CHAPTER 5 ALTERNATIVES

5.1 Introduction

Title 14 of the California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "… a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the "no project" alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR "…shall also identify an environmentally superior alternative among the other alternatives." (CCR Section 15126[e][2]).

In defining "feasibility" (e.g., "… feasibly attain most of the basic objectives of the project…"), CCR Section 15126.6(f) (1) states, in part:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure,

general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

5.2 Rationale for Selection of Alternatives

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, here San Diego County Board of Supervisors. (See PRC Sections 21081.5, 21081[a] [3].)

The project is the CAP Update, prepared as a requirement of mitigation in the adopted County General Plan. This SEIR includes evaluation of project alternatives that identify changes to the proposed GHG reduction strategy in the CAP Update that would reduce the potential for significant environmental impacts to result from implementation. In addition, an analysis is included of "smart growth" alternatives, which would propose modifications to zoning and/or the land use map in the adopted General Plan[1] to reduce the potential for development to generate GHG emissions associated with vehicle miles traveled (VMT). As discussed further below, these alternatives were developed through a 2-year process of extensive stakeholder engagement that included numerous stakeholder meetings, geospatial mapping efforts, and coordination of various planning departments.

5.2.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of an alternative to attain most of the objectives of the Project (State CEQA Guidelines Section 15126.6[a]). Chapter 2, "Project Description," articulates the following objectives.

- 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.

[1] Because these alternatives extend beyond the scope of the CAP Update, which is a program of measures and actions to address GHG emissions from development under the adopted General Plan and government operations, implementation of the smart growth alternatives would require subsequent planning and comprehensive stakeholder engagement, as well as subsequent CEQA analysis. For example, if the Board directs staff to implement a smart growth alternative PDS would engage stakeholders, including outreach to property owners throughout the unincorporated county.

- 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.

5.2.2 Significant Environmental Impacts

5.2.2.1 Impacts that Remain Significant and Unavoidable

Implementation of the CAP Update would result in significant and unavoidable impacts in the following issue areas; however, the magnitude of the impact would be consistent with the impacts disclosed in the 2011 GPU PEIR:

Aesthetics

- Visual Character or Quality (Project)
- Light and Glare (Project)

Agriculture and Forestry Resources

- Direct or Indirect Conversion of Agricultural Resources (Project)

Air Quality

- Air Quality Violations (Project and Cumulative)
- Non-Attainment Criteria Pollutants (Project and Cumulative)
- Sensitive Receptors (Project and Cumulative)

Biological Resources

- Special-Status Plant and Wildlife Species (Project and Cumulative)
- Riparian Habitat and Other Sensitive Natural Communities (Project and Cumulative)
- Wildlife Movement Corridors and Nursery Sites (Project and Cumulative)

Hazards and Hazardous Materials

- Wildland Fires (Project and Cumulative)

Hydrology and Water Quality

- Surface Water and Groundwater Quality (Project and Cumulative)
- Groundwater Supply and Recharge (Project and Cumulative)

Noise

- Excessive Noise Levels (Project and Cumulative)

Transportation

- Substantially Increase Hazards Due to a Design Feature (Project and Cumulative)

5.2.2.2 New or More Severe Significant and Unavoidable Impacts

New or substantially more severe significant and unavoidable impacts are anticipated to result from implementation of the CAP Update in the following issue areas:

Aesthetics

- Scenic Vistas and Scenic Resources (Project and Cumulative)
- Visual Character or Quality (Cumulative)
- Light and Glare (Cumulative)

Agriculture and Forestry Resources

- Direct or Indirect Conversion of Agricultural Resources (Cumulative)
- Conflict with Agricultural Zoning or Williamson Act Contract Lands (Project and Cumulative)

- Direct and Indirect Conversion or Loss of Forest Land (Project and Cumulative)

Cultural and Paleontological Resources

- Historical Resources (Project and Cumulative)
- Archaeological Resources (Project and Cumulative)
- Paleontological Resources (Project and Cumulative)
- Human Remains (Project and Cumulative)

Land Use and Planning

- Physically Divide an Established Community (Project and Cumulative)

Tribal Cultural Resources

- Tribal Cultural Resources (Project and Cumulative)

5.3 Alternatives Considered but Rejected

5.3.1 Alternative Locations

State CEQA Guidelines Section 15126.6(f)(2) states that the "key question and first step" in analysis of alternatives is whether any significant impacts would be avoided or substantially lessened by moving the project to an alternative location. This alternative would implement the measures and actions in the CAP Update in an alternative location.

5.3.1.1 Reasons for Rejection

The CAP Update is a programmatic approach to reduce GHG emissions within the unincorporated county in accordance with state GHG emissions reduction targets. The CAP Update accomplishes this by adopting strategies, measures, and actions that reduce GHG emissions. While these strategies, measures, and supporting actions would apply to all areas of the unincorporated county and County operations and would not be limited to one area or property, they would all be implemented within the unincorporated county. The CAP Update is required as mitigation to reduce GHG impacts of the General Plan that were identified in the 2011 GPU PEIR. Because the mitigation measure (Mitigation Measure CC-1.2 of the 2011 GPU PEIR) sets out to reduce GHG emissions from community-wide sources and County local government operations (County operations) that are consistent with the General Plan, an alternative site where the project could be implemented would not be feasible or appropriate. The County only has jurisdiction over lands within its legal boundaries. As such, consideration of an alternative location has been eliminated from further analysis in this ~~draft~~ SEIR.

5.3.2 Prohibition on Growth in Unincorporated County Alternative

Forecast GHG emissions include both the continued operation of existing structures and associated resident behavior and emissions associated with anticipated population

growth and development. This alternative would prohibit all new development in the unincorporated county (with the exception of previously approved or entitled development); all existing residential, commercial, office, industrial, public facilities, agriculture and open space, along with utilities and roadways would generally remain in their current condition. A prohibition on new development would be adopted by the County Board of Supervisors (Board) as a separate action in conjunction with the CAP Update. An alternative that prohibits all new development and does not implement the proposed CAP Update would not meet project objectives related to SB 32 and AB 1279 compliance.

5.3.2.1 Reasons for Rejection

This alternative would not accommodate the County's Regional Housing Needs Allocation (RHNA), which is the amount of new housing that the state has assigned as the fair share of new housing units to build over the next 8 years. Government Code Section 65863 (the No Net Loss Law) requires that cities and counties ensure that their general plans provide for regional housing needs. Due to inconsistency with state regulations, this alternative would be infeasible. Halting all development in the unincorporated county would impair the County's ability to grow, adapt, and remain economically viable.

A prohibition on growth in the unincorporated county may reduce some environmental impacts associated with growth under the adopted General Plan, as disclosed in the 2011 GPU PEIR, but would not affect the environmental impacts of implementing the CAP Update. This alternative would not reduce the new and more severe impacts related to aesthetics, agriculture, cultural resources, land use, and tribal cultural resources associated with CAP Update implementation. This alternative would achieve project objectives related to development of a CAP, with the exception of the project objective to 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. This alternative was rejected from detailed consideration because it would not meet the County's state-mandated obligations to provide its fair share of housing, making it infeasible.

5.3.3 Prohibition on Changes to the General Plan Land Use Map Alternative

This alternative would prohibit general plan amendments (GPAs) that affect the density and intensity of land uses to preserve the accuracy of the GHG forecasts in the CAP Update. Some changes in density (e.g., higher density in rural areas and lower density near urban centers) can be associated with higher VMT, which is a factor in calculations of the GHG emissions of the unincorporated community. The CAP Update would be implemented as proposed and the prohibition of GPAs that change land use density would be adopted by the BOS as a separate action.

5.3.3.1 Reasons for Rejection

General Plans, and corresponding GHG reduction plans, are prepared to express the vision of a jurisdiction and establish goals and policies that reflect community values. As

a practical matter, these are living documents that are monitored and refined in response to changing conditions. Additionally, under state law, the Board of Supervisors cannot prohibit future Boards of Supervisors from revising, modifying, or amending the County's General Plan and corresponding GHG reduction plans in the future.

GPAs that increase density are outside the scope of the CAP Update, which has been developed as mitigation for the adopted General Plan and covers only the type and level of growth that is within the scope of the General Plan. As discussed in further detail in Section 4.4 of Chapter 4, "Other CEQA Sections," any in-process or future GPAs would conduct a stand-alone CEQA analysis, including an analysis of project specific GHG emissions to determine the project's alignment with County plans and applicable state and local programs adopted to reduce GHG emissions. Moreover, this alternative would result in the same suite of measures and actions, with the same potential for new or substantially severe impacts, as the proposed CAP Update alone and would not improve alignment with the project objectives. For these reasons, this alternative has not been carried forward for detailed analysis.

5.3.4 Carbon Offset Alternative

Stakeholders suggested consideration of an alternative that allows for carbon offsets to reduce GHG emissions associated with development that is within the scope of the General Plan. Under this alternative, a carbon offset mitigation that provides objective standards to determine which carbon offset programs qualify as producing sufficiently real, permanent, quantifiable, verifiable, enforceable, and additional reductions in GHG emissions and includes quantifiable measurements such as compliance with the offset protocols approved by the California Air Resources Board (CARB) or a qualified registry could be considered on a project-specific basis.

5.3.4.1 Reasons for Rejection

As proposed, the CAP Update achieves state GHG reduction targets for forecast growth in the unincorporated county and County operations without the use of carbon offsets; therefore, incorporating the purchase of carbon offset credits to reduce GHG emissions under the General Plan is not required. The CAP Update does not prohibit the use of carbon offsets where appropriate to address the GHG emissions of projects that would require amendments to the General Plan and that would not rely on the CAP Update for GHG reductions (i.e., projects that would be outside of the scope of the General Plan and would conduct project-level GHG emissions modeling and recommend project-specific mitigation, and would not attempt to streamline evaluation of GHG emissions using the tiering and streamlining provisions of State CEQA Guidelines Section 15183.5). CEQA Guidelines Section 15126.4(c)(3) allows mitigation through "off-site measures, including offsets that are not otherwise required, to mitigate a project's emissions." Offsets are expressly allowed in CEQA and are available as a suite of mitigation measures for the reduction of GHG emissions. This alternative was rejected from further consideration both because carbon offsets would not be required for the County to achieve GHG reductions pursuant to applicable state targets under the General Plan and because the Board directed staff to develop a CAP that achieves state targets without the purchase of carbon

offsets. This direction is included in the objectives of the project and is, in fact, a key defining objective of the CAP Update. For the foregoing reasons and, because projects can still use carbon offsets if appropriate, this alternative is rejected from further consideration in this SEIR.

5.3.5 Net Negative by 2035 Alternative

Comments were received during the NOP scoping process that the County should consider an alternative that would achieve net negative emissions by 2035. This alternative would establish a target of net negative GHG emissions by 2035. To achieve this target, all measures and actions in the CAP would be revisited to ensure that all technologically feasible reductions are achieved. Because the CAP Update already includes all feasible measures and actions that would reasonably reduce emissions, this alternative would likely increase environmental impacts and the fiscal cost of CAP Update implementation. Furthermore, because the available reductions are small and not expected to achieve the target alone, this alternative is assumed to require the purchase of carbon offsets.

5.3.5.1 Reasons for Rejection

The CAP Update is aligned with the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) prepared by CARB. The Scoping Plan development process included evaluation of the technological feasibility, cost-effectiveness, and equity-focused pathways for the state to achieve statewide carbon neutrality prior to 2045. In the process, CARB modeled scenarios for economic GHG emission sectors and in four alternatives, including two alternatives for reaching carbon neutrality prior to 2035. The ability for natural working lands to sequester carbon was also evaluated in four separate alternatives to maximize effectiveness of natural carbon dioxide removal. Based on this information and a thorough stakeholder engagement process, CARB decided on a preferred “Scoping Plan Scenario” of achieving net zero emissions by 2045.

CARB ultimately concluded that the Scoping Plan Scenario for 2045 carbon neutrality is more cost effective and technologically feasible than the 2035 carbon neutrality alternatives and identified “several feasibility concerns” with 2035 carbon neutrality. CARB performed analysis demonstrating that 2035 carbon neutrality alternatives would have the following outcomes relative to the 2045 timeline of the Scoping Plan Scenario:

- 5 to 3 times slower job growth in 2035,
- 7 to 6 times higher direct costs in 2035, and
- 6 to 5 times slower economic growth in 2035.

The Scoping Plan Scenario shows that it is economically and technologically feasible to reduce emission to at least 85 percent below 1990 levels by 2045 as called for by AB 1279. It also shows that mitigation of 100 percent of anthropogenic emissions by 2045 is not economically and technologically feasible and that carbon dioxide removal should be

utilized to achieve California's carbon neutrality target. In addition, the Scoping Plan scenario shows that natural and working lands are projected to be a net emissions source of approximately 7 million metric tons of carbon dioxide equivalent per year ($MMTCO_2e$/year) in 2030 and 2040, even with actions to preserve carbon sequestration potential. The Scoping Plan compensates for residual anthropogenic emissions and net emissions from natural working lands with additional mechanical carbon dioxide removal and carbon capture and sequestration strategies, including technologies such as direct air capture with sequestration. The County does not have infrastructure to construct new facilities to capture ambient CO_2 or pipelines, wells, and other surface facilities to enable the transport and injection of CO_2 into a geologic formation for sequestration.

This alternative would have to include the purchase of carbon offsets to close the gap between the emissions reductions that can be achieved in the county and the net negative goal. As described above, the use of carbon offsets contradicts the Board's direction. Additionally, there is not an established carbon offset program in the county, and stakeholders have expressed a desire to avoid out-of-county offsets. Therefore, the Net Negative by 2035 Alternative was dismissed from detailed analysis due to infeasibility.

5.3.6 Enhanced Biological Preserve Alternative

During scoping, commenters identified open space as a source of carbon sequestration and a method of reducing development potential in the unincorporated county. The CAP Update assumes full implementation of a Carbon Farming Program by 2026 and acquisition of 11,000 acres of conservation land by 2030 (and 1,000 acres per year thereafter), as well as agriculture and conservation measures that would preserve natural lands and improve land management practices to protect habitat and increase carbon storage. These assumptions maximize the potential for land preservation under the County's current acquisition mechanisms.

There are several open space preservation tools the county could explore to implement this alternative, including further clustering development, transfer of development rights, and land acquisition. Clustering development allows for development to occur in a way that maximizes the preservation of open space without reducing a property owner's development rights. A transfer of development rights allows a developer to essentially purchase the rights from the property that the community wants to preserve and transfer those rights to another property. However, this is a complex program that is highly dependent on market dynamics and only works if there is a suitable "receiver site" that can receive density for hundreds of additional housing units and property owners or developers willing to purchase development rights for that increased density. The purchase of property by a land trust allows land to be placed under a conservation easement. Alternatively, a bond measure could allow the community to essentially tax itself to purchase the land for public open space. Each of these options present challenges requiring additional investigation.

5.3.6.1 Reasons for Rejection

The Enhanced Biological Preserve Alternative has the potential to meet all established project objectives if the legal and practical constraints discussed above could be overcome. Additionally, an alternative with increased open space may reduce environmental impacts compared to the proposed CAP Update if it would decrease the need for other measures and actions that result in environmental effects (e.g., new renewable energy infrastructure). However, implementation of this alternative would face legal and practical constraints, as explained above. Programs to transfer development rights or purchase property are outside the scope of the planning framework in the proposed CAP Update. As a result, this alternative has been rejected from further consideration.

5.3.7 Nuclear Power Alternative

Comments were received during the NOP scoping process that the County should consider an alternative that would include purchase of San Onofre Nuclear Generating Station. Under this alternative, the County would buy San Onofre Nuclear Generating Station from Southern California Edison and supply the unincorporated county with nuclear power to reduce GHG emissions associated with building energy consumption. The San Onofre Nuclear Generating Station is a permanently closed nuclear power plant located south of San Clemente. The plant was shut down in 2013 after defects were found in replacement steam generators; it is currently in the process of decommissioning.

The Nuclear Power Alternative would include a measure for the acquisition and operation of San Onofre Nuclear Generating Station in addition to the other measures and actions in the CAP Update. All other measures and actions would be included as proposed in the CAP Update.

5.3.7.1 Reasons for Rejection

Because this alternative would reduce reliance on the utility providers for renewable energy, the alternative could result in the reduction of environmental impacts anticipated to indirectly result from the development of large-scale renewable energy infrastructure. However, acquisition and operation of San Onofre nuclear power plant is not a feasible option for the County to explore. The plant is actively being decommissioned by the current owner, Southern California Edison, due to the defective status of the facility. There are technological limitations with the safe operation of the facility and the County does not have the governmental resources with the expertise or capacity to manage the operation of the plant. For these reasons, this alternative has been rejected from further consideration.

5.4 CAP Update Alternatives

5.4.1 Evaluation of CAP Update Alternatives Selected for Detailed Analysis

5.4.1.1 No Project Alternative

The No Project Alternative assumes the CAP Update would not be adopted and implemented. As a result, the County would not adopt strategies, measures, and supporting efforts to reduce GHG emissions in accordance with state-mandated reduction targets. New developments would continue to be reviewed under CEQA. This alternative would not meet any of the project objectives.

Comparison to the Effects of the CAP Update

As described above, under the No Project Alternative the CAP Update would not be implemented. As a result, the County would not have a mechanism by which to meet legislative requirements for GHG emissions. The No Project Alternative would not satisfy the County's obligation under Mitigation Measure CC-1.2 of the 2011 GPU PEIR, which requires the preparation of a CAP to achieve reduction targets. Further, the County would still be obligated to ensure that development under the General Plan would comply with legislative requirements for GHG emissions. Compliance with these requirements would be achieved through individual project-level analysis for all development projects subject to discretionary review. While GHG impacts would be assessed on a project-by-project basis, without the CAP Update in place, it may be more difficult for the County to achieve compliance and could result in inconsistencies with legislative requirements. Therefore, this alternative could result in greater GHG impacts. Transportation impacts related to VMT would also increase under the No Project Alternative. As described in Section 2.13, "Transportation," the CAP Update includes programs designed to reduce GHG emissions from the transportation sector through VMT reduction.

The environmental impacts of CAP Update implementation, and in particular those related to the construction and operation of the large-scale renewable energy infrastructure anticipated necessary to achieve the GHG reductions in the CAP Update that could affect the integrity of agricultural, biological, cultural, aesthetic, water, and tribal cultural resources, would be reduced or similar under the No Project Alternative. However, as described above, individual projects would continue to evaluate and mitigate GHG emissions on a project-by-project basis. The cumulative effect of these individual GHG reduction programs is not known at this time but may result in similar or greater effects on the environment due to a similar demand for renewable energy and infrastructure to support GHG reduction in accordance with state regulations and the absence of coordinated programs to address the necessary mitigation.

5.4.1.2 Distributed Generation Only Alternative

Comments were received during the NOP scoping process that the County should consider an alternative that would limit renewable energy generation to distributed

generation systems (i.e., a variety of small, grid-connected systems that efficiently deliver electricity near its place of origin, such as solar and wind energy generation sited on top of or adjacent to buildings and connected to a micro-grid) and that large, utility-scale energy systems should not be considered. As described in this ~~draft~~ SEIR, many of the project's significant impacts are associated with the large, utility-scale components that would be induced through implementation of CAP Update actions. Specifically, under Action E-3.3 the County would develop a program to provide 100 percent renewable energy to residents and businesses participating in San Diego Community Power by 2030. The County anticipates that private developers and utility companies would implement large-scale renewable infrastructure projects to meet the energy demand generated by this action; development of this infrastructure would require compliance with CEQA and regulatory requirements.

Under the Distributed Energy Only Alternative, Action E-3.3 would be modified to develop a program to provide 100 percent renewable energy to residents and businesses through distributed generation. The first step in establishing this program would be to prepare a feasibility study that assesses the distributed energy generation potential of the unincorporated county to determine how much energy could be generated without the need for large-scale renewable energy projects. Based on the results of the feasibility study and the types of distributed generation systems appropriate for various geographies and land uses, incentives would be identified to promote construction of these renewable energy systems. Distributed generation systems are currently allowed within the county and would be encouraged through mechanisms such as permit process improvements, and zoning and code updates, potentially including a renewable energy zoning overlay. For example, the County's Solar and EV Ready Ordinance, adopted in 2015, requires newly constructed residential dwelling to include solar-ready electrical equipment and roof space for easy installation of future solar photovoltaics. In addition, the County has offered a streamlined web-based permitting platform since 2013 which served as an example for the State permit streamlining law passed in 2014. From 2014 to 2022, 408,954 kilowatts of distributed generation solar photovoltaic systems have been installed since this platform was put into place.

The County currently allows construction of large-scale renewable energy systems (e.g., solar, wind, geothermal) subject to its ordinances, policies, and standards. This would not change under this alternative. However, this alternative would modify the County's commitment to providing renewable energy under Action E-3.3 to promote the construction of distributed generation systems. Large-scale renewable energy systems could still be developed, and their associated impacts could occur. However, this alternative would eliminate the demand for these systems induced by the CAP Update, thereby reducing the total number of systems that would be anticipated within the county. Therefore, overall impacts that are specific to the construction and operation of large-scale renewable energy projects, such as conversion of undeveloped open space to energy infrastructure, would be reduced compared to the project.

The feasibility study would determine how much renewable energy could be feasibly provided to county residents by 2030 using distributed energy infrastructure. The County anticipates that it would be more complicated and time-intensive to produce energy in this

manner than through large scale renewable projects because of the volume of projects required to establish the systems and the inherent potential for site-specific design challenges associated with the establishment of distributed energy systems that would both meet electricity demands in the unincorporated county and achieve emissions reductions equivalent to Action E-3.3 in the proposed CAP. Such challenges could add substantial time and complexity to the generation of distributed energy within the unincorporated county. For this reason, it is anticipated that the Distributed Generation Only Alternative may not meet the project objectives related to meeting the SB 32 target in 2030. However, this alternative would support the objectives of the sustainability principles in the General Plan, contribute to progress toward environmental justice and equity, include other adaptable measures and actions, and minimize undue and unnecessary economic impacts on businesses and property owners.

The CAP requires annual reporting, inventory updates at least every 2 years, and an update to the CAP at least every 5 years to track progress towards attainment of the 2030 and 2045 targets. If this alternative is selected, the County would monitor its efficacy and progress towards achieving the stated reductions under Action E-3.3. The County would be able to adapt if the Distributed Generation Only Alternative is selected and anticipated reductions are not being met.

Comparison to the Effects of the CAP Update

Aesthetics

Large-scale renewable energy infrastructure is anticipated to potentially alter the landscape of undeveloped areas in the county to accommodate renewable energy infrastructure such as PV solar arrays and wind turbines. The distributed energy only alternative would reduce or eliminate the potential for the CAP Update to induce the construction of large-scale renewable energy infrastructure. Distributed energy systems would include similar infrastructure requirements (e.g., solar panels and powerlines), but their smaller scale and proximity to development are anticipated to substantially reduce impacts related to changes or obstruction of scenic vistas and scenic resources, and degradation of visual character or quality. Impacts would be reduced compared to the proposed CAP Update.

The aesthetic impacts from implementing the Distributed Generation Only Alternative would be less than significant with mitigation and the project would not result in a considerable contribution to a significant cumulative impact. Implementation of the Distributed Generation Only Alternative would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Agriculture and Forestry Resources

The scale and magnitude of the renewable energy projects that could be constructed by utilities to meet the demand generated by the CAP Update is anticipated to result in potential conflicts with agricultural zoning and Williamson Act contracts. The Distributed

Generation Only Alternative would result in dispersed, discrete energy projects throughout the county. The additional flexibility in siting these smaller systems and their inherent proximity to areas of development is anticipated to reduce impacts to agricultural and forest resource. Impacts would be reduced compared to the proposed CAP Update.

The Distributed Generation Only Alternative would result in a less-than-significant impact related to conversion of agricultural land, conflicts with agricultural and forest zoning, and Williamson Act contracts and would not result in a new significant cumulative impact. Implementation of the Distributed Generation Only Alternative would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Air Quality

Large scale renewable energy infrastructure would not generate substantial emissions that would affect consistency with air quality plans or standards, pollution concentrations, or emission of odors. For this reason, the Distributed Generation Only Alternative would have similar impacts to the proposed CAP Update. Impacts would remain significant and unavoidable. Like the project, this alternative would result in a considerable contribution to a significant cumulative impact. This would not be a new or more severe impact than disclosed in the 2011 GPU PEIR.

Biological Resources

The Distributed Energy Generation Only Alternative would locate infrastructure more proximate to development, which may reduce impacts to biological resources. Although the Distributed Energy Only Alternative may result in impacts to biological resources, impacts are expected to be more discrete and localized than solar array fields, geothermal infrastructure, and wind turbines that typically encompass large areas. Large-scale solar and wind energy systems, which could indirectly result from implementation of the CAP Update, could result in impacts to special-status species due to construction activities, implementation of access roads and transmission lines, and conversion of large areas of land to industrial uses, resulting in habitat loss. Wildlife could potentially be displaced within the construction areas and use of access roads around the construction area has the potential to result in the direct mortality of less mobile wildlife and rare plants.

Although impacts to biological resources would be reduced compared to the proposed CAP Update, the alternative would have a significant and unavoidable impact and a considerable contribution to significant cumulative impacts. This would not be a new or more severe impact than disclosed in the 2011 GPU PEIR.

Cultural and Paleontological Resources

The Distributed Energy Generation Only Alternative would locate infrastructure more proximate to development, which may reduce impacts to cultural resources. Large-scale renewable energy systems, such as PV and wind turbines, would generally be constructed in areas that are not highly developed because of the size, massing, coverage, and scale of this type of infrastructure that relies upon large amounts of land unencumbered by

buildings or shadowed by buildings or trees. Ground disturbance, including excavation and grading have the potential to alter archaeological and paleontological resources.

Although the Distributed Energy Only Alternative may result in impacts to cultural resources, impacts are expected to be more discrete and localized than solar array fields, geothermal infrastructure, and wind turbines that typically encompass large areas. Impacts would be reduced compared to the proposed CAP Update. However, impacts from GHG reduction measures that would result in the installation of small wind turbines or solar photovoltaic facilities would remain significant and unavoidable and the project would result in a considerable contribution such that new significant cumulative impacts would occur. Under the Distributed Energy Only Alternative, this would remain a new or more severe impact not disclosed in the 2011 GPU PEIR.

Energy

Modification of CAP Update Action E-3.3 under the Distributed Energy Only Alternative to eliminate or reduce the potential to indirectly induce the development of large-scale renewable energy infrastructure would not substantially affect the potential for the CAP Update to result in wasteful, inefficient, or unnecessary consumption of energy resources because changing the source of the energy does not change the manner in which it is used. The shift in the type of renewable energy infrastructure incentivized by the County would not conflict with state and local plans for renewable energy. Therefore, the Distributed Energy Only Alternative would result in similar impacts to the CAP Update.

