



PUBLIC REVIEW DRAFT

CITY OF EL CAJON

Environmental Impact Report

for the

The City of El Cajon Climate Action Plan

SCH # 2019029154

PREPARED BY:
The City of El Cajon

IN CONSULTATION WITH:
Ascent Environmental, Inc.
Energy Policy Initiatives Center



Public Review Draft
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for the

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LIST OF ABBREVIATIONS

°C	degrees Celsius
AB	Assembly Bill
ADA	Americans with Disabilities Act
AFV	alternative fuel vehicle
BAU	business-as-usual
CAAQS	California ambient air quality standards
CAFE	Corporate Average Fuel Economy
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	climate action plan
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CH ₄	methane
CNG	compressed natural gas
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide-equivalent
CPUC	California Public Utilities Commission
CTC	California Transportation Commission
CWA	Clean Water Act

dB	decibel
dBA	A-weighted decibel
diesel PM	particulate matter exhaust from diesel engines
DOT	U.S. Department of Transportation
Draft EIR	Draft Environmental Impact Report
EAP	Energy Action Plan
EO	Executive Order
EPA	U.S. Environmental Protection Agency
EPAct	Energy Policy Act of 1992
ESA	federal Endangered Species Act
EV	electric vehicle
FTA	Federal Transit Administration
GHG	greenhouse gas
GWP	Global Warming Potential
HAP	hazardous air pollutant
HCM 2000	Highway Capacity Manual 2000
HFC	hydrofluorocarbon
I-8	Interstate 8
IEPR	Integrated Energy Policy Report
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
lb/day	pounds per day
LCFS	Low Carbon Fuel Standard
L _{eq}	equivalent noise level
L _{max}	maximum noise level
MBTA	Migratory Bird Treaty Act
MMT	million metric tons

MPOs	metropolitan planning organizations
MSCP	Multiple Species Conservation Program
MT CO ₂ e/year	metric tons of carbon dioxide equivalent per year
MTCO ₂ e	metric ton of carbon dioxide equivalent
MTS	Metropolitan Transit System
MW	megawatt
N ₂ O	nitrogen dioxide
NAAQS	national ambient air quality standards
NCCP	Natural Community Conservation Planning
NHPA	National Historic Preservation Act
NHS	National Highway System
NO	nitric oxide
NO ₂	nitrogen dioxide
NOP	notice of preparation
NO _x	oxides of nitrogen
NRHP	National Register of Historic Places
OEHHA	Office of Environmental Health Hazard Assessment
OIMP	odor impact minimization plan
OPR	Governor's Office of Planning and Research
PFC	perfluorocarbon
PM ₁₀	respirable particulate matter with aerodynamic diameter of 10 micrometers or less
PM _{2.5}	fine particulate matter with aerodynamic diameter of 2.5 micrometers or less
PPV	peak particle velocity
PRC	Public Resources Code
project	El Cajon Climate Action Plan project
PV	photovoltaic
RMS	root-mean-square
ROG	reactive organic gases
RPS	renewable portfolio standard
RTIP	Regional Transportation Improvement Program

RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board, San Diego Region
SAF Plan	State Alternative Fuels Plan
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SF ₆	hexafluoride
SIP	State implementation plan
SLT	screening-level threshold
SO ₂	sulfur dioxide
SR	State Route
STIP	State Transportation Improvement Program
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TRB	federal Transportation Research Board
UFP	ultrafine particulate matter
USFWS	U.S. Fish and Wildlife Service
VdB	vibration decibels
VOC	volatile organic compounds
WMA	watershed management area

EXECUTIVE SUMMARY

INTRODUCTION

This summary is provided in accordance with California Environmental Quality Act Guidelines (State CEQA Guidelines) section 15123. As stated in the State CEQA Guidelines section 15123(a), “an environmental impact report (EIR) shall contain a brief summary of the proposed actions and its consequences. The language of the summary should be as clear and simple as reasonably practical.” As required by the Guidelines, this chapter includes (1) a summary description of the proposed project, (2) a synopsis of environmental impacts and recommended mitigation measures, (3) identification of the alternatives evaluated and of the environmentally superior alternative, and (4) a discussion of the areas of controversy associated with the project.

PROJECT OBJECTIVES

The fundamental purpose of the Climate Action Plan (CAP) is to provide a comprehensive roadmap to address the challenges of climate change in the City of El Cajon (City). Acting on climate change means both reducing greenhouse gas (GHG) emissions from local sources in the City and helping the community to adapt to climate change and improve its resilience over the long term.

The City has developed the following objectives for the project:

- ▶ prepare a baseline GHG emissions inventory including municipal and community-wide sources of emissions in the City, and analyze the potential growth of these emissions over time;
- ▶ identify GHG reduction strategies and measures that reduce GHG emissions from activities in the City that address the challenges of a changing climate and improve resilience in the city over the long term;
- ▶ reduce municipal and community-wide GHG emissions to meet the City’s GHG reduction targets for 2020 and 2030; and
- ▶ provide an implementation strategy that provides guidance to the community on how to achieve consistency with the CAP and an overview of the CEQA tiering/streamlining options for future projects pursuant to the requirements of CEQA Guidelines section 15183.5(b)(2).

PROJECT LOCATION

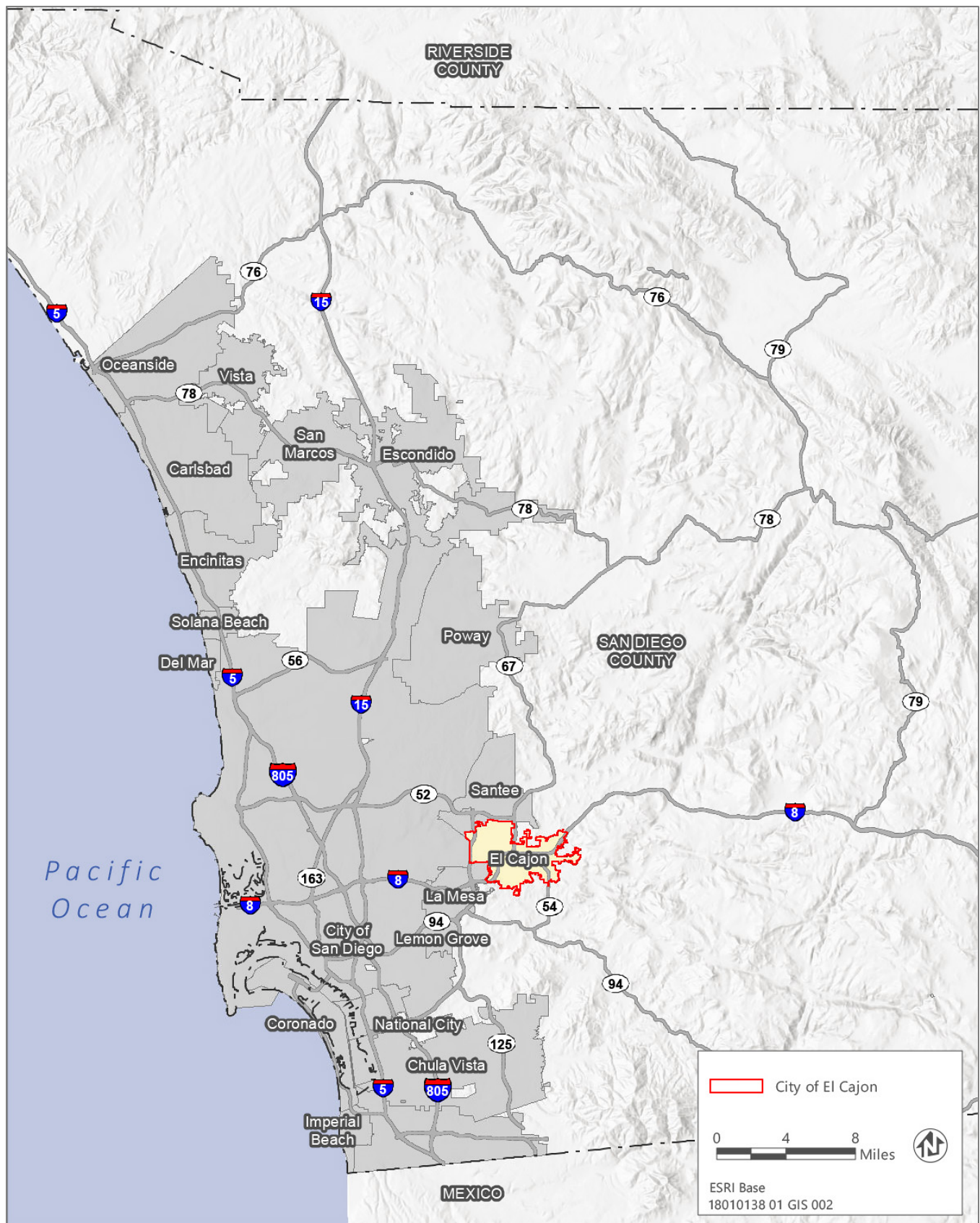
The City of El Cajon is in eastern San Diego County, east of the cities of San Diego and La Mesa, south of the City of Santee and about 15 miles inland (Figure ES-1).

The planning area for the CAP is the same planning area that was considered by the 1991 General Plan, which encompasses approximately 14.4 square miles (Figure ES-2).

SUMMARY DESCRIPTION OF THE PROPOSED PROJECT

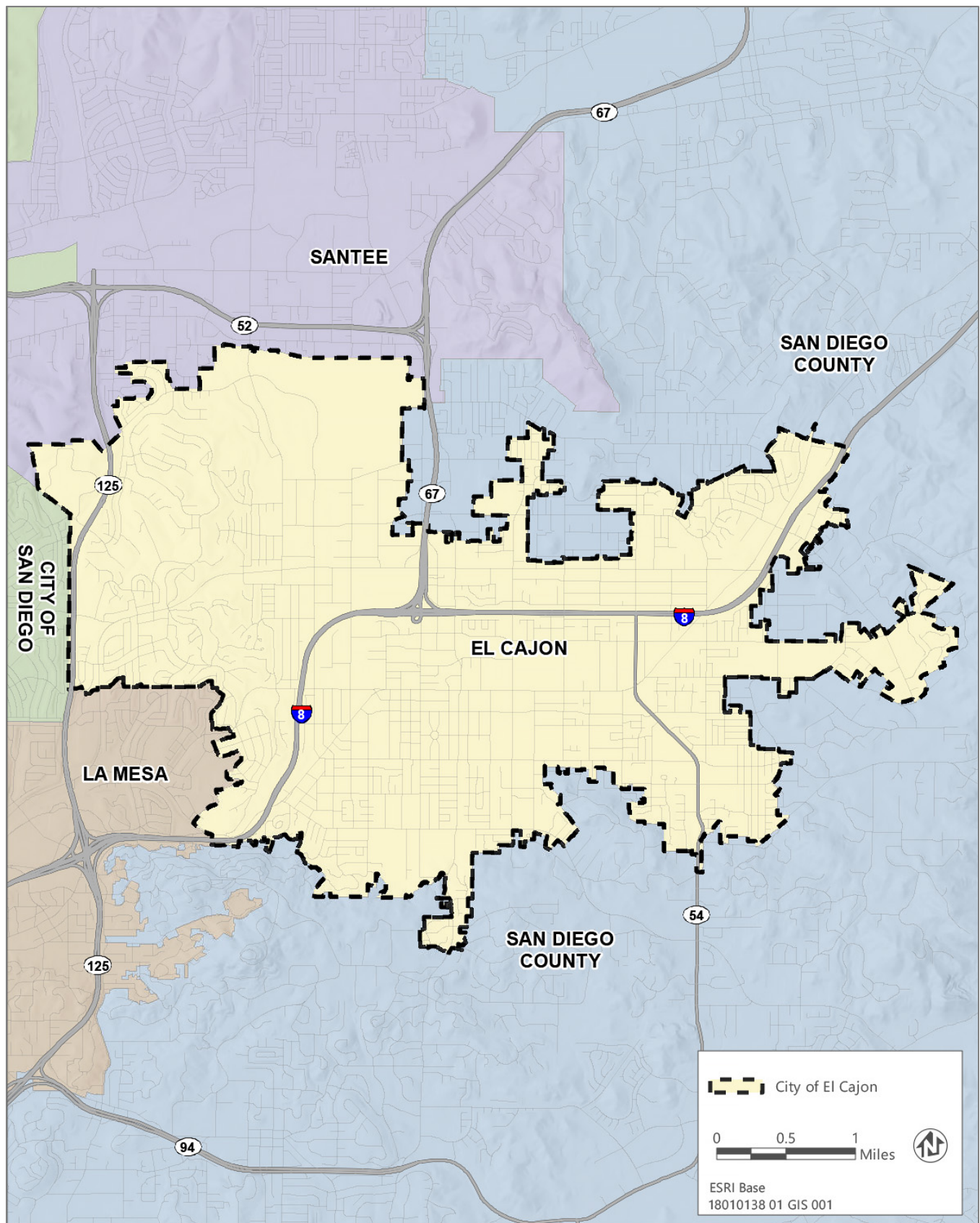
The City of El Cajon is proposing to adopt CAP consistent with State CEQA Guidelines section 15183.5 which outlines the requirements for qualified plans for the reduction of GHG emissions. The El Cajon CAP is part of a regional effort undertaken among a majority of San Diego County jurisdictions, in cooperation with the regional planning agency, the San Diego Association of Governments (SANDAG), to reduce GHG emissions in the region.

The following sections describe the project, including the contents of the CAP.



Source: Data downloaded from the County of San Diego in 2018

Figure ES-1 Regional Location



Source: Data downloaded from the County of San Diego in 2018

Figure ES-1 **Planning Area**

Climate Action Plan

The City's CAP is being developed to be consistent with State legislation and policies that are aimed at reducing statewide GHG emissions. This includes:

- ▶ Assembly Bill (AB) 32, which established a target of reducing statewide GHG levels to 1990 levels by 2020;
- ▶ Senate Bill (SB) 32, which established a mid-term target of reducing statewide GHG levels to 40 percent below 1990 levels by 2030; and
- ▶ Executive Order (EO) S-3-05, which recommends a 2050 statewide longer-term GHG reduction goal of reducing GHG emissions 80 percent below 1990 levels;

The GHG reduction targets and goals for the City in the CAP are established consistent with guidance provided in the 2017 Scoping Plan for plan-level, communitywide GHG reduction analysis and target-setting that aligns with methods used to develop the State's goals. This CAP primarily focuses on reducing emissions by 2020 and 2030, consistent with State mandates. While setting goals beyond 2030 is important to provide long-term objectives, it is difficult to establish targets beyond a 15-year time frame for which defensible reduction assumptions can be made. This is primarily because of uncertainty around future technological advances and future changes in State and Federal law beyond 2030.

Consistent with the Scoping Plan targets and the State's 2014 GHG emissions inventory, the CAP aims to achieve the following community-wide GHG reduction targets:

- ▶ 4 percent below 2014 levels by 2020, and
- ▶ 42 percent below 2014 levels by 2030.

To achieve these GHG reduction targets, the CAP accounts for actions taken by State and Federal agencies that will reduce emissions in the City (also known as "legislative reductions") and identifies several sector-based strategies and GHG reduction measures that can be adopted and implemented locally by the City or others. The CAP also includes implementation and monitoring procedures. Reporting on the status of implementation of strategies, periodic updates to the GHG emissions inventory, and other monitoring activities will help ensure that progress is being made towards achieving the objectives and specific GHG reduction measures.

The CAP will also be used for future project-specific environmental documents by being prepared consistent with the tiering and streamlining provisions of section 15183.5(b)(2) of the State CEQA Guidelines. The EIR will provide the appropriate level of environmental review to allow future projects to tier from and streamline their analysis of GHG emissions pursuant to CEQA Guidelines section 15183.5(b)(2). This is described in detail in Chapter 1, Introduction of this EIR.

CAP CONTENTS

The CAP contains five chapters which are briefly summarized below:

- ▶ Executive Summary: Summarizes the key information contained in the CAP.
- ▶ Chapter 1 - Introduction: This chapter introduces the document, describes the purpose and context of the plan, and identifies the regulatory framework related to global GHG emissions.
- ▶ Chapter 2 - Greenhouse Gas Emissions Inventory, Projections, and Targets: This chapter provides detailed accounting of GHG emissions from municipal operations and community-wide activities within the City. It establishes a baseline inventory with 2012 GHG emissions from all sectors. Projections of GHG emissions and reduction targets are described and the resultant emissions gap between projected emissions and reduction targets is calculated.
- ▶ Chapter 3 - Greenhouse Gas Reduction Strategies, Measures, and Actions: This chapter outlines GHG reduction strategies, measures, and actions to be implemented by the City to achieve its GHG reduction targets. The strategies and measures focus on locally-based actions to reduce GHG emissions in various categories as a complement to legislative actions taken by the State or federal government.

- Chapter 4 - Implementation and Monitoring: This chapter describes the set of actions that comprise the implementation strategy, possible funding mechanisms, the monitoring and compliance program, and an overview of the CEQA tiering/streamlining options for future projects.

The key components included in the CAP chapters listed above are described in more detail below.

GHG EMISSIONS INVENTORY

The inventory was prepared for the year 2012 and serves as the baseline year from which the City determines GHG reduction targets. The 2012 baseline year was chosen as it was the most recent calendar year for which complete source and activity data was available when the planning process began in mid-2017. The 2012 inventory is organized into GHG Emissions Sectors, which represent a distinct subset of a market, society, industry, or economy whose components share similar characteristics. The seven major GHG Emissions Sectors are shown below in order of contribution.

1. On-Road Transportation: On-road transportation emissions associated with gasoline and diesel consumption from driving that occurred on roadways.
2. Electricity: Building energy use emissions associated with electricity in residential and commercial buildings.
3. Natural Gas: Building energy use emissions associated with combustion of natural gas in residential and commercial buildings.
4. Off-Road Transportation: Off-road transportation emissions associated with gasoline and diesel fuel use from recreational vehicles, construction equipment, and residential and commercial equipment.
5. Solid Waste: Waste emissions associated with the disposal of organic waste in landfills and community-generated mixed waste generated by residents and businesses in the City.
6. Water: Emissions associated with the water supplied, conveyed, distributed, and treated to residents and businesses within the City.
7. Wastewater: Wastewater treatment emissions associated with both the energy consumed during treatment and fugitive emissions resulting from combustion during treatment process for domestic sewage.

As illustrated in Table ES-1, in 2012, community activities accounted for approximately 685,000 MTCO₂e.

Table ES-1 2012 City of El Cajon Greenhouse Gas Emissions Inventory

Emission Sector	2012 ¹ (MTCO ₂ e/yr)	Percent
On-Road Transportation	357,000	52
Electricity	200,000	29
Natural Gas	86,000	13
Off-Road Transportation	20,000	3
Solid Waste	15,000	2
Water	7,000	1
Wastewater	1,000	<1
Total	685,000	100

Notes: Columns may not add to totals due to rounding.

MTCO₂e = metric tons of carbon dioxide equivalent; GWP = Global Warming Potential; IPCC = Intergovernmental Panel on Climate Change

¹ Uses GWP factors from IPCC's Fourth Assessment Report.

² Based on SANDAG Series 13 vehicle miles traveled (VMT) estimates. 2012 is the Base Year.

Source: Ascent Environmental 2018.

GHG EMISSIONS FORECAST

GHG emissions forecasts for a community are used to estimate future emissions levels in the absence of climate action measures. Emissions forecasts were prepared for both “business-as-usual” (BAU) and legislative-adjusted BAU scenarios for 2020 and 2030. The BAU emissions scenario is based on projected population, housing, and employment growth anticipated in the City as provided by SANDAG, assuming no actions would be taken to reduce emissions by Federal, State or local agencies pursuant to AB 32 or other legislation. The BAU scenario represents theoretical “worst-case” future conditions, while the legislative-adjusted BAU scenario accounts for future emissions reductions pursuant to AB 32 and other legislation in California from a variety of regulations and programs, including the Renewable Portfolio Standard (RPS), improving vehicle fuel economy standards because of Advanced Clean Cars, and other State and Federal policies.

As shown in Table ES-2, the legislative adjusted BAU forecast scenario, community-wide GHG emissions are forecasted to decrease by approximately 14 percent by 2020 and 13 percent by 2030 for the City compared to 2012 emissions.

Table ES-2 City of El Cajon Projections (MTCO₂e/year)

Sector and Subsector	2012	2020		2030	
		BAU	Legislatively-Adjusted BAU	BAU	Legislatively-Adjusted BAU
On-Road Transportation	357,000	316,000	305,000	306,000	241,000
Electricity	200,000	150,000	135,000	158,000	69,000
Natural Gas	86,000	79,000	77,000	83,000	74,000
Off-Road Transportation	20,000	18,000	18,000	22,000	22,000
Solid Waste	15,000	17,000	17,000	18,000	18,000
Water	7,000	5,000	5,000	6,000	6,000
Wastewater	1,000	1,000	1,000	1,000	1,000
Total	685,000	586,000	558,000	593,000	430,000
Percent change from 2012 (%)	---	-14%	-19%	-13%	-37%

Notes: Columns may not add to totals due to rounding.

BAU = Business as usual; NA = Not Applicable; GWP = Global Warming Potential; MTCO₂e = metric tons of carbon dioxide equivalent

Source: Ascent Environmental, 2018

GHG EMISSIONS REDUCTION TARGETS

The CAP provides a course of action for the City to reduce GHG emissions consistent with AB 32, SB 32, and EO B-30-15 and S-3-05. The state aims to reduce annual statewide GHG emissions to:

- ▶ 1990 levels by 2020,
- ▶ 40% below 1990 levels by 2030, and
- ▶ 80% below 1990 levels by 2050.

To determine an equivalent reduction target at the local level, California’s 2017 Climate Change Scoping Plan released by the California Air Resources Board (CARB) recommends community-wide GHG reduction goals for local climate action plans that are aligned with and contribute to helping the State achieve its 2030 and 2050 goals (CARB 2017). The State’s goals are expressed as reducing emissions to 6 MTCO₂e per capita and 2 MTCO₂e per capita by 2030 and 2050, respectively. Considering the overall statewide emissions in 1990 and 2014 and the forecasted statewide population in 2030 and 2050, these per-capita goals would be equivalent to reducing 2014 emissions by 40 percent

by 2030 and 77 percent by 2050 for the entire San Diego County area (CARB 2016b, DOF 2014). Although CARB did not recommend a similar community-level target for 2020, an equivalent target can be calculated by comparing the State's GHG inventories for 1990 and 2014. According to CARB's estimate of California's GHG inventory, the State emitted approximately 431 million MTCO₂e (MMTCO₂e) in 1990 and 442 MMTCO₂e in 2014, a 2 percent increase. Thus, the following 2020 and 2030 targets would reduce annual municipal and community-wide GHG emissions in the City consistent with CARB's recommended goals:

- ▶ 4 percent below 2012 levels by 2020; and
- ▶ 42 percent below 2012 levels by 2030.

The recommended targets, along with estimated reductions required to achieve the targets, are summarized below in Table ES-3.

Table ES-3 Recommended Greenhouse Gas Emissions Reduction Targets: 2020 and 2030

Scenario or Target	2012	2020	2030
Baseline and Projections			
2012 Baseline GHG Inventory (MTCO ₂ e)	685,000	NA	NA
Legislative-Adjusted BAU Forecast (MTCO ₂ e)	NA	558,000	430,000
Legislative-Adjusted BAU Forecast: Percent below Baseline (%)	NA	19	37
Targets			
Target Percent Reduction below Baseline (%)	NA	4	42
Target Annual Emissions (MTCO ₂ e)	NA	659,000	397,000
Gap Analysis			
Reduction from Baseline needed to meet Target (MTCO ₂ e)	NA	-73,000	196,000
Reduction from Legislative-Adjusted BAU needed to meet Target (MTCO ₂ e)	NA	0	163,000
Additional Reduction below Legislative-Adjusted BAU needed to meet Target ¹	NA	0	33,000
Notes: BAU = Business as usual, MTCO ₂ e = metric tons of carbon dioxide equivalent, GHG = greenhouse gas, NA = Not Applicable			
Source: Ascent Environmental, 2018			

Therefore, the City's 2020 and 2030 GHG emissions reduction targets are identified as the following:

- ▶ 659,000 MTCO₂e by 2020, and
- ▶ 397,000 MTCO₂e by 2030.

GHG EMISSIONS REDUCTIONS STRATEGIES, MEASURES, AND ACTIONS

Based on the City's 2012 inventory shown in Table ES-3, the targets above aim to reduce annual City emissions to 659,000, and 397,000 MTCO₂e by 2020 and 2030, respectively. The City is already meeting the 2020 target because of existing legislative actions but would need to implement additional local GHG reductions to meet the 2030 target. The City would need to reduce annual legislative-adjusted BAU 2030 emissions by 33,000 MTCO₂e.

The CAP includes 28 actions under 15 measures, all within the eight strategies, with supporting measures for each strategy, that the City would implement to reduce GHG emissions. Refer to Table 2-5, GHG Reduction Strategies, Measures, and Actions, at the end of this chapter for the complete list of measures. Measures that could result in physical environmental impacts are evaluated within applicable chapters of this Draft EIR. Those measures that were determined not to result in physical environmental impacts as indicated in Table 2-5, are not discussed further within this Draft EIR.

The total estimated reductions in 2020 would be more than sufficient to meet the recommended 2020 target, with a 73,000 MTCO₂e annual surplus of GHG reductions beyond legislative-adjusted forecasts. Implementation of the proposed reduction strategies and measures would further reduce 2030 GHG emissions by 33,000 MTCO₂e and achieve the City’s 2030 target emissions.

IMPLEMENTATION AND MONITORING APPROACH

Some of the proposed GHG reduction strategies, measures, and actions would be implemented through code updates adopted by the City. Discretionary review processes also provide a mechanism through which to implement strategies, measures, and actions. Implementation of some strategies, measures, actions would rely on financial incentives, research and development of new programs, partnerships with other agencies, and education and outreach.

To achieve the GHG emissions reductions strategies described in Chapter 3, measures need to be assessed and monitored to ensure that: (1) the measures are effective; (2) the CAP is on track to achieve the GHG reduction targets; and (3) beneficial community outcomes are attained. City staff will prepare monitoring reports and provide regular updates on CAP implementation. The CAP would be updated as needed. Consistent with the requirements of CEQA Guidelines section 15183.5 (b)(1)(E), an agency is required to monitor the CAP’s progress and amend it if it is determined that the plan is not achieving its specified targets. If amendments to the CAP are required, they would be reviewed considering CEQA’s requirements for subsequent environmental review as outlined in section 15162 to 15164.

PUBLIC OUTREACH

Public outreach would not result in any direct or indirect physical changes in and of itself that would require evaluation in the Draft EIR (CEQA Guidelines section 15061(b)(3)). The City has engaged the community extensively throughout the Draft CAP and CAP process including several outreach meetings and public hearings at key milestones in the process to engage the community and interested stakeholders. Public outreach for the CAP included involvement and engagement of key internal and external stakeholder groups from various public, private, and nonprofit sectors; as well as individual citizens and residents of the City.

Permits and Approvals

The City Council of El Cajon will be the CEQA lead agency responsible for considering adoption and implementation of the CAP. As the lead agency under CEQA, the City is responsible for considering the adequacy of the EIR and determining if the overall project should be approved (Table ES-4).

Table ES-4 Required Project Approvals

Project Approval	Approving Authority
Approval of Climate Action Plan	El Cajon City Council
Certification of the EIR	El Cajon City Council
Notes: The EIR is intended to apply to all listed project approvals as well as to any other approvals necessary or desirable to implement the project.	

ENVIRONMENTAL IMPACTS AND RECOMMENDED MITIGATION MEASURES

Table ES-5, at the end of this chapter, provides a summary of the environmental impacts of the project, the level of significance of the impact before mitigation, recommended mitigation measures, and the level of significance of the impact after the implementation of the mitigation measures.

SUMMARY OF ALTERNATIVES

The following alternatives are evaluated in this Draft EIR.

- ▶ **Alternative 1: No Project** assumes that the CAP would not be adopted or implemented. As a result, the City would not adopt strategies or measures to reduce GHG emissions in accordance with state-legislated reduction targets.
- ▶ **Alternative 2: Roof-Top Solar for Commercial Properties** would modify GHG Reduction Measures RE-1 to require that solar systems be installed on all new commercial rooftops throughout the City as part of the discretionary approval process. This alternative would not replace renewable energy measures proposed in the CAP.

The following summary provides brief descriptions of the alternatives (Table ES-6). For a more thorough discussion of project alternatives, see Chapter 6, "Alternatives."

Alternative 1: No Project Alternative

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the environmental impacts of the No Project Alternative, to examine and compare the potential environmental consequences associated with not approving the CAP.

This alternative assumes that development would occur under the existing 2000 City of El Cajon General Plan as adopted, but without a qualified CAP as a mechanism to mitigate the GHG emissions that are resultant from the build-out of the 2000 General Plan.

Alternative 2: Roof-Top Solar for Commercial Properties Alternative

This alternative would modify GHG Reduction Measure RE-1 to require the construction of solar systems on new commercial construction to commercial properties throughout the City. This alternative would increase GHG reductions through increased installations of distributed generation systems that are not currently assumed in the CAP and would offset the need to construct other GHG reduction measures that would have larger-scale construction impacts. Distributed generation systems are typically small in scale and located in urban areas. As such, construction-related environmental impacts would be minimal. In addition, because of their small size, no routine management or maintenance of the systems are required and, therefore, would not have any associated operational impacts. As a result, incentivizing and relying on distributed generation systems for additional GHG emissions reductions could reduce construction and operational impacts compared to the current suite of GHG reduction measures in the CAP.

Environmentally Superior Alternative

CEQA Guidelines section 15126.6(e)(2) requires that if an EIR determines that the No Project Alternative is environmentally superior to the project, the EIR must identify an environmentally superior alternative among the other alternatives considered. Table 6-1 provides a summary comparison of the impacts of the project and alternatives. As described above, the No Project Alternative would not be environmentally superior to the project because it would not meet SB 32 reduction targets and would not reduce any of the project's significant environmental impacts. Therefore, this alternative would result in a new significant GHG impact that was not previously identified for the project.

Based on review of the other alternatives considered, the City has determined that the Roof-Top Solar on Commercial Properties Alternative would be environmentally superior to the project because it would reduce impacts related to construction and operation of larger-scale GHG reduction measures that result in a comparable amount of GHG reductions (e.g., ground-mounted solar) while still achieving both the primary objective of GHG emissions reductions consistent with SB 32 and all other supporting project objectives.

AREAS OF CONTROVERSY

In accordance with Public Resources Code (PRC) section 21092 and CEQA Guidelines section 15082, the City issued a notice of preparation (NOP) on [insert date], to inform agencies and the general public that an EIR was being prepared and to invite comments on the scope and content of the document (Appendix A). City staff accepted comments on the scope of the EIR between March 1, 2019 and April 1, 2019.

Based on the comments received during the NOP comment period, the major areas of controversy associated with the project are:

- ▶ AB 52 requirements,
- ▶ Compliance with State GHG reduction targets, and
- ▶ Alternatives analysis.

All the substantive environmental issues raised in the NOP comment letters and at the scoping meeting have been addressed or otherwise considered during preparation of this Draft EIR.

Table ES-5 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
Aesthetics			
Impact 3.1-1: Conflict with City policies or Regulations to Protect Visual Resources or Public Views GHG reduction measures that may result in the development of new rooftop PV solar systems and new/expanded waste facilities could result in impacts to visual resources. However, proposed infrastructure would be small in scale and would be typical of what occurs in urban environments. Additionally, each project with the potential to result in environmental impacts would require a separate and future discretionary review process that would ensure compliance with existing State, and local regulations that protect visual resources, especially City General Plan policies and Municipal Code Title 17. Therefore, this impact would be less than significant.	LTS	No Mitigation is required.	
Impact 3.1-2: Result in Negative Impacts Related to Scenic Resources GHG reduction measures that result in the development of new rooftop PV solar systems and new/expanded waste facilities could result in impacts to scenic resources. However, proposed infrastructure would be in urban areas and would not endanger symbols or landmarks of value within the city. Additionally, each project with the potential to result in environmental impacts would require a separate and future discretionary review process that would require additional environmental review under CEQA, as well as ensure compliance with existing State, and local regulations that protect scenic resources, including City General Plan policies and Municipal Code Title 17. Therefore, this impact would be less than significant.	LTS	No Mitigation is required.	
Impact 3.1-3: Result in Negative Impacts to Visual Quality and Aesthetics GHG reduction measures that result in the development of electric vehicle charging stations, bicycle and pedestrian infrastructure, new rooftop PV solar systems, and new/expanded waste facilities could result in impacts related to visual quality and aesthetics. However, the project types that would be implemented under the CAP are small, and typical of urban environments. Additionally, each project with the potential to result in environmental impacts would require a separate and future discretionary review process that would require additional environmental review under CEQA, as well as ensure compliance with existing State, and local regulations that protect visual quality and aesthetics in the city, including City General Plan policies and Municipal Code Title 17. Therefore, this impact would be less than significant.	LTS	No Mitigation is required.	
Impact 3.1-4: Create a New Source of Substantial Light or Glare GHG reduction measures that result in the development of new rooftop PV solar systems, and new/expanded waste facilities could result in impacts related to visual quality and aesthetics. However, the project types that would be implemented under the CAP are small, and typical of urban environments. Additionally, each project with the potential to result in environmental impacts would require a separate and future discretionary review process that would require	LTS	No Mitigation is required.	

Table ES-5 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
additional environmental review under CEQA, as well as ensure compliance with existing State, and local regulations that would minimize light and glare impacts in the city, including City General Plan policies and Municipal Zoning Code Title 17. Therefore, this impact would be less than significant.			
Air Quality			
Impact 3.2-1: Conflict with or Obstruct Implementation of the Applicable Air Quality Plan The proposed GHG reduction measures are not growth-inducing, nor are they substantial employment generators such that an increase in VMT would be induced. While some measures may result in a temporary increase in the number of construction workers, workers would likely be from the San Diego region and permanent relocation would not be required. Furthermore, a co-benefit of many of the GHG reduction measures is improved air quality through reduction of criteria air pollutant emissions. Given that the CAP would not induce substantial population growth or increase in vehicle miles traveled (VMT), and would result in beneficial impacts, the project would not conflict with or obstruct implementation of any applicable air quality plans. Impacts would be less than significant.	LTS	No Mitigation is required.	
Impact 3.2-2: Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for which the Project Region is in Non-Attainment Under an Applicable Federal or State Ambient Air Quality Standard GHG reduction measures would result in minor air pollutant emissions during construction activities which would be mitigated at the time of permitting. Implementation of GHG Reduction Measure SW-1 would generate operational emissions of air pollutants but would comply with San Diego Air Pollution Control District (SDAPCD) Regulation II, and projects would acquire the appropriate permits. As discussed in Impact 3.2-3, the CAP would not result in an exceedance of SDAPCD's screening level thresholds (SLTs) and thus, would not result in cumulative air quality impacts. Impacts would be less than significant.	LTS	No Mitigation is required.	
Impact 3.2-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations Although there would be a temporary increase in vehicle trips related to construction worker commute and equipment delivery, the CAP would not result in substantial long- or short-term vehicle trip generation at levels that could cause unhealthy concentrations of carbon monoxide (CO) on nearby roadways. Therefore, the project would not contribute to a CO hotspot. Most GHG reduction measures would result in minor criteria air pollutant and toxic air contaminants (TAC) emissions during construction and beneficial long-term air quality impacts. GHG Reduction Measure SW-1 would generate operational emissions of criteria air pollutants but	LTS	No Mitigation is required.	

Table ES-5 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
<p>would comply with SDAPCD Regulation II and acquire the appropriate permits. Although a net increase in the number of haul truck trips would not be anticipated, GHG Reduction Measure SW-1 could result in the rerouting of haul truck routes, which could subject sensitive receptors to new or increased diesel PM emissions. The measure could result in the rerouting of up to 29 truck trips per day, which would not be considered a substantial increase in TAC emissions per CARB's guidance for siting sensitive receptors near TAC sources. The CAP would not result in the violation of any air quality standard, exposing sensitive receptors to substantial pollutant concentrations such that human health would be adversely affected. Impacts would be less than significant.</p>			
<p>Impact 3.2-4: Result in Other Emissions that Would Adversely Affect Substantial Numbers of People Construction activities associated with implementation of GHG reduction measures could result in temporary odorous emissions. Given the temporary and intermittent nature of the impacts, and dissipation of odors with increasing distance from the source, construction odor impacts would be less than significant. GHG Reduction Measure SW-1, which could result in new or expanded waste processing and diversion facilities, could generate objectionable odors during operation. Impacts would be minimized through implementation of an Odor Impact Mitigation Plan (OIMP), as required by CalRecycle, as well as all applicable project-specific mitigation measures. Therefore, impacts would be less than significant.</p>	LTS	No Mitigation is required.	
Biological Resources			
<p>Impact 3.3-1: Effects on Special-Status Species or Their Habitat Implementation of GHG reduction measures resulting from CAP adoption could result in direct and indirect effects on special-status species and their habitat if they are present in areas affected by the new or expanded facilities. However, compliance with existing federal, State, and local regulations that protect sensitive resources, and completion of subsequent project-level planning and environmental review would reduce potential impacts. Impacts would be less than significant.</p>	LTS	No Mitigation is required.	
<p>Impact 3.3-2: Effects on Sensitive Natural Communities, Riparian Habitat, and Protected Water of the United States and State, Including Wetlands Implementation of GHG reduction measures resulting from CAP adoption could result in direct and indirect effects on sensitive natural communities and riparian habitat related to construction activities. Although major channels within the City are concrete-lined and hold little significant environmental value, downstream impacts could occur from ground disturbing activities. However, compliance with existing federal, State, and local regulations that protect sensitive</p>	LTS	No Mitigation is required.	

