unincorporated area.	N/A	N/A
		W-2.3.b	Develop and distribute materials to assist renters with implementing water efficiency and conservation improvements.	N/A	N/A
		W-2.4	Implement the Waterscape Rebate Program to incentivize water efficiency and conservation to reduce outdoor water consumption in the unincorporated area.	N/A	N/A

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
Increase Stormwater Collection, Water Pumping, and Wastewater Treatment Efficiency	W-3: Develop programs to increase stormwater and wastewater treatment efficiency to reduce imported potable water use in the unincorporated area	W-3.1	Increase wastewater treatment efficiency through the East County Advanced Water Purification Program to produce 12,900 acre feet of water each year by 2030.	N/A	N/A
		W-3.1.a	Evaluate Waterscape Rebate Program septic system improvements for opportunities to reduce wastewater emissions in the unincorporated area.	N/A	N/A
Agriculture and Conservation					
Preserve Natural Lands and Improve Land Management Practices to Protect Habitat and Increase Carbon Storage	A-1: Acquire and manage conservation lands to preserve natural lands and maximize carbon storage potential in the unincorporated area	A-1.1	Acquire 11,000 acres of conservation lands by 2030 and 1,000 acres per year thereafter to preserve land in perpetuity.	N/A	Beneficial impacts related to agricultural and biological resources
		A-1.2	Develop a Habitat Restoration Resource Management Framework for County-owned land by 2030 and 80 acres per year thereafter to increase carbon storage.	Potential construction activities related to vegetation management and water use for establishment	Air quality and hydrology and water quality Beneficial impacts related to agricultural and biological resources
		A-1.2.a	Partner with tribal governments to incorporate tribal ecological knowledge and apply indigenous land management practices to contribute towards habitat restoration efforts on County land.	N/A	N/A Beneficial impacts related to agricultural and biological resources
	A-2: Develop a tree planting program that expands canopy across unincorporated area and prioritizes	A-2.1	Expand the County's existing tree planting initiative and implement an Equity Driven Tree Planting Program to plant 70,560 trees by 2030 and 6,650 trees per year thereafter on County property and in the unincorporated area.	Minor ground disturbance and use of equipment related to tree planting, use of water for plant establishment	All resource topics

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
	underserved communities	A-2.1.a	Develop a program to preserve native trees in unincorporated area.	N/A	N/A
		A-2.1.b	Educate the public on the benefits and maintenance of native, fire-resistant, and drought-tolerant tree plantings.	N/A	N/A
		A-2.2	Implement the County's Landscaping Ordinance to require tree planting in new single family residential development in the unincorporated area.	Minor ground disturbance related to tree planting	Beneficial impacts related to aesthetics, air quality, greenhouse gas emissions, hydrology and water quality
Support Climate-Friendly Farming Practices and Preserve Agricultural Land	A-3: Preserve agricultural lands to prioritize carbon storage and balance economic and development goals	A-3.1	Implement the Purchase of Agricultural Conservation Easement (PACE) Program to preserve 6,058 acres of agricultural land by 2030 and 400 acres per year thereafter.	Potential physical changes related to the loss of future development potential due to conversion of existing agricultural land for agricultural uses in perpetuity	Land use and planning Beneficial impacts related to agricultural resources
	A-4: Incentivize carbon farming to expand carbon storage capacity on agricultural land and support climate-friendly farming practices in the unincorporated area	A-4.1	Develop a ~~Carbon Farming~~ Climate Smart Land Stewardship Program by 2026 to increase carbon sequestration on 3,000 acres by 2030 and 36,214 acres by 2045.	N/A	Beneficial impacts related to greenhouse gas emissions
		A-4.1.a	Support the local food system through development of a food sourcing policy that prioritizes contracts with local, equitable, and sustainable food suppliers in County operations.	N/A	N/A
		A-4.1.b	Evaluate opportunities to increase farmworker housing in the unincorporated area to reduce emissions from farmworker transportation.	Potential development of farmworker housing	All resources topics

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
		A4.1.c	Evaluate options to incentivize voluntary alternative manure management and livestock feed projects to reduce manure management and enteric fermentation emissions in the unincorporated area.	N/A	N/A
		A-4.1.d	Evaluate options to incentivize the voluntary reduction of the use of synthetic fertilizers in the unincorporated area.	N/A	N/A
	A-5: Reduce greenhouse gas emissions from agricultural operations	A-5.1	Develop a program by 2026 to incentivize a transition to cleaner fuels and the efficient use of energy to reduce agricultural operations emissions in the unincorporated area.	N/A	N/A
		A-5.1.a	Partner with the local utility to advocate for agricultural pump rates that would incentivize electrification.	N/A	N/A
Energy					
Increase Building Energy Efficiency, Renewable Energy, and Electrification in the Unincorporated Area and County Operations	E-1: Develop policies and programs to increase energy efficiency, renewable energy use, and electrification in County operations	E-1.1	Implement the County Facilities Zero Carbon Portfolio Plan to achieve 90% reduction in operational carbon emissions by 2030 through building electrification and zero net energy construction, energy efficiency, energy management, and renewable energy use and generation.	Physical changes would be attributed to the installation, operation, and maintenance of small-scale solar systems and battery storage, or small-scale wind turbines with new residential construction which may include roof or ground-mounted systems.	All resource topics