The Distributed Generation Only Alternative would result in a less-than-significant impact related energy demand and would not result in a new significant cumulative impact. Implementation of the Distributed Generation Only Alternative would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Environmental Justice

Modification of CAP Update Action E-3.3 under the Distributed Energy Only Alternative to eliminate or reduce the potential to indirectly induce the development of large-scale renewable energy infrastructure would not substantially affect the potential for the CAP Update to result in environmental justice impacts. For this reason, the Distributed Generation Only Alternative would have similar impacts to the proposed CAP Update.

The Distributed Generation Only Alternative would result in a less-than-significant impact related to environmental justice and would not result in a new significant cumulative impact. Implementation of the Distributed Generation Only Alternative would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Greenhouse Gas Emissions

Supplying renewable energy to San Diego Community Power customers would be the most efficient and reliable path to reducing GHG emissions associated with electricity use

in the unincorporated county. The Distributed Energy Only Alternative would require further study to determine if equivalent energy can be feasibly generated by distributed energy systems. Further, distributed energy systems to serve individual users or communities would undergo separate design, review, and construction processes. Even with the incentives included in this alternative, it is possible that there is a longer lead time for the development of distributed energy systems. During this period, it is assumed that a greater proportion of the energy demand in the unincorporated county would be met through non-renewable energy sources, which would increase GHG emissions compared to the CAP Update. For this reason, the Distributed Generation Only Alternative would have greater impacts than the proposed CAP Update on GHG emissions.

Impacts would be potentially significant due to the uncertainty regarding whether enough renewable energy could be provided through distributed energy systems to achieve the established targets and consistency with applicable plans and regulations. Implementation of the Distributed Energy Generation Only Alternative could result in new or more severe impacts than disclosed the 2011 GPU PEIR.

Hazards and Hazardous Materials

Large scale renewable energy infrastructure would not create substantial hazards, interfere with emergency response, or expose people to vectors. The Distributed Generation Only Alternative also would not create substantial hazards, interfere with emergency response, or expose people to vectors. For this reason, the Distributed Generation Only Alternative would have similar impacts to the proposed CAP Update.

As described in Section 2.9, “Hazards and Hazardous Materials,” for the CAP Update, the Distributed Generation Only Alternative would result in the development and redevelopment of infrastructure throughout the unincorporated county, including areas susceptible to wildland fires. Compliance with existing regulations related to wildfire protection and implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would reduce the project-level and cumulative impacts but not to a less-than-significant level. Therefore, impacts associated with exposing people or structures to significant risks of loss, injury, or death involving wildland fires would be significant and unavoidable and would result in a considerable contribution to an existing significant cumulative impact. This alternative would not result in a new significant impact not discussed in the 2011 GPU PEIR or a substantial increase in the severity of the previously identified significant effect.

Hydrology and Water Quality

Large-scale renewable infrastructure would have the potential to impair water quality, groundwater recharge, and surface hydrology. This potential for effects would be addressed through the Major Use Permit process and compliance with County regulations. Because the Distributed Generation Only Alternative does not require as much acreage as large scale renewable solar, geothermal, and wind and would be located closer to where the energy is consumed, it would have less impacts to water quality, groundwater recharge, and surface hydrology. Much of the Distributed Generation

Only Alternative would require PV on rooftops or micro-grids closer to developed areas that would reduce impacts on groundwater. Therefore, the Distributed Generation Only Alternative would have less impacts than the proposed CAP Update.

However, similar to the conclusions for the CAP Update, because of the uncertainty regarding the types, locations, and scale of projects implemented, the Distributed Generation Only Alternative would have a significant and unavoidable impact and would result in a considerable contribution to a significant cumulative impact on groundwater supply and recharge. This would not be a new or more severe impact compared to the 2011 GPU PEIR.

Land Use and Planning

Large-scale renewable energy projects would be required to obtain applicable permits, undergo discretionary review, evaluate project-specific impacts under CEQA, and mitigate those impacts to the extent feasible; however, because of the uncertainty of the types, locations, and scale of future large-scale renewable energy projects impacts related to division of established communities could be significant. The Distributed Generation Only Alternative would reduce the potential for large-scale renewable energy infrastructure to disrupt existing access and circulation patterns in a manner that would have the potential to divide established communities. As a result, this alternative would have reduced impacts compared to the proposed CAP Update.

The Distributed Generation Only Alternative would result in a less-than-significant impact related to the physical division of established communities and would not result in a new significant cumulative impact related to the physical division of established communities. Under this alternative, there would not be a new or more severe impact than disclosed in the 2011 GPU PEIR.

Noise

The Distributed Energy Generation Only Alternative would result in renewable infrastructure, such as solar PV panels on rooftops and micro-grids, close to communities. This alternative would not induce the same demand for large-scale renewable infrastructure as the proposed CAP Update that, consistent with the Wind Energy EIR, would result in a significant and unavoidable impact related to low-frequency noise. However, the Distributed Energy Generation Only Alternative would result in new infrastructure closer to sensitive receptors.

Overall, the Distributed Energy Generation Only Alternative would result in similar impacts compared to the proposed CAP Update. The alternative's impact related to excessive noise levels would be significant and unavoidable and the alternative would result in a considerable contribution to a significant cumulative impact. This would not be a new or more severe impact compared to the 2011 GPU PEIR.

Transportation

The Distributed Energy Generation Only Alternative would locate infrastructure more proximate to development, which may reduce the construction traffic trip lengths anticipated for the construction of large-scale renewable infrastructure that could be located in relatively remote locations. However, once constructed, large-scale renewable energy projects would not have an impact on operation of the circulation system. Overall, the Distributed Energy Generation Only Alternative would result in similar impacts compared to the proposed CAP Update.

The Distributed Energy Generation Only Alternative would result in a less-than-significant impact related to transportation and would not result in a considerable contribution such that a new significant cumulative impact related to VMT would occur. Implementation of the Distributed Energy Generation Only Alternative would not result in new or more severe impacts than disclosed the 2011 GPU PEIR.

Tribal Cultural Resources

The Distributed Energy Generation Only Alternative would result in renewable infrastructure such as solar PV panels on rooftops and micro-grids close to communities. Construction of this infrastructure would have less potential to adversely affect Tribal Cultural Resources than the CAP Update because large-scale renewable energy projects can require expansive land area in more remote locations.

However, the Distributed Energy Generation Only Alternative would result in similar impacts compared to the proposed CAP Update overall because the specific location of projects associated with CAP Update implementation are not known and because they could be implemented in areas where TCRs are present. Because the reduction of impacts to a less-than-significant level cannot be guaranteed, the alternative would have a significant and unavoidable impact and would result in a considerable contribution to a significant cumulative impact to TCRs.

Wildfire

The Distributed Energy Generation Only Alternative reduces the fire risk associated with indirectly inducing the installation of renewable energy systems and associated infrastructure under the proposed CAP Update. However, future large-scale renewable energy projects would be designed to prevent this infrastructure from exacerbating a fire risk to the extent feasible. The large-scale renewable energy projects and associated infrastructure would be required to be designed and constructed in accordance with current fire codes. Defensible space and fuel management required by the California Public Utilities Commission and CAL FIRE for utilities infrastructure development would also be provided. Although the Distributed Energy Generation Only Alternative may slightly reduce impacts compared to the proposed CAP Update because it would limit the need for powerlines traversing undeveloped open space to deliver power to customers, implementation of adopted General Plan policies and 2011 GPU PEIR mitigation measures would ensure that project and cumulative impacts would remain less than

significant and would not result in a considerable contribution such that no new significant cumulative impact would occur, consistent with the proposed CAP Update. Implementation of the alternative would not result in new or more severe impacts than disclosed in the 2011 GPU PEIR.

5.5 Smart Growth Alternatives

5.5.1 Development of Smart Growth Alternatives

This ~~draft~~ SEIR also includes consideration of smart growth[2] alternatives that are intended to significantly reduce VMT as required by the Court of Appeal for Division One of the Fourth Appellate District (Appellate Court) in *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467. The smart growth alternatives discussed below propose actions that, if adopted in addition to the CAP Update measures and actions, are intended to further reduce GHG emissions by reducing VMT through changes in development patterns. Note, however, that the efficacy of alternatives focused on incentives and disincentives for future development is limited because most forecast VMT in the unincorporated county is associated with existing development. Substantial reductions in countywide VMT would require changes to the travel patterns of the existing population and Board-directed land use and zoning changes. For example, siting mixed-use development and neighborhood serving retail near residential development can bring employment and shopping opportunities closer to existing residents, thus reducing VMT. Moving all household growth to specific areas along with changes to employment and commercial land uses in those areas could both minimize VMT from future growth and potentially reduce VMT associated with existing residents. Land use strategies that promote density and mixed-use development also make transit service more feasible to implement, which could shorten/replace existing vehicle trips. Other strategies to address existing VMT include either disincentivizing driving or incentivizing not driving, such as road user charges or programs that pay employees to work from home or pay residents to not make certain trips.

In addition to reducing VMT and GHG emissions, adopting and implementing a smart growth alternative in the unincorporated area could result in development outcomes aligned with previously directed policy objectives, such as increasing housing diversity and affordability levels near jobs and transit and reducing sprawling land use patterns. The General Plan, for which the CAP Update serves as a mitigation measure, was designed to achieve "smart growth" objectives including concentrating development in designated villages with integrated infrastructure and nonresidential uses. Achieving these goals reduces VMT attributable to new development. See Section 1.3 in Chapter 1, “Project Description,” of this ~~draft~~ SEIR, regarding the County’s efforts through the General Plan to focus development within village areas and closer to services in the western portion of the incorporated county. In addition, please refer to Table I-1 in the General Plan regarding sustainability policies.

[2] ”Smart Growth" is defined in the decision as “compact, efficient, and environmentally sensitive pattern of development that focuses future growth away from rural areas and closer to existing and planned job centers and public facilities, while preserving open space and making more efficient use of existing urban infrastructure.”

Adoption of a smart growth alternative would further focus development in areas close to employment centers, commercial services and amenities, and public facilities such as schools, fire stations, libraries, and parks/recreational opportunities. This approach assists in maximizing the use of existing infrastructure, preserves open space and natural resources, and reduces the distance individuals need to travel to meet their needs. Smart growth tends to create a greater range in housing and transportation options by incentivizing redevelopment of underutilized properties, thereby offering more choices and, potentially, a greater range of prices. Smart growth may also contribute to the economic development potential of existing communities by providing new investment opportunities, providing a framework for capital improvements, and supporting more efficient development patterns that allow for a wider mix of uses. A key component of smart growth as an approach to development and conservation is encouraging all stakeholders to participate in the decision-making process. Involving a broad set of stakeholders in planning for smart growth can help foster distinctive communities with a strong sense of place, resulting in increased access for a wider range of residents while creating new placemaking opportunities through the planning process. Due to each place's unique characteristics and stakeholder desires, development outcomes associated with applying new, focused, smart growth strategies in unincorporated communities would largely depend on the communities themselves and the viability of the strategies, programs, and incentives that would be implemented.

5.5.1.1 Summary of Outreach Related to Smart Growth Alternatives

The County conducted outreach on smart growth alternatives beginning in early 2021 following issuance of the Notice of Preparation for this SEIR. The County posted notification of smart growth development on the CAP Update website (https://www.sandiegocounty.gov/content/sdc/sustainability/climateactionplan/). Any individual or organization with interest in providing input on the development of smart growth alternatives was encouraged to reach out via the provided email link to schedule a meeting.

Following release of the NOP, the County's Department of Planning and Development Services (PDS) held five workshops on smart growth alternatives to solicit input and request involvement on development of the smart growth alternatives. After efforts to engage stakeholders, PDS held approximately 65 separate meetings with Community Planning and Sponsor Groups, environmental organizations, industry organizations, and individuals. Meetings were primarily held throughout 2021 and again in Spring of 2023.

In total, the County participated in over 70 meetings with a variety of stakeholders to better understand the community's vision for smart growth and gather suggestions for development of alternatives. In these meetings, the County asked stakeholders to identify the geographies where they thought smart growth development should occur. Based on requests from various stakeholders, the County prepared an interactive land use overlay mapping application and a series of approximately 90 static smart growth maps to

facilitate discussions with stakeholders and development of alternatives. These maps and other materials are available to the public on the CAP Update website.[3]

After identifying where smart growth should occur, PDS asked for input on how to incentivize growth in smart growth locations and disincentivize growth where it was less desirable (i.e., outside of smart growth locations). PDS explained during outreach that development of an overlay zone would be placed over determined smart growth locations where development could be incentivized, and that outside of that overlay zone development could be disincentivized. The results of outreach and overlay zone are discussed below.

Outreach Results

Possible incentives for smart growth development:

- Develop financial incentives, such as waiver of permit application fees, especially to encourage low-and middle-income housing.
- Create opportunities for ministerial (i.e., not requiring CEQA review) applications and processes.
- Develop a priority review process where smart growth projects get expedited "top of the line" review.
- Update zoning and other ordinances to streamline.
- Develop infrastructure studies and parcel analysis to identify service and infrastructure deficiencies.
- Create special improvement districts and programs that can provide focused funding for capital improvement projects.
- Develop economic and market studies to understand the economics of each community and how best to grow.
- Adopt design standards for streets, sidewalks, and public rights-of-way to ensure safety and mobility for all modes of transportation.
- Develop a land banking, density transfer, transfer of development rights, or similar program to assemble parcels for development.

[3] PDS developed the "Land Use Overlays" mapping application to show land use information (e.g., zoning, VMT areas, fire risk areas, General Plan designations and Villages) so that the public could consider where smart growth should occur. Following extensive engagement in 2021, PDS then created Smart Growth Alternative Maps so that stakeholders could review the spatial results of their input on where smart growth should occur.

Both the Land Use Overlays platform and the Smart Growth Alternative Maps are available on the PDS CAP Update website at the following (accessed October 13, 2023): https://www.sandiegocounty.gov/content/sdc/sustainability/climateactionplan.html

- Provide comprehensive mitigation programs, for example, VMT and wildfire so that development can mitigate their impacts.
- Possible disincentives for smart growth development:
- Develop restrictions on General Plan amendments.
- Develop fees to make development outside of smart growth areas more difficult.
- Prohibit development in hazard areas.
- Develop a sliding scale for mitigation, where if located outside a smart growth area it becomes more expensive to develop.
- Continue the current process for development, but without any of the incentives identified above or as developed through public review and hearing processes.

PDS considered all input on the smart growth alternatives and developed a reasonable range of smart growth alternatives for evaluation in this SEIR. Incentives, disincentives, and tools to streamline development in and out of smart growth locations will be considered by the public and decision-makers and developed further through the public review and hearing processes. These lists are not exhaustive. As explained further in this chapter, future implementation would be required if the Board selects an alternative(s) and directs County staff to consider a smart growth location to incentivize and prioritize future development.

5.5.2 Implementation of Smart Growth Strategies

Implementation of smart growth alternatives that result in changes to the adopted General Plan land use map would require subsequent planning by County staff to develop tools to modify the application of the adopted General Plan. State laws facilitating housing streamlining and development (including Senate Bill 330, known as the Housing Crisis Act) also prevent the County from reducing residential capacity on a site zoned for housing in certain areas of the county without identifying replacement capacity. In addition, it is difficult to downzone higher density housing element sites identified and approved by the State as feasible sites for lower-income development. Government Code Section 65863 requires that cities and counties ensure that their general plans provide for regional housing needs. In addition, cities and counties are required to have no “net loss” of lower and moderate-income dwelling units. The County cannot take action that would reduce identified affordable housing sites for these income categories.

Because these alternatives extend beyond the scope of the CAP Update, which is a program of measures and actions to address GHG emissions from development under the adopted General Plan and government operations, implementation of the smart growth alternatives would require subsequent planning and comprehensive stakeholder engagement, as well as subsequent CEQA analysis. If the Board directs staff to prepare a smart growth alternative for adoption, potential strategies that could be employed

include mapping revisions or overlays and tools to facilitate approvals of "smart growth" projects, as described below.

- **Smart Growth Overlay**: A land use overlay is a designation added to the underlying zoning of parcels. Areas subject to the overlay would be subject to a special set of policies and/or rules for development, similar to the County's Forest Conservation Initiative overlay. Parcels within the Smart Growth Overlay would have a designator assigned that would govern the rules, policies, and procedures (e.g., incentives) for development. Parcels outside of the Smart Growth Overlay would have a different set of rules, policies, and procedures (e.g., disincentives) for development. Possible incentives are listed above.

- **Zoning Changes:** The County may also make changes to the underlying zoning of land within the unincorporated county. This may include up-zoning parcels, establishing minimum densities, implementing duplex and lot splits, and identifying mixed use and residential designations in underutilized commercial areas. Zoning changes would require future implementing actions if the Board directs changes.

- **Tools to Make Smart Growth Development Easier:** Dense development in key locations that concentrates growth can support smart growth and implement mapping revisions. The County may develop tools that facilitate the planning application process (e.g., zone box simplification) for certain project types. Streamlining approvals with reduced costs and expedited process may encourage smart growth development patterns.

- The County may also perform infrastructure studies to find deficiencies and develop public/private partnerships to address infrastructure limitations on selected development.

- **Limit General Plan Amendments.** Based on the understanding that the General Plan already embodies "smart growth" principles as adopted, the County could explore feasible limitations on the GPAs that include changes to the General Plan land use map or density that are not aligned with the County's smart growth goals.

- **Transfer of Development Rights Program.** A transfer of development rights program allows a developer to essentially purchase the rights from a property that the community wants to preserve and transfer those rights to another property. However, this is a complex program that is highly dependent on market dynamics and only works if there is a suitable "receiver site" that can receive density for additional housing units and property owners or developers willing to purchase development rights for that increased density. The purchase of property by a land trust allows land to be placed under a conservation easement. Alternatively, a bond measure could allow the community to essentially tax itself to purchase the land for public open space. Each of these options present challenges requiring additional investigation. Such a program could help the County limit development in areas disfavored under a smart growth analysis.

Certification of the SEIR is a necessary step in the adoption of the CAP Update. Adoption of a smart growth alternative is optional, and the Board can both certify this SEIR and adopt the CAP Update while also directing staff to prepare a smart growth alternative for Board consideration at a later date.

If the Board adopts a smart growth alternative, additional actions would be necessary during the CAP Update hearings and beyond. During the CAP Update hearings, the Board would be asked to identify a community, or communities within which to focus smart growth programs and incentives. The selection of smart growth alternatives requires the identification of areas within the unincorporated communities that could be considered “smart” places for new development for reasons including, but not limited to, compact, efficient, and environmentally friendly design that is achievable; proximity to job centers, services, amenities and infrastructure (e.g., roads, water, sewer); and/or presence of existing or plans for future transit infrastructure (e.g., sidewalks, bike lanes, bus service, new transit service). Upon the selection of one or more smart growth communities, the Board would be asked to direct staff to prepare a Smart Growth Zoning Overlay Ordinance, which would place a smart growth zoning designation on properties within the selected smart growth areas. An overlay is a new zone or "layer" that could be added on top of existing zoning. The overlay zone would identify those properties that would be eligible for future programs or process improvements that would incentivize residential, commercial, and mixed-use growth within the smart growth boundary. Depending upon the nature and extent of the regulatory framework within the Smart Growth Overlay Ordinance, additional environmental analysis may be required prior to implementation. After adopting the CAP Update and Smart Growth Zoning Overlay Ordinance, staff would conduct existing conditions analyses within the selected communities to better understand the barriers to smart growth and the opportunities that each community presents. Barriers to smart growth could include lack of critical infrastructure such as fire stations, or schools, or result from land uses or zoning not aligning with the highest-and-best use for individual parcels which may cause extra processing time and costs. The existing conditions analysis would also consider how to incentivize and create opportunities for smart growth, including a focus on identification of opportunity sites for redevelopment, market and economic incentives (e.g., fee waivers, streamlining) to encourage new mixed uses and housing diversity, and a consideration of fee structures (i.e., reduction in development fees) to support new development and supportive capital improvements. The analysis would describe where land use changes should be made, how to support future transportation infrastructure, how to incentivize diverse housing types and redevelopment of underutilized sites that support the development of low-and-middle-income housing, and how to support mixed-uses. Within the communities that were selected for smart growth, staff would align existing programs to streamline new housing at low- to middle-income levels by ensuring that smart growth areas were included in the work program. In future phases of outreach, staff would begin to concurrently advance conversations with community residents, businesses, and other interested stakeholders to better identify how they would like to see smart growth strategies implemented in their community. This would form the foundation of future policies that would guide resulting growth and future outcomes including locations for new housing, transit investments, and expanded accessibility and locations for locally serving amenities or commercial spaces and public spaces. Individual community needs and development

outcomes would vary based on the existing conditions and community identity, and programs could be considered and brought back for the Board's consideration.

In some communities, a smart growth alternative could result in proposed increases in residential density, known as "up-planning" which may require changes to the General Plan land use map, in order to achieve desired development outcomes. Similarly, subsequent changes to the County's Zoning Ordinance may be required to establish a regulatory framework that can achieve alignment across the General Plan land use map and County Zoning Ordinance which regulates development. Any changes to the General Plan land use map or Zoning Ordinance would require additional environmental analysis prior to implementation. Additionally, changes to the land use map of this extent would likely require changes to other aspects of the General Plan, including the Mobility and Conservation and Open Space Elements in order to bring those elements into conformance.

5.5.3 Evaluation of Alternatives Selected for Analysis

5.5.3.1 Fire Safe and VMT Efficient Alternative

The Fire Safe and VMT Efficient Alternative is a smart growth alternative that the County developed through stakeholder outreach. The smart growth geographies were defined as areas that are both outside of areas mapped by the California Department of Forestry as areas with High or Very High fire risk and within areas mapped by the County as at least 15 percent below the regional average for residential VMT (based on the County of San Diego SB 743 Location-Based Screening Maps developed as part of the County's Transportation Study Guidelines adopted in September of 2022).[4]

Under this alternative, future land development that is consistent with the General Plan and an accompanying proposed Smart Growth Overlay would be focused in currently urbanized areas that are identified as VMT efficient outside of High and Very High Fire Hazard Zones. Figure 5-1 indicates where future development would be encouraged. Generally, fire safe and VMT efficient areas were identified in areas of the unincorporated county that immediately border the incorporated cities of Vista, San Marcos, Escondido, El Cajon, and National City, as well as an area in the northwest of the unincorporated county in the community of Fallbrook. Figures 5-1a through 5-1j provide data considered in alternative development, including Fire Hazard Severity Zones, existing services, and employment centers. As shown, this alternative would focus future growth away from rural areas and closer to existing and planned job centers and public facilities. Because of the limited geography within this area and because the County would not prohibit development of properties outside of the fire safe and VMT efficient overlay, it is assumed for the purpose of this analysis that half of the growth that would have occurred outside of the overlay would instead be developed in these areas. Further, it is assumed that all measures and actions in the CAP Update would be implemented.

[4] This alternative only includes VMT efficient areas that are 15 percent below the regional average. It does not include other areas or opportunities to screen from VMT analysis available in the County's Transportation Study Guide for other project types (e.g., locally serving retail and small projects).

Comparison to the Effects of the CAP Update

The intent of this alternative is to address the effects of development that is anticipated based on the land use plan in the adopted General Plan and promote a pattern of development that further reduces VMT and resultant GHG emissions. Because this alternative would not affect implementation of the CAP Update measures and actions, the effects of implementing the CAP Update relative to the topics addressed in Sections 2.1 through 2.15 of this ~~draft~~ SEIR would not be affected by implementation of this smart growth alternative, and the analysis of this alternative is focused on transportation (VMT), wildfire hazards, and GHG impacts. While the revised geographic distribution of growth under this alternative would result in other types of impacts not originally anticipated in the 2011 GPU PEIR, such as potential effects related to aesthetics, agriculture, and public services and utilities, these effects are specific to locations where development would be shifted and, other than at a large scale, the new locations of development would need to be determined. Further, the differences in land-based impacts are comparative to the 2011 GPU itself, for which the CAP Update is a mitigation. Practically, the CAP Update is not a land use plan—it imposes measures and actions on the adopted General Plan land use plan; and this alternative requires consideration of the General Plan itself. Consequently, it is speculative to consider the relative impacts of land use plans, for which the CAP Update does not control and are not the subject of the CAP Update. These impacts would need to be assessed under subsequent CEQA analysis addressing amendments to the land use plan for the General Plan. Therefore, the potential for environmental effects would be substantially similar to the proposed CAP Update and these resources are not discussed in detail below.

The proposed CAP Update includes strategies to address climate change and reduce VMT that are anticipated to result in co-benefits of reducing effects on transportation and on wildfire hazards. As described in Section 2.13, “Transportation,” and Section 2.15, “Wildfire,” in this SEIR, the CAP Update would not result in new or more severe impacts than implementation of the General Plan alone. This alternative was developed through stakeholder outreach to address effects of growth under the adopted General Plan.

Most of the VMT anticipated through 2050 in the plan area occurs under existing conditions and would be relatively unchanged by the development pattern of future growth. Only minor decreases in VMT associated with the existing population are expected due to the DS 39 modeling assumptions (see CAP Update Appendix 3). If implemented, this alternative is anticipated to reduce VMT for new development by 6.6 percent in 2035 and 3.0 percent in 2050. This represents a substantial VMT reduction for new growth. However, when viewed in conjunction with existing development, the magnitude of overall VMT reduction is relatively small because the vast majority of unincorporated county VMT under future year alternatives can be attributed to existing land uses. Overall, the Fire Safe and VMT Efficient Alternative would result in a 0.53 percent reduction in unincorporated county VMT for 2035 and a 0.41 percent reduction in unincorporated county VMT for 2050 (see Appendix C for detailed modeling results). Associated minor reductions in air and GHG emissions are also expected to occur under this alternative.

Under this alternative, VMT per employee is anticipated to be the same as forecast for development without the alternative; 23.9 in 2035 and 24.5 in 2050. VMT per resident in the unincorporated county would decrease slightly in the 2035 forecast from 27.4 to 27.2 but would be the same in 2050 (27.7). Overall, this would be a 0.53 percent reduction in VMT compared to the adopted General Plan in 2035 and a 0.41 percent reduction in VMT compared to the adopted General Plan in 2050. Therefore, although this alternative would reduce VMT from new development, the magnitude of ~~is not expected to meaningfully reduce~~ VMT or GHG emissions reductions in the unincorporated county would be much smaller when all VMT in the future condition is considered.

5.5.3.2 Village Support Areas Alternative

Smart growth concepts focus growth in compact areas close to jobs, services, and public facilities to maximize the use of existing infrastructure and preserve open space and natural resources. This alternative builds on the Villages established in the adopted General Plan. The Village regional category, which allows the most intensive land uses in the unincorporated county under the adopted General Plan, facilitates the use of compact development patterns. Villages that contain a mix of land uses encourage strong neighborhoods and contribute to meeting a community's daily commercial, civic, and social needs.