Table ES-5 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
natural communities and riparian habitat, and completion of subsequent project-level planning and environmental review would reduce potential impacts to sensitive natural communities and riparian habitat. Impacts would be less than significant.			
Impact 3.3-3: Interfere with the Movement of Native Resident or Migratory Wildlife or Impede the Use of Native Wildlife Nursery Sites Implementation of the GHG reduction measures could result in impacts to wildlife nursery sites or wildlife corridors if projects disrupted either resource. Even though there are no identified Biological Core Areas or Linkages within the City, as identified in the County of San Diego South County Multiple Species Conservation Program, it is not possible to predict with certainty that there are no nursery sites or sites used as wildlife corridors. However, compliance with existing federal, State, and local regulations that protect nursery sites and wildlife corridors, and completion of subsequent project-level planning and environmental review would reduce potential impacts to nursery sites and wildlife corridors. Impacts would be less than significant.	LTS	No Mitigation is required.	
Impact 3.3-4: Conflict with Any Local Policies or Ordinances Protecting Biological Resources Future projects implemented under the CAP would be required to follow the City's development requirements, including compliance with the County of San Diego Multiple Species Conservation Program, and other applicable federal, State, and local policies, ordinances, and permitting procedures related to protection of biological resources. This impact would be less than significant.	LTS	No Mitigation is required.	
Archaeological, Historical, and Tribal Cultural Resources			
Impact 3.4-1: Change in the Significance of a Historical Resource GHG reduction measures that would require construction of new or modification of existing structures could result in impacts to historical resources, if they are associated with improvements to a historical building or if the introduction of new infrastructure could disrupt the historical context of the resource or other resources in the vicinity. However, projects would be required to comply with existing federal, State, and local regulations that protect historical resources, and undergo the City's discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review that would ensure that identified resources are appropriately protected. Therefore, this impact would be less than significant.	LTS	No Mitigation is required.	

Table ES-5 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
Impact 3.4-2: Potential Disturbance of Known or Undiscovered Cultural Resources or Paleontological Resources Ground disturbing activities associated with implementation of some GHG reduction measures could result in damage to unknown cultural resources, including humans remains, or paleontological resources as defined in State CEQA Guidelines section 15064.5. Compliance with existing federal, State, and local regulations and completion of subsequent project-level planning and environmental review would reduce potential impacts to these resources. Impacts would be less than significant.	LTS	No Mitigation is required.	
Impact 3.4-3: Impacts to Tribal Cultural Resources The City of El Cajon sent notification for consultation to Barona Band of Mission Indians, Mesa Grande Band of Mission Indians, Jamul Indian Village of California. No response was received prior to the release of this Draft EIR. Ground disturbing activities associated with implementation of some GHG reduction measures could result in damage TCR's. However, Compliance with existing federal, State, and local regulations and completion of subsequent project-level planning and environmental review, where applicable, would reduce potential impacts to TCR's. Impacts would be less than significant .	LTS	No Mitigation is required.	
Energy			
Impact 3.5-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy, During Project Construction or Operation GHG reduction measures have the potential to result in the consumption of energy resources during construction and operation of new or expanded facilities and infrastructure. Standard best management practices would discourage unnecessary idling and the operation of poorly maintained equipment during construction. New facilities would be required to meet current building code requirements including requirements for achieving appropriate energy efficiency standards (e.g., Title 24 standards or better). Moreover, while GHG reduction measures were formulated to reduce GHGs, many would improve energy efficiency and decrease reliance on fossil fuels. Thus, implementation of the CAP would not result in wasteful, inefficient, or unnecessary consumption of energy, during project construction or operation. Therefore, this impact would be less than significant.	LTS	No Mitigation is required.	
Impact 3.5-2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency Relevant plans that pertain to the efficient use of energy include the Energy Action Plan (EAP). The EAP focuses on energy efficiency; demand response; renewable energy; the supply and reliability of electricity, natural gas, and transportation fuels; and achieving GHG reduction targets	NI	No Mitigation is required.	

Table ES-5 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
(CEC and CPUC 2008). Overall, the CAP is intended to reduce GHG emissions generated within the City. GHG reduction measures aimed at improving energy efficiency, conversion from gasoline or diesel to electricity or alternative fuels, and renewable energy would directly support EAP goals and strategies. Therefore, the CAP would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. No impact would occur.			
Greenhouse Gas Emissions and Climate Change			
Impact 3.6-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment GHG reduction measures would directly or indirectly emit GHG emissions during construction and operation. GHG emissions would result from the operation of construction equipment, construction worker vehicle trips, and truck hauling trips. During the operational phase, some CAP measures may require additional employees to operate or maintain new/expanded facilities, resulting in increased vehicle trips and associated GHG emissions. Overall, the CAP is intended to reduce GHG emissions generated within the City by using alternatively fueled vehicles, reducing VMT, using renewable energy, reducing waste generation, and increasing carbon sequestration. Thus, the effects associated with the reduction of GHG emissions in the City would be beneficial. Implementation of the CAP measures would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant.	LTS	No Mitigation is required.	
Impact 3.8-2: Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of GHGs Applicable plans, policies, or regulations include statewide GHG emission targets established by AB 32, SB 32, and Executive Order (EO) S-3-05; California's 2017 Climate Change Scoping Plan (2017 Scoping Plan); San Diego Forward: The Regional Plan; regulations regarding increased use renewables for electricity production (SB X1-2 and SB 100); California Energy Code; and the City of El Cajon General Plan (1991). Implementation of the GHG reduction measures would be consistent with the City's overall goal to reduce GHG emissions consistent with statewide targets and would support a variety of other state and local plans, policies, and regulations. The proposed CAP would reduce emissions by 2020 and 2030, consistent with legislatively-adopted State targets. Impacts would be less than significant.	LTS	No Mitigation is required.	

Table ES-5 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
Noise and Vibration			
Impact 3.7-1: Short-Term Construction Noise Impacts Implementation of the CAP generally would not result in substantial short-term noise impacts because the scale and nature of future improvements which may occur are generally small, localized, and would require little use of heavy-duty construction equipment. Additionally, all projects within the City's jurisdiction would adhere to the City's Municipal Code section 9.44.010, Noise. GHG Reduction Measure SW-1 could result in the construction of new or expanded composting facilities outside of the City's jurisdiction, which may expose receptors to temporary and intermittent noise from mechanical equipment and haul trucks. All compostable materials handling activities must obtain a permit pursuant to the requirements of 27 CCR section 21450, which includes CEQA compliance. Thus, all future projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate noise impacts to the extent feasible in compliance with CEQA Guidelines section 15126.4. Impacts would be less than significant.	LTS	No Mitigation is required.	
Impact 3.7-2: Long-Term Operational Noise Impacts The GHG reduction measures would not result in future improvements that would produce substantial operational noise due to the minor nature of maintenance activities and few new operational vehicle trips. Although GHG Reduction Measure SW-1 could result in new stationary sources of noise, properly installed, operated, and maintained equipment would not be expected to generate excessive operational noise levels at sensitive receptors. Furthermore, all compostable material handling facilities and operations are subject to 14 CCR section 17867(a)(2). Therefore, impacts would be less than significant.	LTS	No Mitigation is required.	
Impact 3.8-3: Excessive Groundborne Vibration Implementation of GHG reduction measures that involve the operation of heavy-duty construction equipment could generate localized groundborne vibration in the vicinity of the construction activity. Given the required setback distances for siting of solid waste facilities within the City, as well as the low likelihood that construction activities or haul truck trips would occur within 43 feet of receptors, it is unlikely that construction or operational vibration impacts would occur. Where there is the potential for these impacts, they are routinely addressed through project-level environmental review and permitting. Future waste diversion projects would be required to evaluate project-specific impacts under CEQA at the time of application and project-specific mitigation would be required to minimize or avoid vibration impacts to the extent	LTS	No Mitigation is required.	

Table ES-5 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable			
feasible in compliance with CEQA Guidelines section 15126.4. Thus, impacts related to excessive groundborne vibration would be less than significant.			
Transportation/Traffic			
Impact 3.8-1: Conflict with a Program, Plan, Ordinance Addressing the Circulation System GHG reduction measures promote a reduction in VMT and are generally consistent with general plan transportation system policies by encouraging the construction of infrastructure that promotes the use of transportation modes other than the private automobile (bicycling and walking). While these projects may result in a temporary increase in construction traffic, the projects would remain consistent with the programs, plans, policies, and ordinances relevant to transportation and circulation systems. This impact would be less than significant.	LTS	No Mitigation is required.	
Impact 3.8-2: Substantially Increase Hazards due to a Geometric Design Feature Future projects that would occur with implementation of the CAP would largely be constructed in developed areas or along existing roadways and would not change the existing configuration of the roadways. GHG measures that encourage a shift in transportation modes and reduction in travel demand would result in minor changes to the existing streetscape. Any streetscape improvements involving pedestrian and bicycle facilities would be required to comply with Caltrans and local design guidelines for roadway facilities as applicable. With compliance with State and local regulations and design guidelines, roadway improvements promoted by the CAP would not substantially increase hazards due to geometric design features or incompatible uses. This impact would be less than significant.	LTS	No Mitigation is required.	
Impact 3.8-3: Result in Inadequate Emergency Access Implementation of some GHG reduction measures may temporarily disrupt traffic flows on area roadways increasing the amount of construction vehicles sharing the roadways with normal vehicle traffic. All future development projects would be required to follow the City of El Cajon standards for development and construction which include provisions for emergency vehicle access. Therefore, this impact would be less than significant.	LTS	No Mitigation is required.	
Impact 3.8-4: Conflict with Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities, or Otherwise Decrease the Performance or Safety of Such Facilities Implementation of some of the GHG reduction measures may temporarily disrupt traffic flows on area roadways increasing the amount of construction vehicles sharing the roadways with normal vehicle traffic. All future development projects would be required to follow the City El Cajon standards for development and construction standards which include provisions for emergency vehicle access. Therefore, this impact would be less than significant.	LTS	No Mitigation is required.	

Table ES-6 CAP Alternatives Comparison of Impacts

Environmental Topic	Proposed Project	Alternative 1: No Project	Alternative 2: Rooftop Solar for Commercial Properties Alternative
Aesthetics	LTS	▼	▼
Air Quality	LTS	▼	▼
Biological Resources	LTS	▼	▼
Archaeological, Historical, and Tribal Cultural Resources	LTS	▼	▼
Energy	LTS	▲	—
Greenhouse Gas Emissions and Climate Change	LTS	▲	—
Noise	LTS	▼	▼
Transportation/Traffic	LTS	▼	▼

▲ Alternative is likely to result in greater impacts to issue when compared to project.

— Alternative is likely to result in similar impacts to issue when compared to project.

▼ Alternative is likely to result in reduced impacts to issue when compared to project.

LTS Less than Significant with mitigation measures

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1 INTRODUCTION

This Draft Environmental Impact Report (Draft EIR) evaluates the potential environmental impacts of the proposed El Cajon Climate Action Plan project (project). The City proposes to adopt a comprehensive greenhouse gas (GHG) reduction plan including strategies, measures, and actions that would apply to all property located within the City.

This Draft EIR evaluates the environmental impacts of the adoption and implementation of the project. The Draft EIR also evaluates alternatives to the project.

This Draft EIR has been prepared under the City's direction in accordance with the requirements of the CEQA (Public Resources Code [PRC] section 21000 et seq.) and the State CEQA Guidelines.

1.1 PURPOSE AND INTENDED USES OF THIS DRAFT EIR

According to the State California Environmental Quality Act (CEQA) Guidelines (14 California Code of Regulations [CCR] section 15064[f][1]), preparation of an EIR is required whenever a project may result in a significant environmental impact. An EIR is an informational document used to inform public-agency decision makers and the general public of the significant environmental impacts of a project, identify possible ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project.

CEQA requires that state and local government agencies consider the environmental effects of projects over which they have discretionary authority before taking action on those projects (PRC section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less than significant levels, wherever feasible, the significant environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts that cannot be feasibly mitigated to less than significant levels, the project can still be approved, but the lead agency's decision makers must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC section 21002; CCR section 15093). Because they have the principal authority over approval of the project, the City is the lead agency, as defined by CEQA, for this EIR.

This document also functions as a Program EIR in accordance with CEQA Guidelines section 15168(c) for streamlining future projects. The climate action plan (CAP) is intended to be used for future project-specific GHG emissions analyses by being prepared consistent with the tiering and streamlining provisions of section 15183.5 of the CEQA Guidelines. The Draft EIR provides the appropriate level of environmental review to allow future projects to tier from and streamline their analysis of GHG emissions pursuant to CEQA Guidelines section 15183.5(a) and (b)(2), unless otherwise determined to be cumulatively considerable.

1.2 SCOPE OF ENVIRONMENTAL ANALYSIS

Pursuant to CEQA and the CEQA Guidelines, a lead agency shall focus an EIR's discussion on significant environmental effects and may limit discussion on other effects to brief explanations about why they are not significant (PRC section 21002.1, CCR section 15128). A determination of which impacts would be potentially significant was made for this project based on review of the information presented and comments received as part of the public scoping process (Appendix A), as well as additional research and analysis of relevant project data during preparation of this Draft EIR.

The City has determined that the project has the potential to result in significant environmental impacts on the following resources, which are addressed in detail in this Draft EIR:

- ▶ Aesthetics;
- ▶ Air Quality;
- ▶ Biological Resources;
- ▶ Cultural, Historical, and Tribal Cultural Resources;
- ▶ Energy;
- ▶ Greenhouse Gas Emissions;
- ▶ Noise; and
- ▶ Transportation/Traffic.

1.2.1 Effects Found Not to be Significant

CEQA allows a lead agency to limit the detail of discussion of the environmental effects that are not considered potentially significant (PRC section 21100, CCR sections 15126.2[a] and 15128). The City determined through a review of notice of preparation (NOP) comments, analysis of project materials, and research that the following issue areas would not result in significant environmental impacts. As such the following topics are not discussed in detail in this Draft EIR and the reasons for determining this are described below.

- ▶ Agricultural and Forestry Resources,
- ▶ Geology and Soils,
- ▶ Hazards and Hazardous Materials,
- ▶ Hydrology and Water Quality,
- ▶ Land Use and Planning,
- ▶ Mineral Resources,
- ▶ Population and Housing,
- ▶ Public Services,
- ▶ Recreation, and
- ▶ Utilities and Service Systems.

AGRICULTURAL AND FORESTRY RESOURCES

Implementation of the CAP would not preclude access to agricultural resources because the City is largely built-out with urban uses and does not contain land designated or zoned for agricultural uses. Pursuant to the Farmland Mapping and Monitoring Program, land within the city is categorized as Urban and Built-Up Land. Further, there are no lands under Williamson Act contract within the city (DOC 2016). According to 2006 mapping data from the California Department of Forestry and Fire Protection, the City does not contain any woodland or forestland cover; therefore, the city does not contain land zoned for Timberland Production nor does the City Zoning map identify areas for Timberland Production (CAL FIRE 2011). Therefore, no impact to agricultural and forestry resources would occur, and this issue will not be discussed further in this Draft EIR.

GEOLOGY AND SOILS

Implementation of the CAP would not expose people or structures to adverse effects resulting from geologic hazards because the CAP's GHG reduction measures and strategies would not amend, revise, or be inconsistent with any existing regulations related to geology and soils. All future infrastructure projects resulting from implementation of the CAP would comply with all relevant federal, State, and local regulations and building standards, including the California Building Code (CBC) and City-required geotechnical reports (El Cajon Municipal Code section 17.170.070) which would minimize the risk of seismic, soil instability, and expansive soils hazards. Compliance with National Pollution Discharge Elimination System, CBC, and the City's requirements for an Erosion and Sediment Control Plan (El Cajon Municipal Code section 13.10.160), would prevent potential impacts to soil erosion. Projects would be required to comply with all applicable federal, State and local regulations related to septic tanks and wastewater disposal, including local discharge prohibitions to prevent water quality issues because of ineffective septic and wastewater systems (El Cajon Municipal Code section 13.10.050). Projects would also be required to follow all applicable regulatory processes, including compliance with the State CEQA Guidelines, which could require the

completion of a geological report to evaluate the significance of unique geologic features on a given project site which would preserve unique geologic features.

Any projects or expansion of facilities associated with subsequent projects implemented as a result of the CAP would be required to comply with existing regulations intended to protect people and structures from seismic hazards, soil instability and expansive soils, and would not expose people or structures to potential substantial adverse effects involving risks related to these hazards. The project would also not amend or revise any regulations in place to prevent soil erosion, water quality impacts from septic tanks and wastewater disposal, or impacts to unique geologic features or expose more people and structures to these hazards. Therefore, impacts would be less than significant, and this issue is not discussed further in this Draft EIR.

HAZARDS AND HAZARDOUS MATERIALS

Implementation of the CAP would not create a significant hazard or expose the public or the environment to hazards or hazardous materials because the CAP's GHG reduction measures and strategies would not amend, revise, or be inconsistent with any existing regulations related hazards and hazardous materials. Implementation of the CAP is intended to reduce GHG emissions through proposed GHG reduction measures that would result in equipment fuel conversion, building energy efficiency improvements, small-scale renewable energy installation, bicycle and pedestrian infrastructure improvements, and solid waste diversion. All future projects resulting from implementation of the CAP would comply with all relevant federal, State, and local regulations that require strict adherence to guidelines regarding the safe use, transportation, and disposal of hazardous materials as well as ensuring the reduction of the potential for humans or the environment to be affected by an accidental release of hazardous materials. Regulations that would be required of those transporting, using or disposing of hazardous materials include the Resource Conservation and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Transportation Act; Title 22; CCR Title 27, and City Fire Code (El Cajon Municipal Code Chapter 15.56).

Implementation of proposed GHG reduction measures would not result in increased populations, and therefore, would not result in locating sensitive land uses upon a contaminated site. With regard to the use or storage of hazardous materials near schools, future projects resulting from implementation of the CAP would be required to comply with local and State regulations which require the consultation of databases which store information related to contaminated sites, soil testing of potential project sites, and project-level environmental assessments before grading.

The Gillespie Field public use airport is located along the City's northern boundary and development is regulated within the airport sphere by the airport land use plan (San Diego County Airport Land Use Commission 2010). There are no private use airports within the City. All projects that could result in airport hazards resulting from implementation of the CAP would be reviewed for consistency with the Gillespie Field Airport Land Use Compatibility Plan, which would ensure compliance with local, State, and federal regulations related to airport safety. Projects would also be evaluated for consistency with applicable local, State, and federal regulations regarding emergency response plans, including the countywide Multi-Jurisdictional Hazard Mitigation Plan and General Plan policies which would prevent interference with emergency response plans (San Diego County 2017). With regard to wildfire risk, a large area along the western boundary of the City is classified as "Very High Fire Hazards Severity Zone" (CAL FIRE 2009). All projects that could result from implementation of the CAP that would be near this area would be required to comply with the City Fire Code (El Cajon Municipal Code Chapter 15.56) to ensure that they would not exacerbate the risk of wildfire. Additionally, all future projects would be reviewed by the Fire Marshal to ensure compliance with fire safety aspects of the building code. Therefore, impacts would be less than significant, and this issue is not discussed further in this Draft EIR.

HYDROLOGY AND WATER QUALITY

Implementation of the CAP would not violate water quality standards or expose people or structures to flood hazards because the CAP's GHG reduction measures and strategies would not amend, revise, or be inconsistent with any existing regulations related to hydrology and water quality. Implementation of the CAP is intended to reduce GHG emissions through proposed GHG reduction measures that would result in equipment fuel conversion, building energy efficiency improvements, small-scale renewable energy installation, bicycle and pedestrian infrastructure improvements, and solid waste diversion. All future projects resulting from implementation of the CAP would be required to comply with all relevant federal, state, and local regulations including the City's Lot Grading Ordinance (El Cajon Municipal Code Chapter 15.64), Storm Water Management and Discharge Control Ordinance (El Cajon Municipal Code Chapter 13.10), Best Management Practices for all Dischargers Ordinance (El Cajon Municipal Code section 13.10.070), and General Plan policies 8-10.2 which directs the City to implement pollution prevention methods supplemented by pollutant source controls and treatment. Each of these regulations require strict adherence to guidelines that protect water quality, potable water and groundwater supplies, stormwater systems, and drainage patterns. Additionally, while specific locations for such improvements have not been identified, most would occur within previously disturbed areas and would be small in nature with less potential to result in significant erosion or water quality issues. Compliance with the National Pollution Discharge Elimination System and the City's requirements for an Erosion and Sediment Control Plan (El Cajon Municipal Code section 13.10.160), would prevent potential impacts to water quality from erosion. None of the GHG reduction measures or strategies would require the use of groundwater.

Implementation of proposed GHG reduction measures and strategies would not result in increased population and therefore, would not place housing within a 100-year flood hazard area, expose people to risk of loss as a result of the failure of a levee or dam, or result in inundation by seiche, tsunami, or mudflow. Additionally, all structures resulting from implementation of the CAP would be expected to conform with flood risk laws and regulations, including the National Flood Insurance Act, National Flood Insurance Reform Act, and Cobey-Alquist Flood Plain Management Act, General Plan policies, and the City's requirements for development within designated floodways (El Cajon Municipal Code section 17.130.260). Therefore, impacts would be less than significant, and this issue is not discussed further in this Draft EIR.

LAND USE AND PLANNING

Implementation of the CAP would not divide an established community or conflict with applicable land use plan, local policies and regulations, habitat plan, or natural community conservation plan because none of the GHG reduction measures or strategies would amend, revise, or be inconsistent with any existing regulations related to land use planning and development because it is a policy document that would apply to existing and new development within the City. Therefore, potential impacts related to land use and planning would be less than significant and this issue is not discussed further in this Draft EIR.

MINERAL RESOURCES

Implementation of the CAP would not result in a loss of availability of State or locally important mineral resources because the City does not contain identified commercial deposits of ores or minerals. Pursuant to the California Department of Conservation, land in western San Diego County contains significant sand and gravel deposits; however, none are located within the City (DOC 1982). Therefore, there would be no impact with respect to mineral deposits, and this issue is not discussed further in this EIR.

POPULATION AND HOUSING

Implementation of the CAP would not induce population growth directly or indirectly, remove existing housing or displace existing populations because it does not propose changes to policies or regulations related to land use or residential zoning. The CAP includes GHG reduction measures and strategies that would result in equipment fuel

conversion, building energy efficiency improvements, small-scale renewable energy installation, bicycle and pedestrian infrastructure improvements, and solid waste diversion. Implementation of proposed GHG reduction measures would not induce population growth nor require the conversion of existing housing developments to a non-residential use. Therefore, potential impacts related to population and housing would be less than significant and this issue is not discussed further in this Draft EIR.

PUBLIC SERVICES

Implementation of the CAP is intended to reduce GHG emissions through the proposed GHG reduction measures that would result in equipment fuel conversion, building energy efficiency improvements, small-scale renewable energy installation, bicycle and pedestrian infrastructure improvements, and solid waste diversion. Implementation of subsequent projects, such as small-scale renewable energy projects, or bike and pedestrian improvements would not directly affect the provision of public services, nor contribute to population growth that could result in an increase for demand for public services. These types of projects would not have a population-generating component. Therefore, no increase in demand on public services is expected. Therefore, potential impacts related to public services would be less than significant and this issue is not discussed further in this Draft EIR.

RECREATION

Implementation of the CAP is intended to reduce GHG emissions through proposed GHG reduction measures that would result in equipment fuel conversion, building energy efficiency improvements, small-scale renewable energy installation, bicycle and pedestrian infrastructure improvements, and solid waste diversion. Implementation of subsequent projects, small-scale renewable energy projects, or bike and pedestrian improvements would not directly affect the provision of recreational facilities, nor contribute to population growth that could result in a deterioration of existing recreational facilities. These types of projects would not have a population-generating component and, therefore, no increase in demand for recreational facilities is expected. Potential impacts related to recreation would be less than significant and this issue is not discussed further in this EIR.

UTILITIES AND SERVICE SYSTEMS

Implementation of the CAP is intended to reduce GHG emissions through proposed GHG reduction measures that would result in equipment fuel conversion, building energy efficiency improvements, small-scale renewable energy installation, bicycle and pedestrian infrastructure improvements, and solid waste diversion. Implementation of subsequent projects would not directly contribute to population growth that could exceed capacity of existing water, wastewater, stormwater, and solid waste facilities. However, proposed City Action SW-1.1 could result in new/expanded composting facilities in areas outside of the City's jurisdiction. Although the City's waste transfer stations have sufficient capacity to handle increased waste processing, this measure could result in future construction of compost facilities. All future development projects resulting from implementation of the CAP would be required to undergo the City's discretionary review process and would be evaluated for project-specific impacts under CEQA at the time of application. Projects would be required to comply with all relevant federal, State, and local regulations and building standards, including the California Building Code (CBC), Building and Construction Ordinance (City of El Cajon Title 15), Lot Grading Ordinance (El Cajon Municipal Code Chapter 15.64), and the City's land use and zoning requirements. Therefore, potential impacts related to utilities and service systems would be less than significant and this issue is not discussed further in this Draft EIR.

1.3 REVIEW AND CONSULTATION REQUIREMENTS

This Draft EIR will be used by the City to ensure that it has met its requirements under CEQA before deciding whether to approve the project. The project is also subject to consultation requirements in addition to the discretionary approvals identified in Table 2-4, Required Project Approvals. To date, the City has engaged in consultation with the following entities regarding the project:

- ▶ **Tribal Governments.** As required by Assembly Bill (AB) 52, the City initiated consultation with all Native American tribes with an affiliation to lands within the City of El Cajon to aid in the protection of traditional tribal cultural places and sacred lands as part of the Draft EIR process. AB 52 letters were sent to Barona Band of Mission Indians, Mesa Grande Band of Mission Indians, Jamul Indian Village of California for a 30- day response period. The City had not received a response prior to the release of this Draft EIR.

1.3.1 Lead Agency

For this EIR, the City of El Cajon is the lead agency under CEQA, as defined in section 15367 of the State CEQA Guidelines.

1.4 CEQA PUBLIC REVIEW PROCESS

1.4.1 Notice of Preparation

In accordance with PRC section 21092 and CCR section 15082, the City issued an NOP on March 1, 2019 to inform agencies and the general public that an EIR was being prepared and to invite comments on the scope and content of the document (Appendix A). The NOP was submitted to the State Clearinghouse (SCH #2019029154); posted on the City's website www.cityofelcajon.us/cap and advertised in the East County Gazette. The NOP was circulated for 30 days, through March 29, 2019.

In accordance with PRC section 21083.9 and CCR section 15082(c), a noticed scoping meeting for the EIR occurred on March 18, 2019 at 6:00 p.m. at Renette Recreation Center located at 935 Emerald Avenue, El Cajon, CA 92020. Appendix A contains the comment letters submitted during the public comment period as well as the Scoping Meeting Summary, which summarizes the comments received during the scoping meeting.

1.4.2 Public Review of the Draft EIR

This Draft EIR is being circulated for public review and comment for a period of 45 days, from April 17, 2019 to May 31, 2019. A public hearing will be held on the Draft EIR on [insert date] to receive input from agencies and the public on the Draft EIR.

In addition, written comments from the public as well as organizations and agencies will be accepted throughout the public comment period. In accordance with time limits mandated by State law, comments should be provided no later than 5:00 p.m. on May 31, 2019. Please send all comments to:

City of El Cajon, Community Development Department
200 Civic Center Way, 3rd Floor
El Cajon, CA 92020
Attention: Melissa Devine, Senior Planner
Telephone: (619) 441-1742
Email: mdevine@cityofelcajon.us

Comments provided by email should include the name and physical address of the commenter. Copies of this Draft EIR are available for public review at the following locations:

City of El Cajon	El Cajon Branch Library	Fletcher Hills Branch Library
Community Development Dept.	201 East Douglas Avenue	576 Garfield Avenue
200 Civic Center Way	El Cajon, CA 92020	El Cajon, CA 92020
El Cajon, CA 92020		

The Draft EIR is also available for public review online at: www.cityofelcajon.us/cap

1.4.3 Final EIR

Following public review of the Draft EIR, a Final EIR will be prepared that will include both written and verbal comments on the Draft EIR received during the public review period, responses to those comments, and any revisions to the Draft EIR. The Draft EIR and the Final EIR will comprise the EIR for the CAP. Before approving the CAP, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgement of the lead agency.

1.5 DRAFT EIR ORGANIZATION

This Draft EIR is organized as follows:

Executive Summary: This chapter introduces the proposed CAP; provides a summary of the environmental review process, effects found not to be significant, and key environmental issues; and lists significant environmental impacts and mitigation measures to reduce significant impacts to less-than-significant levels.

Chapter 1, Introduction: This chapter provides a description of the lead and responsible agencies, the legal authority and purpose for the EIR, the EIR process, and organization of the EIR.

Chapter 2, Project Description: This chapter describes the project background, objectives, and location, and provides a detailed description of the characteristics associated with the proposed CAP.

Chapter 3, Approach to the Environmental Analysis: The resource sections within this chapter evaluate the expected environmental impacts generated by the project. Within each subsection of Chapter 3, the regulatory background, existing environmental setting, the significance criteria, and the analysis methodology and assumptions are described. The anticipated changes to the existing environmental conditions after development of the project are then evaluated for each resource. For any significant or potentially significant impact that would result from project implementation, mitigation measures are presented along with remaining level of significance. Environmental impacts are numbered sequentially within each section (e.g., Impact 3.2-1, Impact 3.2-2, etc.). Any required mitigation measures are numbered to correspond to the impact numbering; therefore, the mitigation measure for Impact 3.2-1 would be Mitigation Measure 3.2-1.

Chapter 4, Cumulative Impacts: This chapter provides information regarding the potential cumulative impacts that would result from implementation of the project together with other past, present, and probable future projects.

Chapter 5, Alternatives: This chapter provides a discussion of alternatives to the project, including the No Project Alternative; alternatives considered but removed from further consideration; and the environmentally superior alternative.

Chapter 6, Other CEQA Sections: This chapter provides a discussion of potential significant and unavoidable impacts, significant and irreversible commitment of resources, energy conservation, and growth-inducing impacts.

Chapter 7, Report Preparers: This chapter identifies the lead agency contacts as well as the preparers of this Draft EIR.

Chapter 8, References: This chapter identifies the organizations and persons consulted during preparation of this Draft EIR and the documents used as sources for the analysis.

1.6 STANDARD TERMINOLOGY

This Draft EIR uses the following standard terminology:

No impact means no change from existing conditions (no mitigation is required).

Less-than-significant impact means no substantial adverse change in the physical environment (no mitigation is required).

Potentially significant impact or **Significant Impact** means an impact that might cause a substantial adverse change in the environment (mitigation is recommended where feasible).

Significant and unavoidable impact means an impact that would cause a substantial adverse change in the physical environment and that cannot be avoided, even with the implementation of all feasible mitigation.

Project means the proposed CAP, including all associated actions.

2 PROJECT DESCRIPTION

2.1 PROJECT BACKGROUND AND NEED

This chapter presents a detailed description of the El Cajon CAP Project (project). The City of El Cajon, as the Lead Agency for the project, has determined that the project requires the preparation of an environmental impact report (EIR) pursuant to the requirements of the CEQA (Public Resources Code [PRC] section 21000 et seq.) and the State CEQA Guidelines.

2.2 PROJECT OBJECTIVES

Section 15124 of the CEQA Guidelines requires an EIR to include a statement of objectives sought by the project proponent. The objectives assist the City, as lead agency, in developing a reasonable range of alternatives to be evaluated in the EIR. The project objectives also aide decision makers in preparing findings or, if necessary, a statement of overriding considerations. The statement of objectives also includes the underlying purpose of the project.

The fundamental purpose of the CAP is to provide a comprehensive roadmap to address the challenges of climate change in the City of El Cajon. Acting on climate change means both reducing GHG emissions from local sources in the City and helping the community to adapt to climate change and improve its resilience over the long term.

The City has developed the following objectives for the project:

- ▶ prepare a baseline GHG emissions inventory including municipal and community-wide sources of emissions in the City, and analyze the potential growth of these emissions over time;
- ▶ identify GHG reduction strategies and measures that reduce GHG emissions from activities in the City, along with climate adaptation measures that address the challenges of a changing climate and improve resilience in the city over the long term;
- ▶ reduce municipal and community-wide GHG emissions to meet the City's GHG reduction targets for 2020 and 2030, and
- ▶ provide an implementation strategy that provides guidance to the community on how to achieve consistency with the CAP and an overview of the CEQA tiering/streamlining options for future projects pursuant to the requirements of CEQA Guidelines section 15183.5(b)(2).

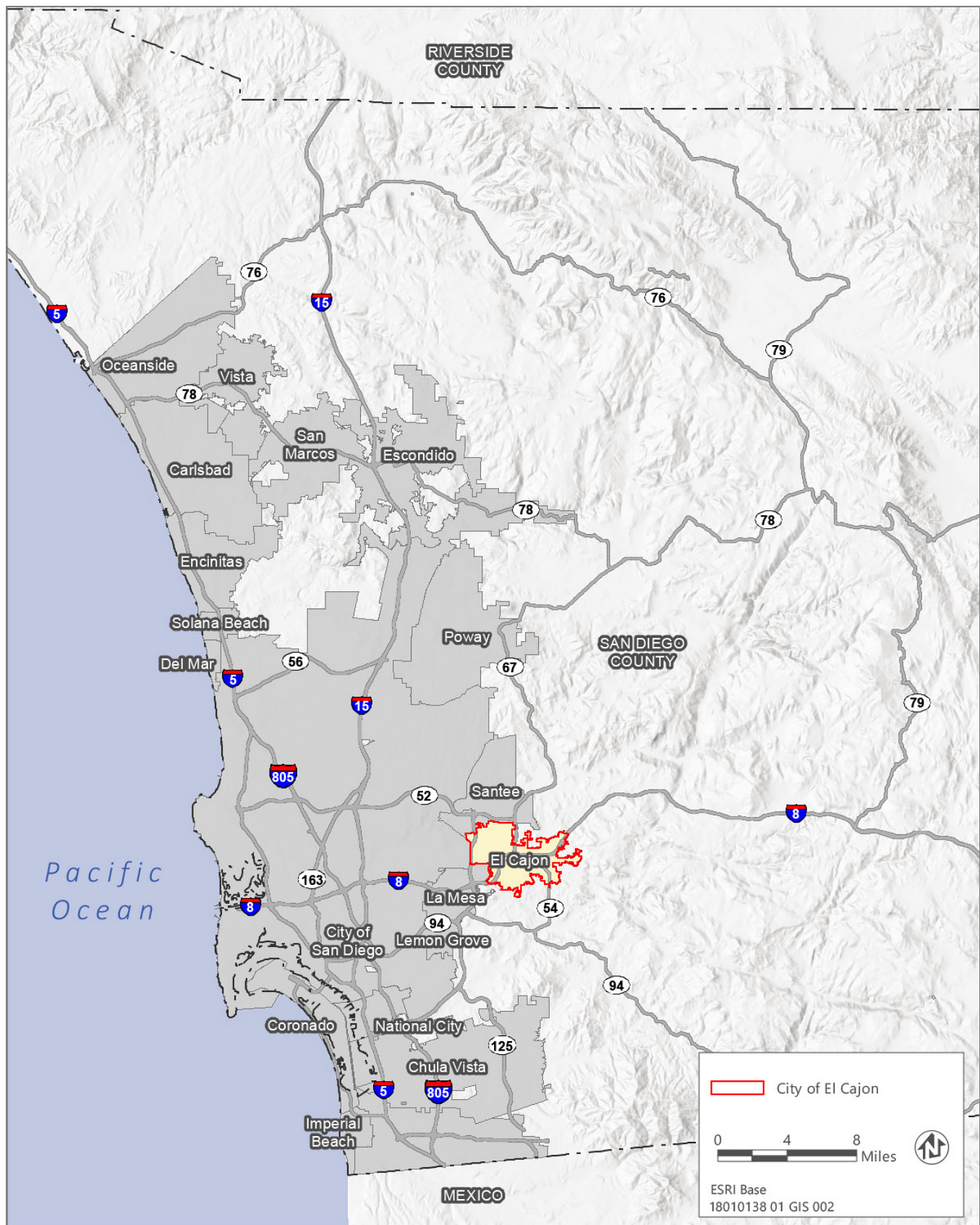
2.3 PROJECT LOCATION

The City of El Cajon is in eastern San Diego County, east of the cities of San Diego and La Mesa, south of the City of Santee and about 15 miles inland (Figure 2-1).