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
	E-2: Develop policies and programs to increase energy efficiency and electrification in the unincorporated area	E-2.1	Amend the County's Code of Regulatory Ordinances by 2026 to require all-electric equipment in new residential, commercial, and industrial construction to reduce energy emissions from new development in the unincorporated area.	N/A	N/A
		E-2.2	Increase energy efficiency and reach 30% electrification in residential and 17% electrification in non-residential existing development in the unincorporated area by 2030 by: • Amending the County's Code of Regulatory Ordinances by 2026 to require (Tier 2) CALGreen or similar energy efficiency requirements for existing development projects with qualifying improvements. • Adopting a Building Energy Performance Standard by 2026 for commercial and multi-family residential properties. • Developing a program by 2026 to incentivize building electrification and energy efficiency (e.g., electrically powered appliances, heat pumps).	Physical changes would be attributed to the installation, operation, and maintenance of small-scale solar systems and battery storage, or small-scale wind turbines with new residential construction which may include roof or ground-mounted systems.	All resource topics
		E-2.2.a	Develop and distribute materials to assist renters with implementing energy efficiency improvements.	N/A	N/A
		E-2.2.b	Develop a voluntary energy assessment/benchmarking program for existing development to identify opportunities for energy efficiency improvements (e.g., weatherization, insulation, equipment replacement/upgrades).	N/A	N/A
		E-2.2.c	Develop a program (e.g., incentives, streamlined permitting, education) to phase out propane use for existing buildings.	N/A	N/A

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
		E-2.2.d	Develop a program to increase energy resiliency in the unincorporated area to ensure continued access to electricity and services during extreme weather events.	N/A	N/A
	E-3: Develop policies and programs to increase renewable energy use, generation, and storage in the unincorporated area	E-3.1	Amend the County's Code of Regulatory Ordinances by 2026 to require (Tier 2) CALGreen or similar renewable energy requirements for new residential and non-residential construction to increase renewable energy generation in new development.	N/A	N/A
		E-3.2	Expand and implement the County's streamlined solar permitting process to install 5,002 kW of renewable energy on existing development by 2030 and 12,505 kW by 2045.	Construction and operation of solar systems and battery storage	All resources topics
		E-3.2.a	Develop a program to incentivize renewable energy on low-income homes.	N/A	N/A
		E-3.2.b	Work with partners to promote and support on-site renewable energy generation and storage to increase renewable energy generation and use in the unincorporated area.	Construction and operation of small-scale renewable energy projects (including solar and wind)	All resources topics
		E-3.2.c	Support local job training program for solar installation through partnerships to support green economy workforce development.	N/A	N/A
		E-3.3	Develop a program to provide 100% renewable energy to residents and businesses participating in San Diego Community Power by 2030 in the unincorporated area.	Construction and operation of large-scale renewable energy projects (including solar and wind)	All resource topics

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
Built Environment and Transportation					
Decarbonize the On-Road and Off-Road Vehicle Fleet	T-1: Reduce fleet and small equipment emissions in County operations	T-1.1	Implement the County's 2019 Electric Vehicle Roadmap and 2023 Green Fleet Action Plan to reduce fleet emissions 35% by 2030 and 100% by 2045.	N/A	N/A
		T-1.1a	Use alternative fuel and/or zero-emission construction equipment in County projects to reduce emissions from medium- and heavy-duty vehicles and equipment.	N/A	N/A
		T-1.1b	Adopt a County operations anti-idling policy to reduce emissions from vehicle idling.	N/A	N/A
		T-1.2	Amend Board policy to require 100% of landscaping equipment used on County property to be zero-emissions by 2030.	N/A	N/A
	T-2: Increase the use of low-carbon and zero-emission landscaping and off-road construction equipment in the unincorporated area	T-2.1	Develop a program by 2026 to provide residents and businesses incentives to purchase alternative fuel and/or zero-emission construction and landscaping equipment to reduce emissions by 3% by 2030.	N/A	N/A
		T-2.2	Develop and adopt a landscaping equipment ordinance to require the use of zero emission landscaping equipment by 2030 and zero emission construction equipment by 2045 in the unincorporated area.	N/A	N/A