Through implementation of the adopted General Plan, the County has identified unforeseen barriers to redevelopment of the Villages. To spur redevelopment in the Villages and create a synergy for smart growth, this alternative would establish 0.5-mile buffers around the established Villages, referred to as Village Support Areas, wherein housing development and services to support development in the Villages would be encouraged (see Figure 5-2). New development can facilitate the achievement of these objectives and enhance the vitality and livability of existing Villages. It is important that new development in Villages be compatible with and connect to the surrounding area. The Village Support Areas Alternative would promote compatible and connected growth in the Village Support Areas to realize the planned densities in the Villages. Figures 5-2a through 5-2j illustrate the relationship between the existing Villages Village Support Areas, existing services, and planned employment centers in the county.

Because Village development will occur as infill or redevelopment, compatibility takes on a greater scope, accounting for the immediately surrounding area as well as the overall character of the Village. Connections are also important to support a Village that has vitality and mobility. Goal LU-9 and the supporting policies in the General Plan were established to realize the smart growth vision of the Village concept, and implementation of these policies was evaluated in the 2011 GPU PEIR. This alternative would also be compatible with General Plan Policy LU-1.4, which establishes that a new Village Regional Category may be developed for land that is contiguous with existing or planned Villages where such land uses are compatible with environmental constraints, accommodated by the General Plan roadway network, supported by public facilities and services, and consistent with orderly growth of the Village.

As with the other smart growth alternatives discussed in this SEIR, this alternative would be implemented through a zoning overlay and development incentives. Supporting efforts are also assumed to include transit and connectivity improvements between the Villages and Village Support Areas. Further, it is assumed that all measures and actions in the CAP Update would be implemented as proposed.

Comparison to the Effects of the CAP Update

The intent of this alternative is to address the effects of development that is anticipated based on the land use plan in the adopted General Plan and promote a pattern of development that reduces VMT and resultant GHG emissions. Because this alternative would not affect implementation of the CAP Update measures and actions, the effects of implementing the CAP Update relative to the topics addressed in Sections 2.1 through 2.15 of this ~~draft~~ SEIR would not be affected by implementation of this smart growth alternative, and the analysis of this alternative is focused on transportation (VMT) and GHG impacts. While the revised geographic distribution of growth under this alternative would result in other types of impacts that differ from those disclosed in the 2011 GPU PEIR, such as potential effects related to aesthetics, agriculture, and public services and utilities, these impacts would need to be assessed under subsequent CEQA analysis for the same reasons explained in Section 5.5.3.1. Therefore, the potential for environmental effects would be substantially similar to the proposed CAP Update and these resources are not discussed in detail below.

Most of the VMT anticipated through 2050 in the plan area occurs under existing conditions and would be relatively unchanged by the development pattern of future growth. Only minor decreases in VMT associated with the existing population are expected due to the DS 39 modeling assumptions. For the purpose of analysis, new households assumed in the CAP Update modeling were adjusted to assume location in Village Support Areas within their original Community Plan Area in randomized process weighted to ensure approximately equal growth in density across a Village Support Area. Densities within the Villages were not changed from the established assumptions for growth under the General Plan. Based on this modeling, the Village Support Areas Alternative is anticipated to reduce VMT for new development by 1.0 percent in 2035 and 0.3 percent in 2050. If the modeling were refined to assign growth into specific Village Support Areas closer to incorporated cities, greater VMT reductions would be anticipated; however, because the location of future growth under the Village Support Areas concept would be within 0.5-mile of any Village, redistribution of growth within Community Plan Areas provides a reasonable assumption to inform analysis. Further, while the change in location reduces trip lengths associated with the relocated households, it may not change the likelihood to use transit, to use alternative modes of transportation, or to commute a long distance to work using a personal vehicle. Note also that no employment changes associated with non-residential development were assumed in the modeling. Therefore, the modeling reflects the highest VMT outcomes since it does not capture the typical benefits associated with mixed-use developments and neighborhood serving retail and focuses only on growth in housing units (Fehr & Peers 2023).

When viewed in conjunction with existing development, the magnitude of overall VMT reduction is relatively small because the vast majority of unincorporated county VMT under future year alternatives can be attributed to existing land uses. Overall, the Village Support Areas Alternative would result in a 0.08 percent reduction in unincorporated county VMT for 2035 and a 0.04 percent reduction in unincorporated county VMT for 2050 (Fehr & Peers 2023).

Under this alternative, VMT per employee is anticipated to be 23.9 in 2035 and 24.5 in 2050, and VMT per resident in the unincorporated county would be 27.4 in 2035 and 27.7 in 2050. This is the same as the forecast VMT under the General Plan without implementation of the Village Support Areas Alternative. Overall, this would be a 0.08 percent reduction in VMT compared to the adopted General Plan in 2035 and a 0.04 percent reduction in VMT compared to the adopted General Plan in 2050. Therefore, this alternative is not expected to meaningfully reduce VMT or associated GHG emissions in the unincorporated county.

5.5.3.3 Sustainable Communities Strategy Alternative

In the Regional Plan, SANDAG has identified strategies that generally align with and encourage smart growth development. The Regional Plan incorporates smart growth planning concepts into a regional growth pattern focused around “Mobility Hubs.” Mobility Hubs are envisioned as places of activity where capital transportation investment will support future housing and jobs, and encompass areas that are both within incorporated city boundaries and within the unincorporated county. Future capital investment in Mobility Hubs, as identified by the Regional Plan, would include: “transit leap” (i.e., improvements on transit accessibility an efficiency); “complete corridors” (i.e., network investments to improve efficiency of all transportation types); investment in alternative transportation options that provide last-mile connections to transit centers; and improvements to technology and communication systems. The Sustainable Communities Strategy Alternative would focus growth in the portions of the Mobily Hubs that are in the unincorporated county (see Figure 5-3). The land use map established in the Regional Plan, which is the basis of the Sustainable Communities Strategy Alternative, and other data related to public services and employment are provided as Figures and 5-3a through 5-3j.

The adopted SANDAG 2021 Regional Plan assumes 9,902 new households in the unincorporated County between the base year (2016) and 2050 (with almost all of the growth occurring between the base year and 2035). Additionally, implementation of the Road User Charge is assumed in the transportation modeling currently available from SANDAG and was captured in this analysis because the 2021 Regional Plan version of the model includes the Road User Charge as a funding source for the Regional Plan. The Road User Charge directly affects auto operating costs; therefore, including the Road User Charge results in lower VMT forecasts in the Regional Plan than scenarios without the Road User Charge.

However, the SANDAG Board voted on September 22, 2023 against including the Road User Charge in the 2025 Regional Plan. On September 23, 2022 the SANDAG Board directed SANDAG staff to prepare an amendment to the 2021 Regional Plan without the

Road User Charge. The SANDAG Board of Directors adopted the proposed amendment on October 13, 2023. The 2021 Regional Plan includes other policy and transportation network assumptions beyond the Road User Charge that further result in lower VMT, and many of these assumptions rely upon public vote, funding, or SANDAG Board actions. Therefore, this scenario does not represent reasonably foreseeable land use, transportation policy/network, and VMT under the County's adopted General Plan.

If the Board were to adopt a smart growth alternative that would aspire to achieve development outcomes in alignment with the SANDAG Regional Plan Mobility Hub framework, a broader and more comprehensive set of General Plan land use map and Zoning Ordinance changes would be required that mirrors the program described in the Regional Plan because the incentives described above may not be sufficient to result in conformity. In this case, the Board would likely be considering both up-planning in areas around the SANDAG Mobility Hubs and down-planning in areas outside of those locations. This would require a more comprehensive update to the General Plan due to the large geographic scope of land use map changes and scale of community engagement required. It is assumed that all measures and actions in the CAP Update would be implemented as proposed.

Comparison to the Effects of the CAP Update

The intent of this alternative is to address the effects of development that is anticipated based on the land use plan in the adopted General Plan and promote a pattern of development that reduces VMT and resultant GHG emissions. Because this alternative would not affect implementation of the CAP Update measures and actions, the effects of implementing the CAP Update relative to the topics addressed in Sections 2.1 through 2.15 of this ~~draft~~ SEIR would not be affected by implementation of this smart growth alternative, and the analysis of this alternative is focused on transportation (VMT) and GHG impacts. While the revised geographic distribution of growth under this alternative would result in changes to other types of impacts that differ from those disclosed in the 2011 GPU PEIR, such as potential effects related to aesthetics, agriculture, and public services and utilities, these impacts would need to be assessed under subsequent CEQA analysis for the same reasons explained in Section 5.5.3.1. Therefore, the potential for environmental effects would be substantially similar to the proposed CAP Update and these resources are not discussed in detail below.

The Sustainable Community Strategy Alternative results in a reduction in VMT compared to the proposed CAP Update as a result of a much smaller growth in households in the unincorporated county, inclusion of the Road User Charge, and significant investments and policy changes related to the transportation network (such as SANDAG's 5-Big Moves which are part of the 2021 Regional Plan). The transportation network policies and network changes included in the Sustainable Community Strategy Alternative result in substantial transportation mode shifts to transit, active transportation, and reduced driving in general. Unlike the Fire Safe and VMT Efficient Alternative and the Village Support Areas Alternative, which were modeled using the same DS 39 SANDAG model as the CAP Update, the modeling for the Sustainable Communities Strategy Alternative reflects

policy assumptions that result in large shifts in the existing population's travel choices (Fehr & Peers 2023).

Under this alternative, VMT per employee is anticipated to be 20.8 in 2035 (compared to 23.9 under the General Plan without this alternative) and 20.2 in 2050 (compared to 24.5 under the General Plan without this alternative). VMT per resident in the unincorporated county would decrease from 27.4 under the General Plan without this alternative to 25.7 in 2035 and from 27.7 under the General Plan without this alternative to 25.5 in 2050. Overall, this would be a 7.71 percent reduction in VMT compared to the adopted General Plan in 2035 and a 9.48 percent reduction in VMT compared to the adopted General Plan in 2050.

As noted above, this alternative is assumed to substantially reduce GHG emissions associated with VMT in the unincorporated county compared to the General Plan. However, as discussed above, the total VMT reductions are based on the Regional Plan's premise of a distribution of growth within Mobility Hubs that encompass areas outside of the unincorporated county, which are outside the County's control. Further, the Road User Charge, which results in lower VMT forecasts in the Regional Plan than scenarios without the Road User Charge, has been removed from the Regional Plan. Therefore, the actual VMT reductions achieved under this alternative may be less than modeled for the purposes of this analysis.

5.5.3.4 General Plan Goal and Policy Edits

In addition to, or in lieu of, any of the alternatives described above, County staff have identified potential amendments to General Plan goals and policies from the Land Use, Conservation and Open Space, Mobility, and Safety Elements of the adopted General Plan that would further enhance the smart growth principles described above and embodied in the General Plan. The Board may choose some or all of these additional policy amendments and pair them with the proposed CAP Update or an alternative. These amendments would be in addition to project amendments to Goal COS-20, Policy COS-20.1, and GPU PEIR Mitigation Measures CC-1.2, CC-1.7, and CC-1.8.). See Table 5-1 below for edits to General Plan goals and policies.

Comparison to the Effects of the CAP Update

The intent of this alternative is to address the effects of development that is anticipated based on the land use plan in the adopted General Plan and promote a pattern of development that reduces VMT and resultant GHG emissions. Because this alternative would not affect implementation of the CAP Update measures and actions, the effects of implementing the CAP Update relative to the topics addressed in Sections 2.1 through 2.15 of this ~~draft~~ SEIR would not be affected by the proposed General Plan goal and policy edits, and the analysis of this alternative is focused on transportation (VMT) and GHG impacts, as well as other impacts such as groundwater, biological resources, and wildfire. While the revised goals and policies under this alternative would result in some impacts that differ from those disclosed the 2011 GPU PEIR because goals and policies therein would be amended, the majority of these potential amendments would result in beneficial outcomes throughout the unincorporated county. However, these impacts

would need to be assessed under subsequent CEQA analysis if the Board directs staff to return at a future date with amendments to goals and policies. The potential for environmental effects would be substantially similar to the proposed CAP Update and resources are not discussed in detail below.

In addition, this alternative includes amendments to goals and policies and addition of new goal and policies that would require certain processes and findings in order to limit impacts of General Plan amendments (e.g., Goal LU-19 and Policy LU-19.1 and LU-19.2). These amendments would reduce the potential impacts of General Plan amendments in the future if adopted.

5.6 Alternatives Evaluated in the 2011 GPU PEIR

This SEIR incorporates by reference the prior alternatives analysis in the 2011 GPU PEIR, which are additional land use alternatives aimed at achieving smart growth. Like the other smart growth alternatives evaluated in this SEIR, these alternatives would require subsequent planning efforts to implement because they would substantially change implementation of the adopted General Plan land use map. The 2011 GPU PEIR provides a detailed evaluation of alternative land use maps identified by County staff to further the discussion of smart growth principles and reduce the environmental effects of the General Plan. The Hybrid Map, Draft Land Use Map, and Environmentally Superior Map alternatives were all found to potentially reduce the global climate change-related impacts of the General Plan, although impacts are assumed to remain significant prior to mitigation. These alternatives are summarized below.

Hybrid Map Alternative. The Hybrid Map Alternative, shown in Figure 4-1 of the 2011 GPU PEIR, strikes a balance between the proposed project and the Draft Land Use Map Alternative. It includes RHNA refinements, road network land use changes, and other refinements to the proposed project. It also incorporates the proposed project changes that meet the project objectives and reflects the policy direction of the General Plan Update Elements. The Hybrid Map Alternative would decrease the countywide acreage of the following land uses, as compared to the proposed project: village residential (-487 acres); semi-rural residential (-11,717 acres); specific plan area (-683 acres); commercial (-325 acres); and industrial (-189 acres). When compared to the adopted General Plan, the Hybrid Map Alternative would increase the acreage of the rural land use designations (+13,672). The Hybrid Map Alternative would result in significantly less acres of semi-rural residential land uses and significantly more acres designated for rural lands than the adopted General Plan.

When compared to the adopted General Plan, the Hybrid Map Alternative would accommodate less growth and development in the unincorporated county, which would translate to less GHG emissions from community and government operations. Additionally, the Hybrid Map Alternative would result in less VMT than the adopted General Plan, which would translate into less GHG emissions from transportation.

Draft Land Use Map Alternative. The Draft Land Use Map Alternative, shown in Figure 4-2 of the 2011 GPU PEIR, was initially endorsed by the Board during the residential land use mapping phase in October 2003, and was subsequently endorsed after refinements were made in June 2004, May 2005, and August 2006. County staff included additional land use modifications in this alternative to achieve a road network that would better accommodate the land use map. The Draft Land Use Map Alternative transitions from the Hybrid Map Alternative with further reductions in densities and intensities for certain properties.

This alternative would decrease the acreage of the following land uses, as compared to the adopted General Plan: village residential (-514 acres); semi-rural residential (-15,313 acres); specific plan area (-683 acres); commercial (-344 acres); industrial (-266 acres); and village core mixed use (-12 acres). When compared to the proposed project, the Draft Land Use Map Alternative would increase the acreage of the following land use designations: rural lands (+17,198) and office professional (+18 acres). The Draft Land Use Map Alternative would result in significantly less acres of semi-rural residential and significantly more acres of rural lands designations, than the adopted General Plan.

The Draft Land Use Map Alternative would accommodate less growth and development in the unincorporated county, which would translate to less GHG emissions from community and government operations. Additionally, the Draft Land Use Map Alternative would result in less VMT than the adopted General Plan, which would translate to less GHG emissions from transportation.

Environmentally Superior Map Alternative. The Environmentally Superior Map Alternative, shown in Figure 4-3 of the 2011 GPU PEIR, reflects a more stringent application of the planning concepts that take into account environmental considerations and constraints, and is more aggressive in restricting growth in portions of the semi-rural residential and the rural lands designations. The Environmentally Superior Map Alternative was developed in response to the areas of significant impacts that were identified for the adopted General Plan, where changes in land use designations would have the potential to reduce or alleviate the impact. The Environmentally Superior Map Alternative would result in significantly less acres of semirural residential land uses and significantly more acres of rural lands than the proposed project. the environmental impacts under the Environmentally Superior Map Alternative would be less than Hybrid Map Alternative.

The Environmentally Superior Map Alternative would accommodate less growth and development in the unincorporated County, which would translate to less GHG emissions from community and government operations. Additionally, the Environmentally Superior Map Alternative would result in less VMT than the adopted General Plan, which would translate to less GHG emissions from transportation.

5.7 Environmentally Superior Alternative

Table 5-2 provides a qualitative summary of the environmental effects of the alternatives evaluated above in comparison to the effects of the CAP Update to identify the environmentally superior alternative. As described above, the No Project Alternative would not meet any of the project objectives of the CAP Update and would result in greater GHG emissions. Impacts to other resources are assumed to be similar or reduced for the purpose of this evaluation, but actual impacts of project-specific mitigation, which would continue to be imposed on a project-by-project basis for development consistent with the adopted General Plan to address GHG emissions, may result in impacts beyond the scope of this analysis. Therefore, the reduction in impacts under the No Project Alternative identified in Table 5-2 may not fully reflect the magnitude of cumulative impacts because future development would not be able to rely on the CAP and the County would not have a plan for reduction of GHGs to meet the state targets for 2030 and 2045. Due to this uncertainty, the No Project Alternative may not be environmentally superior to the CAP Update. CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify an environmentally superior alternative other than the No Project Alternative.

Of the smart growth alternatives, the Fire Safe and VMT Efficient Alternative, Village Support Areas Alternative, and General Plan Policy Edits Alternative would not reduce the impacts of CAP Update implementation; as such they are not considered environmentally superior to the CAP Update.

Based on available modeling, the Sustainable Communities Strategy Alternative would result in greater GHG emission reductions and less VMT than the CAP Update alone. However, as described above, this modeling assumes a shift in existing travel behavior based on a Road User Charge. SANDAG is reconsidering the feasibility of such a charge and the benefits of the Sustainable Communities Strategy Alternative may be reduced without this assumption.

Based on review of the other alternatives considered, the County has determined that the Distributed Energy Only Alternative would be environmentally superior to the project because it would reduce significant and unavoidable impacts related to the induced demand for large-scale renewable energy systems while potentially achieving both the primary objective of GHG emissions reductions consistent with SB 32, AB 1279, and all other supporting project objectives.

Table 5-1 Potential Amendments to General Plan Policies

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Policy LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, ~~and~~ that are designed to meet the LEED-Neighborhood Development Certification or an equivalent~~.~~, and that do not frustrate the County's climate policies implementing General Plan Goals LU-5 (Climate Change and Land Use) and LU-6 (Sustainable Development-Environmental Balance). For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. *[See applicable community plan for possible relevant policies.]*
Policy LU-1.4 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met: • Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding • Potential Village development would be accommodated by the General Plan road network • Public facilities and services can support the expansion without a reduction of services to other County residents • The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area • The expansion would not frustrate the County's climate policies implementing General Plan Goals LU-5 (Climate Change and Land Use) and LU-6 (Sustainable Development-Environmental Balance) • Any expansion within a Very High Fire Hazard Severity Zone would not subject future residents, occupants, and structures to high levels of risk of loss of life or loss of structures
Policy LU-1.5 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands~~.~~, except where such adjustments would result in land use patterns consistent with the County's climate policies implementing General Plan Goals LU-5 (Climate Change and Land Use) and LU-6 (Sustainable Development-Environmental Balance). Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.

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GOAL LU-4. Inter-jurisdictional Coordination. Coordination with the plans and activities of other agencies and tribal governments that relate to issues such as land use, community character, transportation, energy, other infrastructure, public safety, climate policy, and resource conservation and management in the unincorporated County and the region.
Policy LU-4.1 Regional Planning. Participate in regional planning to ensure that the unique communities, assets, and challenges of the unincorporated lands are appropriately addressed with the implementation of the planning principles and land use requirements, including the provisions of SB375~~.~~, (Stats. 2008, ch. 728), SB 743 (Stats. 2013, ch.386, § 5), and SB32 (Stats. 2016, ch. 249).
Policy LU-4.6 Planning for Adequate Energy Facilities. Participate in the planning of regional renewable energy infrastructure with applicable utility providers to ensure plans are consistent with the County's General Plan and Community Plans and minimize adverse impacts to the unincorporated County.
Policy LU-5.1 Reduction of Greenhouse Gas Emissions from Vehicle Trips within Communities~~.~~ and Vehicle Miles Traveled from New and Existing Development. Incorporate a mixture of uses within Villages and Rural Villages and plan residential densities at a level that supports multi-modal transportation, including walking, bicycling, ~~and~~ the use of public transit, when appropriate, and the use of electric vehicles. Develop and implement strategies to avoid, minimize, reduce, and/or compensate for the greenhouse gas emissions associated with vehicle miles traveled from new development, including compensatory strategies that would fund reductions in greenhouse gas emissions from existing development and existing economic activities. Include *in-County* compensatory strategies such as improved energy and water conservation, increased reliance on large- and small-scale renewable energy, enhanced electric vehicle recharging infrastructure, reductions in propane usage in rural areas, replacement of diesel- and gasoline-powered equipment and vehicles, landscape restoration and enhancement (e.g., tree-planting), preservation and enhancement of open space and rural lands to maintain or increase carbon sequestration, and other outcomes that reduce fossil fuel usage, reduce biomass combustion, and/or sequester carbon. In unincorporated areas where new development would lead to comparatively high per capita vehicle miles traveled, maximize to the extent feasible the use of electric vehicles and require construction of electric vehicle recharging infrastructure.
Policy LU-5.2 Sustainable Planning and Design. Incorporate into new development sustainable planning and design~~.~~, including measures that reduce the carbon footprint of new development to the maximum extent feasible on-site and facilitate the use of public transit and/or electric vehicles.
Policy LU-5.3 Rural Land Preservation. Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi Rural Land Use Designations. Consider

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strategies to use the preservation, restoration, and/or enhancement of open space and rural lands for carbon sequestration purposes. Encourage and support the management of public and private open space and rural lands so as to reduce the risk of uncontrolled wildfires with the potential to release large amounts of greenhouse gases.
Policy LU-5.4 Planning Support. Undertake planning efforts that promote infill and redevelopment of uses that accommodate walking ~~and biking~~, biking, transit usage, and electrical vehicle usage within communities.
Policy LU-5.6 Develop Mechanisms for Avoiding Potential Regulatory Takings Where Development is Restricted to Achieve Greenhouse Gas Emissions Targets. In consultation with SANDAG, cities within the County, the public at large, and key stakeholders such as business leaders, land developers, rural property owners, environmental organizations, and environmental justice advocates, develop and implement strategies for providing economic compensation to private landowners where the County restricts or limits the amount of development pursuant to their existing General Plan and zoning designation in order toto achieve greenhouse gas emissions reductions consistent with State law and County General Plan policy. Explore the use of compensation mechanisms such as transferrable development rights, density transfers, density bonuses beyond those already permitted under State law, property tax reductions, compensated down-zonings, and subsidized permanent land conservation for carbon sequestration purposes.
GOAL LU-6. Sustainable Development-Environmental Balance. A carbon neutral built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities.
Policy LU-6.1 Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment~~.~~, including achieving greenhouse gas emissions reductions consistent with State law and County General Plan policy.
Policy LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources~~.~~; consider strategies to reduce planned density in areas in which new development would lead to comparatively high per capita vehicle miles traveled, and Very High Fire Hazard Severity Zones.
Policy LU-6.3 Conservation-Oriented Project Design. Support conservation-oriented project design~~. This~~that, to the maximum extent feasible, protects sensitive biological resources, reduces on-site greenhouse gas emissions, minimizes water usage, and reduces potential losses of life and property associated with wildfires. These outcomes can be achieved with mechanisms such as, but not limited to, Specific Plans, lot area averaging, and reductions in lot size with corresponding requirements for preserved open space (Planned Residential Developments)~~.~~ and design strategies such as resource buffers, renewable energy, energy efficiency and/or electrification, water conservation, collection and reuse features and fire hardening.