The planning area for the CAP is the same planning area that was considered by the 1991 General Plan, which encompasses approximately 14.4 square miles (Figure2-2).

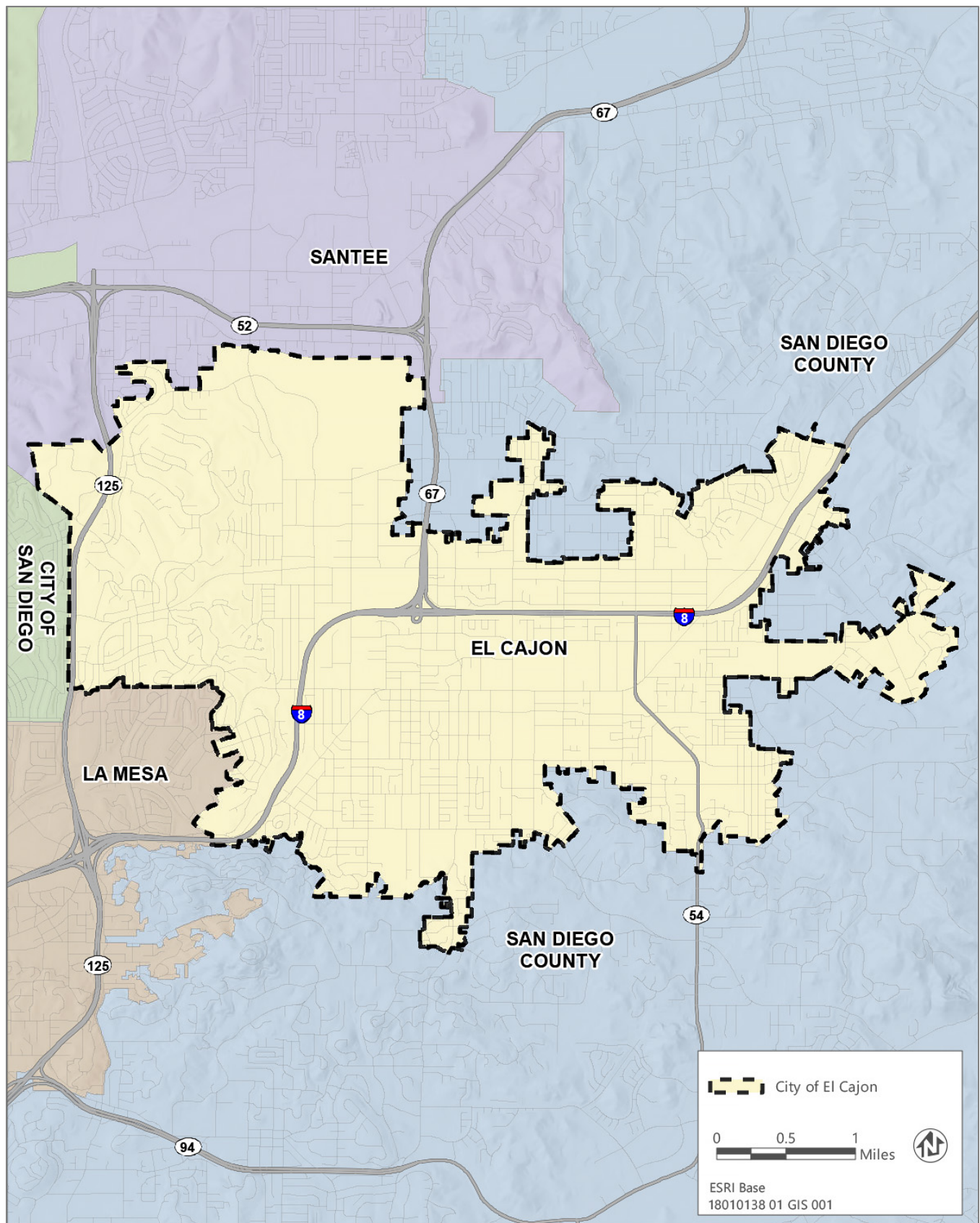
2.4 PROJECT BACKGROUND

The City has received assistance from the San Diego Association of Governments (SANDAG) through the Energy Roadmap Program to develop a CAP. Additionally, a Smart Growth Incentive Program Planning Grant was granted for environmental services, benefit-cost analysis, and community outreach associated with the development of the CAP.



Source: Data downloaded from the County of San Diego in 2018

Figure 2-1 Regional Location



Source: Data downloaded from the County of San Diego in 2018

Figure 2-2 Planning Area

2.5 DESCRIPTION OF THE PROPOSED PROJECT

Reducing GHG emissions in California has been the focus of the state government for approximately two decades (State of California 2018). GHG emission targets established by the state legislature include reducing statewide GHG emissions to 1990 levels by 2020 (Assembly Bill [AB] 32 of 2006) and reducing to 40 percent below 1990 levels by 2030 (Senate Bill [SB] 32 of 2016). Executive Order S-3-05 calls for statewide GHG emissions to be reduced to 80 percent below 1990 levels by 2050. Executive Order B-55-18 calls for California to achieve carbon neutrality by 2045 and achieve and maintain net negative GHG emissions thereafter. These targets are in line with the scientifically established levels needed in the United States to limit the rise in global temperature to no more than 2 degrees Celsius, the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius (United Nations 2015:3).

California's 2017 Climate Change Scoping Plan (2017 Scoping Plan), prepared by the California Air Resources Board (CARB), outlines the main strategies California will implement to achieve the legislated GHG emission target for 2030 and "substantially advance toward our 2050 climate goals" (CARB 2017:1, 3, 5, 20, 25–26). It identifies the reductions needed by each GHG emission sector (e.g., transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste). CARB and other state agencies are currently developing a Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal of Executive Order B-55-18.

This CAP primarily focuses on reducing emissions by 2020 and 2030, consistent with State mandates. While setting goals beyond 2030 is important to provide long-term objectives, it is difficult to establish targets beyond a 15-year time frame for which defensible reduction assumptions can be made. This is primarily because of uncertainty around future technological advances and future changes in State and Federal law beyond 2030. As climate change science and policy continues to advance, the City may be able to apply new strategies to assist in the State's long-term 2050 GHG emissions reduction goal in future CAP updates. Moreover, new Federal and State regulations could further reduce emissions that are currently being captured by local measures and actions.

The development of the CAP for the City of El Cajon is part of a regional effort undertaken among most San Diego County jurisdictions, in cooperation with the regional planning agency, SANDAG, to reduce GHG emissions in the region. The City intends to prepare the CAP consistent with the CEQA Guidelines section 15183.5 which outlines the requirements for qualified plans for the reduction of greenhouse gas emissions.

The following sections describe the project, including the contents of the CAP.

2.5.1 Climate Action Plan

The City's CAP is being developed to be consistent with State legislation and policies that are aimed at reducing statewide GHG emissions. This includes:

- ▶ AB 32, which established a target of reducing statewide GHG levels to 1990 levels by 2020;
- ▶ SB 32, which established a mid-term target of reducing statewide GHG levels to 40 percent below 1990 levels by 2030; and
- ▶ Executive Order (EO) S-3-05, which recommends a 2050 statewide longer-term GHG reduction goal of reducing GHG emissions 80 percent below 1990 levels.

The GHG reduction targets and goals for the City in the CAP are established consistent with guidance provided in the 2017 Scoping Plan for plan-level, communitywide GHG reduction analysis and target-setting that aligns with methods used to develop the State's goals. Consistent with the Scoping Plan targets and the State's 2014 GHG emissions inventory, the CAP aims to achieve the following community-wide GHG reduction targets:

- ▶ 4 percent below 2012 levels by 2020, and

- ▶ 42 percent below 2012 levels by 2030.

To achieve these GHG reduction targets, the CAP accounts for actions taken by State and Federal agencies that will reduce emissions in the City (also known as “legislative reductions”) and identifies several sector-based strategies and GHG reduction measures that can be adopted and implemented locally by the City or others. The CAP also includes implementation and monitoring procedures to ensure progress is being made towards achieving the objectives and specific GHG reduction measures.

The CAP is being prepared consistent with the tiering and streamlining provisions of section 15183.5(b)(2) of the State CEQA Guidelines. The EIR will provide the appropriate level of environmental review to allow future projects to tier from and streamline their analysis of GHG emissions pursuant to CEQA Guidelines section 15183.5(b)(2). This is described in detail in Chapter 1, Introduction of this EIR.

CAP CONTENTS

The CAP contains five chapters which are briefly summarized below:

- ▶ Executive Summary: Summarizes the key information contained in the CAP.
- ▶ Chapter 1 - Introduction: This chapter introduces the document, describes the purpose and context of the plan, and identifies the regulatory framework related to global GHG emissions.
- ▶ Chapter 2 - Greenhouse Gas Emissions Inventory, Projections, and Targets: This chapter provides detailed accounting of GHG emissions from municipal operations and community-wide activities within the City. It establishes a baseline inventory with 2014 GHG emissions from all sectors. Projections of GHG emissions and reduction targets are described and the resultant emissions gap between projected emissions and reduction targets is calculated.
- ▶ Chapter 3 - Greenhouse Gas Reduction Strategies, Measures, and Actions: This chapter outlines GHG reduction strategies, measures, and actions to be implemented by the City to achieve its GHG reduction targets. The strategies and measures focus on locally-based actions to reduce GHG emissions in various categories as a complement to legislative actions taken by the State or federal government.
- ▶ Chapter 4 - Implementation and Monitoring: This chapter describes the set of actions that comprise the implementation strategy, possible funding mechanisms, the monitoring program, and an overview of the CEQA tiering/streamlining options for future projects.

The key components included in the CAP chapters listed above are described in more detail below.

GHG Emissions Inventory

A community GHG emissions inventory is an estimate of a defined set of gases emitted to the atmosphere from local or regional sources that contribute to climate change. The CAP is based on the inventory of these GHG emissions, which identifies and quantifies the sources and amounts of GHG emissions that are generated from activities within the City in one calendar year (i.e., annual emissions). Conducting an inventory of emissions provides a baseline of GHG emissions to be established, from which future changes in emissions can be forecasted, along with calculation of GHG reduction targets, and from which GHG reduction measures can then be quantified.

The inventory was prepared for the year 2012 and serves as the baseline year from which the City determines GHG reduction targets. The 2012 baseline year was chosen as it was the most recent calendar year for which complete source and activity data was available when the planning process began in mid-2017. The 2012 inventory is organized into GHG Emissions Sectors, which represent a distinct subset of a market, society, industry, or economy whose components share similar characteristics. The seven major GHG Emissions Sectors are shown in order of contribution, which include the following (refer to CAP Appendix A for a more detailed discussion of the 2012 emissions inventory methods, data sources, and assumptions):

1. On-Road Transportation: On-road transportation emissions associated with gasoline and diesel consumption from driving that occurred on roadways.

2. Electricity: Building energy use emissions associated with electricity in residential and commercial buildings.
3. Natural Gas: Building energy use emissions associated with combustion of natural gas in residential and commercial buildings.
4. Off-Road Transportation: Off-road transportation emissions associated with gasoline and diesel fuel use for recreational vehicles, construction equipment, and residential and commercial equipment.
5. Solid Waste: Waste emissions associated with the disposal of organic waste in landfills and community-generated mixed waste generated by residents and businesses in the City.
6. Water: Emissions associated with the water supplied, treated, conveyed, and distributed to residents and businesses within the City.
7. Wastewater: Wastewater treatment emissions associated with both the energy consumed during treatment and fugitive emissions resulting from combustion during treatment process for domestic sewage.

Carbon dioxide (CO₂) is the largest contributor to global warming and the most recognized GHG; however, there are five other primary GHGs that must be addressed to meet State-mandated reduction targets, including: methane (CH₄); nitrogen dioxide (N₂O); and, three types of fluorinated gases (F-gases), which are hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and hexafluoride (SF₆). To simplify discussion of these emissions collectively, climate action plans use a measurement known as carbon dioxide equivalent (CO₂e). The CO₂e measurement translates each GHG to CO₂ by weighting it by its relative Global Warming Potential (GWP). For example, according to the Intergovernmental Panel on Climate Change (IPCC), CH₄ and N₂O are 25 and 298 times more potent, respectively, than CO₂ in their ability to trap heat in the atmosphere (IPCC 2007). Converting these gases into CO₂e allows consideration of all the gases in comparable terms and makes it easier to communicate how various sources and types of GHG emissions contribute to global warming. A metric ton of carbon dioxide equivalent (MTCO₂e) is the standard measurement of the amount of GHG emissions produced and released into the atmosphere.

Table 2-1 summarizes the GHG emissions inventory results by sector.

Table 2-1 2012 City of El Cajon Greenhouse Gas Emissions Inventory

Emission Sector	2012 ¹ (MTCO ₂ e/yr)	Percent
On-Road Transportation	357,000	52
Electricity	200,000	29
Natural Gas	86,000	13
Off-Road Transportation	20,000	3
Solid Waste	15,000	2
Water	7,000	1
Wastewater	1,000	<1
Total	685,000	100

Notes: Columns may not add to totals due to rounding.

MTCO₂e = metric tons of carbon dioxide equivalent; GWP = Global Warming Potential; IPCC = Intergovernmental Panel on Climate Change

¹ Uses GWP factors from IPCC's Fourth Assessment Report.

² Based on SANDAG Series 13 vehicle miles traveled (VMT) estimates. 2012 is the Base Year.

Source: Data provided by Ascent Environmental in 2018

As illustrated in Table 2-1 above, in 2012, community activities accounted for approximately 685,000 MTCO₂e. Fifty-two percent of the emissions were due to on-road transportation. Twenty-nine percent of these emissions were due to energy used in buildings for heating, cooling, and powering devices, equipment, and other energy loads. Emissions from natural gas consumption related to buildings accounted for 13 percent of the City's emissions in 2012.

GHG Emissions Forecasts

GHG emissions forecasts for a community are used to estimate future emissions levels in the absence of climate action measures. Emissions forecasts were prepared for the “business-as-usual” (BAU) scenarios based on trend data between baseline 2012 and 2014 data. Between 2012 and 2014, the City experienced an overall reduction in citywide annual GHG emissions. Based on these forecasts, and as shown in Table 2.2, the City’s GHG emissions would continue to decline under BAU conditions until 2020 despite the general growth in population and employment. This observed decrease in BAU emissions is reflective of existing community and regional choices that result in fewer emissions, including using alternative modes of transportation, improved regionwide renewable energy portfolios, and decreased residential and commercial water usage. Beyond 2020, however, GHG emissions would begin increase but would not increase back to 2012 GHG emissions levels until after 2030.

The City prepared for both BAU and legislative-adjusted BAU scenarios for 2020, 2030, and 2035. The BAU emissions scenario is based on projected population, housing, and employment growth anticipated in the City as provided by SANDAG, assuming no actions would be taken to reduce emissions by Federal, State or local agencies pursuant to AB 32 or other legislation. The BAU scenario represents theoretical “worst-case” future conditions while the “BAU with legislative adjustments” forecast accounts for future emissions reductions pursuant to AB 32 and other legislation in California from a variety of regulations and programs, including the Renewable Portfolio Standard (RPS), improving vehicle fuel economy standards because of Advanced Clean Cars Program, and other State and Federal policies. A detailed description and analysis of how specific legislative reductions are included in the City’s BAU GHG emissions inventory and forecast can be found in Appendix A and B of the CAP.

As shown in Table 2-2, in the legislatively-adjusted BAU forecast scenario, community-wide GHG emissions are forecasted to decrease by approximately 14 percent by 2020 and 13 percent by 2030 for the City compared to 2012 emissions.

Table 2-2 City of El Cajon Projections (MTCO₂e/year)

Sector and Subsector	2012	2020		2030	
		BAU	Legislatively-Adjusted BAU	BAU	Legislatively-Adjusted BAU
On-Road Transportation	357,000	316,000	305,000	306,000	241,000
Electricity	200,000	150,000	135,000	158,000	69,000
Natural Gas	86,000	79,000	77,000	83,000	74,000
Off-Road Transportation	20,000	18,000	18,000	22,000	22,000
Solid Waste	15,000	17,000	17,000	18,000	18,000
Water	7,000	5,000	5,000	6,000	6,000
Wastewater	1,000	1,000	1,000	1,000	1,000
Total	685,000	586,000	558,000	593,000	430,000
Percent change from 2012 (%)	---	-14%	-19%	-13%	-37%

Notes: Columns may not add to totals due to rounding.

BAU = Business as usual; NA = Not Applicable; GWP = Global Warming Potential; MTCO₂e = metric tons of carbon dioxide equivalent

Source: Data provided by Ascent Environmental in 2018

GHG Emissions Reduction Targets

The CAP provides a course of action for the City to reduce GHG emissions consistent with AB 32, SB 32, and EOs B-30-15 and S-3-05. The state aims to reduce annual statewide GHG emissions to:

- ▶ 1990 levels by 2020,
- ▶ 40 percent below 1990 levels by 2030, and
- ▶ 80 percent below 1990 levels by 2050.

To determine an equivalent reduction target at the local level, California's 2017 Climate Change Scoping Plan released by CARB recommends community-wide GHG reduction goals for local climate action plans that are aligned with and contribute to helping the State achieve its 2030 and 2050 goals (CARB 2017). The State's goals are expressed as reducing emissions to 6 MTCO₂e per capita and 2 MTCO₂e per capita by 2030 and 2050, respectively. Considering the overall statewide emissions in 1990 and 2014 and the forecasted statewide population in 2030 and 2050, these per-capita goals would be equivalent to reducing 2014 emissions by 40 percent by 2030 and 77 percent by 2050 for the entire San Diego County area (CARB 2016, DOF 2014). Although CARB did not recommend a similar community-level target for 2020, an equivalent target can be calculated by comparing the State's GHG inventories for 1990 and 2014. According to CARB's estimate of California's GHG inventory, the State emitted approximately 431 million MTCO₂e (MMTCO₂e) in 1990 and 442 MMTCO₂e in 2014, a 2 percent increase. Thus, the following 2020 and 2030 targets would reduce annual municipal and community-wide GHG emissions in the City consistent with CARB's recommended goals:

- ▶ 4 percent below 2012 levels by 2020, and
- ▶ 42 percent below 2012 levels by 2030

The recommended targets, along with estimated reductions required to achieve the targets, are summarized below in Table 2-3.

Table 2-3 Recommended Greenhouse Gas Emissions Reduction Targets: 2020 and 2030

Scenario or Target	2012	2020	2030
Baseline and Projections			
2012 Baseline GHG Inventory (MTCO ₂ e)	685,000	NA	NA
Legislative-Adjusted BAU Forecast (MTCO ₂ e)	NA	558,000	430,000
Legislative-Adjusted BAU Forecast: Percent below Baseline (%)	NA	19	37
Targets			
Target Percent Reduction below Baseline (%)	NA	4	42
Target Annual Emissions (MTCO ₂ e)	NA	659,000	397,000
Gap Analysis			
Reduction from Baseline needed to meet Target (MTCO ₂ e)	NA	-73,000	196,000
Reduction from Legislative-Adjusted BAU needed to meet Target (MTCO ₂ e)	NA	0	163,000
Additional Percent Reduction below Legislative-Adjusted BAU needed to meet Target (%) ¹	NA	0	33,000
Notes: BAU = Business as usual, MTCO ₂ e = metric tons of carbon dioxide equivalent, GHG = greenhouse gas, NA = Not Applicable			
Source: Data provided by Ascent Environmental in 2018			

Therefore, the City's 2020 and 2030 GHG emissions reduction targets are identified as the following:

- ▶ 659,000 MTCO₂e by 2020, and
- ▶ 397,000 MTCO₂e by 2030.

GHG Emissions Reductions Strategies, Measures, and Actions

Based on the City's 2012 inventory shown in Table 2-3, the targets above aim to reduce annual City emissions to 659,000, and 397,000 MTCO₂e by 2020 and 2030, respectively. The City is already meeting the 2020 target because of existing legislative actions but would need additional local GHG reductions to meet the 2030 target. The City would need to reduce annual legislatively-adjusted BAU 2030 emissions by 33,000 MTCO₂e.

As a local government, the City can act to adopt or update land use plans, enforce or update City ordinances, adjust municipal operations, encourage or influence City residents and business by partnering with local organizations, and

work with local and regional transportation planning or other agencies that provide services or maintain infrastructure that is not directly in the City's control. The City can effectively reduce emissions in some sectors where the City has jurisdictional control (e.g., municipal operations, land use change), but in some cases the City has limited ability to influence reductions because the City has limited jurisdictional control (e.g., on-road transportation).

The City has developed a GHG reduction strategy framework based on the City's jurisdictional influence, public input, and others based on best practices. The GHG reduction strategy framework consists of strategies, measures, actions, target years, goals, and supporting measures. The measures are organized according to "primary" and "supporting" measure categories in the CAP. Primary measures include those for which GHG reductions have been quantified and are the primary measures that the City would rely upon to meet the GHG reduction targets identified. Supporting measures are qualitative and are not identified as part of the primary set of quantifiable GHG reduction measures to meet the targets due to data limitation or lack of an available method or data to quantify emissions reductions; however, supporting measures are still considered actionable measures that the City would implement as part of the CAP that would help to achieve GHG reductions.

The proposed CAP actions were developed based on a combination of factors, including:

- ▶ the feasibility of the action to be implemented by the City;
- ▶ the need for greater reductions in the sectors with the most emissions, especially in building energy and transportation (See CAP Figure 2-1 in Chapter 2);
- ▶ existing programs, policies, or projects that can be expanded or proposed policies yet to be adopted;
- ▶ feedback from community and other stakeholders; and
- ▶ technological innovations.

The CAP includes eight strategies containing 15 measures with 28 specific actions, with supporting measures for each strategy. Refer to Table 2-5, GHG Reduction Strategies, Measures, and Actions, at the end of this chapter for the complete list of measures. Measures that could result in physical environmental impacts are evaluated within applicable chapters of this Draft EIR. Those measures that were determined not to result in physical environmental impacts as indicated in Table 2-5, are not discussed further within this Draft EIR.

The total estimated reductions in 2020 would be more than sufficient to meet the recommended 2020 target, with a 73,000 MTCO₂e annual surplus of GHG reductions beyond legislatively-adjusted forecasts. Implementation of the proposed reduction strategies and measures would further reduce 2030 GHG emissions by 33,000 MTCO₂e and achieve the City's 2030 target emissions.

Implementation and Monitoring Approach

Some of the proposed GHG reduction strategies, measures, and actions would be implemented through code updates adopted by the City based on the City's ability to protect the public health, safety, and welfare of its citizens. Discretionary review processes also provide a mechanism through which to implement strategies, measures, and actions. Implementation of some strategies, measures, actions would rely on financial incentives, research and development of new programs, partnerships with other agencies, and education and outreach.

To achieve the GHG emissions reductions strategies described in Chapter 3, measures will be monitored to ensure that: (1) the measures are effective; (2) the CAP is on track to achieve the GHG reduction targets; and (3) beneficial community outcomes are attained. City staff will provide regular monitoring reports and updates. The CAP would be updated as needed; consistent with the requirements of CEQA Guidelines section 15183.5 (b)(1)(E), an agency is required to monitor the CAP's progress and amend it if it is determined that the plan is not achieving its specified targets. If amendments to the CAP are required, they would be reviewed considering requirements for subsequent environmental review as outlined in section 15162 to 15164.

Public Outreach

Public outreach would not result in any direct or indirect physical changes in and of itself that would require evaluation in the Draft EIR (CEQA Guidelines section 15061(b)(3)). The City has engaged the community extensively throughout the Draft CAP and CAP process including several outreach meetings at key milestones in the process to engage the community and interested stakeholders. Public outreach for the CAP included involvement and engagement of key internal and external stakeholder groups from various public, private, and nonprofit sectors; as well as individual citizens and residents of the City.

2.6 POTENTIAL PERMITS AND APPROVALS REQUIRED

The City Council of El Cajon will be the CEQA lead agency responsible for considering adoption and implementation of the CAP (Table 2-4). As the lead agency under CEQA, El Cajon is responsible for considering the adequacy of the EIR and determining if the overall project should be approved.

Table 2-4 Required Project Approvals

Project Approval	Approving Authority
Approval of Climate Action Plan	El Cajon City Council
Certification of the EIR	El Cajon City Council
The EIR is intended to apply to all listed project approvals as well as to any other approvals necessary or desirable to implement the project.	

Table 2-5 GHG Reduction Strategies, Measures, and Actions

GHG Reduction Strategy	GHG Reduction Measure	City Action	Potential Physical Changes to the Environment	Environmental Issue Areas Potentially Affected
Transportation				
Strategy 1: Increase Use of Zero Emission or Alternative Fuel Vehicles .	Measure T-1: Transition to a More Fuel-Efficient Municipal Vehicle Fleet.	City Action T-1.1 Develop a Fleet Management Program. Develop a fleet management program to guide the replacement of non-public-safety vehicles to alternative-fuel vehicles.	This measure would result in the conversion of the City's fleet of vehicles to cleaner fuel sources including electricity or other alternative fuels. No physical impacts would result from this measure, but fuel consumption would shift from carbon-based fuels to electricity or other renewable fuel sources.	None. Not evaluated further in this Draft EIR because no direct or indirect physical changes (e.g., construction) to the environment would occur.
Strategy 1: Increase Use of Zero Emission or Alternative Fuel Vehicles (T).	Measure T-2: Increase Electric Vehicle and Electric Vehicle Charging Infrastructure Citywide.	<p>City Action T-2.1 Install Municipal Electric Vehicle Charging Stations. Continue to install EV charging stations at City Hall parking lots and Public Works yard for municipal fleet and City employee use.</p> <p>City Action T-2.2 Incentivize the Installation of Electric Vehicle Charging Stations. Incentivize the installation of EV charging stations at new multi-family and commercial developments through reduced fees and expedited permitting.</p> <p>City Action T-2.3: Increase Clean Air Vehicle Preferential Parking Spaces. Amend the zoning code to increase preferential parking spaces for clean air vehicle parking.</p> <p>City Action T-2.4 Convert School Bus Fleet to Electric. Support the school districts' efforts to continue conversion of the bus fleet to electric.</p>	This measure would result in funding and installation of EV charging stations at City facilities and as amenities with some new development projects. Nominal physical impacts would occur during the installation process which would include typical construction activities.	None. Not evaluated further in this Draft EIR because EV charging station projects are eligible for ministerial permits and would not require a discretionary action by the City of El Cajon.
Strategy 2: Reduce Fuel Use.	Measure T-3: Use Transportation System Management to Reduce Fuel Use	City Action T-3.1 Synchronize Traffic Lights. Continue efforts to synchronize traffic lights in priority areas and pursue grants to develop a citywide traffic signal synchronization plan.	This measure would result in the pursuit of funding and implementation of traffic light synchronization and roundabouts. Both would result in less congestion and idling time which would reduce GHG and air pollutant emissions. Physical impacts would result from the	None. Not evaluated further in this Draft EIR because the impacts of physical changes were previously evaluated in the El Cajon Transit District Specific Plan EIR (SCH # 2017041047).

Table 2-5 GHG Reduction Strategies, Measures, and Actions

GHG Reduction Strategy	GHG Reduction Measure	City Action	Potential Physical Changes to the Environment	Environmental Issue Areas Potentially Affected
		City Action T-3.2 Install Roundabouts. Install roundabouts on El Cajon Boulevard as identified in the Transit District Specific Plan.	implementation of roundabouts and which would include typical construction activities.	
Strategy 2: Reduce Fuel Use.	Measure T-4: Reduce Fuel Use in Construction Equipment.	City Action T-4.1 Increase Renewable and Alternative Fuel Use in Construction Equipment. Increase the use of renewable and alternative fuel use in construction equipment.	This measure would result in the conversion of construction equipment to cleaner fuel sources. No physical impacts would result from this measure, but fuel consumption would shift from carbon-based fuels to renewable and/or alternative fuel.	None. Not evaluated further in this Draft EIR because no direct or indirect physical changes (e.g., construction) to the environment would occur.
Strategy 3: Reduce Vehicle Miles Traveled.	Measure T-5: Increase Alternative Modes of Travel.	City Action T-5.1 Increase Alternative Modes of Travel Through Transportation Demand Management. Require new non-residential development to develop a TDM plan	This measure would result in a series of actions intended to reduce vehicle miles traveled (VMT) by providing alternatives to single-occupancy vehicle travel and would not result in any physical impacts.	None. Not evaluated further in this Draft EIR because no direct or indirect physical changes (e.g., construction) to the environment would occur.
Strategy 3: Reduce Vehicle Miles Traveled.	Measure T-6: Encourage Active Transportation.	City Action T-6.1 Complete an Active Transportation Plan. Complete an Active Transportation Plan that includes a sidewalk master plan and an updated Bicycle Master Plan.	This measure would result in planning for new pedestrian and bicycle infrastructure to encourage more trips to be made by walking or biking instead of driving.. This would result in reduced GHG and air pollutant emissions through less VMT. Physical impacts would result from the implementation of new pedestrian and bicycle infrastructure, which would include typical construction activities.	None. Not evaluated further in this Draft EIR because pedestrian and bicycle infrastructure projects are eligible for ministerial permits and would not require a discretionary action by the City of El Cajon.
Strategy 3: Reduce Vehicle Miles Traveled	Measure T-7: Reduce household Vehicle Miles Traveled through smart growth development	City Action T-7.1 Increase Residential Dwelling Units in Transit Oriented Development Areas. Complete MOU with MTS on the development of the MTS parking lot with residential uses at the El Cajon Transit Center City Action T-7.2 Encourage Development in Mixed-Use Residential Overlay Areas. Allow for parking reductions, or deviations from development standards, for	This measure would result in the marketing of new development and a parking lot within the Transit District Specific Plan area. The action here is to support the existing pursuit of development, which is analyzed in a previously certified EIRs.	None. Not evaluated further in this Draft EIR because the impacts of physical changes were previously evaluated in the El Cajon Transit District EIR (SCH # 2017041047) and the Housing Element Rezoning EIR prepared for the Mixed-Use Overlay zone adoption (SCH # 2016031030).

Table 2-5 GHG Reduction Strategies, Measures, and Actions

GHG Reduction Strategy	GHG Reduction Measure	City Action	Potential Physical Changes to the Environment	Environmental Issue Areas Potentially Affected
		<p>developments in the Mixed-Use Residential Overlay Areas.</p> <p>City Action T-7.3 Implement the Transit District Specific Plan. Implement the Transit District Specific Plan by actively marketing and encouraging development in the plan's proposed area, including new housing projects within the area.</p> <p>City Action T-7.4 Transition to an Online Submittal Permitting System. Transition to an online submittal permitting system, where all permits are processed online, reducing the need to drive to obtain permits.</p>		
Building Energy Efficiency				
Strategy 4: Increase Building Energy Efficiency	Measure BE-1: Increase Residential Building Efficiency	<p>City Action BE-1.1 Require Energy Audits for Additions to Existing Residential Units. Require a whole home energy audit for residential additions over 500 square feet and incentivize energy retrofits through reduced fees and expedited permitting.</p> <p>City Action BE-1.2: Continue the Critical Home Repair Program and Home Rehabilitation Loans. Continue Habitat for Humanity's Critical Home Repair Program and other programs for single-family and mobile home rehabilitation loans that fund energy efficiency improvements.</p>	This measure would result in an amendment to the City Code to require energy audits and incentivize retrofits to increase energy efficiency. This measure would also result in continued support for the Critical Home Repair Program to fund retrofits and energy efficiency improvements for single-family and mobile homes. This would result in a reduction of energy use and GHG emissions but could result in minor construction activities.	<p>▲ Air Quality</p> <p>▲ Cultural/TCR</p> <p>▲ GHG</p> <p>▲ Energy</p>
Strategy 4: Increase Building Energy Efficiency	Measure BE-2: Increase Commercial Building Efficiency	City Action BE-2.1 Require Energy Audits of Non-Residential Additions and Improvements. Require a whole building energy audit for non-residential additions and tenant improvement valued at over \$80,000 or over 1,800 square feet and	This measure would result in an amendment to the City Code to require energy audits and incentivize retrofits to increase energy efficiency. This would result in a reduction of energy use and GHG emissions but could result in minor construction activities.	<p>▲ Air Quality</p> <p>▲ Cultural/TCR</p> <p>▲ GHG</p> <p>▲ Energy</p>

Table 2-5 GHG Reduction Strategies, Measures, and Actions

GHG Reduction Strategy	GHG Reduction Measure	City Action	Potential Physical Changes to the Environment	Environmental Issue Areas Potentially Affected
		incentivize energy retrofits through reduced fees and expedited permitting.		
Strategy 4: Increase Building Energy Efficiency	Measure BE-3: Increase Municipal Operation Energy Efficiency	<p>City Action BE-3.1 Continue Energy Efficiency Projects in Municipal Facilities. Continue to implement lighting and other retrofit measures at municipal facilities as recommended by SANDAG's Energy Roadmap program.</p> <p>City Action BE-3.2 Retrofit High-Pressure Sodium Street Lights. Retrofit city-owned High-Pressure Sodium (HPS) street lights with LED street lights.</p>	This measure would result in lighting retrofits at municipal facilities as well as city-owned High-Pressure Sodium street lights, which would reduce energy consumption. No physical impacts would result from this measure.	None. Not evaluated further in this Draft EIR because no direct or indirect physical changes (e.g., construction) to the environment would occur.
Renewable and Zero-Carbon Energy				
Strategy 5: Increase Renewable and Zero-Carbon Energy	Measure RE-1: Increase Behind-the-Meter Renewable Supply.	<p>City Action RE-1.1 Incentivize Photovoltaic Installation on Commercial Buildings. Incentivize, through the energy audit program, PV installation on existing commercial buildings by providing reduced fees and expedited permitting.</p> <p>City Action RE-1.2 Install Photovoltaic Systems at School Sites. Support the school districts' efforts to install PV systems at school sites.</p>	This measure would support and incentivize installation of PV solar systems on commercial buildings and schools, resulting in the installation of new PV solar systems on roofs. This may result in construction, operation, and maintenance-related impacts.	<ul style="list-style-type: none"> ▲ Aesthetics ▲ Air Quality ▲ Cultural/TCR ▲ GHG ▲ Energy ▲ Noise
Strategy 5: Increase Renewable and Zero-Carbon Energy Supply	Measure RE-2: Increase Grid Renewable and Zero-Carbon Electricity.	City Action RE-2.1 Conduct Research and Present to City Council Options to Increase Renewable and Zero Carbon Electricity.	This measure would encourage the City to research methods to increase grid supply of renewable and zero-carbon electricity and achieve 80 percent renewable and zero carbon electricity supply by 2030, 20 percent beyond the Renewables Portfolio Standard mandate for 2030. To achieve a 20 percent reduction the City would need to offset 14,924 MTCO ₂ e through the installation of renewable energy systems by 2030. To illustrate the types of projects that could achieve the needed offset, the City could	<ul style="list-style-type: none"> ▲ Aesthetics ▲ Air Quality ▲ Biological Resources ▲ Cultural/TCR ▲ GHG ▲ Energy ▲ Noise

Table 2-5 GHG Reduction Strategies, Measures, and Actions

GHG Reduction Strategy	GHG Reduction Measure	City Action	Potential Physical Changes to the Environment	Environmental Issue Areas Potentially Affected
			potentially install additional rooftop solar or ground-mounted solar in undeveloped parcels. The 14,924 MTCO ₂ e offset required, is equivalent to 84,704 megawatt-hours (MWh) using SDG&E's energy intensity factor projected for 2030 (i.e., 0.176 MTCO ₂ e/MWh). On average, a solar photovoltaic system of 55 megawatts (MWs) would generate approximately 87,000 MWh per year (NREL 2019). To accommodate the space needed for a system of this size, the City could install the equivalent of 3.7 million square feet of commercial rooftop solar, or 85 acres of ground-mounted solar. However, as a program EIR, the Draft EIR does not, and cannot, speculate on the individual specific future projects/improvements.	
Water Efficiency				
Strategy 6: Increase Water Efficiency	Measure WE-1: Increase Outdoor Water Efficiency	City Action WE-1.1 Require Covers on New Pools. Amend the Municipal Code to require covers on new residential swimming pools. City Action WE-1.2 Require Weather-Based Irrigation Systems. Require installation of weather-based irrigation controllers for all projects submitting landscape plans.	This measure would require the use of pool covers and use of irrigation controllers which would support water conservation efforts in the City. No physical impacts would result from this measure.	None. Not evaluated further in this Draft EIR because no direct or indirect physical changes (e.g., construction) to the environment would occur.
Reduce and Recycle Solid Waste				
Strategy 7: Reduce and Recycle Solid Waste	Measure SW-1: Reduce Solid Waste and Increase Recycling	City Action SW-1.1 Implement Solid Waste Reduction and Recycling Targets. Implement targets for citywide solid waste reduction and recycling goals.	This measure could result in new/expanded composting facilities in areas in/or outside of the City's jurisdiction. Although the City's waste transfer stations have sufficient capacity to handle increased waste processing, this could result in a variety of physical impacts related to the construction and operation of new compost facilities.	<ul style="list-style-type: none"> ▲ Aesthetics ▲ Air Quality ▲ Biological Resources ▲ Cultural/TCR ▲ GHG ▲ Energy ▲ Noise

Table 2-5 GHG Reduction Strategies, Measures, and Actions

GHG Reduction Strategy	GHG Reduction Measure	City Action	Potential Physical Changes to the Environment	Environmental Issue Areas Potentially Affected
Carbon Sequestration				
Strategy 8: Carbon Sequestration	Measure CS-1: Increase Urban Tree Planting	<p>City Action CS-1.1 Increase Shaded Landscape Area. Continue to require development projects to plant a minimum of one tree per 600 square feet of required landscape area.</p> <p>City Action CS-1.2: Increase Tree Shade in Surface Parking Lots. Update the landscape ordinance to require a minimum of one shade tree per five parking spaces in surface parking lots for all new developments.</p> <p>City Action CS-1.3 Increase Street Trees. Require all new developments to plant one street tree for every 30 linear feet of street frontage.</p>	This measure would result in increased parking lot shading and trees and landscaping to help reduce heat island effect and resulting GHG emissions related to cooling. This would result in nominal emissions related to increased tree planting/landscaping efforts and increased water use.	<ul style="list-style-type: none"> ▲ Air Quality ▲ GHG ▲ Energy

3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

APPROACH TO THE ENVIRONMENTAL ANALYSIS

In accordance with section 15126.2 of the State CEQA Guidelines, this Draft EIR identifies and focuses on the significant direct and indirect environmental effects of the project, giving due consideration to both its short-term and its long-term effects. Short-term effects are generally those associated with construction, and long-term effects are generally those associated with operations. As discussed in Chapter 1, Introduction, this analysis focuses on a limited number of environmental resource topics because the City determined through a review of NOP comments, analysis of project materials, and research that specific issue areas would not result in significant environmental impacts. Therefore, this Draft EIR addresses the following resource topics:

- ▶ Section 3.1, Aesthetics
- ▶ Section 3.2, Air Quality
- ▶ Section 3.3, Biological Resources
- ▶ Section 3.4, Archaeological, Historical, and Tribal Cultural Resources
- ▶ Section 3.5, Energy
- ▶ Section 3.6, Greenhouse Gas Emissions and Climate Change
- ▶ Section 3.7, Noise
- ▶ Section 3.8, Transportation/Traffic

Sections 3.1 through 3.8 of this Draft EIR each include the following components.