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
	T-3: Install electric vehicle charging stations and provide incentives for zero-emissions vehicles in the unincorporated area	T-3.1	Increase the use of electric and other zero-emission vehicles in the unincorporated area by: • Installing 2,040 publicly available electric vehicle charging stations by 2028. • Requiring the electrification of loading docks and idling reduction in new commercial and industrial development by 2030. • Amending the County's Code of Regulatory Ordinances by 2026 to require (Tier 2) CALGreen or similar electric vehicle charging infrastructure installations and preferential parking for ZEVs for new multi-family residential and non-residential construction. • Developing a program by 2026 to incentivize EV purchases and school bus electrification.	Minimal physical effects related to installation of electric vehicle charging stations	All resource topics
		T-3.1a	Support the transition to clean hydrogen fuel for medium- and heavy-duty vehicles by increasing access to hydrogen fueling infrastructure through streamlined permitting processes and other efforts in the unincorporated area.	Potential construction impacts and operational impacts	All resources topics
		T-3.1b	Continue to collaborate with regional partners to increase investments in zero-emission vehicles and infrastructure in the unincorporated area.	N/A	N/A
		T-3.1c	Continue updating the EV Consumer Guide website to serve as a regional resource for consumer-friendly and up-to-date information on EV-related topics and available incentives.	N/A	N/A

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
Support Active Transportation and Reduce Single-Occupancy Vehicle Trips	T-4: Reduce emissions from County employee commutes	T-4.1	Expand County Benefit Program by 2026 to provide County employees with tax-free transportation benefits, alternative work schedules, and expand part-time or full-time teleworking options to reduce vehicle miles traveled from employee commutes by 40% in 2030 and 60% in 2045.	N/A	N/A
		T-4.1a	Provide educational programs and campaigns to encourage County staff to walk, bike, and take transit.	N/A	N/A
		T-4.2	Develop a rebate program by 2026 for County employees to purchase electric vehicles, bicycles, and scooters for commute use.	N/A	N/A
	T-5: Improve County roadways to encourage walking, biking, rolling to/from transit and destinations and increase transportation efficiency	T-5.1	Implement the County's Active Transportation Plan to install 345 miles of sidewalk and 315 miles of bikeways by 2030 to encourage alternative modes of transportation in the unincorporated area.	Construction impacts related to new bike and/or pedestrian infrastructure	All resources topics
		T-5.1a	Develop educational materials to encourage residents and businesses to use and provide access to alternative modes of transportation (e.g., safety information, increased access to bicycle parking).	N/A	N/A
		T-5.1b	Use improved materials and engineering designs to make walking and transit easier.	N/A	N/A
		T-5.2	Develop a countywide Safe Routes to Schools program to reduce vehicle miles traveled to schools by 1.2% by 2030.	N/A	N/A

Strategy	Measure	Action ID	CAP Update Action Description	Potential Physical Changes to the Environment	Key Environmental Issue Areas Potentially Affected
	T-6: Support transit and transportation demand management to reduce single occupancy vehicle trips in the unincorporated area	T-6.1	Develop a program to provide free transit passes and/or free trips in the unincorporated area to reduce vehicle miles traveled in the unincorporated area by 1.2% by 2030.	N/A	N/A
		T-6.2	Increase access to Transit Priority Areas by 5% in the unincorporated area and implement transit-supportive roadway treatments such as traffic signal communication and curb extensions along County-maintained roadways to optimize traffic flow for transit and pedestrians by 2030.	Construction impacts related to new infrastructure	All resources topics
		T-6.2a	Adopt a Transportation Demand Management ordinance to include pre-approved options for new development to reduce single occupancy vehicle trips in the unincorporated area.	N/A	N/A
		T-6.2b	Evaluate options for increasing transit service to unincorporated communities.	N/A	N/A
		T-6.3	Increase access to first/last mile transportation services and connections (e.g., neighborhood electric vehicles, microtransit, bike/scooter-share) to reduce vehicle miles traveled by 7% within the unincorporated area by 2030.	N/A	N/A

Source: Compiled by Ascent Environmental in 2023.

Table 1-3 Required Project Approvals

Project Approval	Approving Authority
Approval of Climate Action Plan	County Board of Supervisors
Approval of General Plan Amendment Including Amendment to the 2011 General Plan Update Mitigation Monitoring and Reporting Program.	County Board of Supervisors
Approval of County of San Diego Guidelines for Determining Significance: Climate Change	County Board of Supervisors
Approval of GHG Threshold	County Board of Supervisors
Certification of the SEIR	County Board of Supervisors

Note: The EIR is intended to apply to all listed project approvals as well as to any other approvals necessary or desirable to implement the project.

Source: Compiled by Ascent Environmental in 2023.

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Figure 1-1 **Regional Location**

Source: San Diego County

Figure 1-2 **County of San Diego Boundary**