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Projects that rely on lot size reductions should incorporate specific design techniques, perimeter lot sizes, or buffers, to achieve compatibility with community character. *[See applicable community plan for possible relevant policies.]*
Policy LU-6.4 Sustainable Subdivision Design. Require that residential subdivisions be planned to reduce on-site greenhouse gas emissions to the maximum extent feasible, conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities. *[See applicable community plan for possible relevant policies.]*
Policy LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas. Require construction practices (e.g., "hardened homes") and landscaping strategies in Very High Fire Hazard Severity Zones that minimize the possibility of loss of life and structures from wildfires consistent with the Safety Element.
Policy LU-8.1 Density Relationship to Groundwater Sustainability. Require land use densities resulting from new development in groundwater dependent areas ~~to~~ be consistent with the long-term sustainability of groundwater supplies~~, except~~. Prohibit new subdivisions and other new discretionary development approvals in groundwater dependent areas when determined that long-term sustainability of groundwater supplies to the ~~Borrego Valley~~ development is not feasible.
Policy LU-8.2 Groundwater Resources. Require development to identify adequate groundwater resources in groundwater dependent areas, as follows: • In areas dependent on currently identified groundwater overdrafted basins, prohibit new development from exacerbating overdraft conditions. Encourage programs to alleviate overdraft conditions in Borrego Valley. • In areas without current overdraft groundwater conditions, evaluate new groundwater-dependent development to assure a sustainable long-term supply of groundwater is available that will not adversely impact existing groundwater users. • Prior to approving any tentative subdivision map for a residential project or any discretionary regulatory approval such as a use permit for a nonresidential project, require a finding that the resulting development or use will not cause any of the following "undesirable results" as defined in the Sustainable Groundwater Management Act: ◦ Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply if continued over the General Plan planning horizon; ◦ Significant and unreasonable reduction of groundwater storage;

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○ Significant and unreasonable seawater intrusion; ○ Significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies; ○ Significant and unreasonable land subsidence that substantially interferes with surface land uses; ○ Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water.
Policy LU-11.6 Office Development. Locate new office development complexes within Village areas where services are available, in proximity to housing, and along primary vehicular arterials (ideally with transit access) with internal vehicular and pedestrian linkages that integrate the new development into the multi-modal transportation network where feasible. Require parking facilities to include electrical vehicle recharging stations commensurate with current and reasonably foreseeable increasing demands over time.
Policy LU-11.8 Permitted Secondary Uses. Provide a process where secondary land uses, including residential uses, may be permitted when appropriate and compatible with the primary commercial, office, and light industrial uses, in order to better serve the daily needs of employees and to reduce the frequency of related automobile trips. This policy is not intended for high impact industrial uses.
Policy LU-11.12 Plan for Mixed Uses. Consider land use designations and zoning standards that allow for the conversion from office and commercial uses to residential uses where office or commercial space has become uncompetitive due to market conditions or other factors and where residential uses would be both compatible with surrounding land uses and consistent with the County's climate policies implementing General Plan Goals LU-5 (Climate Change and Land Use) and LU-6 (Sustainable Development-Environmental Balance).
GOAL LU-12. Infrastructure and Services Supporting Development. Adequate and sustainable infrastructure, public facilities, and essential services that meet community needs and are provided concurrent with growth and development. Facilitate the creation and expansion of electric vehicle recharging infrastructure in response to, and anticipation of, increases in the numbers of electric vehicles being used in the County, consistent with State transportation and climate policies.
Policy LU-12.1 Concurrency of Infrastructure and Services with Development. Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing. Require electric vehicle recharging facilities that meet current and reasonably foreseeable demand over time as the County's vehicle fleet includes greater numbers of electric vehicles, consistent with State transportation and climate policies.
GOAL LU-~~14~~19. Limit the environmental impacts, including greenhouse gas emissions, resulting from General Plan Amendments that would either allow development where it

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is currently disallowed or increase the density or intensity of use beyond currently planned levels, while ensuring that the County can meet its share of the housing needed on a regional basis, as determined through the Regional Housing Needs Assessment process overseen by the San Diego Association of Governments (SANDAG).
Policy LU-19.1 Environmental Review. The environmental review for any privately-initiated development plan or project proposing a general plan amendment (GPA) that would either allow development where it is currently disallowed or increase the density or intensity of use beyond currently planned levels outside "smart growth" areas designated by the Board shall consist of an Environmental Impact Report (EIR) and shall address the following subjects, in addition to those required by the California Environmental Quality Act (CEQA): (i) How the project would achieve net carbon neutrality compared with a scenario in which the proposed project would be disapproved (i.e., under the CEQA No Project Alternative), including the extent to which the project would: • Minimize energy and water consumption; • Rely on strategies such as enhancing electric vehicle recharging infrastructure, reducing propane usage in rural areas, replacing diesel- and gasoline-powered equipment and vehicles, restoring or enhancing open space or rural lands (e.g., tree-planting), preserving or enhancing open space and rural lands to maintain or increase carbon sequestration, or achieving other outcomes that reduce fossil fuel usage, reduce biomass combustion, and/or sequester carbon; and/or • Eliminate or reduce the development potential of other lands planned for development under the General Plan through the use of conservation easements, similar measures resulting in the permanent preservation, management and enhancement of such lands, and/or compensation mechanisms such as transferrable development rights, density transfers, density bonuses beyond those already permitted under State law, property tax reductions, compensated down-zonings, and/or subsidized permanent land conservation for carbon sequestration purposes; (iv) Whether the affected public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing uses; (vi) Whether the project could cause any of the following "undesirable results" within the meaning of the Sustainable Groundwater Management Act: • Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply if continued over the General Plan planning horizon;

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• Significant and unreasonable reduction of groundwater storage; • Significant and unreasonable seawater intrusion; • Significant and unreasonable degraded water quality, including the migration of contaminant plumes that impair water supplies; • Significant and unreasonable land subsidence that substantially interferes with surface land uses; or • Depletions of interconnected surface water that have significant and unreasonable adverse impacts on beneficial uses of the surface water (vii) Whether the project would expose its residents, occupants, or other users or visitors to a risk of potentially life-threatening wildfires; (viii) How the project addresses, either positively or negatively, the County's need for new housing, and particularly affordable housing, consistent with the County's fair share of the housing needed on a regional basis, as determined through the Regional Housing Needs Assessment process overseen by SANDAG; or, for projects that do not produce housing, how the project would create jobs opportunities near existing housing and/ or transit.
Policy LU-19.2 Criteria for Approval. A privately-initiated development project proposing a general plan amendment (GPA) that would either allow development where it is currently disallowed or increase the density or intensity of use beyond currently allowed levels outside of "smart growth" areas designated by the Board requires the Board to make the following findings, which must each be supported by substantial evidence before the Board: (i) Compared with a scenario in which the proposed project would be disapproved (i.e., the CEQA No Project Alternative), the proposed project will achieve net carbon neutrality through mechanisms of the kind set forth in Policy 19.1(i); (ii) Compared with a scenario in which the proposed project would be disapproved (i.e., the CEQA No Project Alternative), the proposed project will contribute positively to meeting the County's housing needs by: (A) Appreciably increasing the overall housing stock in the unincorporated County, consistent with the County's fair share of the housing needed on a regional basis, as determined through the Regional Housing Needs Assessment process overseen by SANDAG; and (B) Providing a component of deed-restricted housing affordable to very low-income, low-income, or moderate-income households for 30 years; or (C) For projects that do not include housing, creating job opportunities near existing residential areas and/ or transit.

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(iii) Compared with the existing conditions baseline in the EIR for the proposed project, the proposed project will not result in significant, unavoidable effects on endangered or threatened species or on any sensitive natural community identified in a local or regional plan, policy, or regulation or by the California Department of Fish and Wildlife or US Fish and Wildlife Service; (iv) Compared with the existing conditions baseline in the EIR for the proposed project, the proposed project will not result in significant, unavoidable effects on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; (v) Compared with the existing conditions baseline in the EIR for the proposed project, the proposed project will not result in significant, unavoidable effects due to the exposure of people or structures (including project occupants or users), either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires; (vi) If located in or near a state responsibility area or lands classified as very high fire hazard severity zones, the proposed project has been designed to reduce and manage fire risk to the greatest degree feasible; (vii) The project can foreseeably be adequately supplied with water for the foreseeable future from a recognized water agency during normal, single dry, and multiple dry water years without compromising the County's ability to serve other existing and planned future land uses, including agricultural and manufacturing uses; and (viii) To the extent the project would rely in whole or in part on groundwater, the project will not cause an "undesirable result" as defined in the Sustainable Groundwater Management Act.
Policy COS-15.7 Develop Program to Retrofit Existing Buildings. Consistent with General Plan policies LU 5.1 and LU 19.1(i), develop greenhouse gas and vehicle miles traveled mitigation strategies for new development, in cooperation with other local jurisdictions as appropriate, such as programs that create funding for retrofitting existing buildings in order to reduce greenhouse gas emissions by improving their energy efficiency and reducing their water usage.
Policy COS-16.1 Alternative Transportation Modes. Work with SANDAG and local transportation agencies to expand opportunities for transit use~~.~~ and electric vehicle use. Support the development of alternative transportation modes and the creation of new and expanded electric vehicle recharging infrastructure, as provided by Mobility Element policies.
Policy COS-16.2 Single-Occupancy Vehicles. Support transportation management programs that reduce the use of single-occupancy vehicles, especially vehicles powered by fossil fuels.
Policy COS-16.3 Low-Emissions Vehicles and Equipment. Require County operations and encourage private development to provide incentives (such as priority parking) for the use of low- and zero-emission vehicles and equipment, including

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electric vehicle recharging infrastructure, to improve air quality and reduce GHG emissions. [Refer also to Policy M-9.3 (Preferred Parking) in the Mobility Element.]
Policy COS-16.4 Alternative Fuel Sources. Explore the potential of developing alternative fuel stations and electric vehicle recharging infrastructure at maintenance yards and other County facilities for the municipal fleet and general public.
Policy COS-18.4 Implement Community Choice Aggregation. Work with regional partners to implement a Community Choice Aggregation program by which the developed portions of the unincorporated area could be served with electricity made up entirely of carbon free energy resources.
Policy COS-19.3 Rainwater Capture and Reuse. Require rainwater capture and reuse in new development where feasible and consistent with the protection of downstream biological resources pursuant to Policy COS-5.3.
Policy COS-20.3 Regional Collaboration. Coordinate air quality and climate planning efforts with federal and State agencies, SANDAG, and other jurisdictions.
~~**GOAL**~~ **Policy COS-20.5 Carbon Neutrality.** Pursue carbon neutrality from community-wide (i.e., unincorporated County) and County Operations greenhouse gas emissions by 2045, consistent with local, state, and federal law (e.g., Assembly Bill 1279).
COS-20.6 Carbon Neutrality Collaboration. Coordinate efforts to achieve carbon neutrality with regional sustainability planning, universities, federal and State agencies, SANDAG, and other jurisdictions and organizations.
GOAL M-5. Safe and Efficient Multi-Modal Transportation System. A multi-modal transportation system that provides for the safe, accessible, convenient, ~~and~~ efficient, and sustainable movement of people and goods within the unincorporated County.
Policy M-5.1 Regional Coordination. Coordinate with regional planning agencies, transit agencies, and adjacent jurisdictions to provide a transportation system with the following: • Sufficient capacity consistent with the County General Plan Land Use Map • Travel choices, including multiple routes and modes of travel to provide the opportunity for reducing vehicle miles traveled and the use of electric vehicles • Facilities sited and designed to be compatible with the differing scales, intensities, and characteristics of the unincorporated communities while still accommodating regional, community, and neighborhood travel demands • Maximized efficiency to enhance connectivity between different modes of travel
Policy M-9.2 Transportation Demand Management. Require large commercial and office development to use TDM programs to reduce single-occupant vehicle traffic

LAND USE ELEMENT GOALS AND POLICIES
generation~~,~~ (especially vehicles powered by fossil fuels), particularly during peak periods to maximize the capacity of existing or improved road facilities.
Policy M-9.5 Electric Vehicle Recharging Infrastructure. Require new development to include electric vehicle recharging facilities to meet current and reasonably foreseeable increasing demand over time as the County's private vehicle fleet includes greater numbers of electric vehicles, consistent with State transportation and climate policies.
GOAL S-3. Minimized Fire Hazards. Minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards, particularly in Very High Fire Hazard Severity Zones, consistent with the Safety Element.
Policy S-3.1 Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires. Require new development in Very High Fire Hazard Severity Zones to employ construction practices (e.g., "hardened homes") and landscaping strategies that minimize the possibility of loss of life and structures from wildfires.
Policy S-3.8 Discourage New Subdivisions in Very High Fire Hazard Severity Zones. Discourage new residential subdivisions in Very High Fire Hazard Severity Zones, except as necessary to avoid regulatory takings and/or to maintain sufficient land to meet the County's fair share of the housing needed on a regional basis, as determined through the Regional Housing Needs Assessment process overseen by SANDAG.
Policy S-4.3 Forest Health. Encourage and support the protection and management of woodlands, forests, and tree resources on public and private lands and limit fire threat through appropriate fuel management such as prescribed burns, herbivory, and the removal of dead, dying, and diseased trees and excessive flammable underbrush.

Table 5-2 CAP Alternatives Comparison of Impacts

Issue Areas	CAP Significance Determination	*Alternatives to the Proposed Project*		*Smart Growth Alternatives*			
		No Project	Distributed Energy Only	Fire Safe and VMT Efficient	Village Support Areas	Sustainable Communities Strategy	General Plan Policy Edits
Aesthetics	SU	▼	▼	—	—	—	—
Agriculture and Forestry	SU	▼	▼	—	—	—	—
Air Quality	SU	▼	—	—	—	—	—
Biological Resources	SU	▼	▼	—	—	—	—
Cultural and Paleontological Resources	SU	▼	▼	—	—	—	—
Energy	LTS	▲	—	—	—	—	—
Environmental Justice	~~SU~~ LTS	▼	▼	—	—	—	—
Greenhouse Gas Emissions	LTS	▲	▲	—	—	▼	—
Hazards and Hazardous Materials	SU	—	—	—	—	—	—
Hydrology and Water Quality	SU	—	—	—	—	—	—
Land Use and Planning	SU	▼	▼	—	—	—	—
Noise	SU	▼	—	—	—	—	—
Transportation	SU	▲	—	—	—	▼	—
Tribal Cultural Resources	SU	▼	—	—	—	—	—
Wildfire	LTS	▼	▼	▼	—	—	—

▲ Alternative is likely to result in greater impacts to issue when compared to proposed project.
— Alternative is likely to result in similar impacts to issue when compared to proposed project.
▼ Alternative is likely to result in reduced impacts to issue when compared to proposed project.

LTS Less than Significant with mitigation measures
SU Potentially significant and unavoidable impact

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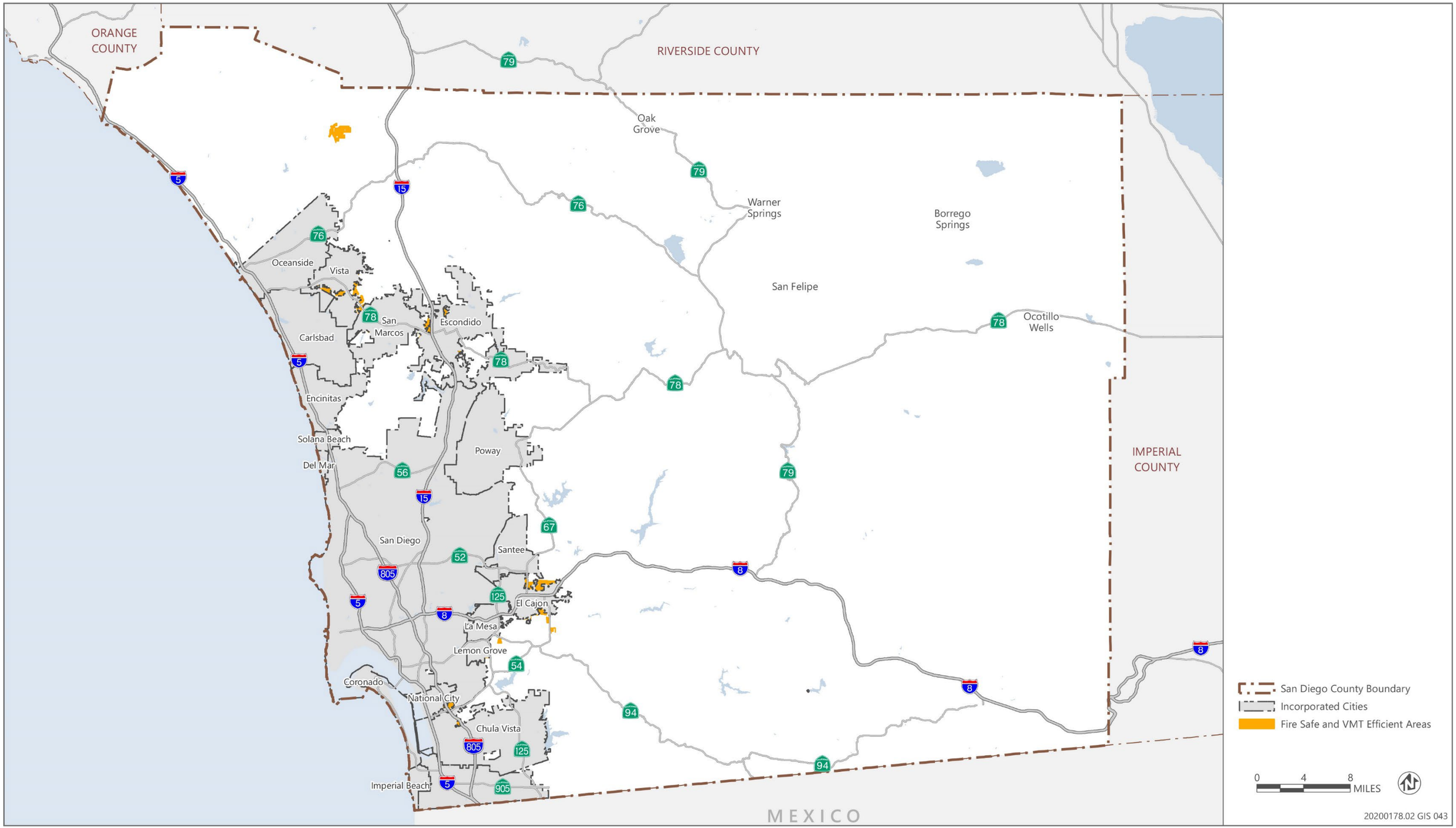
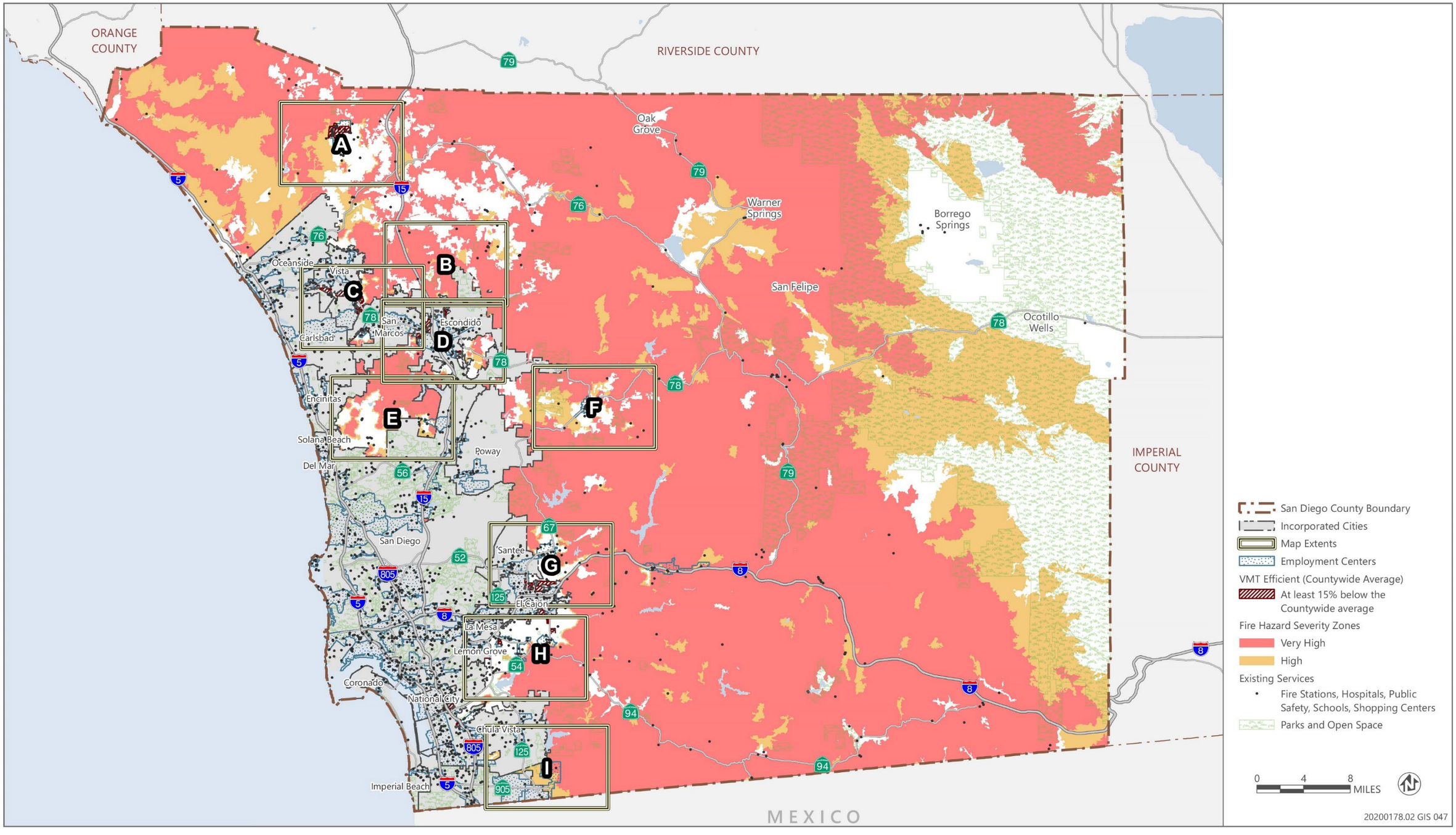


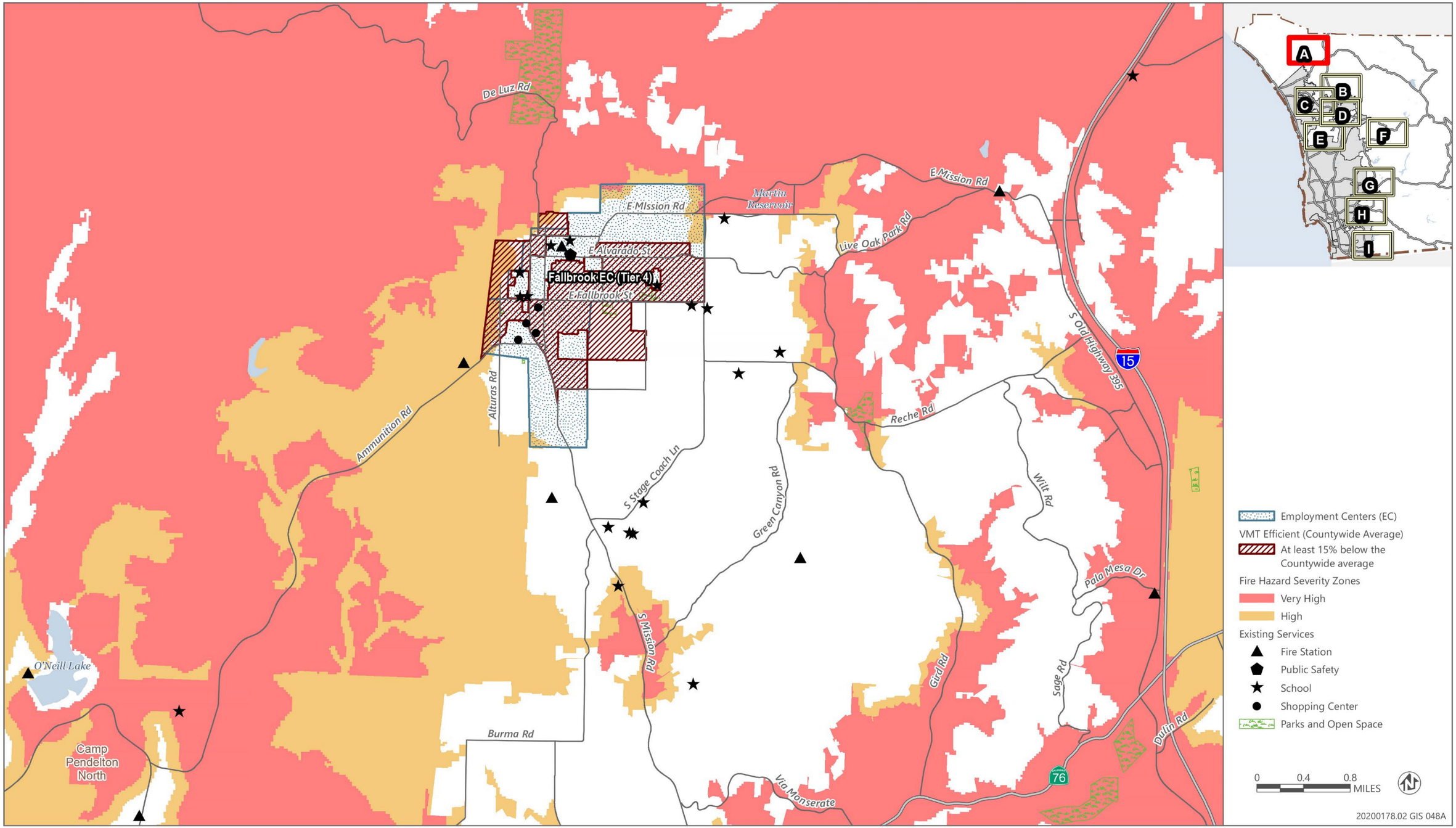
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1 Fire Safe and VMT Efficient Alternative



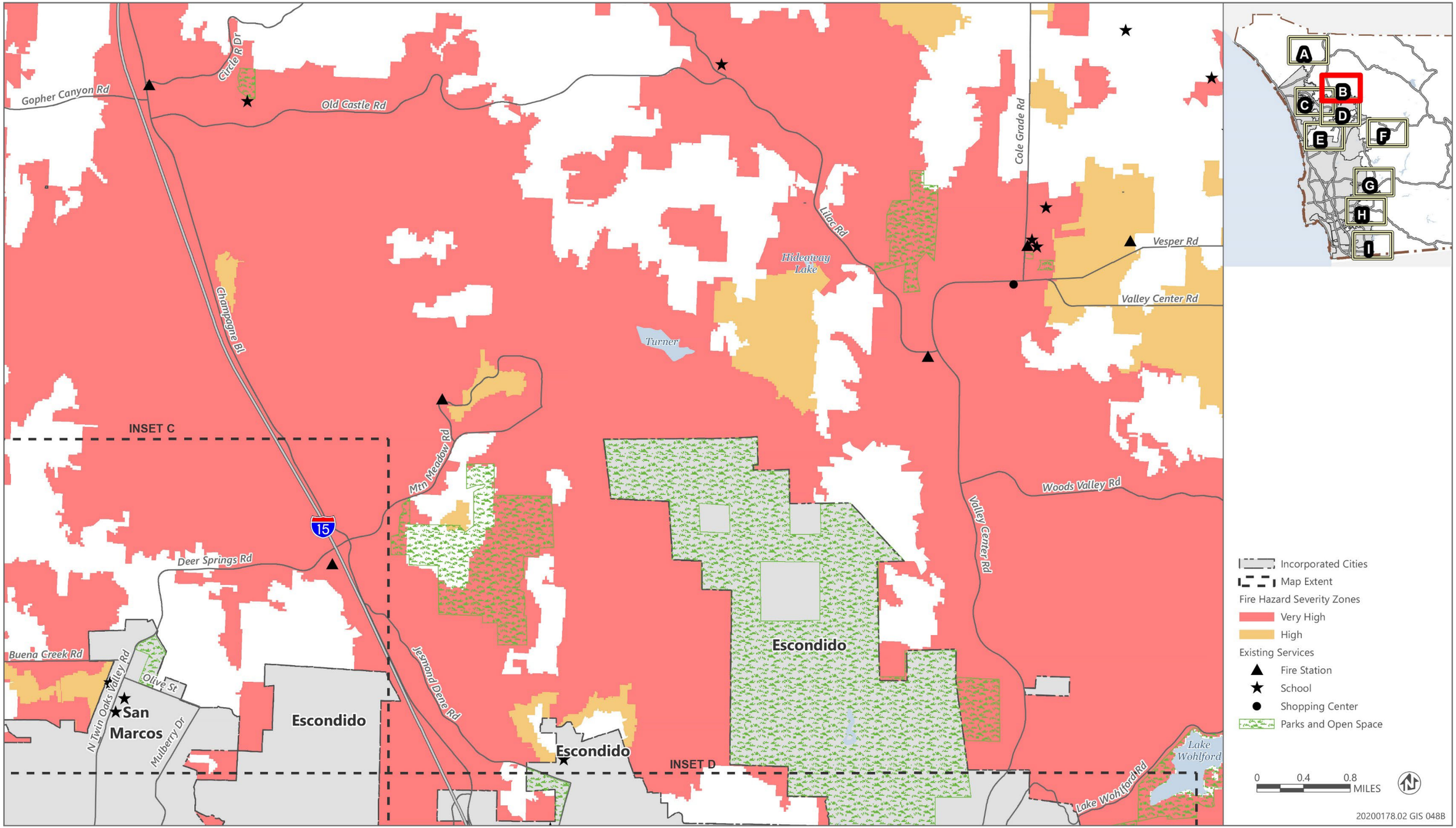
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023