Regulatory Setting presents the laws, regulations, plans, and policies that are relevant to each issue area. Regulations originating from the federal, state, and local levels are each discussed as appropriate.

Existing Setting presents the existing environmental conditions on the project site and surrounding area as appropriate, in accordance with the State CEQA Guidelines (California Code of Regulations [CCR] section 15125). This setting generally serves as the baseline against which environmental impacts are evaluated. The extent of the environmental setting area evaluated (the project study area) differs among resources, depending on the locations where impacts would be expected. For example, air quality impacts are assessed for the air basin (macroscale) as well as the vicinity of projects implemented as a result of the CAP (microscale). In some resource areas such as noise, impacts are assessed for the vicinity of the project only.

Environmental Impacts and Mitigation Measures identifies the thresholds of significance used to determine the level of significance of the environmental impacts for each resource topic, in accordance with the State CEQA Guidelines (Sections 15126, 15126.2, and 15143) and the recently updated Appendix G Checklist. The thresholds of significance used in this Draft EIR are based on the checklist presented in Appendix G of the State CEQA Guidelines; best available data; and regulatory standards of federal, state, and local agencies. The level of each impact is determined by comparing the effects of the project to the environmental setting. Key methods and assumptions used to frame and conduct the impact analysis as well as issues or potential impacts not discussed further (such issues for which the project would have no impact) are also described.

Project impacts are organized numerically in each subsection (e.g., Impact 3.2-1, Impact 3.2-2, Impact 3.2-3, etc.). A bold-font impact statement, a summary of each impact, and its level of significance precedes the discussion of each impact. The discussion that follows the impact summary includes the substantial evidence supporting the impact significance conclusion.

The Draft EIR must describe any feasible measures that could avoid, minimize, rectify, reduce, or compensate for significant adverse impacts, and the measures are to be fully enforceable through incorporation into the project (Public Resources Code section 21081.6[b]). Mitigation measures are not required for effects that are found to be less than significant. Where feasible mitigation for a significant impact is available, it is described following the impact along with its effectiveness at addressing the impact. Each identified mitigation measure is labeled numerically to correspond with the number of the impact that would be mitigated by the measure. Where sufficient feasible mitigation is not available to reduce impacts to a less-than-significant level, or where the City lacks the authority to ensure that the mitigation is implemented when needed, the impacts are identified as remaining "significant and unavoidable."

References: The full references associated with the parenthetical references found throughout Sections 3.1 through 3.8 can be found in Chapter 8, References, organized by section number.

3.1 AESTHETICS

This section provides a description of existing visual and aesthetic conditions associated with the City and evaluates the potential for changes to occur as a result of CAP implementation.

No comments received on the Notice of Preparation were related to aesthetics and visual resources (See Appendix A of this Draft EIR).

3.1.1 Regulatory Setting

FEDERAL

National Highway System Designation Act of 1995

This landmark legislation designates almost 260,000 kilometers (160,955 miles) of roads as the National Highway System (NHS). Title III, Section 304 of the legislation allows, but does not mandate, design standards for NHS projects that consider the constructed and natural environment of the area including the environmental, scenic, aesthetic, historic, community, and preservation impacts of the proposed activity.

National Historic Preservation Act of 1962

The National Historic Preservation Act requires federal agencies to consider the effects of their undertakings on historic properties.

STATE

California Streets and Highways Code

The California Streets and Highways Code establishes standards for undertaking the development and designation of official scenic highways and assigns responsibility for the development of scenic highways to local jurisdictions. It establishes the State Scenic Highway system by designating highways that are either eligible for designation as a State Scenic Highway or have been designated as such.

State Scenic Highways Program

The California Scenic Highways Program was created by the California Scenic Highway Law in 1963 with the purpose of preserving and protecting scenic highway corridors from any change that would diminish the aesthetic value of lands adjacent to highways. State Scenic Highways are those highways that are either officially designated by Caltrans or are eligible for designation. The statewide system of scenic highways is part of the Master Plan of State Highways Eligible for Official State Designation as Scenic Highways. Scenic highway nominations are evaluated using the following criteria:

- ▶ the proposed scenic highway is principally within an unspoiled native habitat and showcases the unique aspects of the landscape, agriculture, or man-made water features;
- ▶ existing visual intrusions do not significantly impact the scenic corridor;
- ▶ strong local support for the proposed scenic highway designation is demonstrated; and
- ▶ the length of the proposed scenic highway is not short or segmented.

A highway's status changes from "eligible" to "officially designated" when the local jurisdiction adopts a Scenic Corridor Protection Program, applies to Caltrans for scenic highway approval, and receives notification from Caltrans that the highway has been designated as an official State Scenic Highway. Once a scenic highway is designated, the responsibility lies with the local jurisdiction to regulate development within the scenic highway corridor. This applies only to areas where the local agency has land use jurisdiction

LOCAL

City of El Cajon General Plan

The City of El Cajon General Plan (1991) contains the following policies that pertain to aesthetics and visual resources and are relevant to this analysis:

- ▶ **Policy 1-4.2:** The City shall adopt a permanent ordinance setting forth requirements for design criteria and review procedures for all development proposals in the city. This ordinance shall include specific procedures for design review within the City's expanded redevelopment district and shall adopt by reference the design criteria adopted by City Council Policy.
- ▶ **Policy 1-5.1:** The City shall adopt a series of design plans for the treatment of major thoroughfares within the City, starting first with those major streets within the expanded redevelopment district. These plans may take into account all visual aspects of the streets, including paving, sidewalks, signage, landscaping, street lights, undergrounding of utilities, street furniture, bus stop shelters, and landscaping and setback areas on the adjacent private property. These shall be adopted as specific plans and shall serve to enhance and unify the appearance of such streets. Where practical, these plans shall include noteworthy entrance points to the City and shall include a "Community Sign" program.
- ▶ **Policy 1-5.2:** The City shall retain a street tree program defined by City Council Policy.
- ▶ **Policy 1-6.1:** The utilities for all new development and all major redevelopment in the City shall be undergrounded.
- ▶ **Policy 1-8.5:** In order to preserve the semi-rural quality of certain neighborhoods, the City shall recognize reduced street standards.
- ▶ **Policy 8-2.1:** The retention of the unique natural features of a development site such as rock outcroppings, native vegetation and trees shall be encouraged.
- ▶ **Policy 8-2.2:** The flat, valley portions of El Cajon shall receive the most intensive development. Hillside areas shall receive less intensive development. Steep hillside areas (slopes more than 25 percent) shall be placed in the open space land use category.

City of El Cajon Municipal Code

The City's Zoning Code, located at Municipal Code Title 17 implements the City's General Plan land uses and establishes a set of development regulations that serve the public health, safety, and general welfare, and that provide the economic and social advantages resulting from an orderly planned use of land resources. The Zoning Ordinance identifies specific uses and development standards for each zone. Through specifying required and allowable building height, density, front and side setbacks, glazing, lighting, signage, rooftop and recycling equipment screening, parking, and buffer or transition conditions in some cases (generally when a non-residential use is adjacent to a residential use), these standards help define the aesthetic outcome of a proposed development or redevelopment project.

City of El Cajon Transit District Specific Plan

The Transit District Specific Plan provides the framework for future development of a 259-acre district within the city. It provides a comprehensive land use program and design guidelines for the area, as well as goals and policies to guide the future public and private actions relating to the area's development.

Downtown El Cajon Specific Plan

The Downtown Specific Plan contains recommendations for land uses and development standards for those parcels considered in the Downtown Master Design Plan which was adopted in 1992. It emphasizes pedestrian access with the scale and design of buildings promoting and reflecting the pedestrian environment.

3.1.2 Environmental Setting

The sources for setting information primarily include the City's General Plan (1991) and the El Cajon Transit District Specific Plan EIR (2018).

REGION

The City is located within the Peninsular Range and is characterized by a generally flat area ranging from 420 to 570 feet above mean sea level. It is in the western portion of San Diego County and is bordered by the cities of Santee to the north and La Mesa to the west. Adjacent to the city's eastern boundary, are the unincorporated communities of Crest and Dehesa, and to the south, the communities of Casa de Oro-Mount Helix and Rancho San Diego. Santee and La Mesa are predominantly urban while the unincorporated communities exhibit larger lot sizes with a predominantly suburban to rural character. The topography of the unincorporated communities and surrounding lands south and east is hilly and rocky, with extreme increases in elevation occurring further east as the foothills transition into the Cuyamaca Mountain Range, approximately 30 miles east.

Visual Character

El Cajon is largely built-out with urban uses, including a well-balanced mix of residential land uses ranging from single-family homes to higher-density multi-family structures, a diverse range of full-service commercial and retail services, office space, light and heavy industrial employment centers, and civic land uses including fire and police stations, schools, parks and recreational and open space uses. Architectural styles are diverse across the mix of land uses, and include one- and two-story stucco, old west/mission styles buildings, and single-story wood frame homes. Commercial and industrial buildings are largely prefabricated and or concrete block. The portion of Main Street that includes the historic downtown includes multiple civic and commercial/retail uses in historic buildings with an historic mission design aesthetic and a pedestrian focus, showcased by wide sidewalks and interspersed plazas. Interstate 8 (I-8) and California State Route 125 provide regional access to the city, and the local roadway network is a grid design with arterials providing primary east-west and north-south access to various quadrants of the city. Neighborhood streets are tree lined and contain sidewalks.

Scenic Vistas and Visual Resources

The city is in a valley which is surrounded by the Cuyamaca foothills, and views are characterized by rolling to hilly uplands that contain frequent narrow, winding valleys. El Cajon is generally characterized by a granitic valley floor surrounded by rising hills and rocky terrain which can be viewed from many locations within the city. Most of the hillside areas are preserved in open space in the City's General Plan Land Use Map. Mission Trails Regional Park is located to the northwest of the city, and views of it are prominent throughout the city. Mt. Helix is located south of the city and is visible from many vantage points. The Cuyamaca Mountain Range is visible in the distance from some vantage points in the city. Public views of the surrounding hillsides from the valley floor are considered important visual resources.

Scenic Highways and Corridors

There are no formally designated scenic highways or corridors within the city. However, views from I-8 afford valued view corridor opportunities of the surrounding hills described above, although depending on the motorist's location and speed, intervening vegetation and structures periodically impede these views.

Light and Glare Conditions

Light and glare conditions within the city are typical of those associated with urban uses. The main sources of daytime glare in the city are from sunlight reflecting from structures with reflective surfaces such as windows, and from vehicles on major roadways. Nighttime lighting is prevalent throughout the city along roadways, parking lots, building perimeters and within residential areas.

3.1.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

The project impact analysis area includes the entire City and the analysis of aesthetic and visual resources presented in this section is based on an evaluation of the proposed GHG reduction measures as described in Table 2-5 of Chapter 2, Project Description.

PROPOSED CAP GHG REDUCTION MEASURES

Table 2-5 of the Draft EIR, provides a list of proposed GHG reduction measures that would be implemented by the CAP. However, only those measures that are relevant to aesthetics and visual resources and could potentially result in a significant impact within the city are described and evaluated below. None of the proposed measures indicate where specific improvements would be constructed, their size, or specific characteristics. As a program EIR, the Draft EIR does not, and cannot, speculate on the individual environmental impacts of specific future projects/improvements. However, implementation of all GHG reduction measures were considered during preparation of the Draft EIR to the degree specific information about implementation is known. Consistent with the requirements of CEQA Guidelines section 15168, this Draft EIR provides a program-level discussion of the potential general impacts of implementing these measures, rather than project-level or site-specific physical impacts of such actions. Only those measures that have the potential to affect aesthetics are listed below. All other measures in Table 2-5 would have no effect on aesthetics and are not discussed further.

- ▶ **Measure RE-1. Increase Behind-the-Meter Renewable Supply.** This measure would support and incentivize installation of rooftop PV solar systems on commercial buildings and schools, resulting in the installation of new rooftop PV solar systems on roofs. This may result in changes to the visual environment with the addition of roof-to PV systems.
- ▶ **Measure RE-2. Increase Grid Renewable and Zero-Carbon Electricity.** This measure would encourage the City to research methods to increase grid supply of renewable and zero-carbon electricity and achieve 80 percent renewable and zero carbon electricity supply by 2030, 20 percent beyond the 60 percent Renewables Portfolio Standard mandate for 2030 required by SB 100. To achieve a 20 percent reduction the City would need to offset 14,924 MTCO₂e, which could be achieved through the installation of renewable energy systems such as small-scale ground-mounted solar or rooftop PV solar systems. This measure may result in changes to the visual environment from construction of additional small-scale ground-mounted solar or rooftop PV solar systems.
- ▶ **Measure SW-1. Implement Solid Waste Reduction and Increase Recycling.** This measure could result in new/expanded composting facilities within the City or in areas outside of the City's jurisdiction. Although the City's waste transfer stations have sufficient capacity to handle increased waste processing, this could result in aesthetic changes related to new or expanded compost facilities and temporary changes during construction activities dependent upon the scale of facilities.

THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the State CEQA Guidelines, an aesthetics impact is considered significant if implementation of the project would do any of the following:

- ▶ have a substantial adverse effect on a scenic vista,
- ▶ substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway,
- ▶ in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality, or
- ▶ create a new source of substantial light or glare which could adversely affect day or nighttime views in the area.

ISSUES NOT DISCUSSED FURTHER

All potential visual and aesthetic issues identified in the significance criteria are evaluated below.

IMPACT ANALYSIS

Impact 3.1-1: Have a Substantial Adverse Effect On a Scenic Vista

GHG reduction measures that may result in the development of new rooftop PV solar systems and new/expanded waste facilities could result in impacts to visual resources. However, proposed infrastructure would be small in scale and would be typical of what occurs in urban environments. Additionally, each project with the potential to result in environmental impacts would require a separate and future discretionary review process that would ensure compliance with existing State, and local regulations that protect visual resources, especially City General Plan policies and Municipal Zoning Code Title 17. Therefore, this impact would be **less than significant**.

The city is generally built-out and is visually characterized as an urban environment, however, views of foothills and distant mountain ranges are provided from many vantage points within city boundaries. There are no formally designated scenic highways or corridors within the city. The CAP is a policy-level document that does not include any site-specific designs or proposals; however, implementation of GHG reduction measures contained within the CAP could directly or indirectly affect visual resources as a result of construction of new infrastructure or expansion of existing facilities as described below.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (RE-1 and RE-2) would not involve construction that would substantially change roof lines or add substantial massing or height such that the altered buildings would result in the potential to substantially alter or obstruct views. Further, installation of rooftop PV solar systems is regulated by the City's Municipal Code Chapter 15.92. Ground-mounted solar facilities are regulated under the City's development standards and design guidelines established by the City's Municipal Code Title 17. Enforcement of these City regulatory standards would ensure that future solar facilities facilitated by the CAP would not result in impacts to visual resources.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could result in aesthetic changes. While these facilities would likely be located outside of the city in rural areas, it is possible that facilities could be constructed within the city limits as part of expansion of existing facilities or redevelopment of

underutilized land where there would likely be public views of such infrastructure that could change temporarily during construction and permanently during operation. New or expanded waste facilities would be required to obtain a conditional use permit per the City's Municipal Code Chapter 17.50 or if outside of the City's jurisdiction, would be required to comply with a similar permit process in that local jurisdiction. Future projects with the potential to result in environmental impacts would also require project-level CEQA review. Therefore, enforcement of City codes would ensure that waste diversion measures facilitated by the CAP would not result in impacts to visual resources.

Impact Summary

Future projects with potential to result in environmental impacts would be required to evaluate project-specific impacts under CEQA at the time of application and implement project-specific mitigation to minimize or avoid impacts to visual resources to the extent feasible in compliance with CEQA Guidelines section 15126.4. As described above in Section 3.2.1 Regulatory Setting, State and local plans and policies (e.g. State Scenic Highways Program and City of El Cajon General Plan objectives and policies) are in place to protect visual resources. Furthermore, all future projects would be required to follow the City's development standards and design guidelines established by the City's Municipal Code Title 17 which would establish order and protect visual resources.

Rooftop PV solar systems are regulated by the City's Municipal Code Chapter 15.92. Ground-mounted solar would also be regulated by the City's development standards for accessory structures. All systems are required to not exceed the maximum legal building height or encroach in required setbacks. This discretionary review process ensures that impacts to visual resources would be less than significant.

Expansion of existing or new waste facilities would be regulated by the City's discretionary review process which would require consistency with the conditional use permit process, or other similar process if development of infrastructure occurred outside of the city limits. In any event, the discretionary review process would require that additional environmental review under CEQA be conducted, which would ensure that impacts to visual resources are minimized to the extent feasible. Therefore, implementation of the CAP would result in **less-than-significant** impacts related to visual resources.

Mitigation Measures

No mitigation is required.

Impact 3.1-2: Result in Negative Impacts Related to Scenic Resources

GHG reduction measures that result in the development of new rooftop PV solar systems and new/expanded waste facilities could result in impacts to scenic resources. However, proposed infrastructure would be in urban areas and would not endanger symbols or landmarks of value within the city. Additionally, each project with the potential to result in environmental impacts would require a separate and future discretionary review process that would require additional environmental review under CEQA, as well as ensure compliance with existing State, and local regulations that protect scenic resources, including City General Plan policies and Municipal Zoning Code Title 17. Therefore, this impact would be **less than significant**.

A comprehensive survey of scenic resources has not been conducted for the City. However, El Cajon is largely built out with urban uses, including a well-balanced mix of residential land uses ranging from single-family homes to higher-density multi-family structures, a diverse range of full-service commercial and retail services, office space, light and heavy industrial employment centers, and civic land uses including fire and police stations, schools, parks and recreational and open space uses. Additionally, downtown El Cajon is recognized for its historic identity. It is possible that projects implemented as a result of CAP adoption could be located near recognized or valued scenic resources. The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development; however, implementation of GHG reduction measures contained within the CAP has the potential to directly or indirectly affect scenic resources as a result of construction of new infrastructure or expansion of existing facilities as described below.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (RE-1 and RE-2) would generally not involve construction that would substantially change roof lines or add substantial massing or height such that the altered buildings would result in the potential to alter or obstruct views. Further, installation of rooftop PV solar systems is regulated by the City's Municipal Code Chapter 15.92. Ground-mounted solar would also need to comply with the City's development standards and design guidelines established by the City's Municipal Code Title 17. Enforcement of these City regulatory standards would ensure that future solar facilities facilitated by the CAP would not result in impacts to scenic resources.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could result in aesthetic changes. While these facilities would likely be located outside of the city in rural areas, it is possible that facilities could be constructed within the city limits as part of expansion of existing facilities or redevelopment of underutilized land where there would likely be public views of such infrastructure that could change temporarily during construction and permanently during operation. New or expanded waste facilities would be required to obtain a conditional use permit per the City's Municipal Code Chapter 17.50 or if outside of the City's jurisdiction, would be required to comply with a similar permit process in that local jurisdiction. Future projects with the potential to result in environmental impacts would also require project-level CEQA review. Therefore, enforcement of City codes would ensure that waste diversion measures facilitated by the CAP would not result in impacts to visual resources.

Impact Summary

Projects with the potential to result in environmental impacts would be required to evaluate project-specific impacts under, CEQA, where applicable, at the time of application and implement project-specific mitigation to minimize or avoid impacts to scenic resources to the extent feasible in compliance with CEQA Guidelines section 15126.4. As described above in Section 3.2.1, Regulatory Setting, State and local plans and policies (e.g., State Scenic Highways Program and City of El Cajon General Plan objectives and policies) are in place to protect scenic resources. Furthermore, all future projects would be required to follow the City's development standards and design guidelines established by the City's Municipal Code Title 17 which would establish order and protect visual resources. The discretionary review process, where applicable, would ensure that impacts to scenic resources are minimized to the extent feasible. Therefore, implementation of the CAP would result in **less-than-significant** impacts to scenic resources.

Mitigation Measures

No mitigation is required.

Impact 3.1-3: Result in Negative Impacts Related to Existing Visual Character

GHG reduction measures that result in the development of new rooftop PV solar systems, and new/expanded waste facilities could result in impacts related to visual quality and aesthetics. However, the project types that would be implemented under the CAP are small, and typical of urban environments. Additionally, each project with the potential to result in environmental impacts would require a separate and future discretionary review process that would require additional environmental review under CEQA, as well as ensure compliance with existing State, and local regulations that protect visual quality and aesthetics in the city, including City General Plan policies and Municipal Zoning Code Title 17. Therefore, this impact would be **less than significant**.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (RE-1 and RE-2) would not

generally not involve construction that would substantially change roof lines or add substantial massing or height such that the infrastructure would alter the appearance of buildings. Further, installation of rooftop PV solar systems is regulated by the City's Municipal Code Chapter 15.92. Ground-mounted solar would also need to comply with the City's development standards and design guidelines established by the City's Municipal Code Title 17. Enforcement of these City regulatory standards would ensure that future solar facilities facilitated by the CAP would not result in impacts to visual quality or aesthetics.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could result in aesthetic changes. While these facilities would likely be located outside of the city in rural areas, it is possible that facilities could be constructed within the city limits as part of expansion of existing facilities or redevelopment of underutilized land where there would likely be public views of such infrastructure that could change temporarily during construction and permanently during operation. However, new or expanded waste facilities would be required to obtain a conditional use permit per the City's Municipal Code Chapter 17.50 or if outside of the City's jurisdiction, would be required to comply with a similar permit process in that local jurisdiction. Future projects with the potential to result in environmental impacts would also require project-level CEQA review. Therefore, enforcement of City codes would ensure that waste diversion measures facilitated by the CAP would not result in negative impacts to visual quality or aesthetics.

Impact Summary

While some projects implemented under the CAP may alter the visual quality or character of a community, these alterations generally would not result in the degradation of the existing visual aesthetic or quality by introducing incompatible uses, bulk, scale, or materials to the area. Also, while it is possible that temporary visual impacts related to construction may detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area, it is not likely that proposed facilities would result in permanent changes to the visual character or quality of the area and would not result in substantial changes to the visual landscape because proposed projects would be typical of the types of facilities that occur with urban environments. Further, projects would undergo a discretionary review process, where applicable, which would ensure consistency with the City's development standards contained in Chapter 17.50 of the Municipal Code. Impacts to visual quality and aesthetics would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 3.1-4: Create a New Source of Substantial Light or Glare

GHG reduction measures that result in the development of new rooftop PV solar systems, and new/expanded waste facilities could result in impacts related to visual quality and aesthetics. However, the project types that would be implemented under the CAP are small, and typical of urban environments. Additionally, each project with the potential to result in environmental impacts would require a separate and future discretionary review process that would require additional environmental review under CEQA, as well as ensure compliance with existing State, and local regulations that would minimize light and glare impacts in the city, including City General Plan policies and Municipal Zoning Code Title 17. Therefore, this impact would be **less than significant**.

The city is generally built-out and is visually characterized as an urban environment. Light and glare conditions within the city are typical of those associated with urban uses. The main sources of daytime glare in the city are from sunlight reflecting from structures with reflective surfaces such as windows, and from vehicles on major roadways. Nighttime lighting is prevalent throughout the city along roadways, parking lots, building perimeters and within residential areas. The CAP is a policy-level document that does not include any site-specific designs or proposals;

however, implementation of GHG reduction measures contained within the CAP could result in new sources of light and glare within the City.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (RE-1 and RE-2) would not involve installation of new lighting sources. However, the small-scale ground-mounted or rooftop PV solar systems could create new sources of glare. Installation of rooftop PV solar systems is regulated by the City's Municipal Code Chapter 15.92. Ground-mounted solar would also need to comply with the City's development standards and design guidelines established by the City's Municipal Code Title 17. Enforcement of these City regulatory standards would ensure that future solar facilities facilitated by the CAP would not result light and glare impacts.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could result in new sources of light and glare. However, new or expanded waste facilities would be required to obtain a conditional use permit per the City's Municipal Code Chapter 17.50 or if outside of the City's jurisdiction, would be required to comply with a similar permit process in that local jurisdiction. Future projects with the potential to result in environmental impacts would also require project-level CEQA review. Therefore, enforcement of City codes would ensure that waste diversion measures facilitated by the CAP would not result in would not result light and glare impacts.

Impact Summary

While some projects implemented under the CAP may create new sources of light and glare, projects types that would be implemented under the CAP are small, and typical of urban environments. Further, all future projects with the potential to result in environmental impacts would undergo a discretionary review process which would ensure consistency with the City's development standards contained in Chapter 17.50 of the Municipal Code. Therefore, impacts would be **less than significant**.

Mitigation Measures

No mitigation is required.

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3.2 AIR QUALITY

This section includes a discussion of existing air quality conditions, a summary of applicable regulations, and an analysis of potential construction and operational air quality impacts that could result from implementation of the project. Mitigation is developed as necessary to reduce significant air quality impacts to the extent feasible.

No comments received on the Notice of Preparation were related to air quality (See Appendix A of this Draft EIR).

3.2.1 Regulatory Setting

Air quality in the project area is regulated through the efforts of various federal, State, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality within the air basins are discussed below.

FEDERAL

U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency (EPA) has been charged with implementing national air quality programs. EPA's air quality mandates draw primarily from the federal Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments were made by Congress in 1990. EPA's air quality efforts address both criteria air pollutants and hazardous air pollutants (HAPs). EPA regulations concerning criteria air pollutants and HAPs are presented in greater detail below.

Criteria Air Pollutants

The CAA required the EPA to establish national ambient air quality standards (NAAQS) for six common air pollutants found all over the U.S. referred to as criteria air pollutants. EPA has established primary and secondary NAAQS for the following criteria air pollutants: ozone; carbon monoxide (CO); nitrogen dioxide (NO₂); sulfur dioxide (SO₂); respirable particulate matter with aerodynamic diameter of 10 micrometers or less (PM₁₀) and fine particulate matter with aerodynamic diameter of 2.5 micrometers or less (PM_{2.5}); and lead. The NAAQS are shown in Table 3.2-1. The primary standards protect public health and the secondary standards protect public welfare. The CAA also required each State to prepare a State implementation plan (SIP) for attaining and maintaining the NAAQS. The federal Clean Air Act Amendments of 1990 added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. California's SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. The EPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments, and whether implementation will achieve air quality goals. If EPA determines a SIP to be inadequate, EPA may prepare a federal implementation plan that imposes additional control measures. If an approvable SIP is not submitted or implemented within the mandated time frame, sanctions may be applied to transportation funding and stationary air pollution sources in the air basin.

Table 3.2-1 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California (CAAQS) ^{ab}	National (NAAQS) ^c	
			Primary ^{bd}	Secondary ^{be}
Ozone	1-hour	0.09 ppm (180 µg/m ³)	— ^e	Same as primary standard
	8-hour	0.070 ppm (137 µg/m ³)	0.070 ppm (147 µg/m ³)	
Carbon monoxide (CO)	1-hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	Same as primary standard
	8-hour	9 ppm ^f (10 mg/m ³)	9 ppm (10 mg/m ³)	
Nitrogen dioxide (NO ₂)	Annual arithmetic mean	0.030 ppm (57 µg/m ³)	53 ppb (100 µg/m ³)	Same as primary standard
	1-hour	0.18 ppm (339 µg/m ³)	100 ppb (188 µg/m ³)	—
Sulfur dioxide (SO ₂)	24-hour	0.04 ppm (105 µg/m ³)	—	—
	3-hour	—	—	0.5 ppm (1300 µg/m ³)
	1-hour	0.25 ppm (655 µg/m ³)	75 ppb (196 µg/m ³)	—
Respirable particulate matter (PM ₁₀)	Annual arithmetic mean	20 µg/m ³	—	Same as primary standard
	24-hour	50 µg/m ³	150 µg/m ³	
Fine particulate matter (PM _{2.5})	Annual arithmetic mean	12 µg/m ³	12.0 µg/m ³	15.0 µg/m ³
	24-hour	—	35 µg/m ³	Same as primary standard
Lead ^f	Calendar quarter	—	1.5 µg/m ³	Same as primary standard
	30-Day average	1.5 µg/m ³	—	—
	Rolling 3-Month Average	—	0.15 µg/m ³	Same as primary standard
Hydrogen sulfide	1-hour	0.03 ppm (42 µg/m ³)	No national standards	
Sulfates	24-hour	25 µg/m ³		
Vinyl chloride ^f	24-hour	0.01 ppm (26 µg/m ³)		
Visibility-reducing particulate matter	8-hour	Extinction of 0.23 per km		

Notes: µg/m³ = micrograms per cubic meter; km = kilometers; ppb = parts per billion; ppm = parts per million.

^a California standards for ozone, carbon monoxide, SO₂ (1- and 24-hour), NO₂, particulate matter, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

^b Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

^c National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic means) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. The PM₁₀ 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. The PM_{2.5} 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. Environmental Protection Agency for further clarification and current federal policies.

^d National primary standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

^e National secondary standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

^f The California Air Resources Board has identified lead and vinyl chloride as toxic air contaminants with no threshold of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Source: CARB 2016

Hazardous Air Pollutants and Toxic Air Contaminants

Toxic air contaminants (TACs), or in federal parlance, HAPs, are a defined set of airborne pollutants that may pose a present or potential hazard to human health. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

A wide range of sources, from industrial plants to motor vehicles, emit TACs. The health effects associated with TACs are quite diverse and generally are assessed locally, rather than regionally. TACs can cause long-term health effects such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage; or short-term acute effects such as eye watering, respiratory irritation (a cough), running nose, throat pain, and headaches.

For evaluation purposes, TACs are separated into carcinogens and non-carcinogens based on the nature of the physiological effects associated with exposure to the pollutant. Carcinogens are assumed to have no safe threshold below which health impacts would not occur. This contrasts with criteria air pollutants for which acceptable levels of exposure can be determined and for which the ambient standards have been established (Table 3.2-1). Cancer risk from TACs is expressed as excess cancer cases per one million exposed individuals, typically over a lifetime of exposure.

EPA and, in California, the California Air Resources Board (CARB) regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the maximum available control technology or best available control technology for air toxics to limit emissions.

STATE

CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA). The CCAA, which was adopted in 1988, required CARB to establish California ambient air quality standards (CAAQS) (Table 3.2-1).

Criteria Air Pollutants

CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing particulate matter, and the above-mentioned criteria air pollutants. In most cases the CAAQS are more stringent than the NAAQS. Differences in the standards are generally explained by the health effects studies considered during the standard-setting process and the interpretation of the studies. In addition, the CAAQS incorporate a margin of safety to protect sensitive individuals.

The CCAA requires that all local air districts in the State endeavor to attain and maintain the CAAQS by the earliest date practical. The CCAA specifies that local air districts should focus attention on reducing the emissions from transportation and area-wide emission sources. The CCA also provides air districts with the authority to regulate indirect sources.

Toxic Air Contaminants

TACs in California are regulated primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807, Chapter 1047, Statutes of 1983) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588, Chapter 1252, Statutes of 1987). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. Research, public participation, and scientific peer review are required before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs and adopted EPA's list of HAPs as TACs. Most recently, particulate matter (PM) exhaust from diesel engines (diesel PM) was added to CARB's list of TACs.

After a TAC is identified, CARB then adopts an airborne toxics control measure for sources that emit that particular TAC. If a safe threshold exists for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If no safe threshold exists, the measure must incorporate best available control technology for toxics to minimize emissions.

The Hot Spots Act requires that existing facilities that emit toxic substances above a specified level prepare an inventory of toxic emissions, prepare a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

AB 617 of 2017 aims to help protect air quality and public health in communities around industries subject to the State's cap-and-trade program for GHG emissions. AB 617 imposes a new State-mandated local program to address non-vehicular sources (e.g., refineries, manufacturing facilities) of criteria air pollutants and TACs. The bill requires CARB to identify high-pollution areas and directs air districts to focus air quality improvement efforts through adoption of community emission reduction programs within these identified areas. Currently, air districts review individual sources and impose emissions limits on emitters based on best available control technology, pollutant type, and proximity to nearby existing land uses. This bill addresses the cumulative and additive nature of air pollutant health effects by requiring community-wide air quality assessment and emission reduction planning.

CARB has adopted diesel exhaust control measures and more stringent emissions standards for various transportation-related mobile sources of emissions, including transit buses, and off-road diesel equipment (e.g., tractors, generators). Over time, the replacement of older vehicles will result in a vehicle fleet that produces substantially lower levels of TACs than under current conditions. Mobile-source emissions of TACs (e.g., benzene, 1-3-butadiene, diesel PM) have been reduced significantly over the last decade and will be reduced further in California through a progression of regulatory measures (e.g., Low Emission Vehicle/Clean Fuels and Phase II reformulated gasoline regulations) and control technologies. With implementation of CARB's Risk Reduction Plan, it is expected that diesel PM concentrations will be 85 percent less in 2020 in comparison to year 2000 (CARB 2000). Adopted regulations are also expected to continue to reduce formaldehyde emissions emitted by cars and light-duty trucks. As emissions are reduced, it is expected that risks associated with exposure to the emissions will also be reduced.

Odors

The California Department of Resources Recycling and Recovery (CalRecycle) regulates solid waste disposal and composting facilities. All compostable material handling facilities and operations are required to comply with the State minimum standards set forth in Title 14 CCR, Division 7, Chapter 3.1, Articles 5, 6, 7, 8, and 9. An odor impact minimization plan (OIMP) is required for facilities and operations as specified in 14 CCR section 17863.4. The CalRecycle minimum standard (14 CCR section 17867(a)(2)) for odor requires that "All handling activities shall be conducted in a manner that minimizes vectors, odor impacts, litter, hazards, nuisances, and noise impacts; and minimizes human contact with, inhalation, ingestion, and transportation of dust, particulates, and pathogenic organisms."

LOCAL

San Diego Air Pollution Control District

The San Diego County Air Pollution Control District (SDAPCD) is the local agency authorized to regulate air quality sources in the project area. The clean air strategy of SDAPCD includes preparing plans and programs for the attainment of ambient air quality standards, adopting and enforcing rules and regulations, and issuing permits for stationary sources. In accordance with the CAA and CCAA, SDAPCD maintains the region's portion of the State Implementation Plan (SIP) and the regional air quality strategy (RAQS) for federal and State ozone standards. These air quality management plans lay out the feasible emission control standards, actions, and regulations to bring the region into attainment for the NAAQS and CAAQS, which are scientifically substantiated, numerical concentrations of criteria air pollutants considered to be protective of human health (SDAPCD 2016a, b). All projects are subject to SDAPCD rules and regulations in effect at the time of construction. Specific rules and regulations applicable to the construction of the proposed project may include, but are not limited to, the following (summarized below; full text can be found on SDAPCD's website):

- ▶ Regulation II, Permits, describes the permitting process for stationary sources, including emergency generators.
- ▶ Rule 51, Nuisance, states that a person shall not discharge quantities of air contaminants that would cause considerable damage to the health and safety of the public.

- ▶ Rule 55, Fugitive Dust Control, regulates construction and demolition activities that discharge visible dust emissions into the atmosphere.
- ▶ Rule 67.0.1, Architectural Coatings, specifies volatile organic compounds (VOC) limits for certain specialty coatings.
- ▶ Rule 1206, Asbestos Removal, Renovation, and Demolition, describes proper procedures regarding asbestos removal, renovation, and demolition activities.

While SDAPCD does not provide quantitative thresholds for determining the significance of construction or mobile source-related impacts, the district does provide Air Quality Impact Analysis screening-level thresholds (SLTs) for new or modified stationary sources (SDAPCD Rules 20.2 and 20.3). For CEQA purposes, these SLTs can be used to determine if a project's total emissions (e.g., stationary and fugitive emissions, as well as emissions from mobile sources) would result in a significant impact to air quality. The daily SLTs are most appropriately used for the standard construction and operational emissions. When project emissions have the potential to approach or exceed the SLTs listed below in Table 3.2-2, additional air quality modeling may need to be prepared to demonstrate that ground-level concentrations resulting from project emissions (with background levels) will be below the NAAQS and CAAQS, which represent concentration limits of criteria air pollutants needed to adequately protect human health.

Table 3.2-2 SDAPCD Screening-Level Thresholds for Air Quality Impact Analysis

Pollutant	Mass Daily Thresholds (lb./day)
Respirable Particulate Matter (PM ₁₀)	100
Fine Particulate Matter (PM _{2.5})	67
Oxides of Nitrogen (NO _x)	250
Oxides of Sulfur (SO _x)	250
Carbon Monoxide (CO)	550
Lead and Lead Compounds	3.2

Source: SDAPCD Rules 20.2 and 20.3

City of El Cajon General Plan

The City of El Cajon General Plan (1991) includes the following policies that pertain to air quality and are relevant to this analysis:

- ▶ **Policy 8-9.1:** The Air Pollution Control District shall be supported in its efforts to meet State and federal air quality standards.
- ▶ **Policy 8-9.2:** The City shall discourage drive-up or drive-through development which are exclusively automobile-oriented or auto-mobile dependent in the transaction of business.

City of El Cajon Municipal Code

Chapter 15.92 of the City's Municipal Code provides expedited processing of permitting for small rooftop photovoltaic (PV) solar, electric vehicle (EV) charging stations, and advanced energy storage systems. In general, permits are issued unless the building official finds that the installation of a solar energy system, EV charging station, or advanced energy storage system will have a specific, adverse, impact upon the public health or safety, requiring a conditional use permit or minor conditional use permit pursuant to Municipal Code Chapter 17.50. If a minor conditional use permit is required by the building official, based on findings that the solar energy system, EV charging station, or advanced energy storage system will have a specific, adverse, impact upon the public health or safety, and the director of community development finds that there is no feasible method to satisfactorily mitigate or avoid the specific, adverse, impact, and denies application for a minor conditional use permit, the director's decision may be appealed to the Planning Commission as provided in Municipal Code Chapter 17.30.

3.2.2 Environmental Setting

The City of El Cajon is located in the San Diego Air Basin (SDAB). The ambient concentrations of air pollutant emissions are determined by the amount of emissions released by the sources of air pollutants and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources, as discussed separately below.

CLIMATE, METEOROLOGY, AND TOPOGRAPHY

The City is in the southwestern portion of the SDAB, roughly 15 miles inland from the coast. The coastal region of the SDAB is made up of coastal terraces that rise from the ocean into wide mesas, which transition into the Laguna Foothills farther east. The Laguna Mountains run approximately parallel to the coast about 45 miles inland and separate the coastal area from the desert portion of the county. The topography of the City is a broad level valley surrounded by hills rising 200 to 600 feet above the valley floor (City of El Cajon 1991).

The climate of the SDAB is characterized by warm, dry summers and mild, wet winters. One of the main determinants of the climate is a semi-permanent high-pressure area (the Pacific High) in the eastern Pacific Ocean. In the summer, this pressure center is located well to the north, causing storm tracks to be directed north of California. This high-pressure cell maintains clear skies for much of the year. When the Pacific High moves southward during the winter, this pattern changes and low-pressure storms are brought into the region, causing widespread precipitation. A common atmospheric condition known as a temperature inversion sometimes affects air quality in the SDAB. During an inversion, air temperatures get warmer rather than cooler with increasing height. Inversion layers are an important element of local air quality because they inhibit the dispersion of pollutants, thus resulting in a temporary degradation of air quality.

The local meteorology of the City is represented by measurements recorded at the Western Regional Climate Center at the El Cajon Cooperative Station. The average annual precipitation is approximately 12.4 inches. January temperatures range from an average minimum of 42.3°F to an average maximum of 69.8°F. July temperatures range from an average minimum of 62.7°F to an average maximum of 87.4°F (WRCC 2018).

CRITERIA AIR POLLUTANTS

Concentrations of criteria air pollutants are used to indicate the quality of the ambient air. A brief description of key criteria air pollutants in the SDAB is provided below. Emission source types and health effects are summarized in Table 3.2-3.

Ozone

Ozone is a photochemical oxidant (a substance whose oxygen combines chemically with another substance in the presence of sunlight) and the primary component of smog. Ozone is not directly emitted into the air but is formed through complex chemical reactions between precursor emissions of reactive organic gases (ROG) and NO_x in the presence of sunlight. ROG are VOCs that are photochemically reactive. ROG emissions result primarily from incomplete combustion and the evaporation of chemical solvents and fuels. NO_x are a group of gaseous compounds of nitrogen and oxygen that result from the combustion of fuels.

Emissions of the ozone precursors ROG and NO_x have decreased over the past several years because of more stringent motor vehicle standards and cleaner burning fuels. Emissions of ROG and NO_x decreased from 2000 to 2010 and are projected to continue decreasing from 2010 to 2035 (CARB 2013).

Nitrogen Dioxide

NO₂ is a brownish, highly reactive gas that is present in all urban environments. The major human-made sources of NO₂ are combustion devices, such as boilers, gas turbines, and mobile and stationary reciprocating internal

combustion engines. Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO₂. The combined emissions of NO and NO₂ are referred to as NO_x and are reported as equivalent NO₂. Because NO₂ is formed and depleted by reactions associated with photochemical smog (ozone), the NO₂ concentration in a geographical area may not be representative of the local sources of NO_x emissions (EPA 2012).

Particulate Matter

Respirable particulate matter with an aerodynamic diameter of 10 micrometers or less is referred to as PM₁₀. PM₁₀ consists of particulate matter emitted directly into the air, such as fugitive dust, soot, and smoke from mobile and stationary sources, construction operations, fires and natural windblown dust, and particulate matter formed in the atmosphere by reaction of gaseous precursors (CARB 2013). PM_{2.5} includes a subgroup of smaller particles that have an aerodynamic diameter of 2.5 micrometers or less. The majority of PM₁₀ emissions in the SDAB are from area-wide sources. Direct emissions of PM_{2.5} have steadily declined in the SDAB between 2000 and 2010 and are projected to increase slightly after 2020 (CARB 2013).

Ultrafine Particulate Matter

More recently, ultrafine particulate matter (UFP) has become a pollutant of greater concern and familiarity. UFP refers to a subfraction of currently regulated PM_{2.5} and PM₁₀ size particles. UFP is most often defined as particles with an aerodynamic diameter of 0.1 microns or smaller. Although UFP consists of only a small fraction of total PM emissions, UFP supports a large surface area and is often heavily concentrated. Because of its small size, a given mass of UFP contains thousands to tens of thousands more particles. Moreover, also because of its size, UFP is highly penetrative to human tissues as compared to PM₁₀ and PM_{2.5}. Observed human health effects in selected studies include lung function changes, airway inflammation, enhanced allergic responses, vascular thrombogenic effects, altered endothelial function, altered heart rate and heart rate variability, accelerated atherosclerosis, and increased markers of brain inflammation. The predominant source of UFP is combustion by on-road vehicles, off-road vehicles, stationary sources, and vegetation burning (OEHHA 2015a).

Table 3.2-3 Sources and Health Effects of Criteria Air Pollutants

Pollutant	Sources	Acute ¹ Health Effects	Chronic ² Health Effects
Ozone	Secondary pollutant resulting from reaction of ROG and NO _x in presence of sunlight. ROG emissions result from incomplete combustion and evaporation of chemical solvents and fuels; NO _x results from the combustion of fuels	increased respiration and pulmonary resistance; cough, pain, shortness of breath, lung inflammation	permeability of respiratory epithelia, possibility of permanent lung impairment
Carbon monoxide (CO)	Incomplete combustion of fuels; motor vehicle exhaust	headache, dizziness, fatigue, nausea, vomiting, death	permanent heart and brain damage
Nitrogen dioxide (NO ₂)	combustion devices; e.g., boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines	coughing, difficulty breathing, vomiting, headache, eye irritation, chemical pneumonitis or pulmonary edema; breathing abnormalities, cough, cyanosis, chest pain, rapid heartbeat, death	chronic bronchitis, decreased lung function
Sulfur dioxide (SO ₂)	coal and oil combustion, steel mills, refineries, and pulp and paper mills	Irritation of upper respiratory tract, increased asthma symptoms	Insufficient evidence linking SO ₂ exposure to chronic health impacts
Respirable particulate matter (PM ₁₀), Fine particulate matter (PM _{2.5})	fugitive dust, soot, smoke, mobile and stationary sources, construction, fires and natural windblown dust, and formation in the atmosphere by condensation and/or transformation of SO ₂ and ROG	breathing and respiratory symptoms, aggravation of existing respiratory and cardiovascular diseases, premature death	alterations to the immune system, carcinogenesis

Table 3.2-3 Sources and Health Effects of Criteria Air Pollutants

Pollutant	Sources	Acute ¹ Health Effects	Chronic ² Health Effects
Lead	metal processing	reproductive/ developmental effects (fetuses and children)	numerous effects including neurological, endocrine, and cardiovascular effects

Notes: NO_x = oxides of nitrogen; ROG = reactive organic gases.

¹ "Acute" refers to effects of short-term exposures to criteria air pollutants, usually at high concentrations.

² "Chronic" refers to effects of long-term exposures to criteria air pollutants, usually at lower, ambient concentrations.

Sources: EPA 2016

MONITORING STATION DATA AND ATTAINMENT DESIGNATIONS

Criteria air pollutant concentrations are measured at several monitoring stations in the SDAB. The El Cajon-Lexington Elementary School station is the closest and most representative station to the project area with recent data for ozone, PM_{2.5}, and PM₁₀. Table 3.2-4 summarizes the air quality data from the last 3 years (2015–2017).

Table 3.2-4 Summary of Annual Data on Ambient Air Quality (2015-2017)¹

	2015	2016	2017
Ozone			
Maximum concentration (1-hr/8-hr avg, ppm)	*/*	0.087/0.074	0.096/0.081
Number of days State standard exceeded (1-hr/8-hr)	*/*	0/1	1/9
Number of days national standard exceeded (8-hr)	*	1	9
Fine Particulate Matter (PM_{2.5})			
Maximum concentration (24-hour µg/m ³ , California)	*	31.0	35.6
Number of days national standard exceeded (24-hour measured ²)	0	0	0
Respirable Particulate Matter (PM₁₀)			
Maximum concentration (µg/m ³ , California)	*	44.1	49.4
Number of days State standard exceeded	0	0	0
Number of days national standard exceeded	0	0	0

Notes: µg/m³ = micrograms per cubic meter; ppm = parts per million

* Insufficient data available to determine the value

¹ Measurements from the El Cajon-Lexington Elementary School station

Source: CARB 2018

Both CARB and EPA use this type of monitoring data to designate areas according to their attainment status for criteria air pollutants. The purpose of these designations is to identify those areas with air quality problems and thereby initiate planning efforts for improvement. The three basic designation categories are "nonattainment," "attainment," and "unclassified." "Unclassified" is used in an area that cannot be classified based on available information as meeting or not meeting the standards. As shown in Table 3.2-5 below, San Diego County is designated as a nonattainment for ozone with respect to the CAAQS and NAAQS and nonattainment for PM₁₀ and PM_{2.5} with respect to the CAAQS.

Table 3.2-5 Attainment Status Designations for San Diego County

Pollutant	National Ambient Air Quality Standard	California Ambient Air Quality Standard
Ozone	Attainment (1-hour) ¹	Nonattainment (1-hour)
	Nonattainment (8-hour)	Nonattainment (8-hour)
Respirable particulate matter (PM ₁₀)	Unclassifiable ²	Nonattainment
Fine particulate matter (PM _{2.5})	Attainment	Nonattainment
Carbon monoxide (CO)	Attainment	Attainment
Nitrogen dioxide (NO ₂)	Attainment	Attainment
Sulfur dioxide (SO ₂) ⁵	Attainment	Attainment
Lead (Particulate)	Attainment	Attainment
Hydrogen Sulfide	No Federal Standard	Attainment
Sulfates		Attainment
Visibly Reducing Particles		Unclassified
Vinyl Chloride		Unclassified

Notes:

¹ The federal 1-hour standard of 12 pphm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

² At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

Source: SDAPCD 2018

TOXIC AIR CONTAMINANTS

According to the *California Almanac of Emissions and Air Quality* (CARB 2013), most of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being diesel PM. Diesel PM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although diesel PM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emissions control system is being used. Unlike the other TACs, no ambient monitoring data are available for diesel PM because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a PM exposure method. This method uses the CARB emissions inventory's PM₁₀ database, ambient PM₁₀ monitoring data, and the results from several studies to estimate concentrations of diesel PM. In addition to diesel PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

Diesel PM poses the greatest health risk among these 10 TACs mentioned. Diesel PM emissions decreased from 2000 to 2010 primarily as a result of reduced exhaust emissions from diesel mobile sources. Emissions from diesel mobile sources are projected to continue to decrease through 2035. Overall, levels of most TACs, except para-dichlorobenzene and formaldehyde, have decreased since 1990 (CARB 2013).

ODORS

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals can smell very minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; an odor that is offensive to one person may be perfectly acceptable to another (e.g., fast food restaurant). It is important to also note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity. Odor sources of concern include wastewater treatment plants, sanitary landfills, composting facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting operations, rendering plants, and food packaging plants.

SENSITIVE RECEPTORS

Sensitive receptors are generally considered to include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. Residential dwellings, schools, hospitals, playgrounds, and similar facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and/or the potential for increased and prolonged exposure of individuals to pollutants.

3.2.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

The scope of the project and cumulative impact analysis study area for air quality is SDAB. The impact analysis below uses the local jurisdictions' policies and thresholds to determine whether implementation of the CAP would result in a significant environmental impact.

PROPOSED CAP GHG REDUCTION MEASURES

Table 2-5 of the Draft EIR, provides a list of proposed GHG reduction measures that would be implemented by the CAP. None of the proposed measures indicate where specific improvements would be constructed, their size, or specific characteristics. As a program EIR, the Draft EIR does not, and cannot, speculate on the individual environmental impacts of specific future projects/improvements. However, implementation of all GHG reduction measures were considered during preparation of the Draft EIR to the degree specific information about implementation is known. Consistent with the requirements of the CEQA Guidelines section 15168, this Draft EIR provides a program-level discussion of the potential general impacts of implementing these measures, rather than project-level or site-specific physical impacts of such actions. Only those measures that have the potential to affect air quality are listed below. All other measures in Table 2-5 would have no effect on air quality and are not discussed further.

- ▶ **Measure BE-1: Increase Residential Building Efficiency.** This measure would result in an amendment to the City's Municipal Code to require energy audits and incentivize retrofits to increase energy efficiency for large residential additions. This measure would result in continued support for the Critical Home Repair Program to fund retrofits and energy efficiency improvements for single-family and mobile homes. This would result in nominal construction activities, which would emit short-term air pollutants.
- ▶ **Measure BE-2: Increase Commercial Building Efficiency.** This measure would result in an amendment to the City's Municipal Code to require energy audits and incentivize retrofits to increase energy efficiency for large commercial additions. This would result in nominal construction activities, which would emit short-term air pollutants.

- ▶ **Measure RE-1: Increase Behind-the-Meter Renewable Supply.** This measure would support and incentivize installation of PV solar systems on commercial buildings and schools, resulting in the installation of new PV solar systems on roofs. Short-term air pollutants would be emitted during project construction.
- ▶ **Measure RE-2: Increase Grid Renewable and Zero-Carbon Electricity.** This measure would encourage the City to research methods to increase grid supply of renewable and zero-carbon electricity and achieve 80 percent renewable and zero carbon electricity supply by 2030, 20 percent beyond the 60 percent Renewables Portfolio Standard mandate for 2030 per SB 100. To achieve a 20 percent reduction the City would need to offset 14,924 MTCO₂e, which could be achieved through the installation of renewable energy systems such as small-scale ground-mounted solar or rooftop PV solar systems. This would result in minor temporary construction and maintenance activities, which would emit short-term air pollutants.
- ▶ **Measure SW-1: Implement Reduce Solid Waste and Increase Recycling.** This measure could result in new/expanded composting facilities in areas in/or outside of the City's jurisdiction. Although the City's waste transfer stations have sufficient capacity to handle increased waste processing, this could result in a variety of physical impacts related to the construction and operation of new compost facilities. Air pollutants would be emitted during project construction, operation, and maintenance of new or expanded facilities. Although this measure would result in new vehicle trips related to new or expanded composting collection services, the associated air pollutant emissions would be offset by a reduction in vehicle trips to landfills.
- ▶ **Measure CS-1: Increase Urban Tree Planting.** This measure would result in increased parking lot shading, trees, and landscaping to help reduce heat island effect and resulting GHG emissions related to cooling. This would result in nominal air pollutant emissions related to increased tree planting/landscaping efforts and increased water use.

THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the State CEQA Guidelines the project would result in a potentially significant impact on air quality if it would:

- ▶ conflict with or obstruct implementation of the applicable air quality plan;
- ▶ result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard;
- ▶ expose sensitive receptors to substantial pollutant concentrations; or
- ▶ result in other emissions (such as those leading to odors adversely affecting a substantial number of people).

ISSUES NOT DISCUSSED FURTHER

All potential air quality issues identified in the significance criteria are evaluated below.

IMPACT ANALYSIS

Impact 3.2-1: Conflict with or Obstruct Implementation of the Applicable Air Quality Plan

The proposed GHG reduction measures are not growth-inducing, nor are they substantial employment generators such that an increase in VMT would be induced. While some measures may result in a temporary increase in the number of construction workers, workers would likely be from the San Diego region and permanent relocation would not be required. Furthermore, a co-benefit of many of the GHG reduction measures is improved air quality through reduction of criteria air pollutant emissions. Given that the CAP would not induce substantial population growth or increase in VMT, and would result in beneficial impacts, the project would not conflict with or obstruct implementation of any applicable air quality plans. Impacts would be **less than significant**.

The emission inventories used to develop a region's air quality attainment plans are based primarily on projected population growth and VMT for the region, which are based, in part, on the planned growth identified in regional and community plans. Therefore, projects that would result in increases in population or employment growth beyond that projected in regional or community plans could result in increases in VMT above that planned in the attainment plan, further resulting in mobile source emissions that could conflict with a region's air quality planning efforts. Increases in VMT beyond that projected in area plans generally would be considered to have a significant adverse incremental effect on the region's ability to attain or maintain State and federal ambient air quality standards. The analysis below focuses on whether GHG reduction measures would increase population, employment, or VMT above planned levels.

Small Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (BE-1, BE-2, RE-1, RE-2) could require a temporary increase in the number of construction workers. However, workers would likely be from the San Diego region and permanent relocation would not be required. Therefore, implementation of these measures would not result in substantial population growth or increase in VMT.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities within or outside of the City's jurisdiction, which would require an increase in the number of workers. However, workers would likely be from the San Diego region and permanent relocation would not be required. Furthermore, these types of projects are not substantial employment generators such that substantial population growth would be induced. Measure SW-1 could also result in increased haul truck trips to and from the new or expanded facility; however, it is anticipated that these trips would displace the haul truck trips that would be diverted from the landfill. Therefore, a net increase in the number of haul truck trips within the City would not be anticipated.

Carbon Sequestration Measure

GHG Reduction Measure CS-1 would result in the installation of parking lot shading, trees, and landscaping as part of new landscape or development projects. This would result in minimal additional tree plantings which would not create new jobs nor require the relocation of laborers to the City. Therefore, implementation of this measure would not result in substantial population growth or increase in VMT.

Impact Summary

Overall, the CAP is intended to reduce GHG emissions generated within the City by using alternatively fueled vehicles, reducing VMT, increasing energy efficiency, using renewable energy, and improving waste diversion. While these reduction measures were formulated to reduce GHGs, they also act to improve overall air quality by reducing the emission of criteria air pollutants. In addition, energy efficiency measures and renewable energy generation would reduce both GHG emissions and air pollutants at power plants generating electricity in the region. Energy efficiency measures in the CAP would also reduce natural gas combustion at residential and commercial land uses within the City, which would reduce local criteria air pollution. The effects associated with the reduction of air pollutant emissions in the City would be beneficial. Given that GHG reduction measures would not induce substantial population growth or increase in VMT, and given the beneficial air quality effects, the project would not conflict with or obstruct implementation of any applicable air quality plans. Impacts would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.2-2: Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for which the Project Region is in Non-Attainment Under an Applicable Federal or State Ambient Air Quality Standard

GHG reduction measures would result in minor air pollutant emissions during construction activities which would be mitigated at the time of permitting. GHG Reduction Measure SW-1 would generate operational emissions of air pollutants but would comply with SDAPCD Regulation II and acquire the appropriate permits. As discussed in Impact 3.2-3, the CAP would not result in an exceedance of SDAPCD's SLTs and thus, would not result in cumulative air quality impacts. Impacts would be **less than significant**.

San Diego County is designated as a nonattainment for ozone with respect to the CAAQS and NAAQS and nonattainment for PM₁₀ and PM_{2.5} with respect to the CAAQS (see Table 3.2-5, above). Impacts would be cumulative in nature if the project, in combination with cumulative development, leads to violation of any air quality standard or contributes substantially to an existing or projected air quality violation. In developing thresholds of significance for air pollutants, SDAPCD considered the emission levels for which a project's individual emissions would be cumulatively considerable. Thus, the CAP would result in a significant cumulative impact if it would cause construction-generated or operational criteria air pollutant or precursor emissions to exceed SDAPCD's SLTs. These impacts are discussed in Impact 3.2-3 and are summarized below.

Small-Scale Renewable Energy and Efficiency Measures

As discussed in Impact 3.2-3, emissions associated with small-scale renewable energy and efficiency measures (BE-1, BE-2, RE-1, RE-2) would be temporary, minimal, and would not result in a cumulatively considerable impact. Furthermore, small-scale PV solar systems are subject to Chapter 15.92 of the City's Municipal Code, which provides expedited permitting for small-scale rooftop PV solar or conditional use permits if it is found that the PV system would have a specific, adverse, impact upon the public health or safety.

Waste Diversion and Compost Measure

As discussed in Impact 3.2-3, construction emissions associated with measure SW-1 would be temporary, minimal, and would not result in a cumulatively considerable impact. During operation, anaerobic decomposition of waste would result in emissions of VOCs that would be analyzed during discretionary review of individual projects and is regulated by SDAPCD through Regulation II – Permits. Furthermore, SDAPCD has tentatively proposed Rule 67.25, Composting and Related Operations, for consideration and adoption in 2019. Measure SW-1 could also result in increased haul truck trips to and from the new or modified facility; however, it is anticipated that these trips would displace the haul truck trips that would be diverted from the landfill. Therefore, a net increase in the number of haul truck trips and associated air pollutant emissions within the City would not be anticipated.

Carbon Sequestration Measure

As discussed in Impact 3.2-3, emissions associated with measure CS-1 would be temporary, minimal, and would not result in a cumulatively considerable impact.

Impact Summary

As discussed in Impact 3.2-3, implementation of CAP would not result in the violation of any air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulative air quality impact such that human health would be adversely affected. Impacts would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.2-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations

Although there would be a temporary increase in vehicle trips related to construction worker commute and equipment delivery, the CAP would not result in substantial long- or short-term vehicle trip generation at levels that could cause unhealthy concentrations of CO on nearby roadways. Therefore, the project would not contribute to a CO hotspot.

Most GHG reduction measures would result in minor criteria air pollutant and TAC emissions during construction and beneficial long-term air quality impacts. GHG Reduction Measure SW-1 would generate operational emissions of criteria air pollutants but would comply with SDAPCD Regulation II and acquire the appropriate permits. Although a net increase in the number of haul truck trips would not be anticipated, GHG Reduction Measure SW-1 could result in the rerouting of haul truck routes, which could subject sensitive receptors to new or increased diesel PM and UFP emissions. The measure could result in the rerouting of up to 29 truck trips per day, which would not be considered a substantial increase in TAC emissions per CARB's guidance for siting sensitive receptors near TAC sources. The CAP would not result in the violation of any air quality standard, exposing sensitive receptors to substantial pollutant concentrations such that human health would be adversely affected. Impacts would be **less than significant**.

Carbon Monoxide

The single largest source of CO is motor vehicle engines. CO concentration near roadways is a direct function of vehicle idling time and, thus, traffic flow conditions. The CAP does not include new or modified land use designations that would increase traffic or have the potential to result in CO hotspots. The CAP does not induce or otherwise result in any residential development that would result in regional population increases. The goal of the CAP is to reduce GHG emissions in the City that would also have the co-benefit of reducing air emissions. Although there would be a temporary increase in vehicle trips related to construction worker commute and equipment delivery, the CAP would not result in substantial long- or short-term vehicle trip generation at levels that could cause unhealthy concentrations of CO on nearby roadways. Therefore, the CAP would not contribute to a CO hotspot.

Criteria Air Pollutants

The CAP would result in a significant localized and/or regional air quality impact such that human health would be adversely affected if it would cause construction-generated or operational criteria air pollutant or precursor emissions to exceed SDAPCD's SLTs of 100 pounds per day (lb/day) for PM₁₀, 55 lb/day for PM_{2.5}, 250 lb/day for NO_x and SO_x, 550 lb/day for CO, and 75 lb/day for VOCs.

The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development; however, construction and operation of GHG reduction measures that would be implemented with the CAP have the potential to directly or indirectly emit air pollutants. Emissions of PM₁₀, PM_{2.5}, NO_x, SO_x, CO, and VOCs would result from the operation of construction equipment, construction worker vehicle trips, and truck hauling trips. Emissions of fugitive dust (PM₁₀ and PM_{2.5}) are largely associated with ground-disturbing activities, such as site preparation. During the operational phase, some CAP measures may require additional staffing, resulting in increased vehicle trips and associated air pollutant emissions. Additionally, some CAP measures would result in a slight increase in electricity consumption, leading to increased air pollutant emissions from electricity generation.

Toxic Air Contaminants

The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development; however, construction and operation of GHG reduction and adaptation measures that would be implemented with CAP adoption have the potential to directly or indirectly emit TACs. For projects that do not propose stationary sources of emissions, diesel PM is the primary TAC of concern. CAP measures would result in short-term diesel exhaust emissions from construction equipment and heavy-duty trips during construction. Diesel PM dissipates rapidly from the source, and exposure concentrations would decline with distance from construction activities (Zhu et al. 2002). The dose to which receptors are exposed is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated

with time, meaning that a longer exposure period would result in a higher exposure level for the maximally exposed individual. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, should be based on a 70- or 30-year exposure period. However, such assessments should be limited to the period/duration of activities that generate TAC emissions (OEHHA 2015b).

The analysis below discusses emissions of criteria air pollutant and TAC from the GHG reduction measures.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (BE-1, BE-2, RE-1, RE-2) would not involve large amounts of labor or extensive use of construction equipment. Maintenance activities would be minimal and would consist of occasional inspection and cleaning of solar panels. Operational vehicle trips and associated criteria air pollutant emissions would be minimal. Furthermore, small-scale PV solar systems are subject to Chapter 15.92 of the City's Municipal Code, which provides expedited permitting for small-scale rooftop solar or conditional use permits if it is found that the PV system would have a specific, adverse, impact upon the public health or safety. Thus, these measures would not be expected to result in air pollutant emissions in exceedance of SDAPCD's SLTs.

GHG reduction measures BE-1, BE-2, RE-1, RE-2 would result in diesel PM emissions from construction equipment. Although locations for such improvements have not been identified, these types of activities would generally occur in residential and commercial areas, which could be near potential sensitive receptors. However, these activities would involve minimal use of heavy-duty diesel equipment and thus, diesel PM emissions would be minimal and temporary as well.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities within or outside of the City's jurisdiction. This would result in criteria air pollutant and TAC emissions from construction equipment, vehicle trips, anaerobic decomposition, and stationary sources. Construction activities would primarily consist of site preparation, grading, and the construction of small structures. Anaerobic decomposition of waste would result in operational emissions of VOCs that would be analyzed during discretionary review of individual projects, and is regulated by SDAPCD through Regulation II – Permits, including the Authority to Construct and Permit to Operate. Furthermore, SDAPCD has tentatively proposed Rule 67.25, Composting and Related Operations, for consideration and adoption in 2019. Rule 67.25 would address VOCs from composting operations and require the application of best management practices or control requirements depending on the size and characteristics of the operation. Stationary source operational TAC emissions are from air toxics (primarily hydrogen sulfide and ammonia) released as fugitives from the grinding system, anaerobic digester, boilers, diesel generators, flares, and organics processing operations. As discussed above, these emissions would be regulated by SDAPCD through Regulation II – Permits and would be subject to the proposed Rule 67.25, Composting and Related Operations. Furthermore, it is unlikely that construction would last for longer than a year, which is a short exposure period relative to the 30- or 70-year exposure timeframe recommended for health risk assessments.

GHG Reduction Measure SW-1 could also result in increased haul truck trips to and from the new or modified facility; however, it is anticipated that these trips would displace the haul truck trips that would be diverted from the landfill. Therefore, a net increase in the number of haul truck trips and associated criteria air pollutant emissions within the City would not be anticipated. In regard to TACs, although a net increase in the number of haul truck trips would not be anticipated, new haul truck routes or additional haul truck traffic in some areas may subject sensitive receptors to new or increased diesel PM and UFP emissions. Waste Management is the City's exclusive hauler and is currently converting their collection fleet to trucks powered by compressed natural gas (CNG). While CNG trucks emit less particulate matter, some studies suggest that CNG trucks may emit more UFP than diesel trucks (Hallquist et al. 2013). Thus, diesel-powered or CNG-powered haul trucks could expose sensitive receptors to diesel PM or UFP. In 2012 the City disposed 88,407 tons of waste at landfills, achieving a 67 percent waste diversion rate (EPIC 2019, CalRecycle 2019). To achieve a 75 percent waste diversion rate by 2020, the City would need to reduce waste disposed at landfills

to 72,661 tons per year (EPIC 2019). Assuming a compost load of 10 tons per truck and two trips (one for pick-up and one for drop-off), this would result in the potential rerouting of approximately 29 truck trips per business day by 2030 (See Appendix B for detailed calculations). Using CARB's guidance for siting sensitive receptors near TAC sources, a truck distribution center with activity of 100 or more trucks per day would be considered a major source of TACs (CARB 2005). Thus, project-generated increases of 29 truck trips per day would not be considered a substantial increase in TAC emissions. Further, these truck haul routes and related emissions would likely be distributed across multiple roads throughout the City as pickups, reducing the level of TAC emissions at any one receptor along future potential haul routes. Nonetheless, even if the redirection of haul truck trips would occur on a single route, an increase in 29 truck trips per day would not result in substantial TAC emissions. Thus, increases in mobile-related TAC emissions would not result in substantial TAC exposure to any single receptor.

Carbon Sequestration Measure

GHG reduction measure CS-1 would result in the installation of parking lot shading, trees, and landscaping. These activities would result in minor air pollutant emissions from equipment and vehicle trips, and a minor amount of diesel PM emissions from truck trips to deliver trees. Any criteria air pollutant and diesel PM emissions associated with these improvements would be minimal and temporary and would not contribute to air quality violations nor expose sensitive receptors to substantial pollutant concentrations.

Impact Summary

The CAP would not introduce or change land use designations that would increase traffic or have the potential to result in CO hotspots. Although there would be a temporary increase in vehicle trips related to construction worker commute and equipment delivery, the CAP would not result in substantial long- or short-term vehicle trip generation at levels that could cause unhealthy concentrations of CO on nearby roadways. Impacts regarding CO emissions would be less than significant.

GHG reduction measures that would result in small-scale PV solar systems, building retrofits, and installation of parking lot shading would result in minor criteria air pollutant and TAC emissions during construction and beneficial long-term air quality impacts. It is unlikely that these types of activities would be of the size, intensity, or duration to exceed SDAPCD's SLTs or to emit substantial TAC concentrations. As discussed in Section 3.2.1, "Regulatory Settings," SDAPCD developed these thresholds in consideration of achieving attainment for the NAAQS and CAAQS, which represent concentration limits of criteria air pollutants needed to adequately protect human health. Therefore, these measures would not contribute to the exceedance of the NAAQS or CAAQS in the SFBAAB nor result in greater acute or chronic health impacts compared to existing conditions.

GHG Reduction Measure SW-1 would generate operational emissions of criteria air pollutants but would comply with SDAPCD Regulation II and acquire the appropriate permits. In regard to TACs, although a net increase in the number of haul truck trips would not be anticipated, new haul truck routes or additional haul truck traffic in some areas may subject sensitive receptors to new or increased diesel PM and UFP emissions. The measure could result in the rerouting of up to 29 truck trips per day, which would not be considered a substantial increase in TAC emissions per CARB's guidance for siting sensitive receptors near TAC sources. Thus, increases in mobile-related TAC emissions would not result in substantial TAC exposure to any single receptor. The CAP would not result in the violation of any air quality standard, exposing sensitive receptors to substantial pollutant concentrations such that human health would be adversely affected. Impacts would be **less than significant**.

Impact 3.2-4: Result in Other Emissions That Would Adversely Affect Substantial Numbers of People

Construction activities associated with implementation of GHG reduction measures could result in temporary odorous emissions. Given the temporary and intermittent nature of the impacts, and dissipation of odors with increasing distance from the source, construction odor impacts would be less than significant. GHG Reduction Measure SW-1, which could result in new or expanded waste processing and diversion facilities, could generate objectionable odors during operation. Impacts would be minimized through implementation of an OIMP, as required by CalRecycle, as well as all applicable project-specific mitigation measures. Therefore, impacts would be **less than significant**.

The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development. However, implementation of some GHG reduction measures would result in temporary and long-term emissions of odors from diesel-powered equipment, asphalt paving, and composting and waste diversion facilities.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (BE-1, BE-2, RE-1, RE-2) would result in odorous emissions from construction equipment. Although locations for such improvements have not been identified, these types of activities would generally occur in residential and commercial areas, which could be near potential sensitive receptors. These emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Because odors would be temporary and would disperse rapidly with distance from source, construction-generated odors would not result in the frequent exposure of nearby receptors to objectionable odor emissions.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities within or outside of the City's jurisdiction. This would result in odorous emissions from construction equipment, haul truck trips, and anaerobic decomposition. Construction emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Because odors would be temporary and would disperse rapidly with distance from source, construction-generated odors would not result in the frequent exposure of nearby receptors to objectionable odor emissions.