Figure 5-1a Fire Safe and VMT Efficient Smart Growth Locations



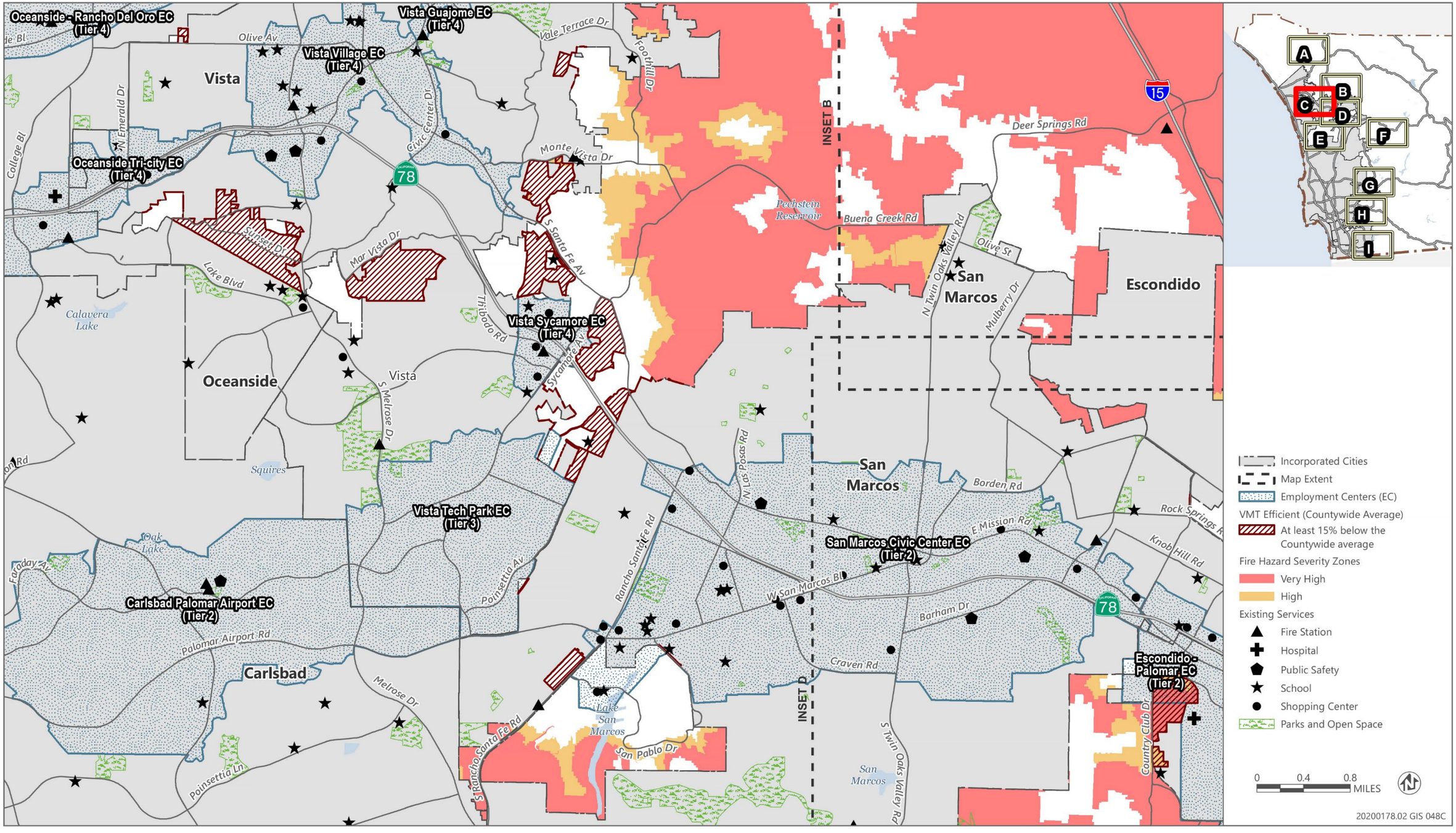
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1b Fire Safe and VMT Efficient Smart Growth Locations - Inset A



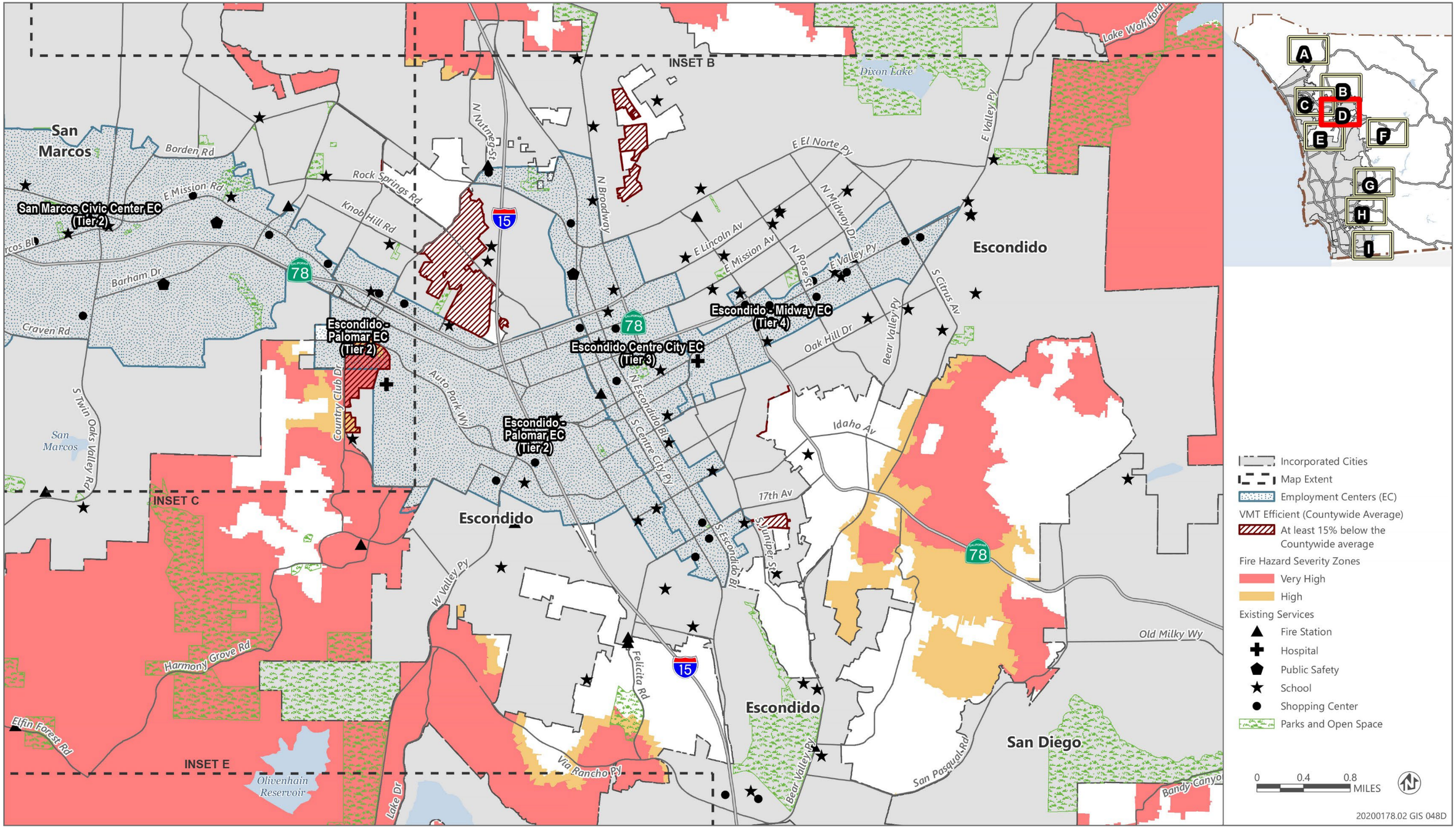
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1c Fire Safe and VMT Efficient Smart Growth Locations - Inset B



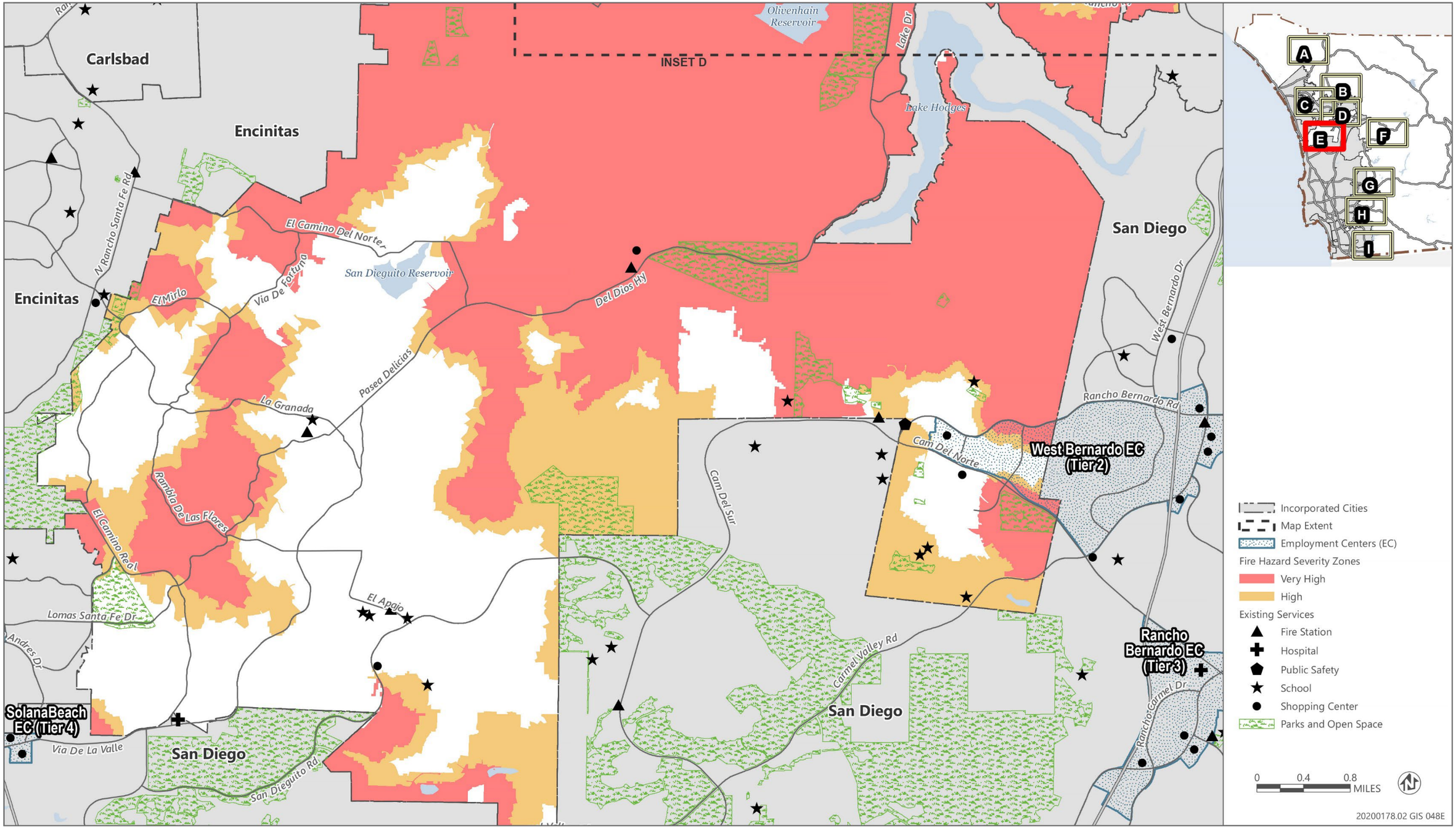
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1d Fire Safe and VMT Efficient Smart Growth Locations - Inset C



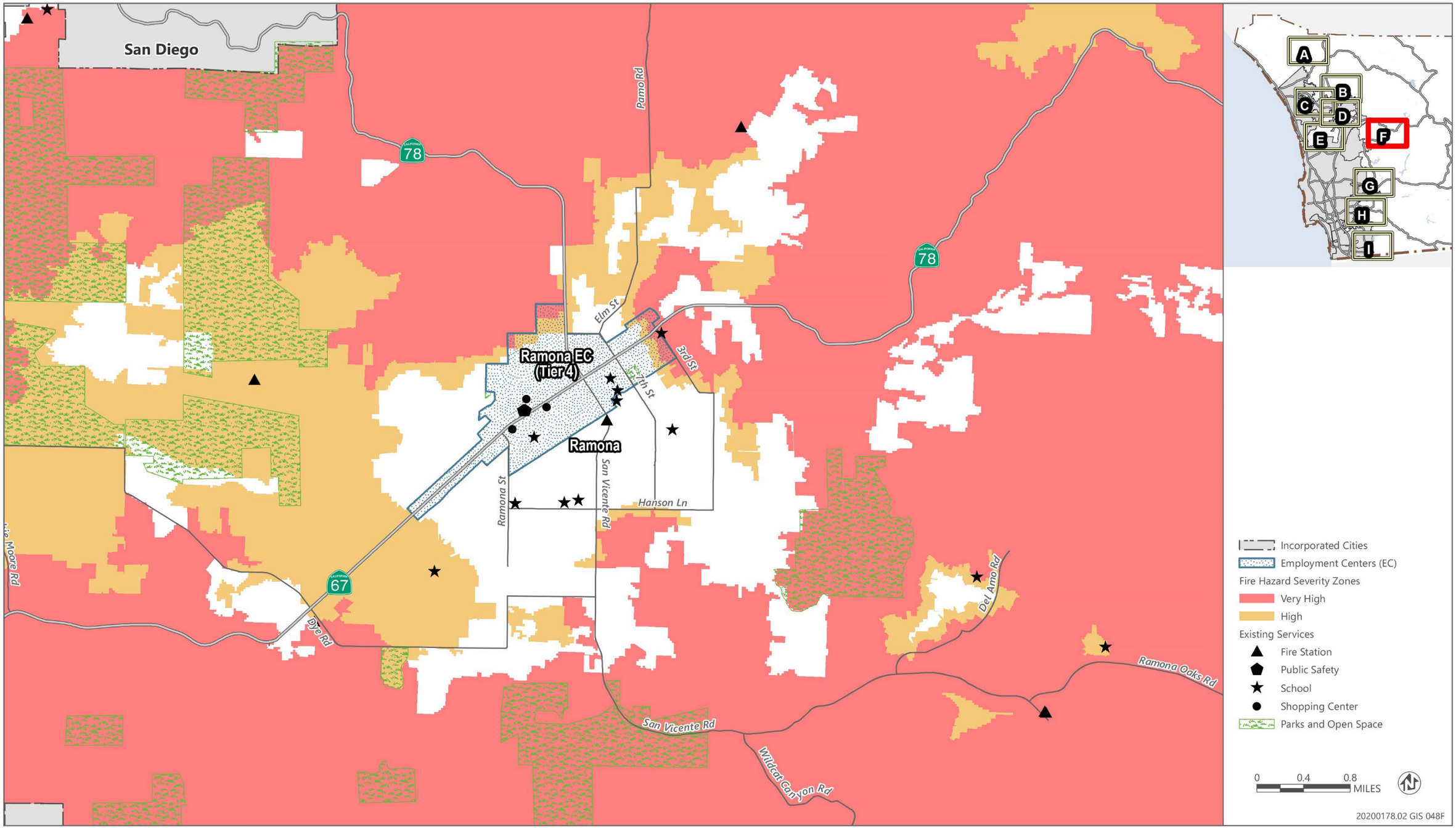
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1e Fire Safe and VMT Efficient Smart Growth Locations - Inset D



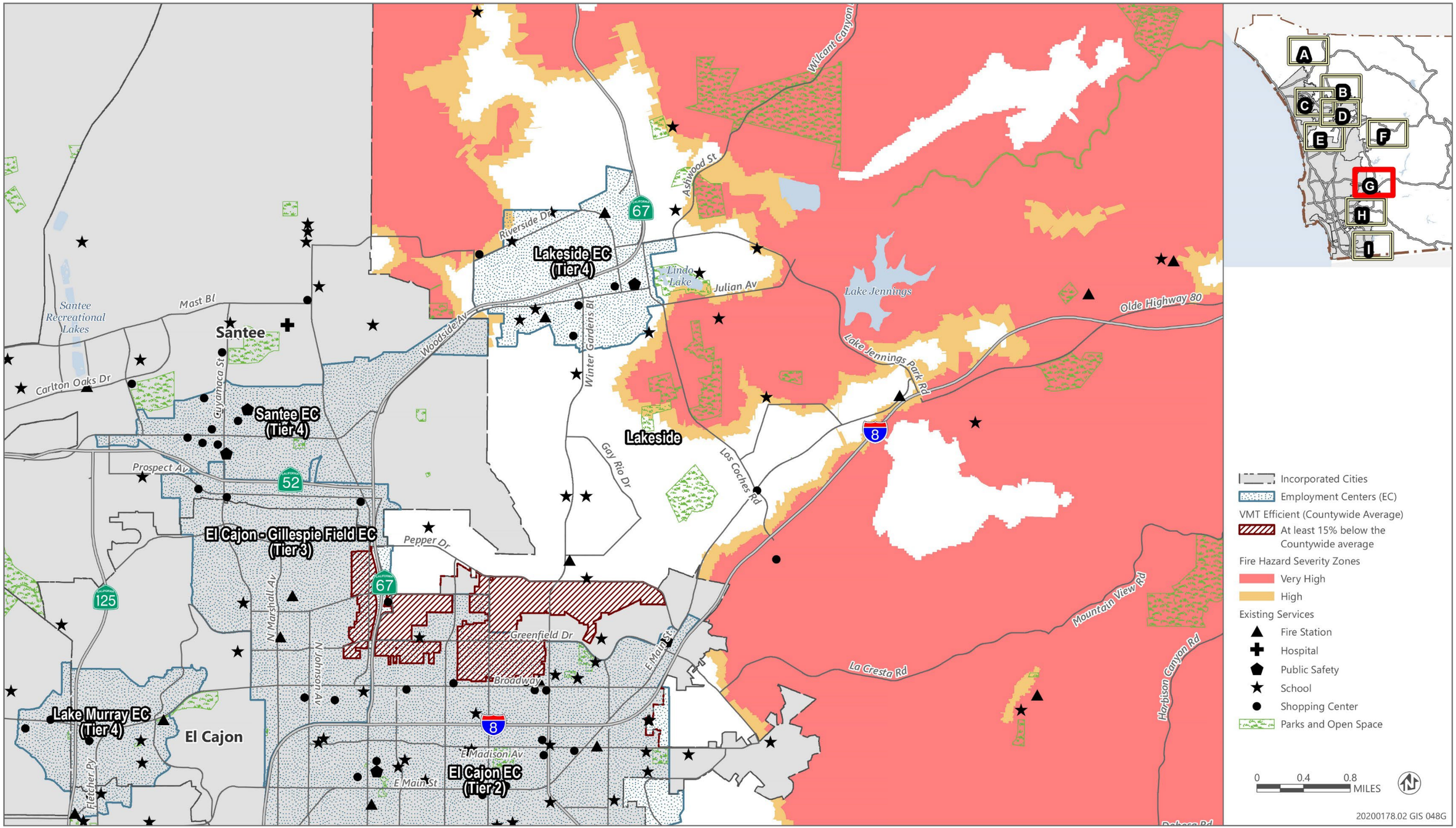
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1f Fire Safe and VMT Efficient Smart Growth Locations - Inset E



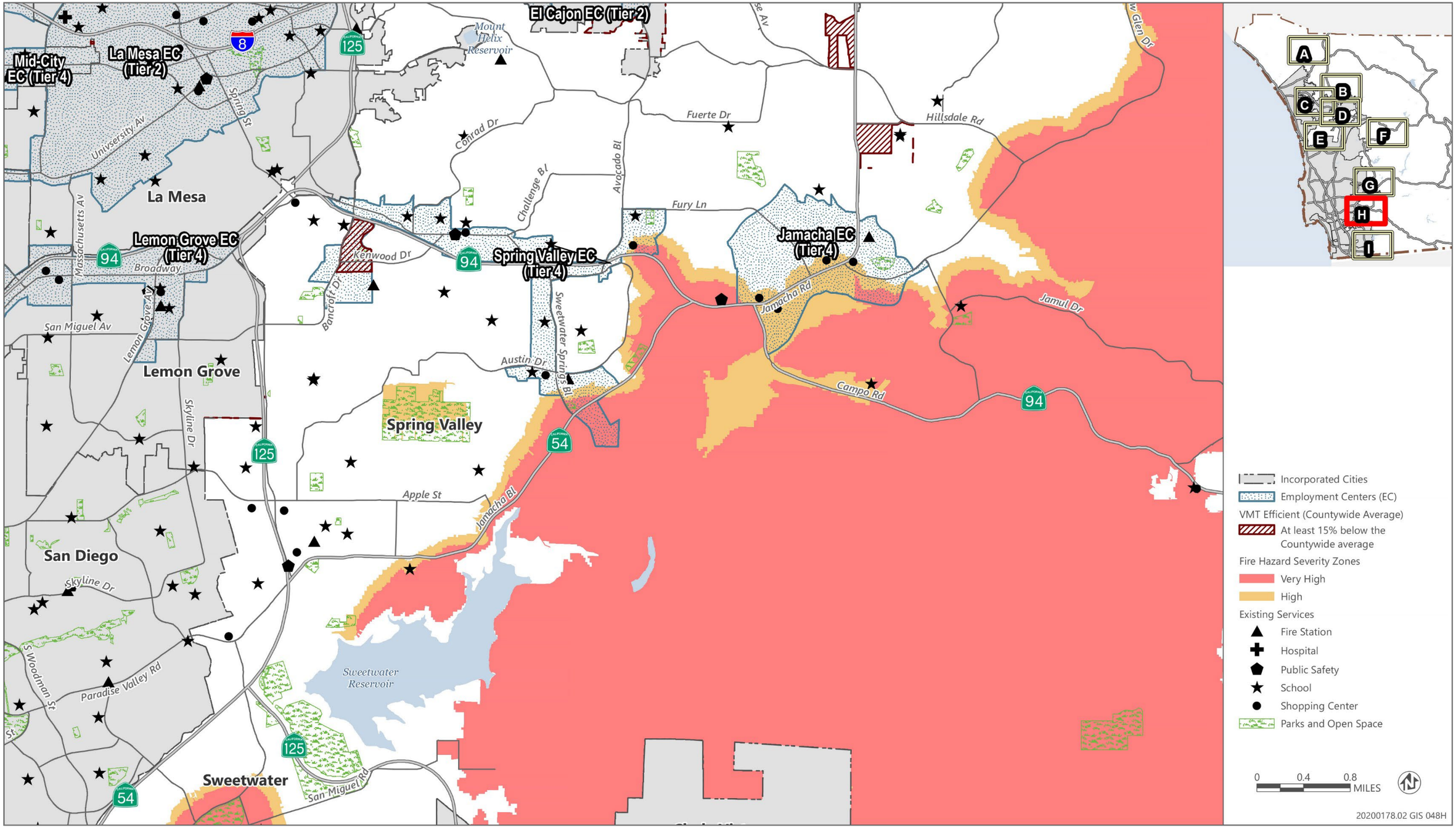
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1g Fire Safe and VMT Efficient Smart Growth Locations - Inset F



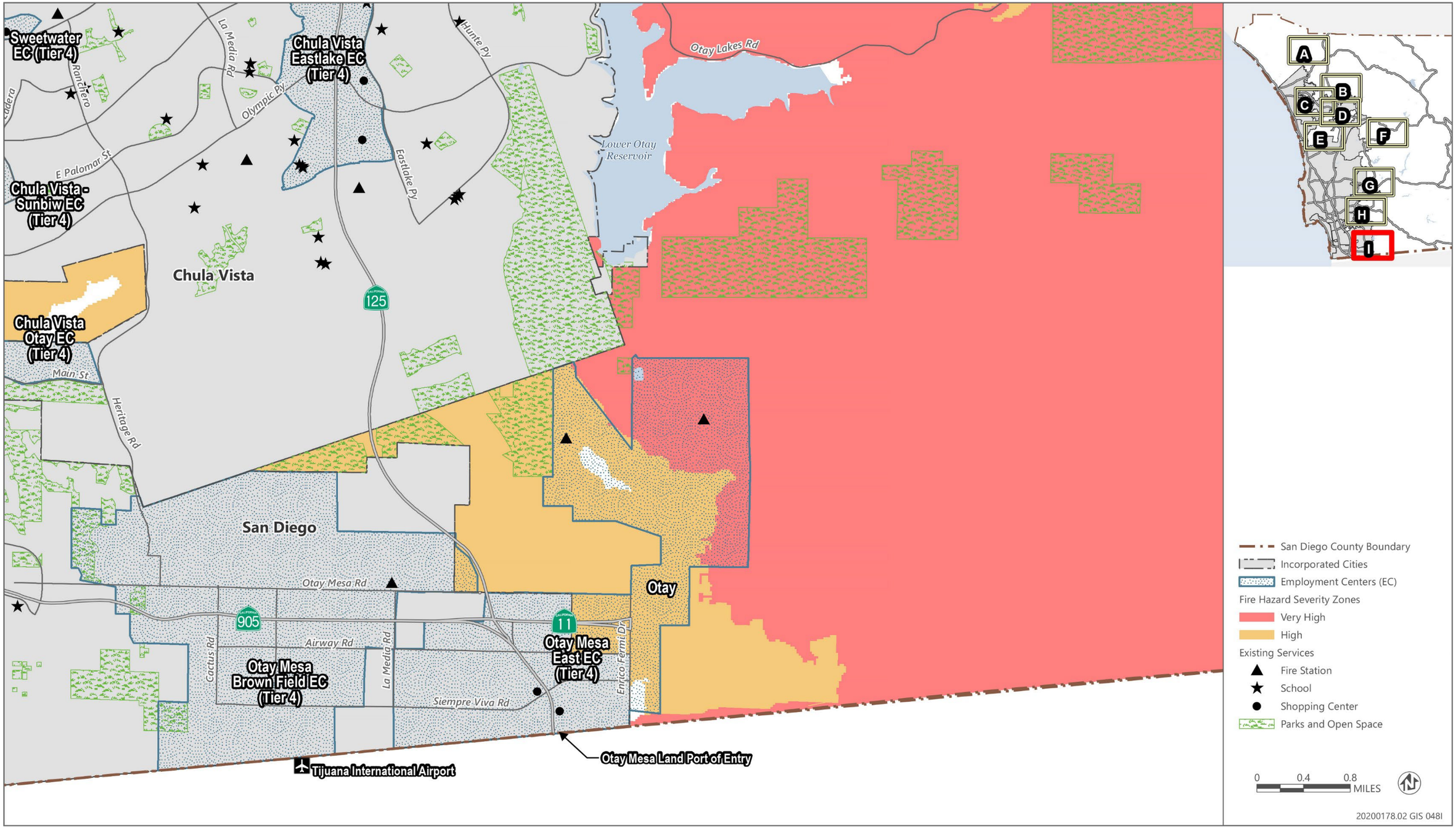
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1h Fire Safe and VMT Efficient Smart Growth Locations - Inset G