During operation, odors would be generated through the anaerobic decomposition of waste and through increased haul truck trips to the facility. As discussed in Section 3.2.1, Regulatory Setting, facilities that are regulated by CalRecycle (e.g. landfill, composting, etc.) are required to have OIMPs in place and have procedures that establish fence line odor detection thresholds.

Carbon Sequestration Measure

GHG Reduction Measure CS-1 would result in the installation of parking lot shading, trees, and landscaping. These activities would not require heavy equipment but could result in a small amount of diesel PM emissions from truck trips to deliver trees. Any odorous emissions associated with these improvements would be minimal and temporary and would not result in odors affecting a substantial number of people.

Impact Summary

Construction activities associated with implementation of GHG reduction measures could result in temporary generation of odorous emissions. The specific locations and emissions of possible future facilities are not known at this time. Therefore, the precise odor impacts cannot be identified at this time. Factors necessary to identify specific impacts include location, operational characteristics, frequency and duration, and the location of sensitive receptors. However, given the temporary and intermittent nature of the impacts, and dissipation of odor, construction odor impacts would be less than significant.

In terms of operational impacts, GHG Reduction Measure SW-1 could result in new or expanded waste processing and diversion facilities, which would generate objectionable odors during operation. These projects would require discretionary review by the City and would be required to evaluate project-specific impacts under CEQA at the time of application. Project-specific mitigation would be required to minimize or avoid odor impacts to the extent feasible in compliance with CEQA Guidelines section 15126.4. Impacts would be further minimized through implementation of an OIMP, as required by CalRecycle. Therefore, impacts would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

3.3 BIOLOGICAL RESOURCES

This section provides a description of biological resources associated with the City and evaluates the potential for changes to occur as a result of CAP implementation.

No comments received on the Notice of Preparation were related to biological resources (See Appendix A of this Draft EIR).

3.3.1 Regulatory Setting

FEDERAL

Federal Endangered Species Act

Pursuant to the federal Endangered Species Act (ESA) (16 U.S.C. section 1531 et seq.), the U.S. Fish and Wildlife Service (USFWS) regulates the taking of species listed in the ESA as threatened or endangered. In general, persons subject to ESA (including private parties) are prohibited from “taking” endangered or threatened fish and wildlife species on private property, and from “taking” endangered or threatened plants in areas under federal jurisdiction or in violation of State law. Under section 9 of the ESA, the definition of “take” is to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” USFWS has also interpreted the definition of “harm” to include significant habitat modification that could result in take.

Section 10 of the ESA applies if a non-federal agency is the lead agency for an action that results in take and no other federal agencies are involved in permitting the action. Section 7 of the ESA applies if a federal discretionary action is required (e.g., a federal agency must issue a permit), in which case the involved federal agency consults with USFWS.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA), first enacted in 1918, provides for protection of international migratory birds and authorizes the Secretary of the Interior to regulate the taking of migratory birds. The MBTA provides that it will be unlawful, except as permitted by regulations, to pursue, take, or kill any migratory bird, or any part, nest, or egg of any such bird. Under the MBTA, “take” is defined as “to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or any attempt to carry out these activities.” A take does not include habitat destruction or alteration, as long as there is not a direct taking of birds, nests, eggs, or parts thereof. The current list of species protected by the MBTA can be found in Title 50 of the Code of Federal Regulations (CFR), section 10.13 (50 CFR 10.13). The list includes nearly all birds native to the United States.

Bald and Golden Eagle Protection Act

The Bald Eagle and Golden Eagle Protection Act prohibits the taking or possession of and commerce in bald and golden eagles, with limited exceptions. Under the Act, it is a violation to “...take, possess, sell, purchase, barter, offer to sell, transport, export or import, at any time or in any manner, any bald eagle commonly known as the American eagle, or golden eagle, alive or dead, or any part, nest, or egg, thereof...” Take is defined to include pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest, and disturb.

Federal Water Pollution Control Act (Clean Water Act) (1972)

The Water Pollution Control Act, passed by Congress in 1948, authorized the Surgeon General of the Public Health Service to prepare comprehensive programs for eliminating or reducing the pollution of interstate waters and tributaries and improving the sanitary condition of surface and underground waters. The Act was later amended to become the Federal Water Pollution Control Act Amendments of 1972, commonly known as the Clean Water Act (CWA). The CWA was designed to restore and maintain the chemical, physical, and biological integrity of the waters of the U.S. and gave the EPA the authority to implement pollution control programs, including setting wastewater

standards for industry and water quality standards for contaminants in surface waters. The EPA has delegated responsibility for implementation of portions of the CWA in California to the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Board, San Diego Region (RWQCB), including water quality control planning and control programs.

The CWA also prohibits the discharge of any pollutants from a point source into navigable waters, except as allowed by permits issued under certain sections of the CWA. Specifically, section 404 authorizes the U.S. Army Corps of Engineers to issue permits for and regulate the discharge of dredged or fill materials into wetlands or other “waters of the U.S.” Under the CWA and its implementing regulations, “waters of the U.S.” are broadly defined as rivers, creeks, streams, and lakes extending to their headwaters, including adjacent wetlands. Further, section 401 allows States to certify or deny federal permits or licenses that might result in a discharge to State waters, including wetlands. Section 401 certifications are issued by the RWQCB for activities requiring a federal permit or license that may result in the discharge of pollutants into waters of the U.S.

STATE

California Endangered Species Act

Pursuant to the California Endangered Species Act (CESA), a permit from CDFW is required for projects that could result in the “take” of a plant or animal species that is listed by the State as threatened or endangered. Under CESA, “take” is defined as an activity that would directly or indirectly kill an individual of a species, but does not include “harm” or “harass,” as does the federal definition. As a result, the threshold for take is higher under CESA than under the federal ESA. Authorization for take of State-listed species can be obtained through a California Fish and Game Code section 2081 incidental take permit.

California Fish and Game Code Sections 3503 and 3503.5—Protection of Bird Nests and Raptors

Section 3503 of the Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 of the California Fish and Game Code states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders Falconiformes and Strigiformes), including their nests or eggs. Typical violations include destruction of active nests as a result of tree removal or disturbance caused by project construction or other activities that cause the adults to abandon the nest, resulting in loss of eggs and/or young.

Fully Protected Species under the California Fish and Game Code

Protection of fully protected species is described in sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code. These statutes prohibit take or possession of fully protected species and do not provide for authorization of incidental take.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act provides for Statewide coordination of water quality regulations. The Act established the California SWRCB as the Statewide authority and nine separate RWQCBs to oversee smaller regional areas within the State. The Act authorizes the SWRCB to adopt, review, and revise policies for all waters of the State (including both surface and ground waters); and directs the RWQCBs to develop regional Basin Plans. Section 13170 of the California Water Code also authorizes the SWRCB to adopt water quality control plans on its own initiative. The Basin Plan for the San Diego Region is designed to preserve and enhance the quality of water resources in the San Diego region for the benefit of present and future generations. The purpose of the plan is to designate beneficial uses of the region’s surface and ground waters, designate water quality objectives for the reasonable protection of those uses and establish an implementation plan to achieve the objectives.

Natural Community Conservation Planning Act of 1991

The Natural Community Conservation Planning (NCCP) Act is designed to conserve natural communities at the ecosystem scale while accommodating compatible land uses. CDFW is the principal State agency implementing the NCCP Program. Section 2800 et seq. of the California Fish and Game Code addresses NCCPs and a 2835 permit is issued by CDFW for all NCCPs. The Act established a process to allow for comprehensive, regional multi-species planning in a manner that satisfies the requirements of the State and federal ESAs (through a companion regional Habitat Conservation Plan). The NCCP program has provided the framework for innovative efforts by the State, local governments, and private interests to plan for the protection of regional biodiversity and the ecosystems upon which it depends. NCCPs seek to ensure the long-term conservation of multiple species, while allowing for compatible and appropriate economic activity to proceed.

LOCAL

County of San Diego South County Multiple Species Conservation Program

The City is a participant in the County of San Diego South County Multiple Species Conservation Program (MSCP) which is a comprehensive habitat conservation planning program that addresses multiple species habitat needs and the preservation of native vegetation communities within southwestern San Diego County. The MSCP allows local jurisdiction to maintain land use control and development flexibility by planning a regional preserve system that can meet future public and private project mitigation needs. Local jurisdictions implement their respective portions of the MSCP through subarea plans which describe specific implementing mechanisms. Subarea plans contain criteria, such as conservation targets, mitigation standards, and encroachment limits, to ensure that habitat conservation proceeds in step with development. There are no identified Biological Core Areas of Linkages within the City (San Diego County 1998: 3-18).

City of El Cajon General Plan

The City of El Cajon General Plan (1991) contains the following policies that pertain to biological resources and are relevant to this analysis:

- ▶ **Policy 1-5.2:** The City shall retain a street tree program defined by City Council Policy.
- ▶ **Policy 8-2.1:** The retention of the unique natural features of a development site such as rock outcroppings, native vegetation and trees shall be encouraged.
- ▶ **Policy 8-2.2:** The flat, valley portions of El Cajon shall receive the most intensive development. Hillside areas shall receive less intensive development. Steep hillside areas (slopes more than 25%) shall be placed in the open space land use category.
- ▶ **Policy 8-5.3:** Hillside property retained in its natural state and used for passive public recreational purposes (hiking, picnicking, etc.) shall be considered for public acquisition.
- ▶ **Policy 8-6.1:** The city shall conduct research for purposes of developing a wildlife/vegetative inventory for the Planning Area (city) with special emphasis on preserving any unique habitats of any rare, endangered or declining species.
- ▶ **Policy 8-6.2:** The City shall develop an Urban Forestation policy the goal of which would be to provide increased vegetation mass for enhanced wildlife value. A tree planting program shall be considered for zones within the urban and rural areas of El Cajon, including but not limited to, street trees, parking lots, municipal projects, private projects, parks and open space. The development of this program shall include an analysis of significant factors which affect the selection of trees. Of particular importance is an analysis of the wildlife habitat we wish to encourage, the amount of water necessary for the plant to survive, and other considerations such as fire susceptibility, type and quantity of pests, tree litter and life span.

- ▶ **Policy 8-7.1:** Appropriate measures shall be required for the protection of any rare or endangered animal or plant species located in an area to be developed. Methods of compensation to the property owners should be explored to assist in the preservation of such species.
- ▶ **Policy 8-7.2:** The City shall consider imaginative and effective measures to preserve unique species and habitats; including, but not limited to, relocation of the species, creation of open space preserves and transfer of development rights.
- ▶ **Policy 8-10.3:** The City shall preserve, and where possible, create or restore areas that provide important water quality benefits, such as riparian corridors, wetlands, and buffer zones. The City will encourage land acquisition of such areas.
- ▶ **Policy 8-10-4:** The City shall limit disturbances of natural water bodies and natural drainage systems caused by development including roads, highways, and bridges.

El Cajon Municipal Code- Title 17

Title 17 of the City's Municipal Code contains the Zoning Code, which implements the City's General Plan land uses and establishes a set of development regulations that serve the public health, safety, and general welfare, and that provide the economic and social advantages resulting from an orderly planned use of land resources. The Zoning Code identifies specific uses and development standards for each zone.

City of El Cajon Urban Forestry Program

The Public Works Department oversees the planting and maintenance of trees in city parks, public grounds, median islands and in parkways (area between the curb and sidewalk) along city streets. Current tree maintenance inventory includes over 7,000 various trees. The National Arbor Day Foundation has recognized the City as Tree City USA.

3.3.2 Environmental Setting

REGIONAL SETTING

El Cajon is in western San Diego County, which is located within the Peninsular Range of California's South Coast Province which extends from Santa Barbara County to the Mexico border. Inland, the region is bounded by the Peninsular Mountain Ranges and the transition to the Mojave and Colorado Deserts on the east and by the Transverse Mountain Ranges on the north. It is an area of strikingly varied landscapes, ranging from wetlands and beaches to hillsides, rugged mountains, arid deserts, and densely populated metropolitan areas. The region's coastal habitats include coastal strand, lagoons, and river-mouth estuaries that transition from riparian wetlands to fresh and saltwater marshes. Moving inland, the predominant hillside and bluff communities are coastal sage scrub and chaparral.

Therefore, San Diego County is recognized as one of the most important biological areas in the U.S. The diversity of species found in the county can be attributed to the variety of vegetation and habitats associated with the region's range of micro-climates, topography, soils, and other natural features. The unincorporated lands comprise the largest geographical area within the county boundary with natural features that include lagoons, foothills, mountain ranges, and deserts. The physical and climatic conditions found in the unincorporated county provide for a wide variety of habitats and biological communities. Biological communities are associations of plants, animals, fungi, and microbes that can occur separately or be intermixed. Because each biological community has different characteristics, they often support unique assemblages of species. The county's unique attributes have resulted in a relatively large number of endemic species in the area (e.g., species that are only found in a limited geographic location). For example, 26 plant species in the County are found nowhere else in the world. As a result of the limited distribution of many of the county's species, combined with habitat loss from urban, rural, and agricultural development, the county is home to an exceptional number of rare, threatened, endangered, or otherwise sensitive species. Invasive plant and animal species have the potential to disrupt native habitat regeneration and pose a threat to conservation of native habitat and endemic species (San Diego County 2011).

CITY OF EL CAJON

El Cajon is nearly entirely developed with urban uses, and has no agricultural areas, forests, permanent streams, lakes or beaches. The city consists primarily of buildings, paved roads, parking lots, and/or landscaping. As such, most of the city is not likely to support any native species, special status species, or any natural habitat community. In addition, there are no identified Biological Core Areas or Linkages within the city, as identified in the County of San Diego South County Multiple Species Conservation Program. However, the city is surrounded by hillsides that constitute the foothills of nearby mountain ranges. As a result, the City recognizes the importance of protecting sensitive land uses and has placed much of the undeveloped hillside land into open space conservation. The city contains smaller urban open spaces, parks, green belts, and common open space in residential developments which totals approximately 80 acres (El Cajon 1991).

3.3.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

The project impact analysis area includes the entire City and the analysis of biological resources presented in this section is based on an evaluation of the proposed GHG reduction and supporting measures as described in Table 2-5 of Chapter 2, Project Description. The analysis focuses on the potential for activities that could occur during implementation of the CAP to result in physical effects on the biological resources within the City.

PROPOSED CAP GHG REDUCTION MEASURES

Table 2-5 of the Draft EIR provides a list of proposed GHG reduction measures that would be implemented by the CAP. However, only those measures that are relevant to biological resources and could potentially result in a significant impact within the City are described and evaluated below. None of the proposed measures indicate where specific improvements would be constructed, their size, or specific characteristics. As a program EIR, the Draft EIR does not, and cannot, speculate on the individual environmental impacts of specific future projects/improvements. However, implementation of all GHG reduction measures were considered during preparation of the Draft EIR to the degree specific information about implementation is known. Consistent with the requirements of CEQA Guidelines section 15168, this Draft EIR provides a program-level discussion of the potential general impacts of implementing these measures rather than project-level or site-specific physical impacts of such actions. Only those measures that have the potential to affect biological resources are listed below. All other measures in Table 2-5 would have no effect on biological resources and are not discussed further.

- ▶ **Measure RE-2: Increase Grid Renewable and Zero-Carbon Electricity.** This measure would encourage the City to research methods to increase grid supply of renewable and zero-carbon electricity and achieve 80 percent renewable and zero carbon electricity supply by 2030, 20 percent beyond the 60 percent Renewables Portfolio Standard mandate for 2030 required by SB 100. To achieve a 20 percent reduction the City would need to offset 14,924 MTCO₂e, which could be achieved through the installation of renewable energy systems such as small-scale ground-mounted solar or rooftop PV solar systems. This measure may result in physical changes to the biological resources if present, resulting from construction of additional small-scale ground-mounted solar installations.
- ▶ **Measure SW-1: Implement Solid Waste Reduction and Increase Recycling.** This measure could result in new/expanded composting facilities within the City or in areas outside of the City's jurisdiction. This could result in a variety of physical impacts related to the construction and operation of such facilities dependent upon the scale of facilities. This measure could result in physical changes to biological resources if present, related to construction of such facilities.

THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the State CEQA Guidelines, an impact on biological resources is considered significant if implementation of CAP would do any of the following:

- ▶ have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;
- ▶ have a substantial adverse impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS;
- ▶ have a substantial adverse effect on State or federally protected wetlands through direct removal, filling, hydrological interruption, or other means;
- ▶ interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites;
- ▶ conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan; or
- ▶ conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

ISSUES NOT DISCUSSED FURTHER

All potential biological resources issues in the significance criteria are evaluated below.

IMPACT ANALYSIS

Impact 3.3-1: Effects on Special-Status Species or Their Habitat

Implementation of GHG reduction measures resulting from CAP adoption could result in direct and indirect effects on special-status species and their habitat if they are present in areas affected by the new or expanded facilities. However, compliance with existing federal, State, and local regulations that protect sensitive resources, and completion of subsequent project-level planning and environmental review would reduce potential impacts. Impacts would be **less than significant**.

Most of the City is highly urbanized and consists of developed land, which includes permanent unnatural areas that contain buildings, paved roads, parking lots, and/or landscaping. Additionally, there are no identified Biological Core Areas or Linkages within the City, as identified in the County of San Diego South County Multiple Species Conservation Program (1998). However, there are small segments of natural habitat areas, open space, and parkland interspersed throughout the urban areas, especially near the edges of the city along the hillsides. While it is likely that there are relatively few native species located throughout the city, it is not possible to determine with certainty that there are zero special-status species.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (RE-2) would generally not involve construction that would substantially change roof lines or add substantial massing or height such that the altered buildings would result in the potential to interfere with the flight paths of birds. Similarly, rooftop solar PV would not result in ground disturbing activities and would not interfere with ground-based biological resources. Additionally, the installation of PV solar systems is regulated by the City's Municipal Code Chapter 15.92, which provides expedited permitting for small-scale rooftop solar or conditional use permits if it is found that the PV system will have a specific, adverse, impact upon the public health or safety.

Installation of ground-mounted solar would result in ground disturbing activities. However, there are no identified Biological Core Areas of Linkages within the City of El Cajon; therefore, future facilities would not impact sensitive habitat areas covered by the MSCP. In addition, the El Cajon General Plan includes policies that require the City to protect any rare or endangered animal or plant species located in an area to be developed.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could result in changes to existing biological resources. While these facilities would likely be located outside of the city in rural areas, it is possible that facilities could be constructed within the city limits as part of expansion of existing facilities or redevelopment of underutilized land. As discussed above, there are no identified Biological Core Areas of Linkages within the City of El Cajon; therefore, future facilities would not adversely affect sensitive habitat areas covered by the MSCP. In any event, new or expanded waste facilities would be required to obtain a conditional use permit under the City's Municipal Code Chapter 17.50, which would require a project-specific environmental review and potential implementation of mitigation for biological impacts, or if outside of the City's jurisdiction, would be required to comply with a similar permit process in that local jurisdiction which would require compliance with existing regulations protecting biological resources.

Impact Summary

Retrofits and renewable energy systems installed on existing buildings would not require ground disturbing activities that could disturb habitat. Additionally, the installation of PV solar systems is regulated by the City's Municipal Code Chapter 15.92, which provides expedited permitting for small-scale rooftop solar or conditional use permits if it is found that the PV system will have a specific, adverse, impact upon the public health or safety. Rooftop systems would not result in a significant biological resources impact.

Implementation of GHG Reduction Measure SW-1 could result in new or expanded composted facilities within or outside of the City's jurisdiction. If new or expanded facilities occurred within the City's jurisdictional boundaries, projects would be required to obtain a conditional use permit, which would require project-specific environmental review and implementation of all feasible mitigation under CEQA. If new or expanded facilities would occur within nearby adjacent jurisdictions, projects would undergo a similar conditional use permit process because of the particular impacts that may occur with the project type. In each scenario, all projects would be required to comply with existing federal, State, and local regulations that protect biological resources.

All future projects with the potential to result in environmental impacts would generally require discretionary review and would be required to evaluate project-specific impacts under CEQA at the time of application. Project-specific mitigation would be required to minimize or avoid impacts to special-status species and their habitat to the extent feasible in compliance with CEQA Guidelines section 15126.4. Impacts would be minimized through implementation of the City's General Plan policies described above, which strive to protect existing natural resources, hillside habitats, and maintain a level of water quality throughout the City, among other protections. In addition, federal and State requirements would be adhered to, and project-specific measures implemented to conserve, protect, and preserve special-status species and their habitat. Impacts would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 3.3-2: Effects on Sensitive Natural Communities, Riparian Habitat, and Protected Water of the United States and State, Including Wetlands

Implementation of GHG reduction measures resulting from CAP adoption could result in direct and indirect effects on sensitive natural communities and riparian habitat related to construction activities. Although major channels within the City are concrete-lined and hold little significant environmental value, downstream impacts could occur from ground disturbing activities. However, compliance with existing federal, State, and local regulations that protect sensitive natural communities and riparian habitat, and completion of subsequent project-level planning and environmental review would reduce potential impacts to sensitive natural communities and riparian habitat. Impacts would be **less than significant**.

The City lies entirely within the San Diego River watershed management area (WMA), Hydrologic Unit 907, which encompasses approximately less than 3.5 percent of the WMA. There are no Areas of Special Biological Significance, water bodies that support habitats necessary for the survival of threatened species, or State Water Quality Protected Areas within the City's jurisdiction. The City has chosen to designate major channels within the City as environmentally sensitive areas, although major channels within the City are primarily concrete-lined and hold little significant environmental value. Designating major channels as environmentally sensitive areas is a proactive measure to protect the downstream water quality of Forrester Creek and the San Diego River (El Cajon 2015).

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (RE-2). Rooftop solar PV would not result in ground disturbing activities and would not interfere with existing sensitive communities or riparian habitat. Installation of ground-mounted solar would result in ground disturbing activities; however, future projects would comply with existing regulations protecting biological resources.

Waste Diversion and Compost Measure

Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could result in changes to existing sensitive natural communities or riparian habitat. While these facilities would likely be located outside of the city in rural areas, it is possible that facilities could be constructed within the City limits as part of expansion of existing facilities or redevelopment of underutilized land. In any event, new or expanded waste facilities would be required to obtain a conditional use permit under the City's Municipal Code Chapter 17.50 or if outside of the City's jurisdiction, would be required to comply with a similar permit process in that local jurisdiction.

Impact Summary

Ground-mounted solar PV systems would require an Erosion Control Plan, which would ensure that appropriate best management practices related to erosion management would be implemented.

Implementation of GHG Reduction Measure SW-1 could result in new or expanded composting facilities within or outside of the City's jurisdiction. If new or expanded facilities occurred within the City's jurisdictional boundaries, projects would be required to obtain a conditional use permit, which would require project-specific environmental review and implementation of all feasible mitigation under CEQA, including best management practices related to erosion and project-site specific surveying for riparian habitat. If new or expanded facilities would occur within nearby adjacent jurisdictions, projects would undergo a similar conditional use permit process because of the impacts that may occur with the project type. In each scenario, all projects would be required to comply with existing federal, State, and local regulations that protect sensitive natural communities and riparian habitat.

O Future projects with the potential to result in environmental impacts would require discretionary review and would be required to evaluate project-specific impacts under CEQA at the time of application. Project-specific mitigation would be required to minimize or avoid impacts to sensitive natural communities and riparian habitat to the extent feasible in compliance with CEQA Guidelines section 15126.4. Impacts would be minimized through implementation of the City's General Plan policies described above, which strive to protect existing natural resources, hillside habitats,

and maintain a level of water quality throughout the City, among other protections. In addition, federal and State requirements would be adhered to, and project-specific measures implemented to conserve, protect, and preserve sensitive natural communities and riparian habitat. Impacts would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 3.3-3: Interfere with the Movement of Native Resident or Migratory Wildlife or Impede the Use of Native Wildlife Nursery Sites

Implementation of the GHG reduction measures could result in impacts to wildlife nursery sites or wildlife corridors if projects disrupted either resource. Even though there are no identified Biological Core Areas or Linkages within the City, as identified in the County of San Diego South County Multiple Species Conservation Program, it is not possible to predict with certainty that there are no nursery sites or sites used as wildlife corridors. However, compliance with existing federal, State, and local regulations that protect nursery sites and wildlife corridors, and completion of subsequent project-level planning and environmental review would reduce potential impacts to nursery sites and wildlife corridors. Impacts would be **less than significant**.

Most of the City of El Cajon is highly urbanized and consists of developed land, which includes permanent unnatural areas that contain buildings, paved roads, parking lots, and/or landscaping. Additionally, there are no identified Biological Core Areas or Linkages within the City, as identified in the County of San Diego South County Multiple Species Conservation Program (1998). However, there are small segments of natural habitat areas, open space, and parkland interspersed throughout the urban areas, especially near the edges of the City along the hillsides. While it is likely that there are relatively few native species located throughout the City, it is not possible to determine with certainty that there are zero native wildlife nursery sites or corridors within the city.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (RE-2). Rooftop PV solar energy panels generally do not involve construction that would substantially change roof lines or add substantial massing or height such that the altered buildings would result in the potential to interfere with the flight paths of bird. Similarly, rooftop solar PV would not result in ground disturbing activities and would not interfere with ground-based biological resources. Additionally, the installation of rooftop PV solar systems is regulated by the City's Municipal Code Chapter 15.92. Ground-mounted solar facilities are regulated under the City's development standards and design guidelines established by the City's Municipal Code Title 17. Enforcement of these City regulatory standards would ensure that future solar facilities facilitated by the CAP would not result in impacts to biological resources. In addition, the El Cajon General Plan includes policies that require the City to protect any rare or endangered animal or plant species located in an area to be developed.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could result in changes to existing biological resources. While these facilities would likely be located outside of the city in rural areas, it is possible that facilities could be constructed within the City limits as part of expansion of existing facilities or redevelopment of underutilized land. In any event, new or expanded waste facilities would be required to obtain a conditional use permit under the City's Municipal Code Chapter 17.50, which would require a project-specific environmental review and potential implementation of mitigation for biological impacts, or if outside of the City's jurisdiction, would be required to comply with a similar permit process in that local jurisdiction which would require compliance with existing regulations protecting biological resources.

Impact Summary

Future projects with the potential to result in environmental impacts would require discretionary review and would be required to evaluate project-specific impacts under CEQA at the time of application. Project-specific surveys and implementation of mitigation would be required to minimize or avoid impacts to wildlife corridors and nursery sites to the extent feasible in compliance with CEQA Guidelines section 15126.4. Additionally, impacts would be minimized through implementation of the City's General Plan policies described above, which strive to protect existing natural resources, hillside habitats, and maintain a level of water quality throughout the City, among other protections. In addition, federal and State requirements would be adhered to, and project-specific measures implemented to protect wildlife corridors and nursery sites. Impacts would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 3.3-4: Conflict with Any Local Policies or Ordinances Protecting Biological Resources

Future projects implemented under the CAP would be required to follow the City's development requirements, including compliance with the County of San Diego Multiple Species Conservation Program, and other applicable federal, State, and local policies, ordinances, and permitting procedures related to protection of biological resources. This impact would be **less than significant**.

Most of the City is highly urbanized and consists of developed land, which includes permanent unnatural areas that contain buildings, paved roads, parking lots, and/or landscaping. However, the City is a participating member of the County of San Diego Multiple Species Conservation Program (1998).

As described in Section 3.3.2, "Regulatory Framework," several federal, State, and local regulations and policies are in place to protect biological resources in the city. Other than most roof-mounted PV systems, all future projects would be required to follow City development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to protection of biological resources. Additionally, project-level planning, environmental analysis, and compliance with existing local regulations and policies would identify potentially significant conflicts with local policies; minimize or avoid those impacts through the design, siting, and permitting process; and provide mitigation for any significant effects as a condition of project approval and permitting. Therefore, implementation of the CAP would not result in any project or cumulative impacts related conflicts with local policies or ordinances protecting biological resources. This would be a **less-than-significant** impact.

Mitigation Measures

No mitigation is required.

3.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

This section evaluates existing conditions for cultural, historical, paleontological, and tribal cultural resources within the City of El Cajon, and the potential effects that implementation of the project may have on these resources.

The City received one comment regarding cultural resources and tribal cultural consultation during the Notice of Preparation (NOP) scoping process. The comment letter outlines the tribal consultation requirements consistent with Assembly Bill (AB) 52. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this Draft EIR.

3.4.1 Regulatory Setting

FEDERAL

Section 106 of the National Historic Preservation Act

Federal protection of resources is legislated by (a) the National Historic Preservation Act (NHPA) of 1966 as amended by 16 U.S. Code section 470 et seq., (b) the Archaeological Resource Protection Act of 1979, and (c) the Advisory Council on Historical Preservation. These laws and organizations maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP).

Section 106 of the NHPA and accompanying regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the main federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed in or may be eligible for listing in the NRHP. The NRHP is the nation's master inventory of known historic resources. It is administered by the National Park Service and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, and cultural districts that are considered significant at the national, State, or local level.

The formal criteria (36 CFR 60.4) for determining NRHP eligibility are as follows:

1. The property is at least 50 years old (however, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);
2. It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and
3. It possesses at least one of the following characteristics:
 - a. Association with events that have made a significant contribution to the broad patterns of history (events).
 - b. Association with the lives of persons significant in the past (persons).
 - c. Distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction (architecture).
 - d. Has yielded, or may be likely to yield, information important to prehistory or history (information potential).

Listing in the NRHP does not entail specific protection or assistance for a property but it does guarantee recognition in planning for federal or federally-assisted projects, eligibility for federal tax benefits, and qualification for federal historic preservation assistance. Additionally, project effects on properties listed in the NRHP must be evaluated under CEQA.

The National Register Bulletin also provides guidance in the evaluation of archaeological site significance. If a heritage property cannot be placed within a particular theme or time period, and thereby lacks "focus," it is considered not eligible for the NRHP. In further expanding upon the generalized National Register criteria, evaluation standards for

linear features (such as roads, trails, fence lines, railroads, ditches, flumes, etc.) are considered in terms of four related criteria that account for specific elements that define engineering and construction methods of linear features: (1) size and length; (2) presence of distinctive engineering features and associated properties; (3) structural integrity; and (4) setting. The highest probability for National Register eligibility exists within the intact, longer segments, where multiple criteria coincide.

STATE

California Environmental Quality Act

CEQA requires public agencies to consider the effects of their actions on both "historical resources" and "unique archaeological resources." Pursuant to PRC section 21084.1, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." Section 21083.2 requires agencies to determine whether projects would have effects on unique archaeological resources.

Historical Resources

"Historical resource" is a term with a defined statutory meaning (PRC section 21084.1; determining significant impacts to historical and archaeological resources is described in the State CEQA Guidelines, sections 15064.5[a] and [b]). Under State CEQA Guidelines section 15064.5(a), historical resources include the following:

- 1) A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (PRC section 5024.1).
- 2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- 3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be historically significant if the resource meets the criteria for listing in the California Register of Historical Resources (PRC section 5024.1), including the following:
 - a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - b) Is associated with the lives of persons important in our past;
 - c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - d) Has yielded, or may be likely to yield, information important in prehistory or history.
- 4) The fact that a resource is not listed in or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC section 5020.1(j) or 5024.1.

Unique Archaeological Resources

CEQA also requires lead agencies to consider whether projects will impact unique archaeological resources. Public Resources Code section 21083.2, subdivision (g), states that unique archaeological resource means an archaeological

artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Tribal Cultural Resources

CEQA also requires lead agencies to consider whether projects will impact tribal cultural resources. Public Resources Code section 21074 states the following:

- a) "Tribal cultural resources" are either of the following:
 - 1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
 - 2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- c) A historical resource described in section 21084.1, a unique archaeological resource as defined in subdivision (g) of section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

California Register of Historical Resources

All properties in California that are listed in or formally determined eligible for listing in the NRHP are eligible for the CRHR. The CRHR is a listing of State of California resources that are significant within the context of California's history. The CRHR is a statewide program of similar scope and with similar criteria for inclusion as those used for the NRHP. In addition, properties designated under municipal or city ordinances are also eligible for listing in the CRHR.

A historic resource must be significant at the local, State, or national level under one or more of the criteria defined in the California Code of Regulations Title 15, Chapter 11.5, section 4850 to be included in the CRHR. The CRHR criteria are similar to the NRHP criteria and are tied to CEQA because any resource that meets the criteria below is considered a significant historical resource under CEQA. As noted above, all resources listed in or formally determined eligible for the NRHP are automatically listed in the CRHR.

The CRHR uses four evaluation criteria. The resource:

1. Is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. Is associated with the lives of persons important to local, California, or national history.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Similar to the NRHP, a resource must meet one of the above criteria and retain integrity. The CRHR uses the same seven aspects of integrity as the NRHP.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both State and private lands. The Act requires that upon discovery of human remains, construction or excavation activity cease and the County coroner be notified. If the remains are of a Native American, the coroner must notify NAHC, which notifies and has the authority to designate the most likely descendant (MLD) of the deceased. The Act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.

Health and Safety Code Sections 7052 and 7050.5

Section 7052 of the Health and Safety Code states that the disturbance of Native American cemeteries is a felony. Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC.

Public Resources Code Section 5097

PRC section 5097 specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. The disposition of Native American burial falls within the jurisdiction of the NAHC. Section 5097.5 of the Code states the following:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

Assembly Bill 52

AB 52, signed by the California Governor in September of 2014, establishes a new class of resources under CEQA: "tribal cultural resources." It requires that lead agencies undertaking CEQA review must, upon written request of a California Native American tribe, begin consultation once the lead agency determines that the application for the project is complete, prior to the issuance of an NOP of an EIR or notice of intent to adopt a negative declaration or mitigated negative declaration. AB 52 also require a revision to CEQA Appendix G, the environmental checklist, which created a new category for "tribal cultural resources."

LOCAL

City of El Cajon General Plan

The City of El Cajon General Plan (1991) includes the following policies that pertain to the preservation of historical resources and are relevant to this analysis:

- ▶ **Policy 14-1.1:** All applications for discretionary permits shall be checked against the City's historic resources inventory.
- ▶ **Policy 14-1.3:** Demolition or removal of an historic structure will require review under the California Environmental Quality Act.

City of El Cajon Municipal Code

Title 15 of the City's Municipal Code sets forth the permitting process for small residential rooftop solar energy systems, electric vehicle charging stations, and advanced energy storage systems in the City of El Cajon. Pursuant to section 15.92.050, the City's Building and Safety Division shall review completed applications to ensure that all required documents meet local, State, and federal health and safety requirements. Once applications are determined

to be complete, the City's Building and Safety Division shall issue a building permit for small rooftop solar, electric vehicle charging station, or advanced energy storage system. If the building official determines that the installation of a solar energy system, electric vehicle charging station, or advanced energy storage system will have a specific, adverse, impact upon the public health or safety, the project proponent would be required to obtain a conditional use permit or minor conditional use permit.

Title 17 of the City's Municipal Code establishes regulations and procedures for the identification and certification of historic resources within the City of El Cajon. The overall objective is to preserve historical resources whenever possible. Pursuant to section 17.55.050, the Planning Commission serves as the historic preservation commission for the city and is charged with the responsibility to protect the historic resources through participation in the review and approval of historic resource designations. Section 17.55.070, requires a Certificate of Modification to alter a designated historical resource.

3.4.2 Environmental Setting

Historical resources generally include standing buildings (e.g., houses, barns, outbuildings, cabins), intact structures (e.g., dams, bridges, wells), or other remains of human's alteration of the environment (foundation pads, remnants of rock walls).

Cultural resources typically include districts, sites, buildings, structures, or objects generally older than 50 years and considered to be important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. They include pre-historic resources, historic-era resources, and "tribal cultural resources" (the latter as defined by Assembly Bill (AB) 52, Statutes of 2014, in PRC section 21074). Archaeological resources are locations where human activity has measurably altered the earth or left deposits of prehistoric or historic-era physical remains (e.g., stone tools, bottles, former roads, house foundations). Paleontological resources include fossil remains, as well as fossil localities and formations, which have produced fossil material in other nearby areas.

Tribal cultural resources (TCRs) as defined by AB 52 includes site features, places, cultural landscapes, and sacred places or objects, which are of cultural value to a tribe.

REGIONAL PREHISTORY

The prehistoric cultural sequence in San Diego County is generally comprised of three periods: the Paleoindian, the Archaic, and the Late Prehistoric. Each period is manifested by complexes of artifacts that provide information about human occupation within the region.

The Paleoindian period is manifested by the San Dieguito Complex, dating to approximately 10,000 years ago, which is believed to represent the earliest archaeological manifestation of human occupation in San Diego County. The material culture of the San Dieguito Complex is primarily characterized by well-developed flake stone component consisting of scrapers, scraper planes, choppers, drills, gravers, and projectile points. San Dieguito sites are typically found on or near former pluvial lake shores, marshes, old stream channels, and coastal sites (City of El Cajon 2012:21).