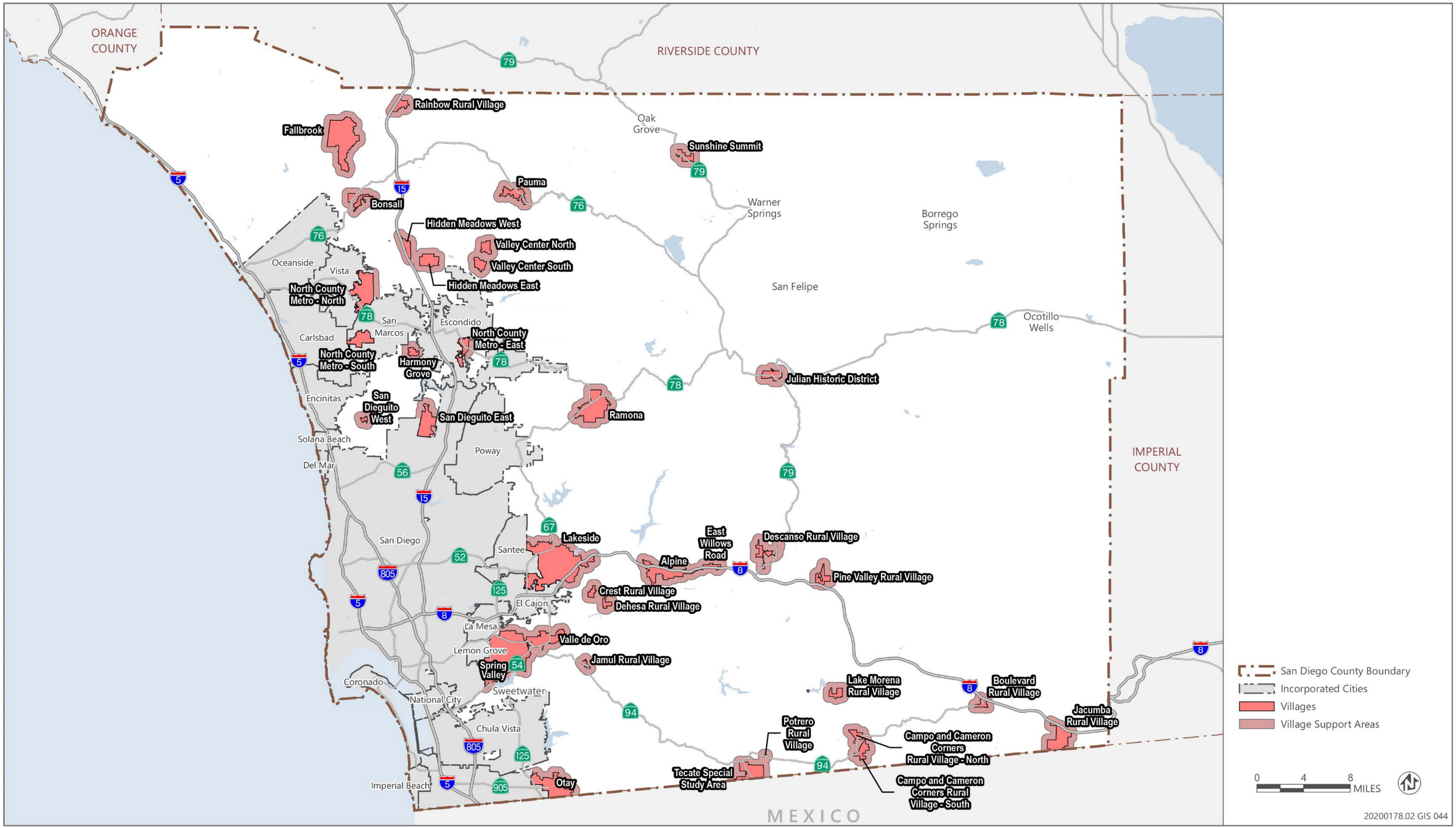
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1i Fire Safe and VMT Efficient Smart Growth Locations - Inset H



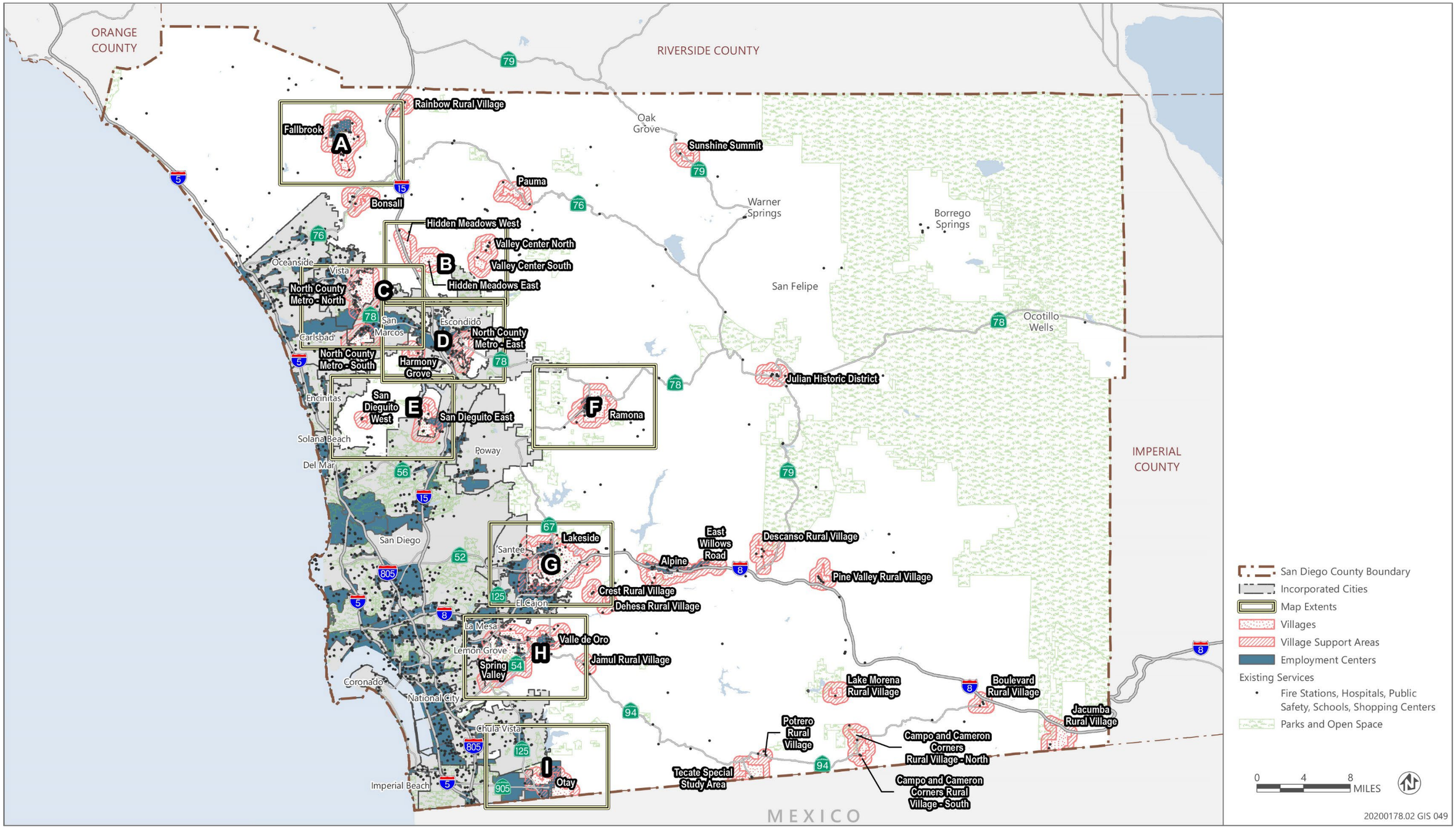
Sources: Data received and downloaded from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-1j Fire Safe and VMT Efficient Smart Growth Locations - Inset I



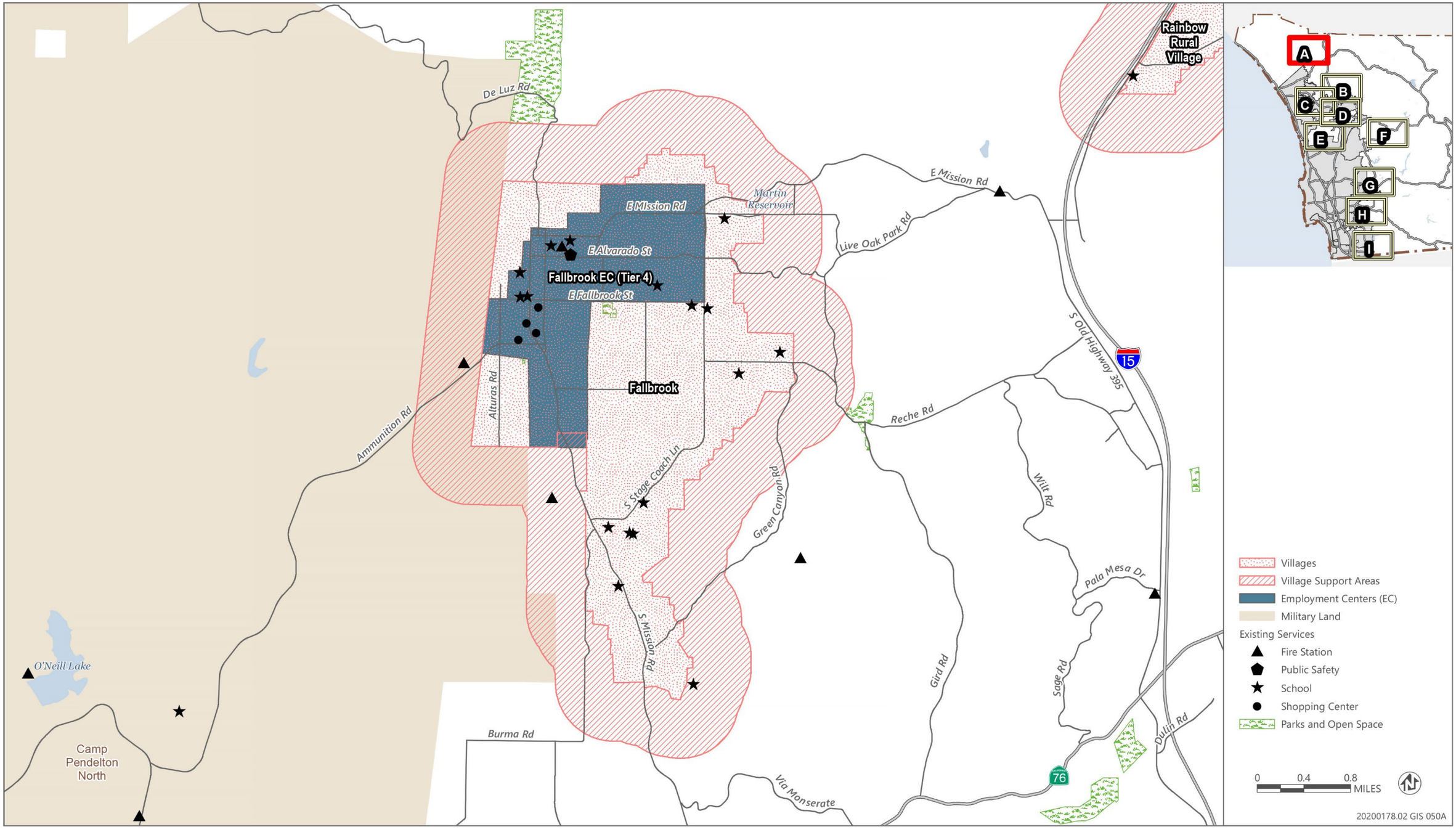
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2 Village Support Areas Alternative



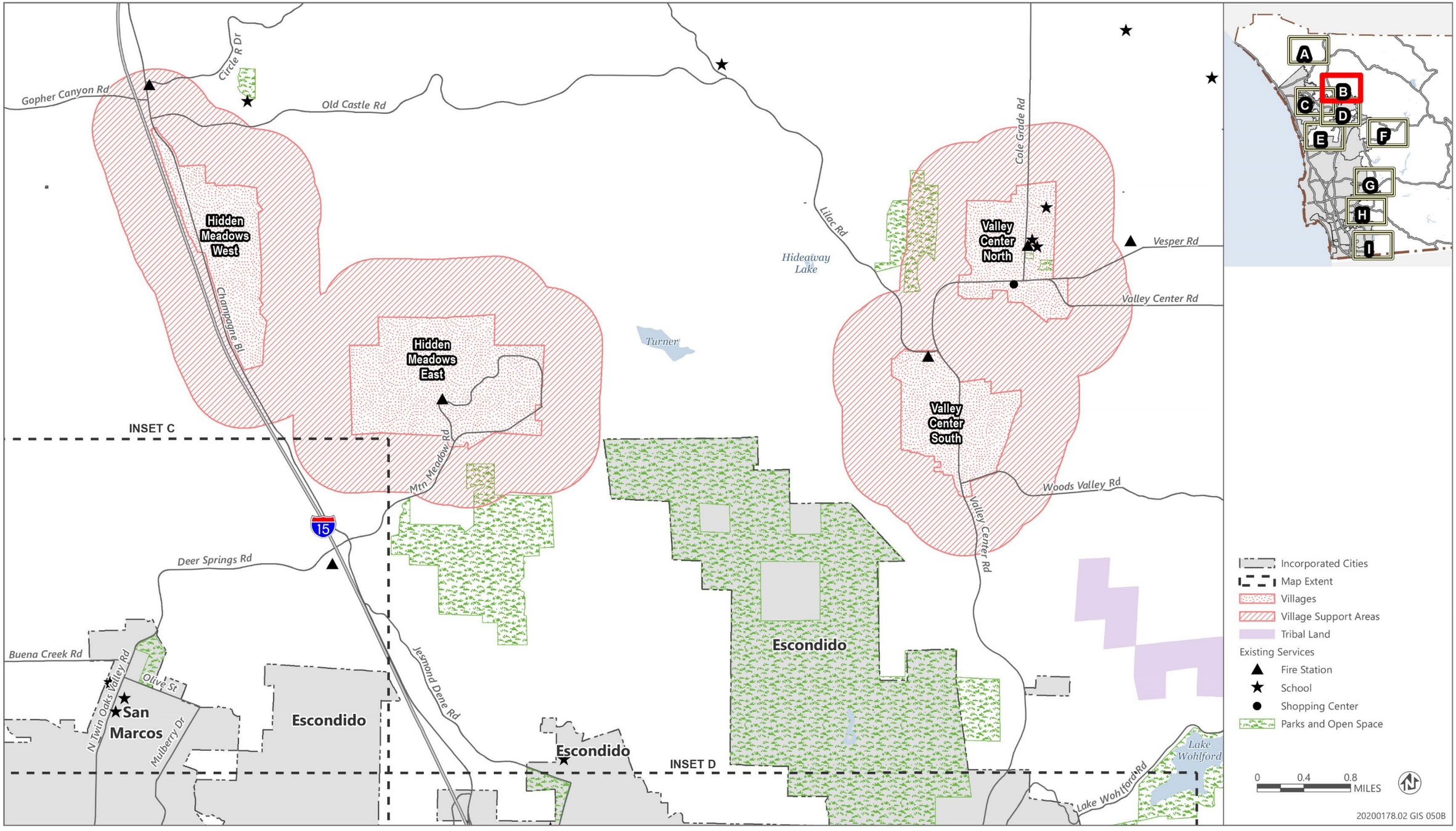
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023

Figure 5-2a Village and Village Support Areas



Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2b Villages and Village Support Areas - Inset A

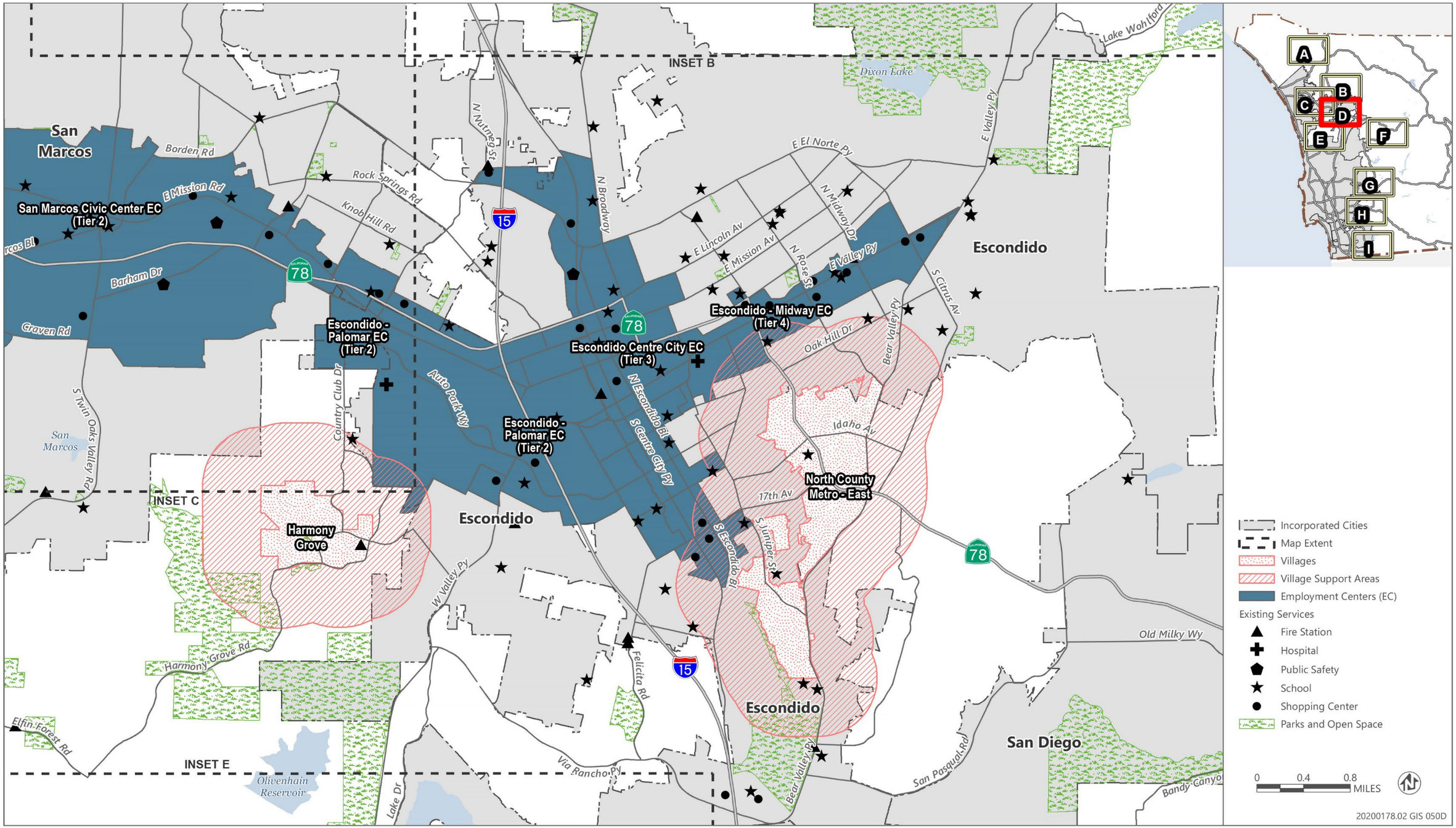


Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2c Villages and Village Support Areas - Inset B

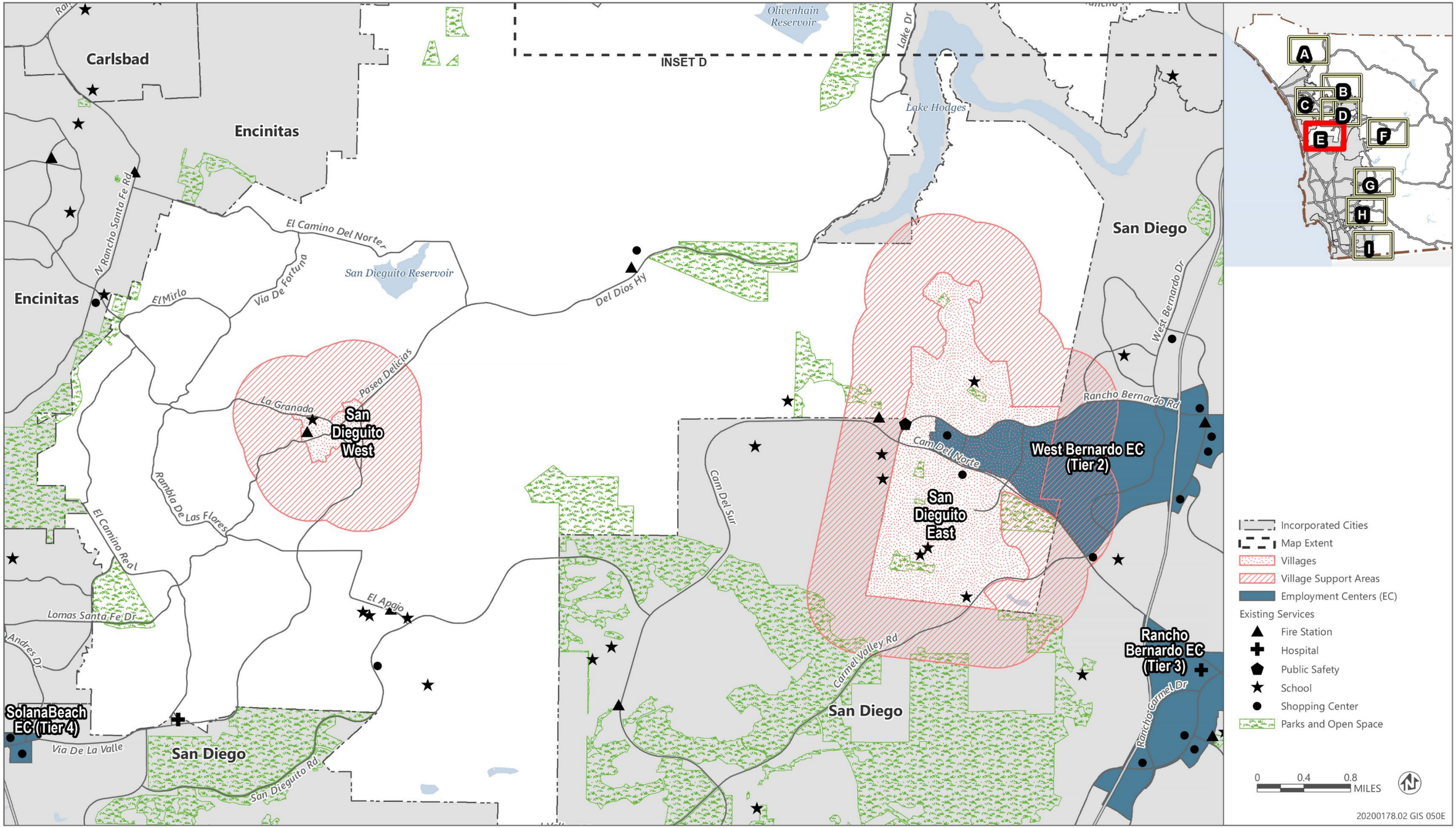
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2d Villages and Village Support Areas - Inset C



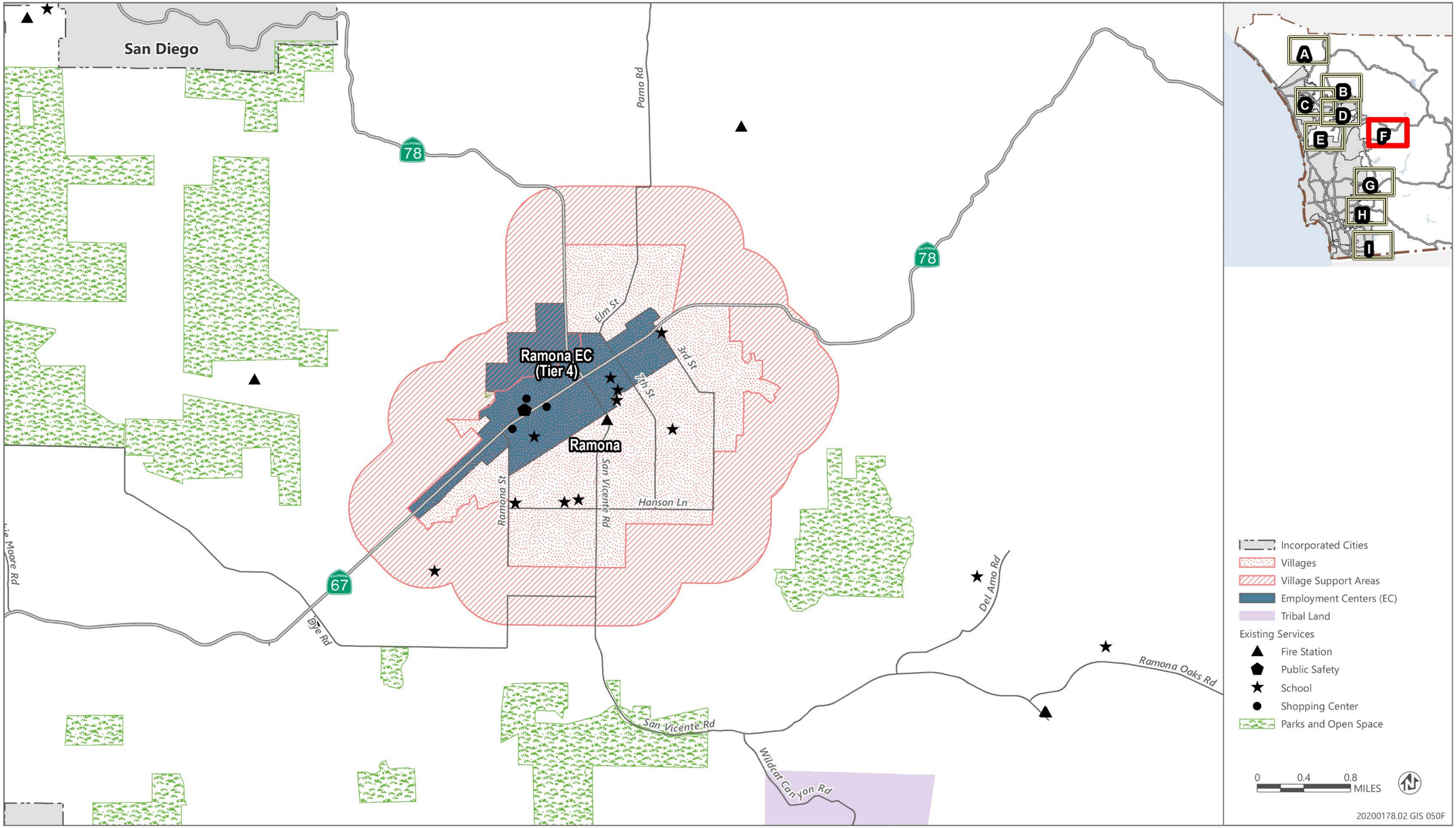
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2e Villages and Village Support Areas - Inset D