The Archaic period is manifested by the La Jolla and Pauma Complexes chronologically which date from about 8,500 to 1,500 years ago. The La Jolla Complex area associated with shell midden sites on the coast and the Pauma Complex is associated with inland sites, particularly in the valleys and sheltered canyons. The material culture of these complexes is characterized by ground stone milling toolkits, including manos and metates. In addition, assemblages often contain a mix of finely worked stone artifacts including cog stones, small domed scrapers, flaked cobble tools, and dart points. Given the similarity in artifact assemblages, it is believed that the two complexes may represent seasonal or geographic variation of the same group (City of El Cajon 2012:22).

The Late Prehistoric period is manifested by the Cuyamaca and San Luis Rey Complexes. The Cuyamaca Complex is associated with coastal areas and foothills of San Diego County, while the San Luis Rey Complex is associated with northern San Diego County. The Cuyamaca Complex is characterized by the presence of arrowshaft straighteners, pendants, comales (heating stones), pottery, ceramic figurines, ceramic bow pipes, ceramic rattles, miniature pottery,

various cobble-based tools (e.g., scrapers, choppers, hammerstones), bone awls, manos and metates, mortars and pestles, and projectile points (City of El Cajon 2018:4.3-2).

ETHNOGRAPHY

At the time of historic contact, the Kumeyaay occupied lands within San Diego County, Imperial County, and Baja California, Mexico. Neighboring groups included the Luiseño and Cupeño to the north, the Cahuilla and Quechan to the east, and the Pai-pai to the south. The Kumeyaay established seasonal dwelling sites in the winter and summer. Winter villages were often located at lower elevations and were composed of earth-covered semi-subterranean structures. Dwellings within winter villages typically include a granary, communal ceremonial shelter, a dance ground, and a semicircular shelter for mourning ceremonies. Summer campsites were less elaborate and often located near windbreaks, trees, and rocky overhangs (City of El Cajon 2012:23).

Kumeyaay material culture included finely woven baskets, twined caps, agave fiber sandals, ceramic vessels, pipes, human figures, throwing sticks, mesquite war clubs, and double-bladed paddles for tule watercrafts. Trading primarily occurred within settlement groups; however, the Kumeyaay also traded with groups in the Southwest and along Pacific coast (City of El Cajon 2012:24).

In 1769, the Presidio de San Diego and the Mission San Diego de Alcalá were established by Franciscan missionaries. Many Kumeyaay were physically removed from their territories and forced to work for the missions. Their population declined drastically from missionization, introduced diseases, military conflicts, displacement, and Mexican and American settlement starting in the 1830s and 1840s. Today, people of Kumeyaay descent comprise 12 bands collectively known as the Kumeyaay Indian Nation and control 70,000 acres of ancestral land within San Diego County (City of El Cajon 2012:24).

HISTORIC SETTING

The first recorded European explorer in San Diego County, Juan Rodriguez Cabrillo, traveled through the area in 1542. However, the Spanish didn't settle in the area until 1769, when Presidio de San Diego and the Mission San Diego de Alcalá were established. The Spanish retained control of the area until Mexican independence in 1821. By 1833, the missions were secularized, and their lands divided among the Californios as land grants called Ranchos (City of El Cajon 2012:25). A 49,000-acre Rancho El Cajon land grant, which included the area now known as the City of El Cajon, was awarded to Antonia Maria Estudillo de Pedroarena and Miguel Pedroarena. The land remained in the Pedroarena family until 1869 when it was purchased by Isaac Lankershim who subsequently sold off large tracts of the land to interested buyers. During this time much of the land was cultivated for production of citrus, avocados, grapes, and raisins (City of El Cajon 2012:26).

In 1876, Amaziah Lord Knox constructed a seven-room building that served as both a residence and hotel. This structure initiated the beginning of the central business district of El Cajon. The City was officially incorporated in 1912, with 158 residents. The population doubled by 1940 and continued to increase in the five years following World War II. As the population boomed, new development occurred throughout the city to accommodate the growing populace (City of El Cajon 2012:26). Currently, the City encompasses 14.4 square miles with a population of approximately 105,000 individuals.

NATIVE AMERICAN CONSULTATION

Tribal Cultural Resources

As required by the AB 52, the City initiated consultation with all Native American tribes with an affiliation to lands within the City of El Cajon to aid in the protection of traditional tribal cultural places and sacred lands as part of the Draft EIR process. AB 52 letters were sent to Barona Band of Mission Indians, Mesa Grande Band of Mission Indians, Jamul Indian Village of California for a 30-day response period. The City had not received a response prior to the release of this Draft EIR.

3.4.3 Impacts and Mitigation Measures

METHODOLOGY

The CAP would be implemented across the entire City of El Cajon and the analysis of cultural, historical, paleontological, and tribal cultural resources presented in this section is based on an evaluation of the proposed GHG reduction measures as described in Table 2-5 of Chapter 2, Project Description. Because there is the potential for unknown cultural, historical, paleontological, or tribal cultural resources to occur within the City, the analysis conservatively assumes that any ground disturbing activities could affect these resources.

PROPOSED CAP GHG REDUCTION MEASURES

Table 2-5 of the Draft EIR provides a list of proposed GHG reduction measures that would be implemented by the CAP. However, only those measures and strategies that are relevant to cultural, historical, paleontological and tribal cultural resources and could potentially result in a significant impact are described and evaluated below. None of the proposed measures indicate where specific improvements would be constructed, their size, or specific characteristics. As a program EIR, the Draft EIR does not, and cannot, speculate on the individual environmental impacts of specific future projects/improvements. However, implementation of all GHG reduction measures were considered during preparation of the Draft EIR to the degree specific information about implementation is known. Consistent with the requirements of CEQA Guidelines section 15168, this Draft EIR provides a program-level discussion of the potential general impacts of implementing these measures, rather than project-level or site-specific physical impacts of such actions. Only those measures that have the potential to affect cultural, historical, paleontological or tribal cultural resources are listed below. All other measures in Table 2-5 would have no effect on these resources and are not discussed further.

- ▶ **Measure BE-1: Increase Residential Building Efficiency.** This measure would result in an amendment to the City Code to require energy audits and incentivize retrofits to increase energy efficiency for large residential additions. This measure would also result in continued support for the Critical Home Repair Program to fund retrofits and energy efficiency improvements for single-family and mobile homes. This would result in a reduction of energy use and GHG emissions but could result in minor construction activities. This may result in physical changes to cultural, historical, paleontological, or tribal cultural resources resulting from ground disturbance and modification of historic structures.
- ▶ **Measure BE-2: Increase Commercial Building Efficiency.** This measure would result in an amendment to the City Code to require energy audits and incentivize retrofits to increase energy efficiency for large commercial additions. This would result in a reduction of energy use and GHG emissions but could result in minor construction activities. This may result in physical changes to cultural, historical, paleontological, or tribal cultural resources resulting from ground disturbance.
- ▶ **Measure RE-1: Increase Behind-the-Meter Renewable Supply.** This measure would support and incentivize installation of PV systems on commercial buildings and schools, resulting in the installation of new PV systems on roofs. This may result in construction, operation, and maintenance-related impacts. This could result in physical changes to cultural, historical, paleontological or tribal cultural resources resulting from modification of historic structures.
- ▶ **Measure RE-2: Increase Grid Renewable and Zero-Carbon Electricity.** This measure would encourage the City to research methods to increase grid supply of renewable and zero-carbon electricity and achieve 80 percent renewable and zero carbon electricity supply by 2030, 20 percent beyond the 60 percent Renewables Portfolio Standard mandate for 2030 required by SB 100. This may result in the installation ground-mounted solar or rooftop solar. This may result in physical changes to cultural, historical, paleontological, or tribal cultural resources

- ▶ **Measure SW-1: Implement Reduce Solid Waste Reduction and Increase Recycling.** This measure could result in new/expanded composting facilities in areas outside of the City's jurisdiction. This could result in a variety of physical impacts related to the construction and operation of such facilities dependent upon the scale of facilities. This measure could result in physical changes to cultural, historical, paleontological or tribal cultural resources related to resulting from ground disturbance.

THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix G of the State CEQA Guidelines an impact to archaeological, historical, or tribal cultural resources is considered significant if implementation of the proposed project would:

- ▶ cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5 of the State CEQA Guidelines;
- ▶ cause a substantial adverse change in the significance of an archaeological or paleontological resource pursuant to section 15064.5 or disturb any human remains, including those interred outside of formal cemeteries; or
- ▶ cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074.

ISSUES NOT DISCUSSED FURTHER

All potential archaeological, historical, and tribal cultural resources issues identified in the significance criteria are evaluated below.

IMPACT ANALYSIS

Impact 3.4-1: Change in the Significance of a Historical Resource

GHG reduction measures that would require construction of new or modification of existing structures could result in impacts to historical resources, if they are associated with improvements to a historical building or if the introduction of new infrastructure could disrupt the historical context of the resource or other resources in the vicinity. However, projects would be required to comply with existing federal, State, and local regulations that protect historical resources, and undergo the City's discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review that would ensure that identified resources are appropriately protected. Therefore, this impact would be **less than significant**.

Although a comprehensive inventory of historical resources has not been conducted for the CAP, there are many historical resources and resources that are currently eligible for listing as historical resources within the City. In addition, it is likely that other resources not yet evaluated within the City may be eligible for listing in the NRHP and/or CRHR. The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development; however, implementation of GHG reduction measures would have the potential to directly or indirectly effect listed or eligible historical resources as a result of construction of new facilities or expansion of existing facilities as described below.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (BE-1, BE-2, RE-1 and RE-2) could result in direct impacts to historical buildings or potentially eligible historical resources or change the historical context of a historical resource. However, installation of rooftop PV solar systems is regulated by the City's Municipal Code Chapter 15.92, which provides expedited permitting for small-scale rooftop solar or conditional use permits if it is found that the PV system will have a specific, adverse, impact upon the public health or safety. Ground-

mounted solar would also be regulated by the City's development standards for accessory structures. . In addition, pursuant to section 17.55.070 of the City's Municipal Code, projects would require a Certificate of Modification to alter a designated historical resource. Enforcement of these City regulatory standards would ensure that future solar facilities facilitated by the CAP would not result in significant impacts to historic resources.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could result in changes to existing historical resources. While these facilities would likely be located outside of the City in rural areas at facilities that are not historically significant, it is possible that facilities could be constructed within the City limits as part of expansion of existing facilities or redevelopment of underutilized property where historic buildings may be located. New or expanded waste facilities would be required to obtain a conditional use permit per the City's Municipal Code Chapter 17.50 or if outside of the City's jurisdiction, would be required to comply with a similar permit process in that local jurisdiction. In addition, pursuant to section 17.55.070 of the City's Municipal Code, a Certificate of Modification is required to alter a designated historical resource. All future projects would also be required to comply with General Plan Policies 14-1.1 and 14-1.3, which direct the City to require projects to undergo additional environmental review pursuant to CEQA if demolition or removal of a historic structure is proposed. Enforcement of these City regulatory standards would ensure that future waste diversion and composting measures facilitated by the CAP would not result in impacts to historic resources.

Impact Summary

In general, the project with the potential to result in environmental impacts would undergo discretionary review by the City, which would include project specific impact evaluation under CEQA at the time of application.

Solar PV installations and EV charging stations are regulated by Chapter 15.92 of the El Cajon Municipal Code and would be subject to a building permit which would also require the project to undergo ministerial review by the City. Pursuant to section 15.92.050, if the City's building official determines that the installation of a solar energy system or electric vehicle charging station does not meet the criteria, then a conditional use permit, or minor conditional use permit must be obtained, which is a discretionary process. Additionally, pursuant to Section 17.55.070 any proposed alterations to a designated historical resource is subject to a Certificate of Modification, which is a discretionary process.

Construction of new composting facilities or expansion of existing facilities would be required to comply with federal, State, and local regulations, including CEQA evaluation and project mitigation. Therefore, potential impacts to historical resources would be minimized through project conditioning.

In summary, project specific evaluation would minimize or eliminate impacts to historical resources to the extent feasible in compliance with CEQA Guidelines section 15126.4. The types of projects that would result from implementation of the CAP would not typically result in the substantial alteration of known historic resources. In addition, the City's discretionary review process, where applicable, would provide an opportunity to condition projects such that damage to historical resources would not occur. Projects implemented under the CAP would be required to comply with all applicable federal, State, and local regulations related to protection of historic resources. Impacts would **be less than significant**.

Mitigation Measures

No mitigation is required.

Impact 3.4-2: Potential Disturbance of Known or Undiscovered Cultural Resources or Paleontological Resources

Ground disturbing activities associated with implementation of some GHG reduction measures could result in damage to unknown cultural resources, including human remains, or paleontological resources as defined in State CEQA Guidelines section 15064.5. Compliance with existing federal, State, and local regulations and completion of subsequent project-level planning and environmental review, where applicable, would reduce potential impacts to these resources. Impacts would be **less than significant**.

As discussed in Section 3.4.2, "Environmental Setting," the City of El Cajon has a rich cultural history. Although a comprehensive inventory of cultural resources including human remains and paleontological resources was not prepared for the project, there are known resources within the City. In addition, there is a high likelihood of discovering new, previously unidentified, cultural resources within the City during construction activities. Impacts to cultural resources generally occur because of ground-disturbing activities, including grading, excavation, and utilities installation. The potential for disturbance may be reduced through surveying a site to determine the likelihood that cultural resources are present, review of records to determine if cultural resources are known to occur in the area, and then designing future development to avoid areas where resources may be present. However, if surface evidence and cultural records do not exist for a site, construction activities associated with the future projects, including grading and excavation, would have the potential to disturb cultural resources.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (BE-1, BE-2, RE-1 and RE-2) could disturb cultural or paleontological resources. Small-scale renewable energy systems would typically occur in areas of existing development and could include ground-mounted small-scale renewable energy systems and accessory infrastructures. Ground disturbing activities associated with installation of renewable energy systems has the potential to disturb or damage undiscovered cultural or paleontological resources during construction. However, installation of rooftop PV solar systems is regulated by the City's Municipal Code Chapter 15.92, which provides expedited permitting for small-scale rooftop solar or conditional use permits if it is found that the PV system will have a specific, adverse, impact upon the public health or safety. Ground-mounted solar would also be regulated by the City's development standards for accessory structures. Enforcement of these City regulatory standards would ensure that future solar facilities facilitated by the CAP would not result in significant impacts to cultural or paleontological resources.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could disturb or damage undiscovered cultural resources during construction. However, all future projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to cultural or paleontological resources to the extent feasible in compliance with CEQA Guidelines section 15126.4. Enforcement of these regulatory standards would ensure that new/expanded composting facilities facilitated by the CAP would not result in significant impacts to cultural or paleontological resources.

Impact Summary

In general, projects with the potential to result in environmental impacts would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to cultural or paleontological resources to the extent feasible in compliance with CEQA Guidelines section 15126.4.

As described above in Section 3.4.1, solar installations and EV charging stations are regulated by Chapter 15.92 of the El Cajon Municipal Code and would be subject to a building permit which would also require the project to undergo

ministerial review by the City. Pursuant to section 15.92.050, if the City's building official determines that the installation of a solar energy system or electric vehicle charging station does not meet the criteria, then conditional use permit, or minor conditional use permit must be obtained, which is a discretionary process. Construction of new composting facilities or expansion of existing facilities would be required to comply with federal, State, and local regulations, including CEQA evaluation and project mitigation. Therefore, potential impacts to cultural or paleontological resources would be minimized through project conditioning.

In summary, project-specific evaluation would minimize or eliminate impacts to cultural or paleontological resources to the extent feasible in compliance with CEQA Guidelines section 15126.4. While most projects implemented under the CAP would not typically result in the substantial impacts to known cultural or paleontological resources, it is possible that ground-disturbing activities could result in impacts to unknown resources. However, all future projects would be required to comply with federal, State, and local regulations, including CEQA evaluation, where applicable, and project mitigation. Therefore, impacts related to cultural and paleontological resources would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 3.4-3: Impacts to Tribal Cultural Resources

The City of El Cajon sent notification for consultation to Barona Band of Mission Indians, Mesa Grande Band of Mission Indians, Jamul Indian Village of California. No response was received prior to the release of this Draft EIR. Ground disturbing activities associated with implementation of some GHG reduction measures could result in damage TCR's. However, Compliance with existing federal, State, and local regulations and completion of subsequent project-level planning and environmental review, where applicable, would reduce potential impacts to TCR's. Impacts would be **less than significant**.

As discussed in Section 3.4.2, "Environmental Setting," the City of El Cajon has a rich cultural history. Although a comprehensive inventory of tribal cultural resources was not prepared for the proposed project, there are known resources within the City. In addition, there is a high likelihood of discovering new, previously unidentified tribal cultural resources within the city during construction activities. Impacts to tribal cultural resources generally occur because of ground-disturbing activities, including grading, excavation, and utilities installation. The potential for disturbance may be reduced through surveying a site to determine the likelihood that cultural resources are present, review of records to determine if cultural resources are known to occur in the area, and then designing future development to avoid areas where resources may be present. However, if surface evidence and cultural records do not exist for a site, construction activities associated with the future development, including grading and excavation, would have the potential to disturb cultural resources.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (BE-1, BE-2, RE-1 and RE-2) could disturb cultural or paleontological resources. Small-scale renewable energy systems would typically occur in areas of existing development and could include ground-mounted small-scale renewable energy systems and accessory infrastructures. Ground disturbing activities associated with installation of renewable energy systems has the potential to disturb or damage undiscovered tribal cultural resources during construction. However, installation of rooftop PV solar systems is regulated by the City's Municipal Code Chapter 15.92, which provides expedited permitting for small-scale rooftop solar or conditional use permits if it is found that the PV system will have a specific, adverse, impact upon the public health or safety. Ground-mounted solar would also be regulated by the City's development standards for accessory structures. . Enforcement of these City regulatory standards would ensure that future solar facilities facilitated by the CAP would not result in significant impacts to cultural or paleontological resources.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which disturb or damage undiscovered cultural resources during construction. However, all future projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to cultural or paleontological resources to the extent feasible in compliance with CEQA Guidelines section 15126.4. Enforcement of these regulatory standards would ensure that future waste facilities facilitated by the CAP would not result in significant impacts to cultural or paleontological resources.

Impact Summary

In general, projects implemented under the CAP would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate impacts to cultural or paleontological resources to the extent feasible in compliance with CEQA Guidelines section 15126.4.

As described above in Section 3.4.1, solar installations and EV charging stations are regulated by Chapter 15.92 of the El Cajon Municipal Code and would be subject to a building permit which would also require the project to undergo ministerial review by the City. Pursuant to section 15.92.050, if the City's building official determines that the installation of a solar energy system or electric vehicle charging station does not meet the criteria, then a conditional use permit, or minor conditional use permit must be obtained which is a discretionary process. Ground-mounted solar would also be regulated by the City's development standards for accessory structures. Construction of new composting facilities or expansion of existing facilities would be required to comply with federal, State, and local regulations, including CEQA evaluation and project mitigation. Therefore, potential impacts to cultural or paleontological resources would be minimized through project conditioning.

In summary, project specific evaluation would minimize or eliminate impacts to tribal cultural resources to the extent feasible in compliance with CEQA Guidelines section 15126.4. While most projects implemented under the CAP would not typically result in the substantial impacts to known tribal cultural resources, it is possible that ground-disturbing activities could result in impacts to unknown resources. However, all future projects with the potential to result in environmental impacts would be required to undergo the City's discretionary review process and comply with federal, State, and local regulations, including CEQA evaluation and project mitigation. Therefore, impacts related to cultural and paleontological resources would be **less than significant**.

Mitigation Measures

No mitigation is required.

3.5 ENERGY

This section was prepared pursuant to CEQA Guidelines section 15126 and Appendix F of the CEQA Guidelines, which require that EIRs include a discussion of the potential energy impacts of projects. It describes existing energy production and consumption within the City, as well as potential energy use and related impacts from the project. This chapter evaluates the potential effects that implementation of the project may have on energy resources.

No comments received on the Notice of Preparation were related to energy use and consumption (See Appendix A of this Draft EIR).

3.5.1 Regulatory Setting

Energy conservation is embodied in many federal, State, and local statutes and policies. At the federal level, energy standards apply to numerous products (e.g., the U.S. Environmental Protection Agency's [EPA] EnergyStar™ program) and transportation (e.g., fuel efficiency standards). At the State level, Title 24 of the California Code of Regulations sets forth energy standards for buildings. Further, the State provides rebates/tax credits for installation of renewable energy systems, and offers the Flex Your Power program, which promotes conservation in multiple areas. At the local level, individual cities and counties establish policies in their general plans and climate action plans (CAPs) related to the energy efficiency of new development and land use planning and to the use of renewable energy sources.

FEDERAL

Energy Policy and Conservation Act, and CAFE Standards

The Energy Policy and Conservation Act of 1975 established nationwide fuel economy standards to conserve oil. Pursuant to this Act, the National Highway Traffic and Safety Administration, part of the U.S. Department of Transportation (DOT), is responsible for revising existing fuel economy standards and establishing new vehicle economy standards.

The Corporate Average Fuel Economy (CAFE) program was established to determine vehicle manufacturer compliance with the government's fuel economy standards. Compliance with the CAFE standards is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the country. EPA calculates a CAFE value for each manufacturer based on the city and highway fuel economy test results and vehicle sales. The CAFE values are a weighted harmonic average of the EPA city and highway fuel economy test results. Based on information generated under the CAFE program, DOT is authorized to assess penalties for noncompliance. Under the Energy Independence and Security Act of 2007 (described below), the CAFE standards were revised for the first time in 30 years.

Energy Policy Act of 1992 and 2005

The Energy Policy Act of 1992 (EPAAct) was passed to reduce the country's dependence on foreign petroleum and improve air quality. EPAAct includes several parts intended to build an inventory of alternative fuel vehicles (AFVs) in large, centrally-fueled fleets in metropolitan areas. EPAAct requires certain federal, State, and local government and private fleets to purchase a percentage of light-duty AFVs capable of running on alternative fuels each year. In addition, financial incentives are also included in EPAAct. Federal tax deductions are allowed for businesses and individuals to cover the incremental cost of AFVs. States are also required by the act to consider a variety of incentive programs to help promote AFVs. The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 is designed to improve vehicle fuel economy and help reduce U.S. dependence on oil. The Energy Independence and Security Act of 2007 increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly five-fold increase over current levels; and reduces U.S. demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020—an increase in fuel economy standards of 40 percent.

By addressing renewable fuels and the CAFE standards, the Energy Independence and Security Act of 2007 builds upon progress made by the Energy Policy Act of 2005 in setting out a comprehensive national energy strategy for the 21st century.

STATE

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the California Energy Commission (CEC). The Act established State policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. The California Public Utilities Commission (CPUC) regulates privately-owned utilities in the energy, rail, telecommunications, and water fields.

State of California Energy Action Plan

CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The current plan is the 2003 California Energy Action Plan (2008 Update). The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs; and encouragement of urban design that reduces vehicle miles traveled (VMT) and accommodates pedestrian and bicycle access.

Assembly Bill 2076: Reducing Dependence on Petroleum

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000), the CEC and the California Air Resources Board (CARB) prepared and adopted a joint agency report in 2003, *Reducing California's Petroleum Dependence*. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT (CEC and CARB 2003). Further, in response to the CEC's 2003 and 2005 *Integrated Energy Policy Reports*, Governor Davis directed CEC to take the lead in developing a long-term plan to increase alternative fuel use. A performance-based goal of AB 2076 was to reduce petroleum demand to 15 percent below 2003 demand by 2020.

Integrated Energy Policy Report

Senate Bill (SB) 1389 (Chapter 568, Statutes of 2002) required CEC to: "conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The Energy Commission shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety" (Public Resources Code section 25301(a)). This work culminated in the Integrated Energy Policy Report (IEPR).

The CEC adopts an IEPR every two years and an update every other year. The 2017 IEPR is the most recent IEPR, which was adopted March 16, 2018. The 2017 IEPR provides a summary of priority energy issues currently facing the State, outlining strategies and recommendations to further the State's goal of ensuring reliable, affordable, and environmentally-responsible energy sources. Energy topics covered in the report include progress toward statewide renewable energy targets and issues facing future renewable development; efforts to increase energy efficiency in

existing and new buildings; progress by utilities in achieving energy efficiency targets and potential; improving coordination among the State's energy agencies; streamlining power plant licensing processes; results of preliminary forecasts of electricity, natural gas, and transportation fuel supply and demand; future energy infrastructure needs; the need for research and development efforts to statewide energy policies; and issues facing California's nuclear power plants.

Senate Bill 1078: California Renewables Portfolio Standard Program

SB 1078 (Chapter 516, Statutes of 2002) establishes a renewable portfolio standard (RPS) for electricity supply. The RPS requires that retail sellers of electricity, including investor-owned utilities and community choice aggregators, provide 20 percent of their supply from renewable sources by 2017. This target date was moved forward by SB 1078 to require compliance by 2010. In addition, electricity providers subject to the RPS must increase their renewable share by at least 1 percent each year. The outcome of this legislation will impact regional transportation powered by electricity. The CEC estimates that 32 percent of 2017 retail electricity sales in California were served by renewable energy facilities such as wind, solar, geothermal, biomass, and small hydroelectric (CEC 2018a).

Senate Bill X1-2: California Renewable Energy Resources Act

SB X1-2 of 2011 requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB X1-2 sets a three-stage compliance period requiring all California utilities, including independently-owned utilities, energy service providers, and community choice aggregators, to generate 20 percent of their electricity from renewables by December 31, 2013; 25 percent by December 31, 2016; and 33 percent by December 31, 2020. SB X1-2 also requires the renewable electricity standard to be met increasingly with renewable energy that is supplied to the California grid from sources within, or directly proximate to, California. SB X1-2 mandates that renewables from these sources make up at least 50 percent of the total renewable energy for the 2011-2013 compliance period, at least 65 percent for the 2014-2016 compliance period, and at least 75 percent for 2016 and beyond.

Senate Bill 100: California Renewables Portfolio Standard Program

SB 100 requires that all California utilities, including independently-owned utilities, energy service providers, and community choice aggregators, supply 44 percent of retail sales from renewable resources by December 31, 2024, 50 percent by December 31, 2026, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. The law requires that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

Energy Action Plan

The first Energy Action Plan (EAP) emerged in 2003 from a crisis atmosphere in California's energy markets. The State's three major energy policy agencies (CEC, CPUC, and the Consumer Power and Conservation Financing Authority [established under deregulation and now defunct]) came together to develop one high-level, coherent approach to meeting California's electricity and natural gas needs. It was the first time that energy policy agencies formally collaborated to define a common vision and set of strategies to address California's future energy needs and emphasize the importance of the impacts of energy policy on the California environment.

In the October 2005 *Energy Action Plan II*, CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues and research and development activities. CEC recently adopted an update to the EAP II in February 2008 that supplements the earlier EAPs and examines the State's ongoing actions in the context of global climate change.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statutes of 2005) required CEC to prepare a State plan to increase the use of alternative fuels in California. CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other State, federal, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes the costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce greenhouse gas (GHG) emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

California Building Energy Efficiency Standards (Title 24, Part 6)

The energy consumption of new residential and nonresidential buildings in California is regulated by the State's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The California Energy Code was established by CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption, and provide energy efficiency standards for residential and non-residential buildings. CEC updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions.

The 2019 California Energy Code was adopted by CEC on May 9, 2018 and will apply to projects constructed after January 1, 2020. The 2019 California Energy Code is designed to move the State closer to its zero-net energy goals for new residential development. It does so by requiring all new residences to install enough renewable energy to offset all the electricity needs of each residential unit (CCR, Title 24, Part 6, section 150.1[c][4]). CEC estimates that the combination of mandatory on-site renewable energy and prescriptively-required energy efficiency standards will result in a 53 percent reduction in energy consumption in new residential construction as compared to the 2016 California Energy Code. Non-residential buildings are anticipated to reduce energy consumption by 30 percent as compared to the 2016 California Energy Code primarily through prescriptive requirements for high-efficiency lighting (CEC 2018b). The Energy Code is enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary because of local climatologic, geologic, or topographic conditions, provided that these standards exceed those provided in the California Energy Code.

Assembly Bill 32, Senate Bill 32, and Climate Change Scoping Plan and Update

In December 2008, CARB adopted its Climate Change Scoping Plan, which contains the main strategies California will implement to achieve reduction of approximately 118 million metric tons (MMT) of carbon dioxide-equivalent (CO₂e) emissions, or approximately 21.7 percent from the State's projected 2020 emission level of 545 MMT of CO₂e under a business-as-usual scenario (this is a reduction of 47 MMT CO₂e, or almost 10 percent, from 2008 emissions). In May 2014, CARB released and has since adopted the *First Update to the Climate Change Scoping Plan* to identify the next steps in reaching AB 32 goals and evaluate progress that has been made between 2000 and 2012 (CARB 2014). According to the update, California is on track to meet the near-term 2020 GHG limit and is well positioned to maintain and continue reductions beyond 2020 (CARB 2014). The update also reports the trends in GHG emissions from various emissions sectors (e.g., transportation, building energy, agriculture).

In August 2016, Governor Brown signed SB 32 and AB 197, which serve to extend California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by Executive Order (EO) B-30-15 for 2030, which set the next interim step in the State's continuing efforts to pursue the long-term target expressed in EOs S-3-05 and B-30-15 of 80 percent below 1990 emissions levels by 2050. Achievement of these goals will have the co-benefit of reducing California's dependency of fossil fuels and making land use development and transportation systems more energy efficient.

California's 2017 Climate Change Scoping Plan (2017 Scoping Plan), prepared by CARB, outlines the main strategies California will implement to achieve the legislated GHG emission target for 2030 and “substantially advance toward our 2050 climate goals” (CARB 2017:1, 3, 5, 20, 25–26). It identifies the reductions needed by each GHG emission sector (e.g., transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste). In 2015, electricity generation accounted for 11 percent of the State’s GHG emissions. California plans to significantly reduce GHG emissions from energy through the development of renewable electricity generation in the form of solar, wind, geothermal, hydraulic, and biomass generation. The State is on target to meet the SB X1-2-33 percent renewable energy target by 2020 and will continue to increase statewide renewable energy to 50 percent by 2030, as directed by SB 350. Additionally, the State will further its climate goals through improving the energy efficiency of residential and non-residential buildings by continual updates (i.e., every three years) to the California Energy Code, which contains mandatory and prescriptive energy efficiency standards for all new construction.

More details about the statewide GHG reduction goals and 2017 Scoping Plan measures are provided in the regulatory setting of Section 3.6, “Greenhouse Gas Emissions and Climate Change.”

Senate Bill 375

SB 375, signed by the Governor in September 2008, aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy, showing prescribed land use allocation in each MPO’s Regional Transportation Plan. CARB, in consultation with the MPOs, is to provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in their respective regions for 2020 and 2035. Implementation of SB 375 will have the co-benefit of reducing California’s dependency of fossil fuels and making land use development and transportation systems more energy efficient.

The San Diego Association of Governments (SANDAG) serves as the MPO for San Diego County, including El Cajon and the 17 other cities within the County. Under SB 375, SANDAG adopted its most recent *San Diego Forward: The Regional Plan* in October 2015. The plan combines and updates the region’s two big picture planning documents, the Regional Comprehensive Plan and the Regional Transportation Plan/Sustainable Communities Strategy. CARB’s targets for the SANDAG region call for a 7 percent reduction in GHG emissions per capita from automobiles and light-duty trucks compared to 2005 levels by 2020, and a 13 percent reduction by 2035 (CARB 2018). It is intended to result in more compact development patterns with greater emphasis on use of transit and less need to rely on private vehicle travel; it is to be updated every four years to monitor progress. The San Diego Forward plan contains the following required elements: Policy Element; SCS; Financial Element; and Action Element.

Executive Order B-30-15

On April 20, 2015 Governor Edmund G. Brown Jr. signed Executive Order B-30-15 to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. The Governor’s executive order aligns California’s GHG reduction targets with those of leading international governments such as the 28-nation European Union which adopted the same target in October 2014. California is on track to meet or exceed the target of reducing GHG emissions to 1990 levels by 2020, as established in the California Global Warming Solutions Act of 2006 (AB 32, discussed above). California’s new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the ultimate goal of reducing emissions 80 percent below 1990 levels by 2050. This is in line with the scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius, the warming threshold at which major climate disruptions are projected, such as super droughts and rising sea levels.

Advanced Clean Cars Program

In January 2012, CARB approved the Advanced Clean Cars program which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles, into a single package of standards for vehicle model years 2017 through 2025. The new rules strengthen the GHG standard for 2017 models and beyond. This will be achieved through existing technologies, the use of stronger and lighter materials, and more efficient drivetrains and engines. The program’s zero-emission vehicle regulation requires

battery, fuel cell, and/or plug-in hybrid electric vehicles (EVs) to account for up to 15 percent of California's new vehicle sales by 2025. The program also includes a clean fuels outlet regulation designed to support the commercialization of zero-emission hydrogen fuel cell vehicles planned by vehicle manufacturers by 2015 by requiring increased numbers of hydrogen fueling stations throughout the State. The number of stations will grow as vehicle manufacturers sell more fuel cell vehicles. By 2025, when the rules will be fully implemented, the statewide fleet of new cars and light trucks will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions than the statewide fleet in 2016 (CARB 2016).

LOCAL

City of El Cajon General Plan

The City's General Plan (1991) sets forth adopted policies expressing the official position of the City with regard to physical and environmental development. The General Plan Circulation, Conservation, and Land Use elements include goals, objectives, and policies that are directly and indirectly related to energy consumption associated with future development and City operations. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, and water conservation.

City of El Cajon Municipal Code

The City's Municipal Code contains ordinances regarding renewable energy and water conservation. Chapter 15.92 establishes an expedited and streamlined permitting process for small rooftop photovoltaic (PV) solar, EV charging stations, and advanced energy storage systems. Chapter 17.195 is a water efficient landscaping ordinance intended to establish a structure for planning, designing, installing, maintaining and managing water efficient landscapes. It sets a maximum applied water allowance and encourages water conservation.

3.5.2 Environmental Setting

PHYSICAL SETTING

Energy Facilities and Services in the Project Area

San Diego Gas & Electric (SDG&E) is a regulated public utility that provides energy service to 3.6 million customers within a 4,100-square-mile service area that encompasses 25 cities throughout San Diego and southern Orange counties, including the City of El Cajon (SDG&E 2018). Energy generation and storage facilities within the City include the 48.7-megawatt (MW) Cuyamaca Peak Energy facility, 49.9 MW El Cajon Energy Center, and the 7.5 MW El Cajon Energy Storage Facility (EPA 2018).

Energy Types and Sources

California relies on a regional power system comprised of a diverse mix of natural gas, renewable (e.g., solar, wind, and geothermal), hydroelectric, and nuclear generation resources. Natural gas consists of one-third of energy commodities consumed in California. In 2017, approximately 28 percent of natural gas consumed in the State was used to generate electricity. Residential land uses represented approximately 20 percent of California's natural gas consumption with the balance consumed by the industrial, resource extraction, and commercial sectors (EIA 2018a). Power plants in California generate approximately 71 percent of the in-state electricity demand, with large hydroelectric in the Pacific Northwest and power plants in the Southwestern U.S. generating the remaining electricity (CEC 2017). The contribution of in- and out-of-state power plants depends on the precipitation that occurred in the previous year, the corresponding amount of hydroelectric power that is available, and other factors. As of 2016, SDG&E was powered by 43.2 percent renewables, including biomass, solar, and wind (CPUC 2017).

Alternative Fuels

A variety of alternative fuels are used to reduce demand for petroleum-based fuel. The use of these fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard, AB 32 Scoping Plan). Conventional gasoline and diesel may be replaced (depending on the capability of the vehicle) with many transportation fuels, including:

- ▶ biodiesel,
- ▶ electricity,
- ▶ ethanol (E-10 and E-85),
- ▶ hydrogen,
- ▶ natural gas (methane in the form of compressed and liquefied natural gas),
- ▶ propane,
- ▶ renewable diesel (including biomass-to-liquid),
- ▶ synthetic fuels, and
- ▶ gas-to-liquid and coal-to-liquid fuels.

California has a growing number of AFVs through the joint efforts of CEC, CARB, local air districts, federal government, transit agencies, utilities, and other public and private entities. As of March 2018, California contained 6,078 alternative fueling stations (AFDC 2018).