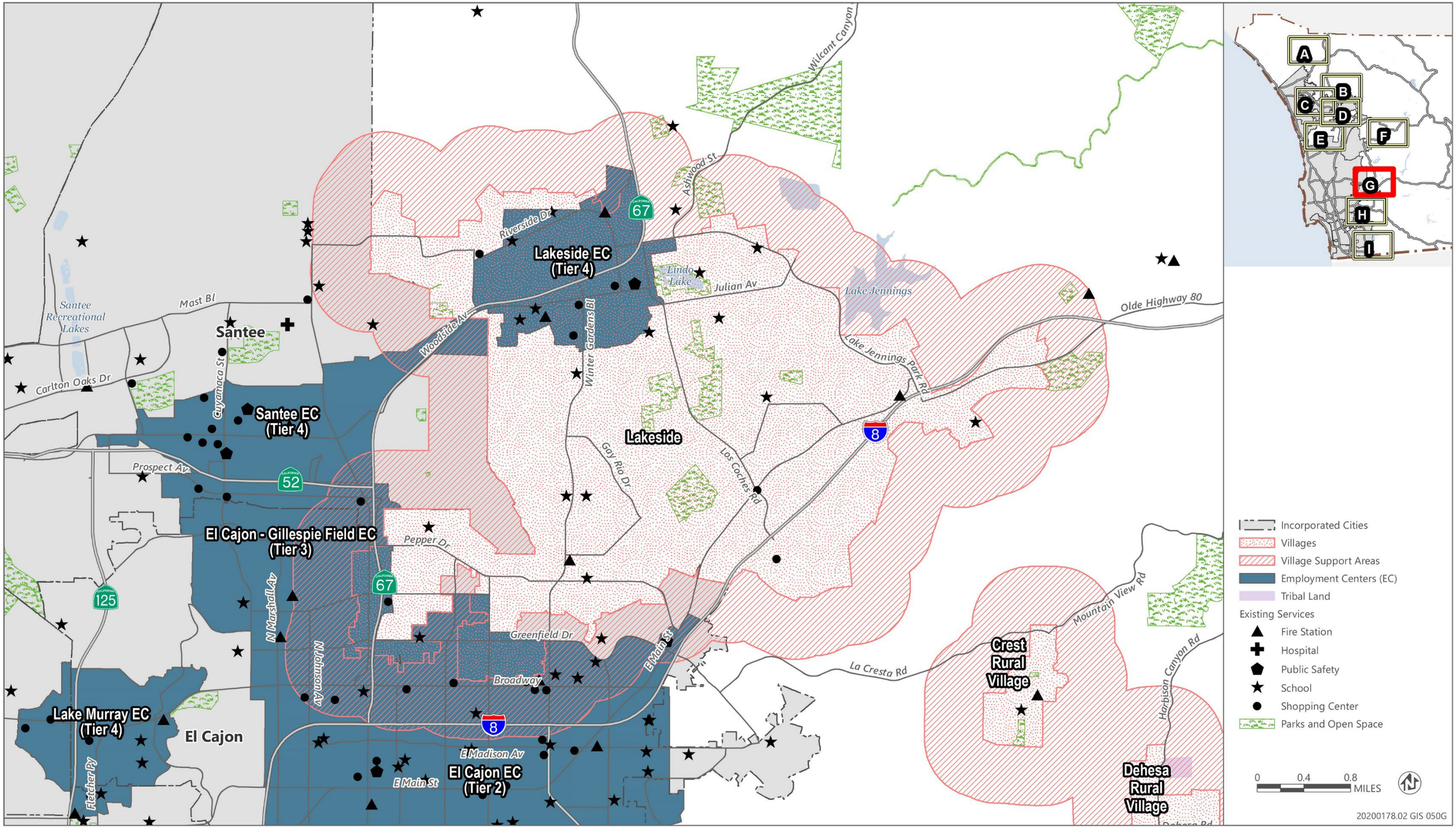
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2f Villages and Village Support Areas - Inset E



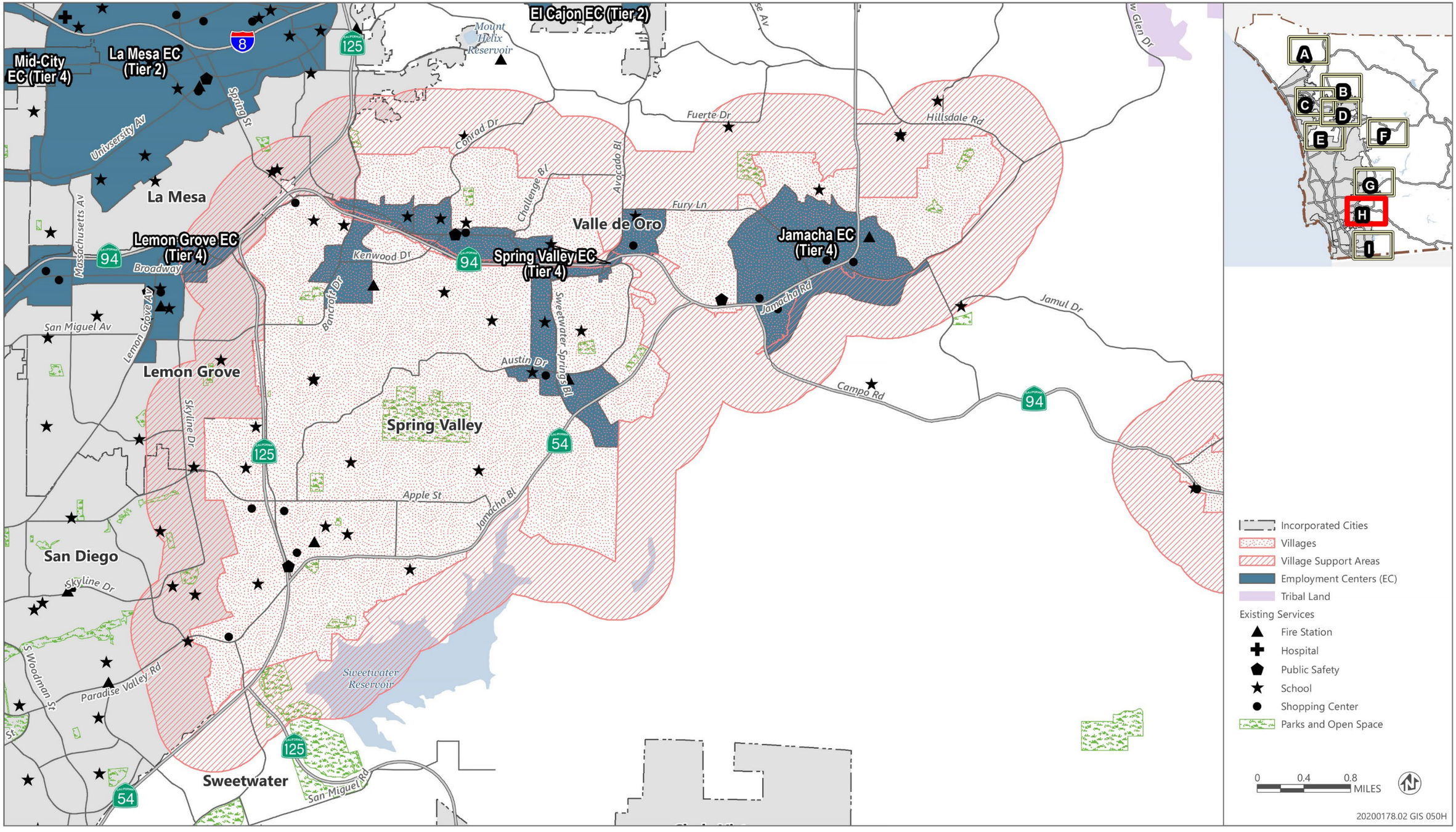
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2g Villages and Village Support Areas - Inset F



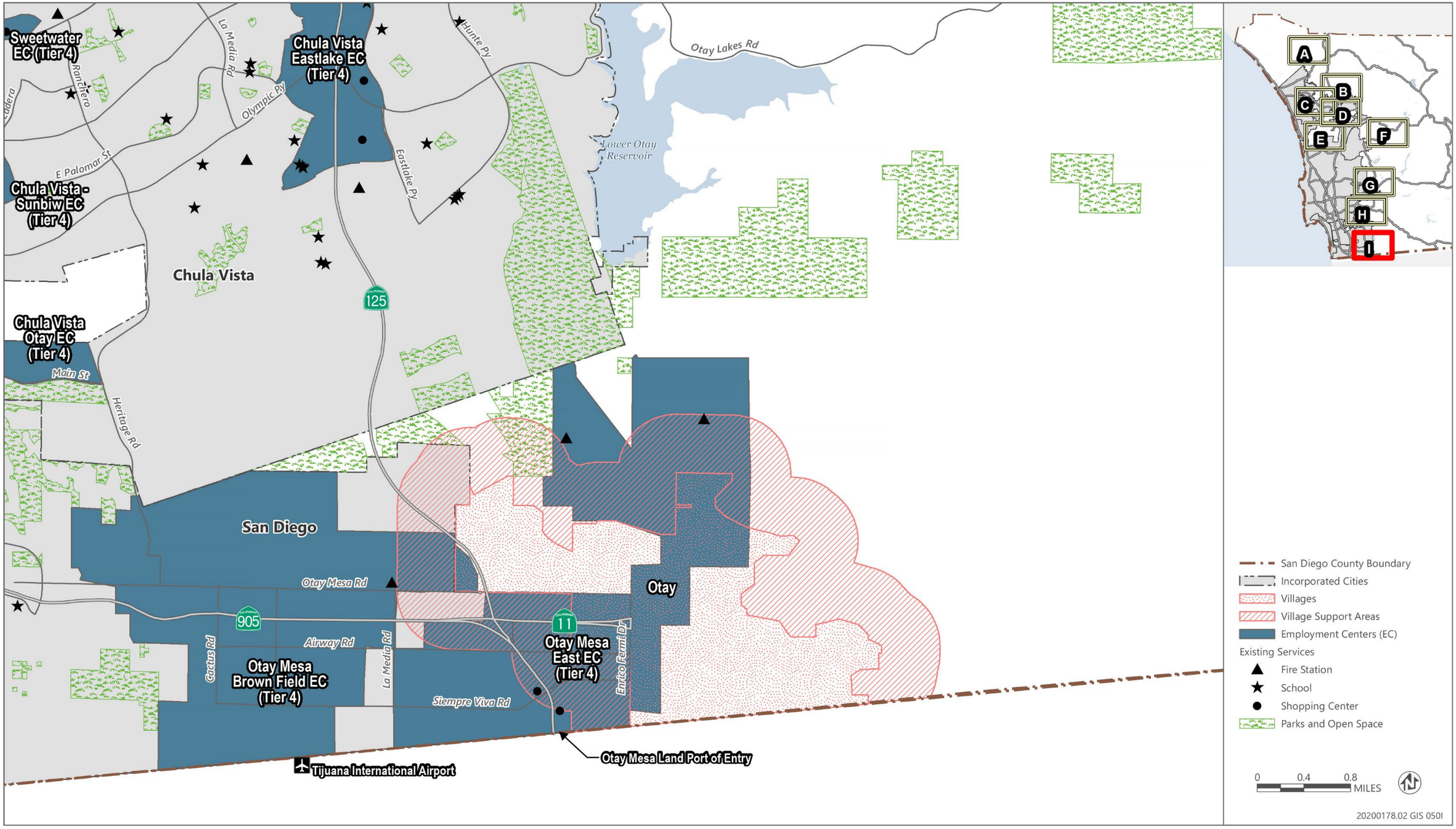
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2h Villages and Village Support Areas - Inset G



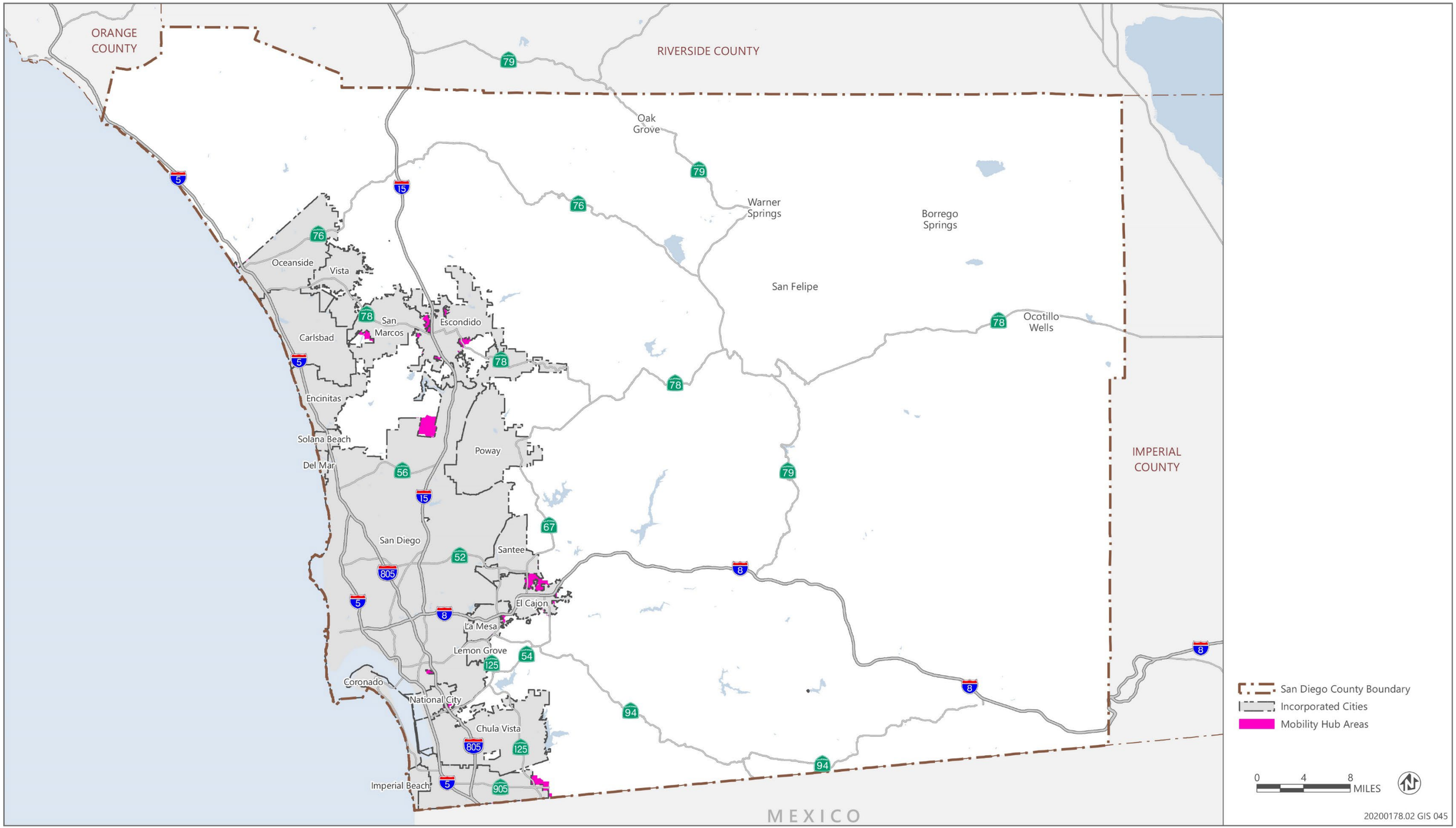
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2i Villages and Village Support Areas - Inset H



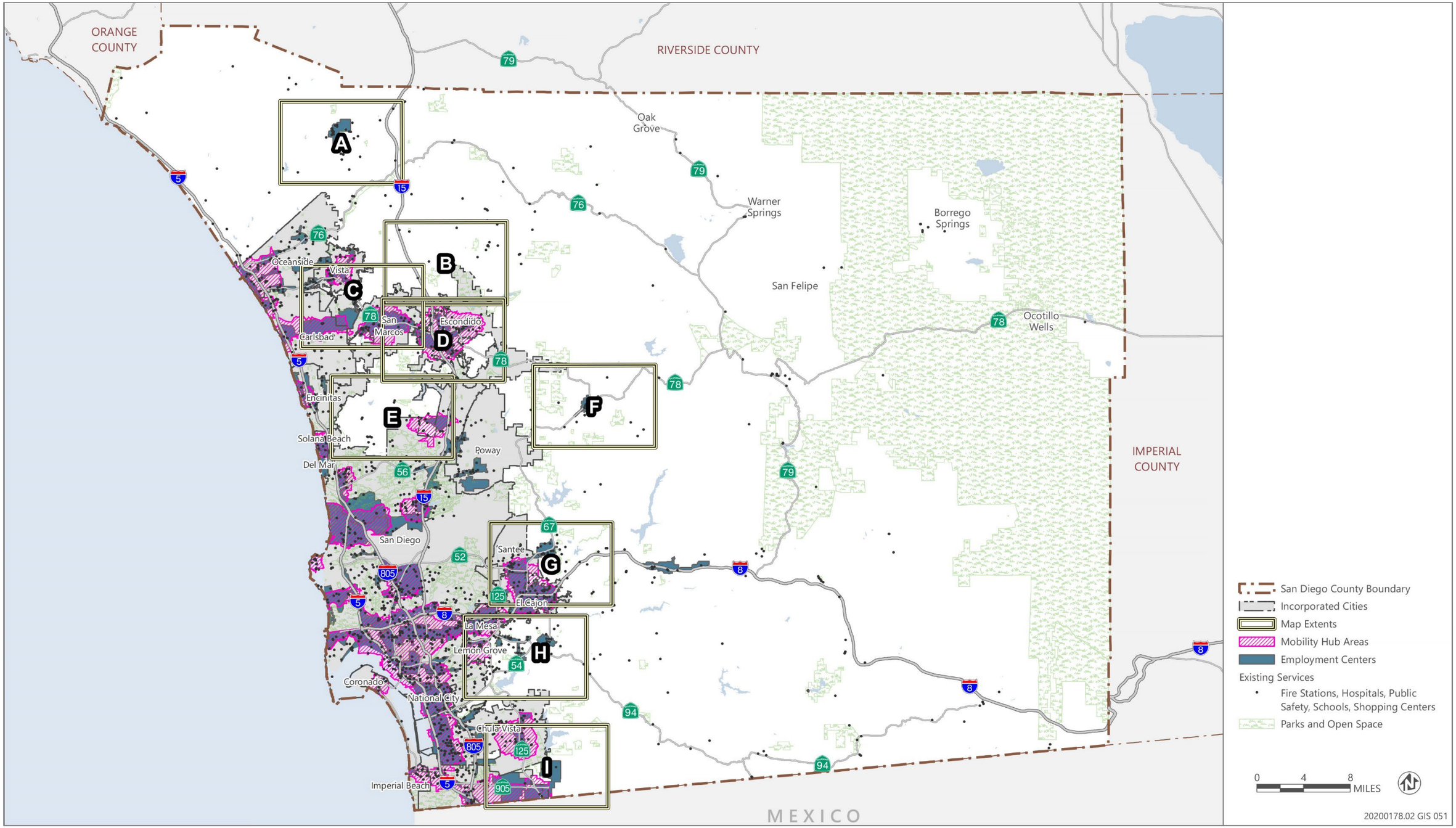
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-2j Villages and Village Support Areas - Inset I



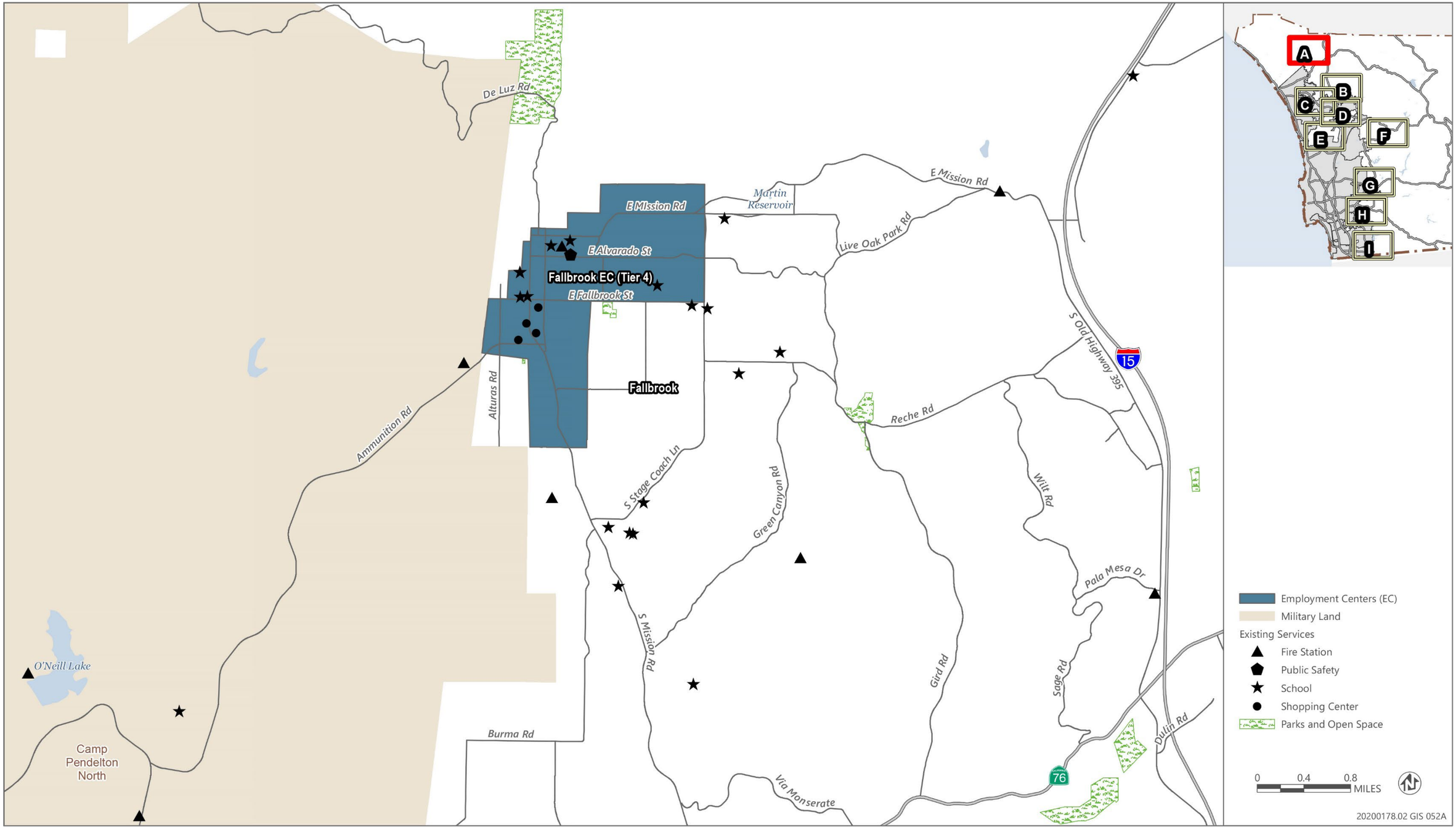
Sources: Data received from San Diego County in 2021.

Figure 5-3 Sustainable Communities Strategy Alternative



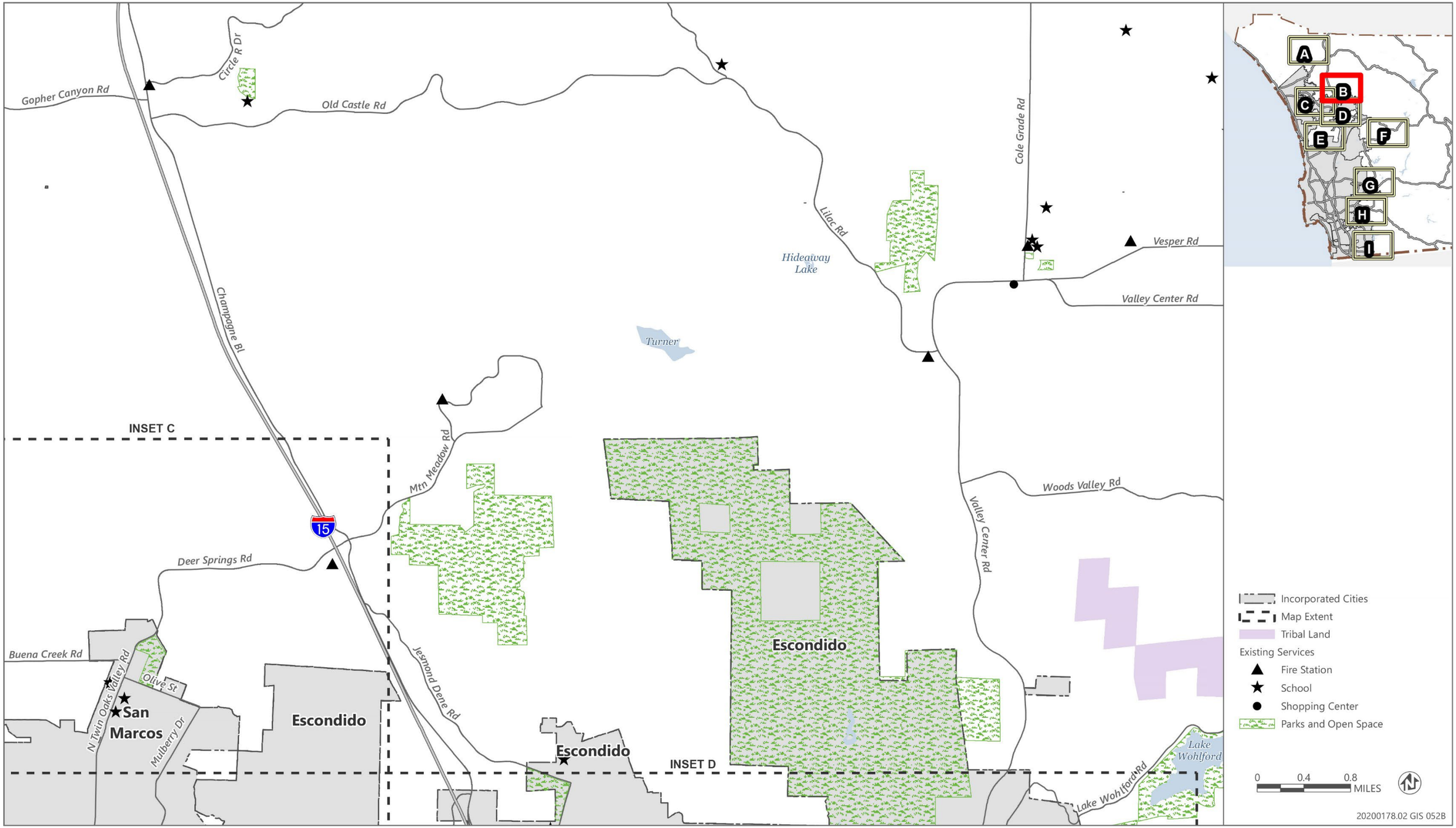
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3a Mobility Hub Areas



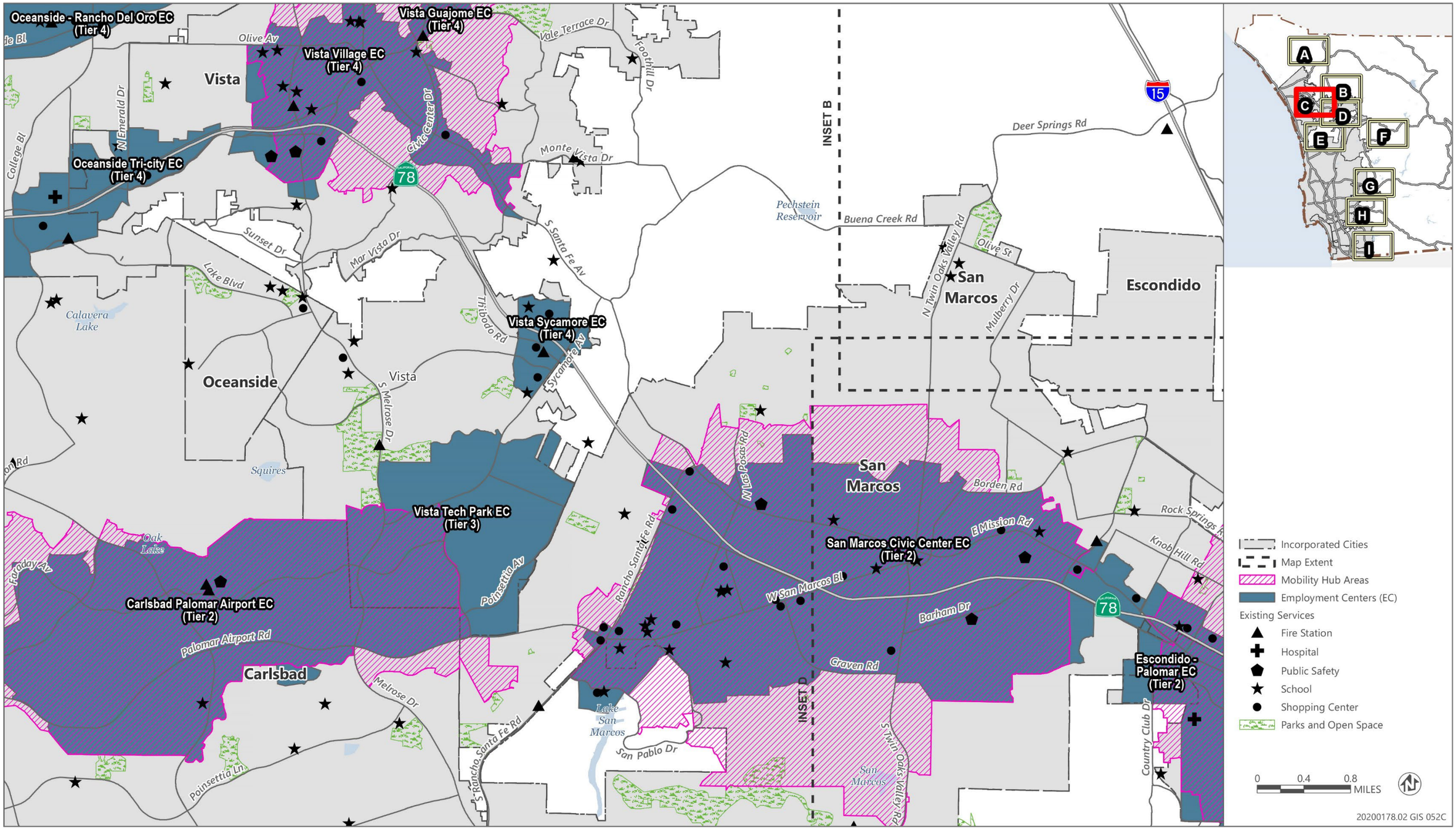
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3b Mobility Hub Areas - Inset A



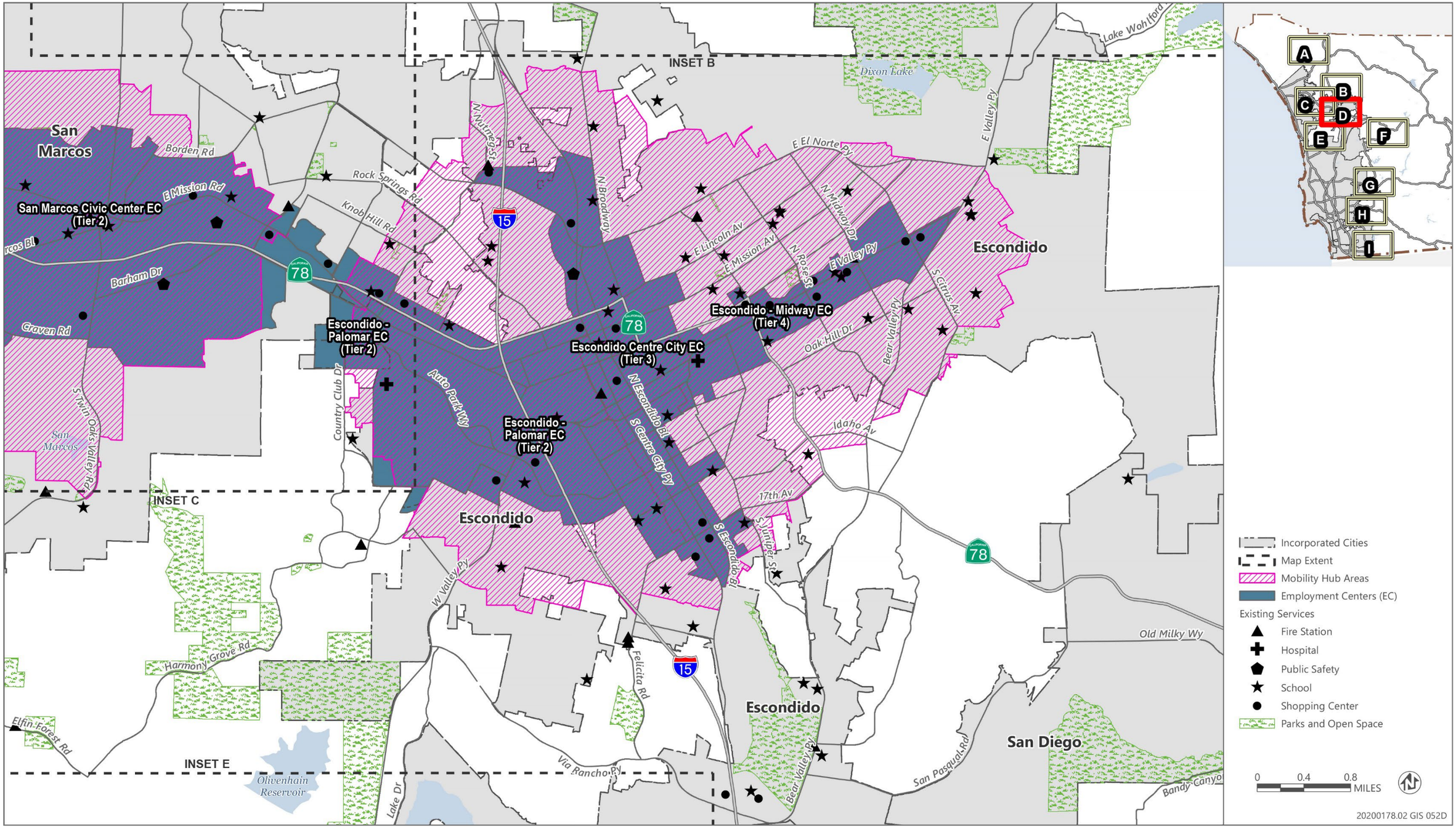
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3c Mobility Hub Areas - Inset B



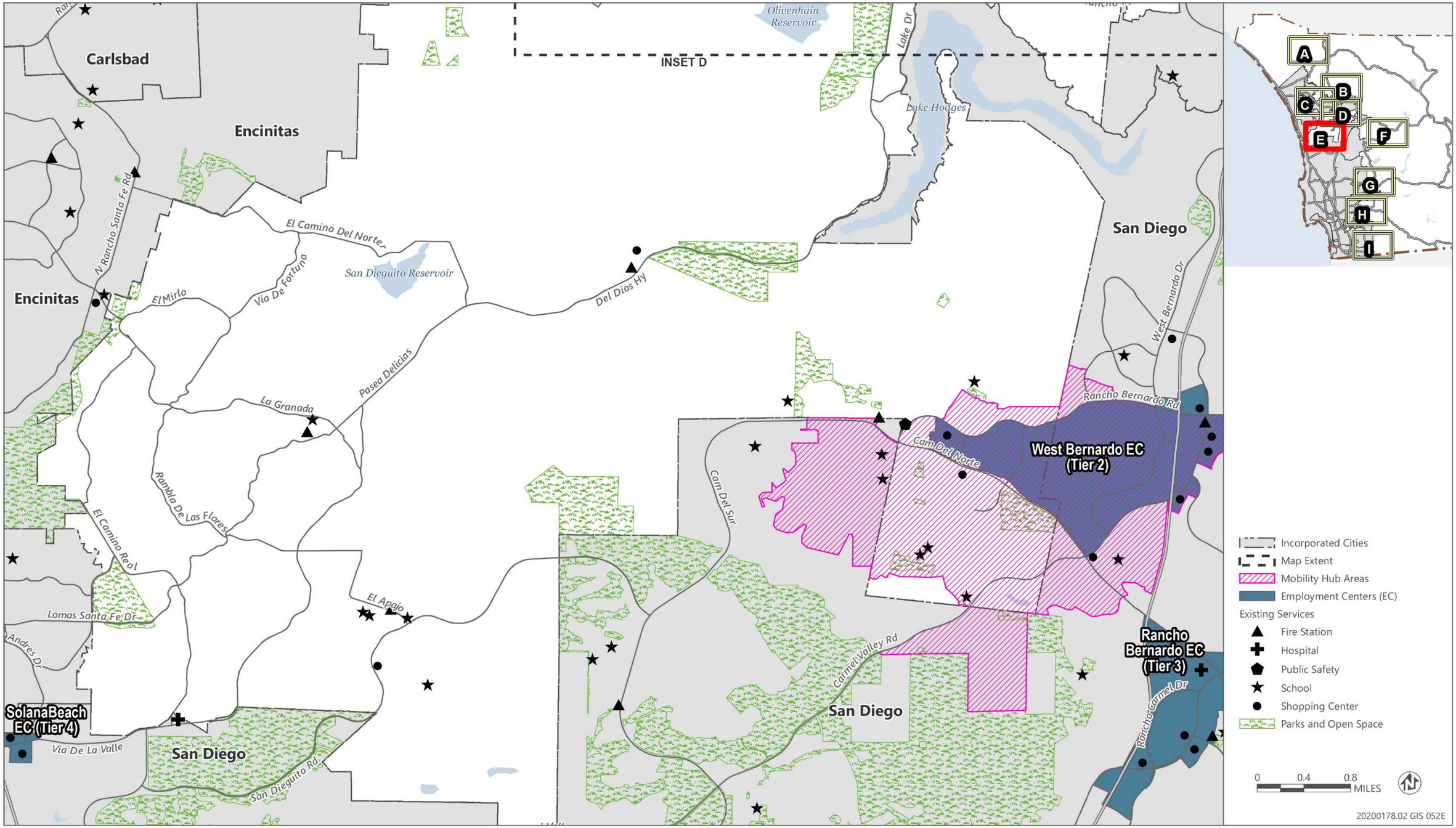
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3d Mobility Hub Areas - Inset C



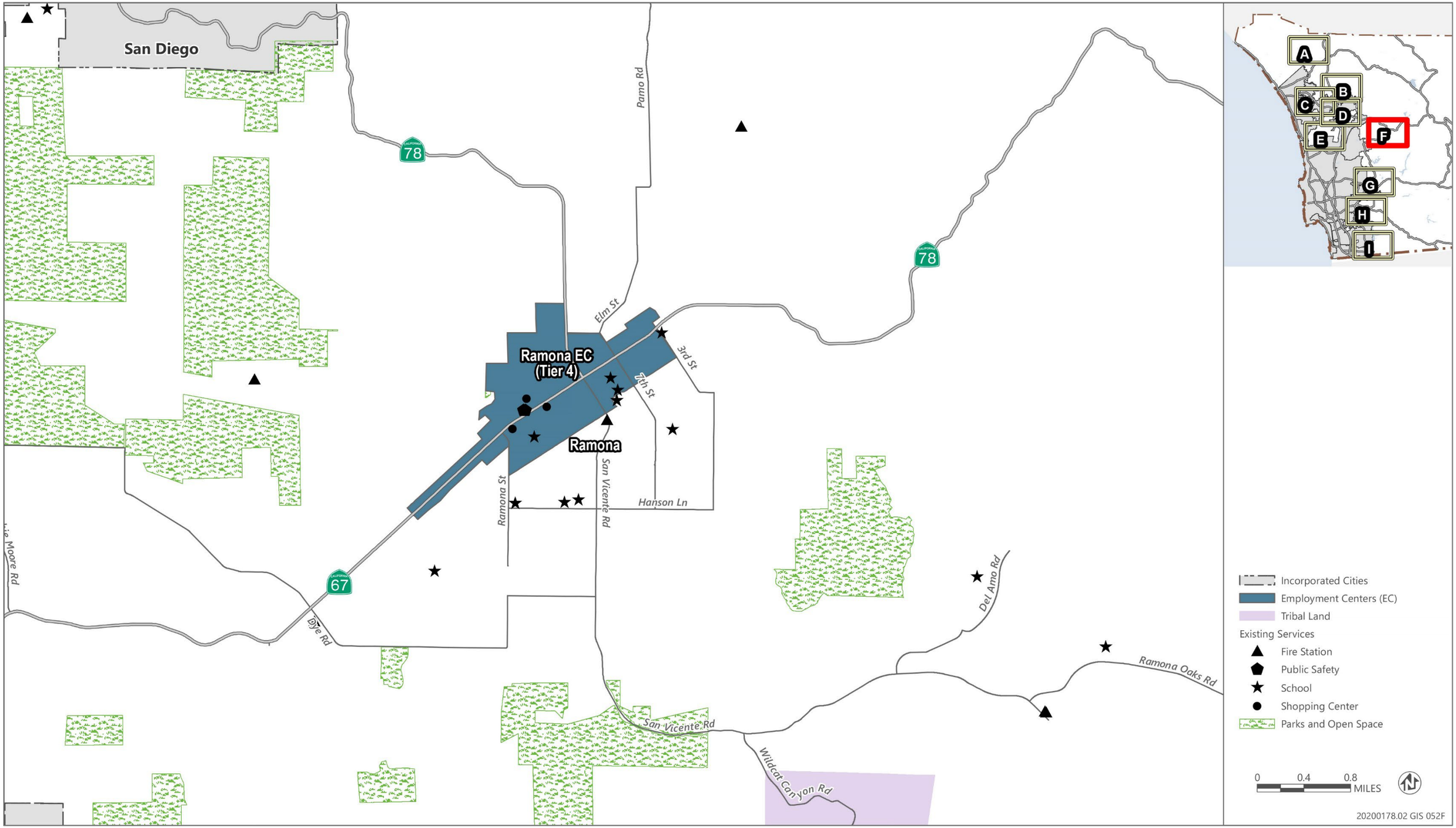
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3e Mobility Hub Areas - Inset D



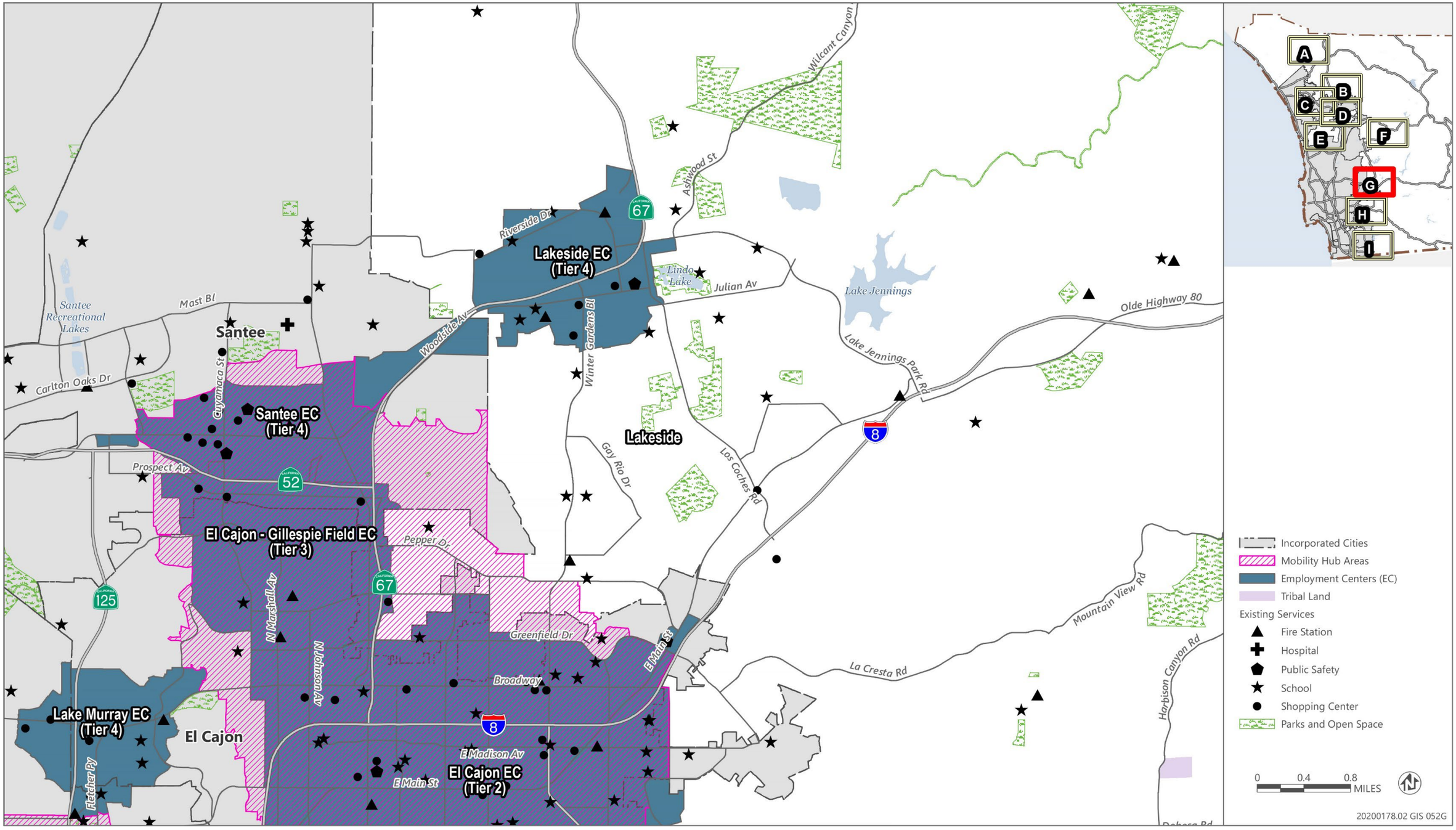
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3f Mobility Hub Areas - Inset E



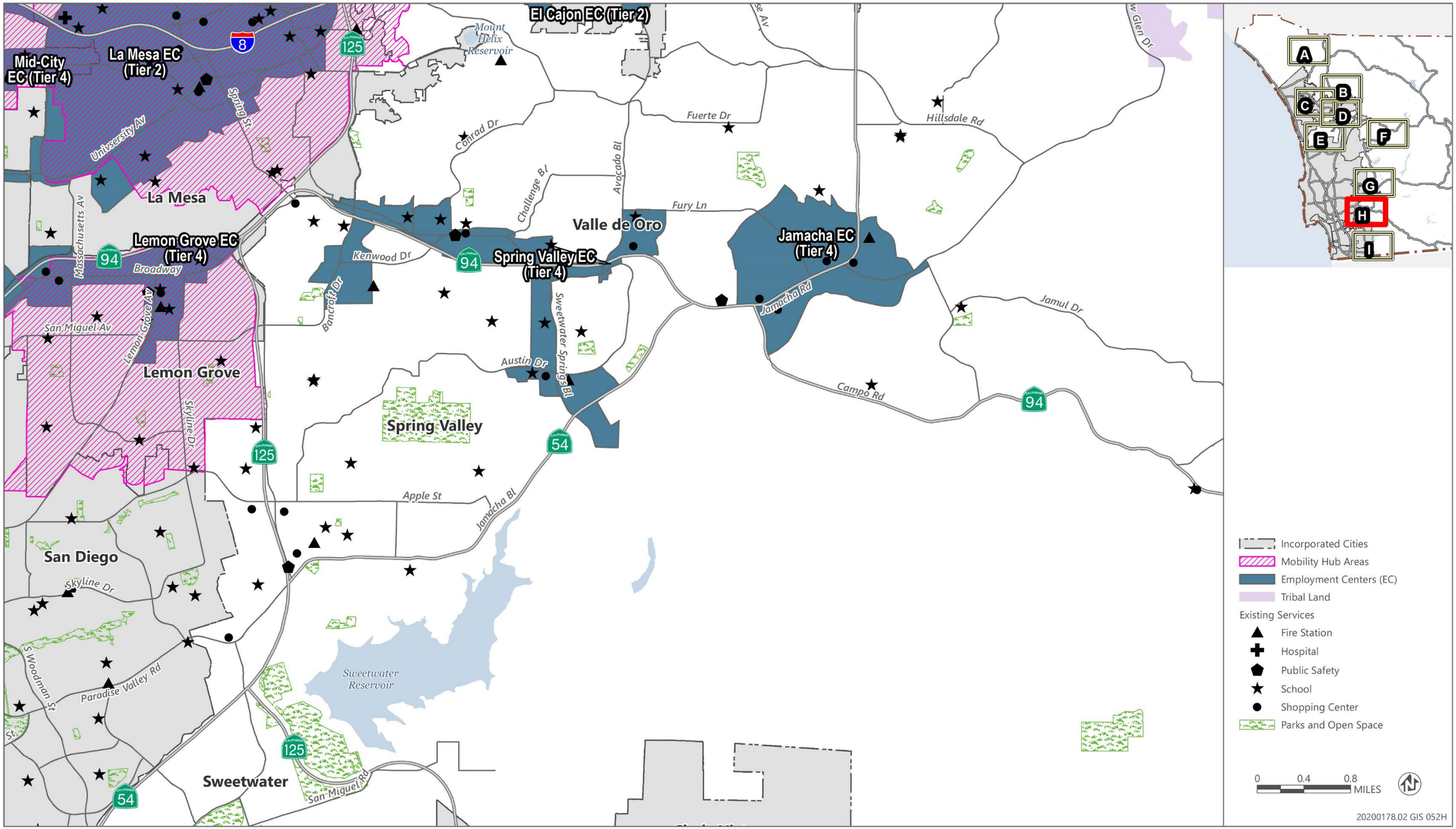
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3g Mobility Hub Areas - Inset F



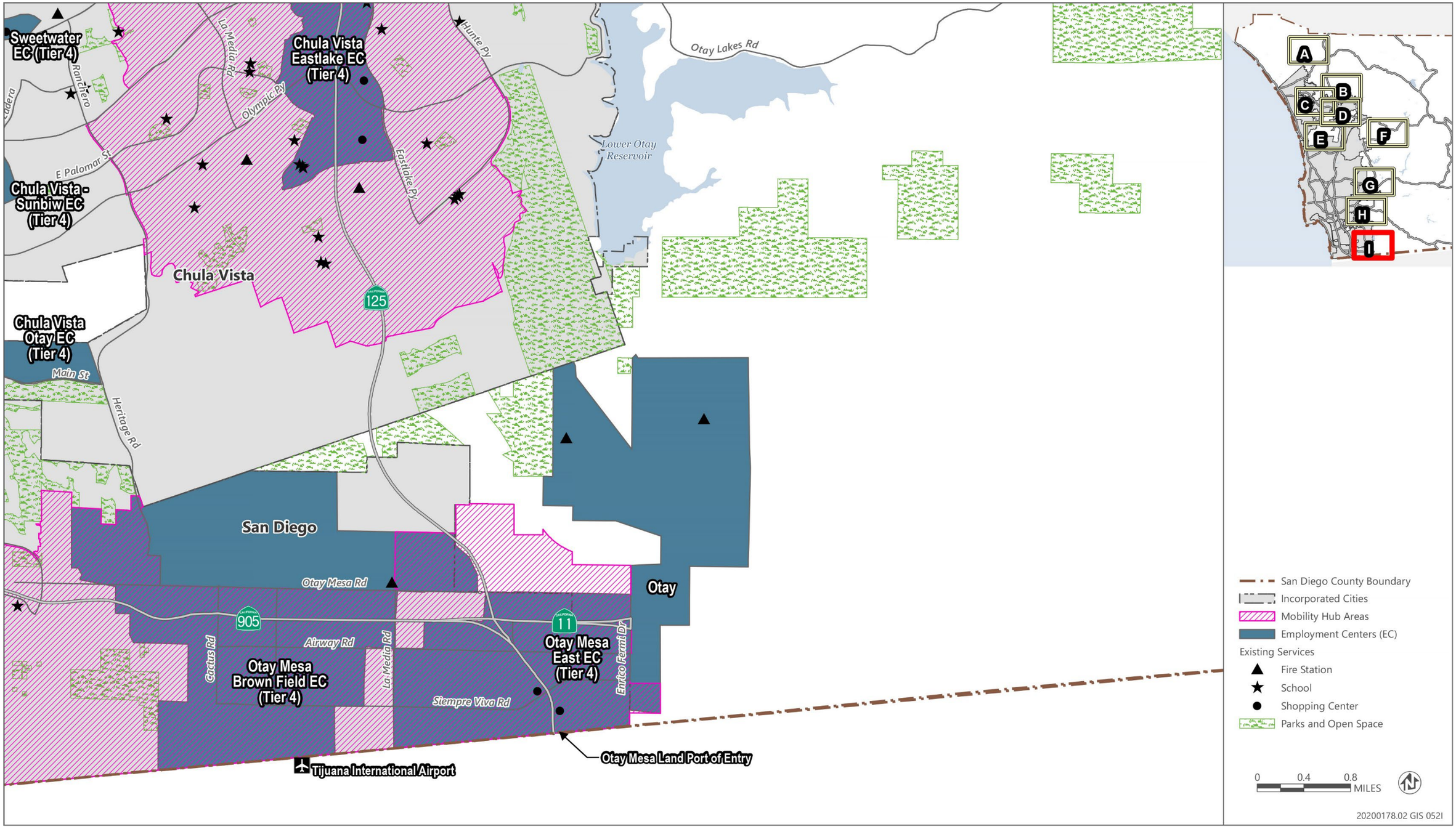
Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3h Mobility Hub Areas - Inset G



Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3i Mobility Hub Areas - Inset H



Sources: Data received from San Diego County in 2021 and 2023; adapted by Ascent in 2023.

Figure 5-3j Mobility Hub Areas - Inset I