COMMERCIAL AND RESIDENTIAL ENERGY USE

Households account for 55 percent of the energy used in buildings in the United States and consumed a total of 9,114 trillion Btu in 2015 (the latest year the EIA's *Residential Energy Consumption Survey* was completed) for space heating, water heating, air conditioning, refrigerators, and other uses (EIA 2018b). Residential electricity use per household is projected to decrease for most end uses as a result of increases in appliance energy efficiency standards and building energy codes. It is projected that by 2050, the average household will use less than half as much electricity for lighting as it did in 2017, as more energy-efficient, light-emitting diodes replace incandescent bulbs and compact fluorescent lamps. However, increased adoption of electronic devices contributes to growth in residential use of electricity (EIA 2018c).

In aggregate, commercial buildings consumed 46 percent of building energy consumption and approximately 19 percent of U.S. energy consumption. In comparison, the residential sector consumed approximately 22 percent of U.S. energy consumption (U.S. Department of Energy 2012).

ENERGY USE FOR TRANSPORTATION

On-road vehicles use about 90 percent of the petroleum consumed in California. The California Department of Transportation (Caltrans) projected 1805 million gallons of gasoline and diesel were consumed in San Diego County in 2015, an increase of approximately 203 million gallons of fuel from 2010 levels (Caltrans 2008).

ENERGY USE AND CLIMATE CHANGE

Scientists and climatologists have produced evidence that the burning of fossil fuels by vehicles, power plants, industrial facilities, residences, and commercial facilities has led to an increase of the earth's temperature. For an analysis of GHG production and the project's impacts on climate change, refer to Section 3.6, "Greenhouse Gas Emissions and Climate Change."

3.5.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

This analysis addresses the proposed CAP's potential energy use, including electricity, natural gas, and transportation fuel consumption. Appendix F of the CEQA Guidelines requires consideration of the potentially significant energy implications of a project and mitigation measures to reduce "wasteful, inefficient and unnecessary" energy usage (PRC section 21100, subdivision [b][3]). However, neither the law nor the CEQA Guidelines establish thresholds that define wasteful, inefficient, or unnecessary use of energy. Therefore, this section includes a qualitative discussion of the potential for the project to result in the inefficient, wasteful, and unnecessary consumption of energy. Evaluation of potential energy impacts is based on a review of documents that regulate development within the City, including the City of El Cajon General Plan (1991) and applicable municipal ordinances. In determining the level of significance, this analysis assumes that the project would comply with relevant State regulations and local ordinances.

PROPOSED CAP GHG REDUCTION MEASURES

Table 2-5 of the Draft EIR, provides a list of proposed GHG reduction measures that would be implemented by the CAP. None of the proposed measures indicate where specific improvements would be constructed, their size, or specific characteristics. As a program EIR, the Draft EIR does not, and cannot, speculate on the individual environmental impacts of specific future projects/improvements. However, implementation of all GHG reduction measures were considered during preparation of the Draft EIR to the degree specific information about implementation is known. Consistent with the requirements of the CEQA Guidelines section 15168, this Draft EIR provides a program-level discussion of the potential general impacts of implementing these measures, rather than project-level or site-specific physical impacts of such actions. Only those measures that have the potential to result in the wasteful, inefficient, and unnecessary use of energy are listed below. All other measures in Table 2-5 would have no effect on energy and are not discussed further.

- ▶ **Measure BE-1: Increase Residential Building Efficiency.** This measure would result in an amendment to the City's Municipal Code to require energy audits and incentivize retrofits to increase energy efficiency for large residential additions. This measure would also result in continued support for the Critical Home Repair Program to fund retrofits and energy efficiency improvements for single-family and mobile homes. This may result in minor temporary construction activities that use fuels.
- ▶ **Measure BE-2: Increase Commercial Building Efficiency.** This measure would result in an amendment to the City's Municipal Code to require energy audits and incentivize retrofits to increase energy efficiency for large commercial additions. This may result in minor temporary construction activities that use fuels.
- ▶ **Measure RE-1: Increase Behind-the-Meter Renewable Supply.** This measure would support and incentivize the installation of PV solar systems on commercial buildings and schools, resulting in the installation of new PV solar systems on roofs. This may result in minor temporary construction and minor maintenance activities that use fuels.
- ▶ **Measure RE-2: Increase Grid Renewable and Zero-Carbon Electricity.** This measure would encourage the City to research methods to increase grid supply of renewable and zero-carbon electricity and achieve 80 percent renewable and zero carbon electricity supply by 2030, 20 percent beyond the 60 percent Renewables Portfolio Standard mandate for 2030 required by SB 100. To achieve a 20 percent reduction the City would need to offset 14,924 MTCO₂e, which could be achieved through the installation of renewable energy systems such as small-scale ground-mounted solar or rooftop PV solar systems. This may result in minor temporary construction and maintenance activities that use fuels.
- ▶ **Measure SW-1: Implement Reduce Solid Waste and Increase Recycling.** This measure could result in new/expanded composting facilities in areas in/or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, this could result in a variety of physical

impacts related to the construction and operation of new compost facilities. Temporary construction activities would consume fuels. Although this measure could lead to new vehicle trips related to new or expanded composting collection services, the associated fuel consumption would be offset by a reduction in vehicle trips to landfills.

- ▶ **Measure CS-1: Increase Urban Tree Planting.** This measure would result in increased parking lot shading, trees, and landscaping to help reduce heat island effect and resulting GHG emissions related to cooling. A nominal temporary increase in energy consumption related to distribution, installation, and early maintenance of trees could occur.

THRESHOLDS OF SIGNIFICANCE

Consistent with Appendix F (energy), a project would have a significant impact on energy if it would:

- ▶ result in potentially significant environmental impact because of wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- ▶ conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

ISSUES NOT DISCUSSED FURTHER

All potential visual and aesthetic issues identified in the significance criteria are evaluated below.

IMPACT ANALYSIS

Impact 3.5-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy, During Project Construction or Operation

GHG reduction measures have the potential to result in the consumption of energy resources during construction and operation of new or expanded facilities and infrastructure. Standard best management practices would discourage unnecessary idling and the operation of poorly maintained equipment during construction. New facilities would be required to meet current building code requirements including requirements for achieving appropriate energy efficiency standards (e.g., Title 24 standards or better). Moreover, while GHG reduction measures were formulated to reduce GHGs, many would improve energy efficiency and decrease reliance on fossil fuels. Thus, implementation of the CAP would not result in wasteful, inefficient, or unnecessary consumption of energy, during project construction or operation. Therefore, this impact would be **less than significant**.

Implementation of the GHG reduction measures have the potential to result in the consumption of energy resources during construction and operation of new or expanded facilities and infrastructure. During construction activities, energy resources including electricity, fuels, and non-renewable resources would be utilized. Demand for energy resources during construction would vary throughout the construction period and would generally cease upon completion of construction. During operation, some projects would consume energy resources to operate and maintain new or expanded facilities and infrastructure.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (BE-1, BE-2, RE-1, RE-2) would not involve large amounts of labor or extensive use of construction equipment. Some worker trips and construction equipment may be required during installation of these facilities and features, resulting in the short-term consumption of diesel fuel and gasoline. Maintenance activities would be minimal and could consist of occasional inspection and cleaning of solar panels. Operational vehicle trips and associated fuel consumption would be minimal. Furthermore, these measures would increase the supply of renewable energy and improve building energy efficiency, conserving energy over the long-term.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region. This would require the use of heavy mechanical equipment and worker trips during construction, resulting in the short-term consumption of diesel fuel and gasoline. However, these measures are intended to reduce methane emissions from landfills and to increase waste diversion and recycling of resources. Therefore, these projects would be considered necessary and beneficial uses of energy resources.

Carbon Sequestration Measure

GHG Reduction Measure CS-1 would result in the installation of parking lot shading, trees, and landscaping. These activities would not require heavy equipment but could result in a small amount of fuel consumption because of distribution of trees and electricity use for watering. However, these measures are intended to reduce the urban heat island effect, improve air quality, and reduce the amount of energy consumed for cooling in the summer. Therefore, these projects would be considered necessary and beneficial uses of energy resources.

Impact Summary

Implementation of GHG reduction measures have the potential to result in the consumption of energy resources during construction and operation of new infrastructure that would increase the City's ability to reduce GHG emissions.

The goal of the CAP is to reduce GHG emissions generated within the City by using alternatively fueled vehicles, reducing VMT, using renewable energy, reducing waste generation, and increasing carbon sequestration. Although the majority of GHG reduction measures would result in temporary construction activities that would consume energy resources, standard best management practices would discourage unnecessary idling and the operation of poorly maintained equipment during construction. New facilities would be required to meet current building code requirements including requirements for achieving appropriate energy efficiency standards (e.g., Title 24 standards or better). Moreover, while GHG reduction measures were formulated to reduce GHGs, many would improve energy efficiency and decrease reliance on fossil fuels. Thus, implementation of the CAP would not result in wasteful, inefficient, or unnecessary consumption of energy, during project construction or operation. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 3.5-2: Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency

Relevant plans that pertain to the efficient use of energy include the EAP. The EAP focuses on energy efficiency; demand response; renewable energy; the supply and reliability of electricity, natural gas, and transportation fuels; and achieving GHG reduction targets (CEC and CPUC 2008). Overall, the CAP is intended to reduce GHG emissions generated within the City. GHG reduction measures aimed at improving energy efficiency, conversion from gasoline or diesel to electricity or alternative fuels, and renewable energy would directly support EAP goals and strategies. Therefore, the CAP would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. **No impact** would occur.

Relevant plans that pertain to the efficient use of energy include the EAP, which focuses on energy efficiency; demand response; renewable energy; the supply and reliability of electricity, natural gas, and transportation fuels; and achieving GHG reduction targets (CEC and CPUC 2008). As discussed above in Impact 3.5-1, although implementation of the GHG reduction measures have the potential to result in the consumption of energy resources during construction and operation, it was determined that the measures would not constitute the wasteful, inefficient, or

unnecessary consumption of energy. Furthermore, many of the measures would support the goals of the EAP, as discussed below.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (BE-1, BE-2, RE-1, RE-2) would support strategies related to renewable energy, energy efficiency, and achieving climate targets.

Waste Diversion and Compost Measure

GHG Reduction Measure SW-1 would establish a waste diversion goal of 75 percent, which would support strategies related to achieving climate targets.

Carbon Sequestration Measure

GHG Reduction Measure CS-1 would result in the installation of parking lot shading, trees, and landscaping. These measures are intended to reduce the urban heat island effect, improve air quality, and reduce the amount of energy consumed for cooling in the summer, which would support strategies related to achieving climate targets.

Furthermore, Chapter 17.195 of the City's Municipal Code is a water efficient landscaping ordinance, which would ensure that features installed under measure CS-1 would conserve water, resulting in associated energy savings.

Impact Summary

Overall, the CAP is intended to reduce GHG emissions generated within the City by using alternatively fueled vehicles, reducing VMT, using renewable energy, reducing waste generation, and increasing water conservation. While the GHG reduction, supporting, and adaptation measures were formulated to reduce GHGs, they also act to conserve energy and reduce reliance on fossil fuels. Measures aimed at improving energy efficiency, conversion from gasoline or diesel to electricity or alternative fuels, and renewable energy would directly support EAP goals and strategies. Therefore, the CAP would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

No impact would occur.

Mitigation Measures

No mitigation is required.

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3.6 GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

This section presents a summary of climate change science and greenhouse gas (GHG) emissions sources in California, a summary of applicable regulations, discussion of GHG emissions generated during CAP implementation, and discussion about their contribution to global climate change.

The City received one comment regarding GHG emissions and climate change during the Notice of Preparation (NOP) scoping process. The comment letter includes recommendations to use GHG thresholds of significance in line with the mandates of Senate Bill (SB) 32, Executive Order (EO) S-3-05, and EO B-55-18. These regulations are described in Section 3.6.1, “Regulatory Setting,” and addressed in Impact 3.8-2: Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of GHGs. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this Draft EIR.

3.6.1 Regulatory Setting

FEDERAL

Regulations for Greenhouse Gas Emissions from Passenger Cars and Trucks and Corporate Average Fuel Economy Standards

In October 2012, EPA and the National Highway Traffic Safety Administration, issued final rules to further reduce GHG emissions and improve corporate average fuel economy (CAFE) standards for light-duty vehicles for model years 2017 and beyond (77 Federal Register [FR] 62624). These rules would increase fuel economy to the equivalent of 54.5 miles per gallon, limiting vehicle emissions to 163 grams of carbon dioxide (CO₂) per mile for the fleet of cars and light-duty trucks by model year 2025 (77 FR 62630). However, on April 2, 2018, the EPA administrator announced a final determination that the current standards are not appropriate and should be revised. On August 2, 2018, the U.S. Department of Transportation and EPA proposed the Safer Affordable Fuel-Efficient Vehicles Rule, which would amend existing CAFE and tailpipe CO₂ emissions standards for passenger cars and light trucks and establish new standards covering model years 2021 through 2026. The proposal would retain the model year 2020 standards for both programs through model year 2026 (NHTSA 2018).

Clean Power Plan

In 2015, EPA unveiled the Clean Power Plan. The purpose of the plan was to reduce CO₂ emissions from electrical power generation by 32 percent relative to 2005 levels within 25 years. EPA is proposing to repeal the Clean Power Plan because of a change to the legal interpretation of section 111(d) of the federal Clean Air Act, on which the Clean Power Plan was based. The comment period on the proposed repeal closed April 26, 2018. A final ruling by EPA has not yet been issued.

STATE

Plans, policies, regulations, and laws established by the state agencies are generally presented in the order they were established.

Statewide GHG Emission Targets and the Climate Change Scoping Plan

Reducing GHG emissions in California has been the focus of the state government for approximately two decades (State of California 2018). GHG emission targets established by the state legislature include reducing statewide GHG emissions to 1990 levels by 2020 (Assembly Bill [AB] 32 of 2006) and reducing them to 40 percent below 1990 levels by 2030 (Senate Bill [SB] 32 of 2016). EO S-3-05 calls for statewide GHG emissions to be reduced to 80 percent below 1990 levels by 2050. EO B-55-18 calls for California to achieve carbon neutrality by 2045 and achieve and maintain net negative GHG emissions thereafter. These targets are in line with the scientifically established levels needed in the

United States to limit the rise in global temperature to no more than 2 degrees Celsius, the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius (United Nations 2015:3).

California's 2017 Climate Change Scoping Plan (2017 Scoping Plan), prepared by the California Air Resources Board (CARB), outlines the main strategies California will implement to achieve the legislated GHG emission target for 2030 and "substantially advance toward our 2050 climate goals" (CARB 2017:1, 3, 5, 20, 25–26). It identifies the reductions needed by each GHG emission sector (e.g., transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste). CARB and other state agencies are currently developing a Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal of EO B-55-18.

The state has also passed more detailed legislation addressing GHG emissions associated with industrial sources, transportation, electricity generation, and energy consumption, as summarized below.

Cap-and-Trade Program

CARB administers the state's cap-and-trade program, which covers GHG emission sources that emit more than 25,000 metric tons of carbon dioxide equivalent per year (MT CO₂e/year), such as refineries, power plants, and industrial facilities. This market-based approach to reducing GHG emissions provides economic incentives for achieving GHG emission reductions.

Transportation-Related Standards and Regulations

As part of its Advanced Clean Cars program, CARB established more stringent GHG emission standards and fuel efficiency standards for fossil fuel-powered on-road vehicles. In addition, the program's zero-emission vehicle (ZEV) regulation requires battery, fuel cell, and plug-in hybrid electric vehicles to account for up to 15 percent of California's new vehicle sales by 2025 (CARB 2016a:15). By 2025, when the rules will be fully implemented, GHG emissions from the statewide fleet of new cars and light-duty trucks will be reduced by 34 percent and cars will emit 75 percent less smog-forming pollution than the statewide fleet in 2016 (CARB 2016b:1).

EO B-48-18, signed into law in January 2018, requires all state entities to work with the private sector to have at least 5 million ZEVs on the road by 2030, as well as 200 hydrogen fueling stations and 250,000 electric vehicle-charging stations installed by 2025. It specifies that 10,000 of these charging stations must be direct-current fast chargers.

CARB adopted the Low Carbon Fuel Standard (LCFS) in 2007 to reduce the carbon intensity of California's transportation fuels. The LCFS applies to fuels used by on-road motor vehicles and by off-road vehicles, including construction equipment (Wade, pers. comm., 2017).

In addition to regulations that address tailpipe emissions and transportation fuels, the state legislature has passed regulations to address the amount of driving by on-road vehicles. Since passage of SB 375 in 2008, CARB requires metropolitan planning organizations (MPOs) to adopt plans showing reductions in GHG emissions from passenger cars and light trucks in their respective regions for 2020 and 2035 (CARB 2018a:1). These plans link land use and housing allocation to transportation planning and related mobile-source emissions. The San Diego Association of Governments (SANDAG) serves as the MPO for San Diego County, including El Cajon and the 17 other cities within the County. Under SB 375, SANDAG adopted its most recent *San Diego Forward: The Regional Plan* in October 2015. The plan combines and updates the region's two big picture planning documents, the Regional Comprehensive Plan and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). CARB's targets for the SANDAG region call for a 7 percent reduction in GHG emissions per capita from automobiles and light-duty trucks compared to 2005 levels by 2020, and a 13 percent reduction by 2035 (CARB 2018a:1). It is intended to result in more compact development patterns with greater emphasis on use of transit and less need to rely on private vehicle travel; it is to be updated every four years to monitor its progress. The San Diego Forward plan contains the following required elements: Policy Element; Sustainable Communities Strategy; Financial Element; and Action Element.

Under SB 743 of 2013, the Governor's Office of Planning and Research (OPR) proposed changes to the State CEQA Guidelines, including the addition of section 15064.3, which would require that CEQA transportation analysis move away from focusing on vehicle delay and level of service (OPR 2017a:77–90). In January 2018, OPR submitted comprehensive updates to the CEQA Guidelines to the California Natural Resources Agency (CNRA). These updates indicated that vehicle miles traveled (VMT) be the primary metric used to identify transportation impacts. The updates to the CEQA Guidelines were finalized in late 2018 and became effective on December 28, 2018. More detail about SB 743 is provided in the "Regulatory Setting" section of Section 3.8, "Transportation."

Legislation Associated with Electricity Generation

The state has passed legislation requiring the increasing use of renewables to produce electricity for consumers. California utilities are required to generate 33 percent of their electricity from renewables by 2020 (SB X1-2 of 2011); 52 percent by 2027 (SB 100 of 2018); 60 percent by 2030 (also SB 100 of 2018); and 100 percent by 2045 (also SB 100 of 2018).

Building Energy Efficiency Standards (Title 24, Part 6)

The energy consumption of new residential and nonresidential buildings in California is regulated by the state's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The California Energy Commission (CEC) updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions. The current California Energy Code (2016) is scheduled to be replaced by the 2019 standards on January 1, 2020. The 2019 California Energy Code will require builders to use more energy-efficient building technologies for compliance with increased restrictions on allowable energy use. Additionally, new residential units will be required to include solar panels, sized to offset the estimated electrical requirements of each unit (CCR, Title 24, Part 6, section 150.1[c]14). CEC estimates that the combination of required energy-efficiency features and mandatory solar panels in the 2019 California Energy Code will result in new residential buildings that use 53 percent less energy than those designed to meet the 2016 California Energy Code. The CEC also estimates that the 2019 California Energy Code will result in new commercial buildings that use 30 percent less energy than those designed to meet the 2016 standards, primarily through the transition to high-efficacy lighting (CEC 2018a).

LOCAL

San Diego Air Pollution Control District

SDAPCD administers EPA's Prevention of Significant Deterioration and Title V GHG Tailoring Rule through Rule 20.3(d)(3) and Regulation XIV (Title V Operating Permits), respectively. SDAPCD has not developed thresholds of significance or guidance for analysis of GHGs under CEQA.

City of El Cajon General Plan

The City of El Cajon General Plan (1991) includes the following policies that pertain to GHG emissions and are relevant to this analysis.

- ▶ **Policy 1-1.1:** Adequate landscaped off-street parking areas shall be provided for all commercial areas and they shall be properly maintained.
- ▶ **Policy 1-1.2:** Numerous trees and ample landscaping shall be used around and within commercial areas to break up the monotonous and barren look of parking areas.

3.6.2 Environmental Setting

THE PHYSICAL SCIENTIFIC BASIS OF GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the atmosphere from space. A portion of the radiation is absorbed by the earth's surface, and a smaller portion of this radiation is reflected toward space. The absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. The earth has a much lower temperature than the sun; therefore, the earth emits lower frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

Prominent GHGs contributing to the greenhouse effect are CO₂, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Human-caused emissions of these GHGs in excess of natural ambient concentrations are found to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. It is "extremely likely" that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic forcing (IPCC 2014:5).

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas most pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately 1 day), GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any GHG molecule depends on multiple variables and cannot be determined with any certainty, it is understood that more CO₂ is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. Of the total annual human-caused CO₂ emissions, approximately 55 percent are estimated to be sequestered through ocean and land uptake every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO₂ emissions remain stored in the atmosphere (IPCC 2013:467).

The quantity of GHGs in the atmosphere responsible for climate change is not precisely known. No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

GREENHOUSE GAS EMISSION SOURCES

The total GHG inventory for California in 2016 was 429 million metric tons of carbon dioxide equivalent (MMTCO₂e) (CARB 2018b). This is less than the 2020 target of 431 MMTCO₂e (CARB 2018c:1). Transportation, industry, and electricity generation are the largest GHG emission sectors. A GHG inventory for the City of El Cajon is provided in Table 2-1 of Chapter 2, "Project Description."

EFFECTS OF CLIMATE CHANGE ON THE ENVIRONMENT

According to the Intergovernmental Panel on Climate Change, which was established in 1988 by the World Meteorological Organization and the United Nations Environment Programme, global average temperature will increase by 3.7 to 4.8 degrees Celsius (°C) (6.7 to 8.6 degrees Fahrenheit [°F]) by the end of the century unless additional efforts to reduce GHG emissions are made (IPCC 2014:10). According to CEC, temperatures in California will warm by approximately 2.7°F above 2000 averages by 2050 and by 4.1°F to 8.6°F by 2100, depending on emission levels (CEC 2012:2).

Other environmental resources could be indirectly affected by the accumulation of GHG emissions and the resulting rise in global average temperature. In recent years, California has been marked by extreme weather and its effects. According to CNRA's *Safeguarding California Plan: 2018 Update*, California experienced the driest 4-year statewide precipitation on record from 2012 through 2015; the warmest years on average in 2014, 2015, and 2016; and the smallest and second smallest Sierra snowpack on record in 2015 and 2014 (CNRA 2018:55). In contrast, the northern Sierra Nevada experienced its wettest year on record during the 2016-2017 water year (CNRA 2018:64). The changes in precipitation exacerbate wildfires throughout California, increasing their frequency, size, and devastation. As temperatures increase, the amount of precipitation falling as rain rather than snow also increases, which could lead to increased flooding because water that would normally be held in the snowpack of the Sierra Nevada and Cascade Range until spring would flow into the Central Valley during winter rainstorm events. This scenario would place more pressure on California's levee/flood control system (CNRA 2018:190–192). Furthermore, in the extreme scenario involving the rapid loss of the Antarctic ice sheet, the sea level along California's coastline could rise up to 10 feet by 2100, which is approximately 30–40 times faster than the sea-level rise experienced over the last century (CNRA 2017:102). Changes in temperature, precipitation patterns, extreme weather events, wildfires, and sea-level rise have the potential to threaten transportation and energy infrastructure and crop production (CNRA 2018:64, 116–117, 127).

Cal-Adapt is a climate change scenario planning tool developed by CEC that downscales global climate model data to local and regional resolution under two emissions scenarios. The Representative Concentration Pathway (RCP) 8.5 scenario represents a business-as-usual future emissions scenario, and the RCP 4.5 scenario represents a future with reduced GHG emissions. According to Cal-Adapt, annual average temperatures in the City of El Cajon are projected to rise by 5.2°F to 8.1°F by 2099, with the low and high ends of the range reflecting the lower and higher emissions increase scenarios. The City experienced an average precipitation of 13.5 inches per year between 1961 and 1990. Under the RCP 4.5 scenario, the City is projected to experience a decrease of 0.6 inches to 12.9 inches per year by 2099. Under the RCP 8.5 scenario, the City is projected to experience a decrease of 0.1 inches to 13.4 inches per year by 2099 (CEC 2018b).

3.6.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

The overarching intent of the CAP is to reduce GHG emissions; however, certain measures may lead to a temporary increase in GHG emissions in the City and are analyzed below.

PROPOSED CAP GHG REDUCTION MEASURES

Table 2-5 of the Draft EIR, provides a list of proposed GHG reduction measures that would be implemented by the CAP. None of the proposed measures indicate where specific improvements would be constructed, their size, or specific characteristics. As a program EIR, the Draft EIR does not, and cannot, speculate on the individual environmental impacts of specific future projects/improvements. However, implementation of all GHG reduction measures were considered during preparation of the Draft EIR to the degree specific information about implementation is known. Consistent with the requirements of the CEQA Guidelines section 15168, this Draft EIR provides a program-level discussion of the potential general impacts of implementing these measures, rather than project-level or site-specific physical impacts of such actions. Only those measures that have the potential to affect GHG emissions are listed below. All other measures in Table 2-5 would have no effect on GHG emissions and are not discussed further.

- ▶ **Measure BE-1: Increase Residential Building Efficiency.** This measure would result in an amendment to the City Code to require energy audits and incentivize retrofits in order to increase energy efficiency for large residential additions. This measure would also result in continued support for the Critical Home Repair Program to fund retrofits and energy efficiency improvements for single-family and mobile homes. This would result in nominal construction activities, which would generate short-term GHG emissions.

- ▶ **Measure BE-2: Increase Commercial Building Efficiency.** This measure would result in an amendment to the City Code to require energy audits and incentivize retrofits in order to increase energy efficiency for large commercial additions. This would result in nominal construction activities, which would generate short-term GHG emissions.
- ▶ **Measure RE-1: Increase Behind-the-Meter Renewable Supply.** This measure would support and incentivize installation of PV solar systems on commercial buildings and schools, resulting in the installation of new PV solar systems on roofs. Short-term GHG emissions would be generated during construction.
- ▶ **Measure RE-2: Increase Grid Renewable and Zero-Carbon Electricity.** This measure would encourage the City to research methods to increase grid supply of renewable and zero-carbon electricity and achieve 80 percent renewable and zero carbon electricity supply by 2030, 20 percent beyond the 60 percent Renewables Portfolio Standard mandate for 2030 required by SB 100. To achieve a 20 percent reduction the City would need to offset 14,924 MTCO₂e, which could be achieved through the installation of renewable energy systems such as small-scale ground-mounted solar or rooftop PV solar systems. This would result in minor temporary construction and maintenance activities, which would generate short-term GHG emissions.
- ▶ **Measure SW-1: Implement Reduce Solid Waste and Increase Recycling.** This measure could result in new/expanded composting facilities in areas in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, this could result in a variety of physical impacts related to the construction and operation of new compost facilities. GHG emissions would be generated during project construction, operation, and maintenance of new or expanded facilities. Although this measure would result in new vehicle trips related to new or expanded composting collection services, the associated GHG emissions would be offset by a reduction in vehicle trips to landfills.
- ▶ **Measure CS-1: Increase Urban Tree Planting.** This measure would result in increased parking lot shading, trees, and landscaping to help reduce heat island effect and resulting GHG emissions related to cooling. This would result in nominal GHG emissions related to increased tree planting/landscaping efforts and increased water use.

THRESHOLDS OF SIGNIFICANCE

The issue of global climate change is inherently a cumulative issue because the GHG emissions of individual projects cannot be shown to have any material effect on global climate. Thus, the project's impact on climate change is addressed only as a cumulative impact.

State CEQA Guidelines section 15064 and relevant portions of Appendix G recommend that a lead agency consider a project's consistency with relevant, adopted plans and discuss any inconsistencies with applicable regional plans, including plans to reduce GHG emissions. Under Appendix G of the State CEQA Guidelines, implementing a project would result in a cumulatively considerable contribution to climate change if it would:

- ▶ generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or
- ▶ conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

ISSUES NOT DISCUSSED FURTHER

All potential GHG issues identified in the significance criteria are evaluated below.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.6-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment

GHG reduction measures would directly or indirectly emit GHG emissions during construction and operation. GHG emissions would result from the operation of construction equipment, construction worker vehicle trips, and truck hauling trips. During the operational phase, some CAP measures may require additional employees to operate or maintain new/expanded facilities, resulting in increased vehicle trips and associated GHG emissions. Overall, the CAP is intended to reduce GHG emissions generated within the City by using alternatively fueled vehicles, reducing VMT, using renewable energy, reducing waste generation, and increasing carbon sequestration. Thus, the effects associated with the reduction of GHG emissions in the City would be beneficial. Implementation of the CAP measures would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be **less than significant**.

The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development; however, construction and operation of GHG reduction measures that would be implemented with CAP adoption have the potential to directly or indirectly emit GHG emissions. GHG emissions would result from the operation of construction equipment, construction worker vehicle trips, and truck hauling trips. During the operational phase, some CAP measures may require additional employees to operate or maintain new/expanded facilities, resulting in increased vehicle trips and associated GHG emissions. The following section describes the GHG emissions that could result from the implementation of the CAP.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (BE-1, BE-2, RE-1, RE-2) would not involve large amounts of labor or extensive use of construction equipment. Maintenance activities would be minimal and could consist of occasional inspection and cleaning of solar panels. Operational vehicle trips and associated GHG emissions would be minimal. Thus, these measures would not be expected to result in substantial GHG emissions. Furthermore, any temporary GHG emissions would be offset by the overall net benefit of GHG emissions reduction during the operation of the small-scale renewable energy systems and through energy conservation.

Waste Diversion and Compost Measure

GHG Reduction Measure SW-1 could result in new/expanded composting facilities within or outside of the City's jurisdiction. This would result in GHG emissions from construction equipment, vehicle trips, anaerobic decomposition, and stationary sources. Construction activities would primarily consist of grading and clearing land and construction of small structures. The anaerobic decomposition of the waste would result in emissions of methane; however, the diversion of waste from landfills to organics processing facilities would reduce emissions from decomposition of organic waste in landfills. Generators used for aeration and powering water pumps generate GHG emissions, but the emissions are typically minimal. Operation of new or expanded composting programs and waste diversion facilities would result in increased haul truck trips to and from the facility; however, it is anticipated that these trips would displace the haul truck trips that would be diverted from the landfill. Therefore, a net increase in the number of haul truck trips and associated GHG emissions within the City would not be anticipated. Similarly, increased construction and demolition waste recycling and collection of commercial food scraps and household hazardous waste is expected to displace trips already occurring to transport this waste to landfills.

Carbon Sequestration Measure

GHG Reduction Measure CS-1 would result in the installation of parking lot shading, trees, and landscaping. These activities would result in minor GHG emissions from equipment and vehicle trips. These activities would not require heavy equipment but could result in a small amount of GHG emissions due to distribution of trees and watering at the

beginning of the establishment period. Any emissions associated with these improvements would be minimal and temporary and would not generate substantial GHG emissions.

Impact Summary

Overall, the CAP is intended to reduce GHG emissions generated within the City by using alternatively fueled vehicles, reducing VMT, using renewable energy, reducing waste generation, and increasing carbon sequestration. In addition, energy efficiency measures to reduce electricity use and renewable energy generation would reduce GHG emissions at power plants generating electricity in the region. The effects associated with the reduction of GHG emissions in the City would be beneficial. Thus, implementation of the GHG reduction measures would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 3.8-2: Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of GHGs

Applicable plans, policies, or regulations include statewide GHG emission targets established by AB 32, SB 32, and EO S-3-05; the 2017 Scoping Plan; *San Diego Forward: The Regional Plan*; regulations regarding increased use renewables for electricity production (SB X1-2 and SB 100); California Energy Code; and the City of El Cajon General Plan (1991). Implementation of the GHG reduction measures would be consistent with the City's overall goal to reduce GHG emissions consistent with statewide targets and would support a variety of other state and local plans, policies, and regulations. The proposed CAP would reduce emissions by 2020 and 2030, consistent with legislatively-adopted State targets. Impacts would be **less than significant**.

Based on Appendix G of the CEQA Guidelines, the project would have a significant impact if it would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Applicable plans, policies, or regulations include statewide GHG emission targets established by AB 32, SB 32, and EO S-3-05; the 2017 Scoping Plan; *San Diego Forward: The Regional Plan*, the region's long-range RTP/SCS; regulations regarding increased use renewables for electricity production (SB X1-2 and SB 100); California Energy Code; and the City of El Cajon General Plan (1991).

As discussed in Chapter 2.4, "Reduction Targets," of the CAP, the CAP primarily focuses on reducing emissions by 2020 and 2030, consistent with State mandates. California's GHG reduction targets have been legislatively adopted for 2020 and 2030, while the 2050 goal is expressed in an EO. While setting goals beyond 2030 is important to provide long-term objectives, it is difficult to establish targets beyond a 15-year time frame for which defensible reduction assumptions can be made. This is primarily because of uncertainty around future technological advances and future changes in State and federal law beyond 2030. In addition, CARB's Scoping Plan is focused on meeting the 2030 reduction target, as directed in SB 32. Therefore, the City's CAP aligns with the state in setting a 2030 target.

Section 2.3, "Emissions Projections," of the CAP provides an assessment of how the City's GHG emissions would change over time without further action from the City. In addition to accounting for the City's growth, a legislatively-adjusted business as usual (BAU) forecast accounts for legislative actions at the State and federal levels that would affect emissions, such as the California Renewable Portfolio Standard, and federal and State vehicle efficiency standards. The selected future milestone years of 2020 and 2030 are generally based on the State's GHG reduction target years established in key State legislation and policies, including AB 32, SB 32, and EO S-3-05.

Based on the City's 2012 inventory, shown in Table 2-1, "2012 City of El Cajon Greenhouse Gas Emissions Inventory," the targets and long-term goals above aim to reduce annual City emissions to 659,000 and 397,000 MTCO₂e by 2020 and 2030 respectively. As shown in Table 2-3, "Recommended Greenhouse Gas Emissions Reduction Targets: 2020 and 2030," the City is already meeting the 2020 target due to existing legislative actions but would require additional GHG reductions to meet the 2030 target. Federal and State legislative actions would not be adequate to achieve the

City's 2030 GHG reduction goals. The City would need to reduce annual legislative-adjusted BAU 2030 emissions by 33,000 MTCO₂e.

The following section describes the potential conflicts with plans, policies, or regulations adopted to reduce or avoid GHG emissions from the implementation of GHG reduction, supporting, and adaptation measures.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of small-scale ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings; and retrofits to existing buildings (BE-1, BE-2, RE-1, RE-2) would be consistent with the City's overall goal to reduce GHG emissions consistent with statewide targets. These measures would also support SB X1-2, SB 100, and the California Energy Code.

Waste Diversion and Compost Measure

GHG Reduction Measure SW-1 establishes a waste diversion goal of 75 percent, which would reduce emissions from decomposition of organic waste in landfills. This is consistent with the City's overall goal to reduce GHG emissions consistent with statewide targets.

Carbon Sequestration Measure

GHG Reduction Measure CS-1 would result in the installation of parking lot shading, trees, and landscaping, which would reduce the urban heat island effect and increase carbon sequestration. This would be consistent with the City's overall goal to reduce GHG emissions consistent with statewide targets. These measures would also support City of El Cajon General Plan Objective 1-1, Policy 1-1.1, and Policy 1-1.2.

Impact Summary

Implementation of the GHG reduction measures would be consistent with the City's overall goal to reduce GHG emissions consistent with statewide targets and would support a variety of other state and local plans, policies, and regulations. The proposed CAP would reduce emissions by 2020 and 2030, consistent with legislatively-adopted State targets. After adoption of the CAP, GHG reduction measures would be implemented and monitored periodically, to reduce emissions. Meeting the long-term 2050 goal would require significant improvements in the availability and/or cost of near-zero and zero-emissions technology, as well as potential increased reductions from ongoing State and Federal legislative actions that are currently unknown. New methods may become available to quantify measures that are currently unquantifiable, and new State and federal regulations may further reduce emissions in sectors currently addressed primarily by local City measures. Through the climate planning services offered via its Energy Roadmap Program, SANDAG is updating GHG emissions inventories for El Cajon and the other cities in the County every two years, beginning with the 2016 baseline year. The City will aim to coordinate monitoring of the CAP consistent with SANDAG's schedule. Impacts would be **less than significant**.

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3.7 NOISE AND VIBRATION

This section includes definitions of common noise descriptors; summaries of applicable noise regulations, acoustic fundamentals, and existing ambient noise conditions; and an analysis of potential short- and long-term noise impacts associated with implementation of the project.

No comments received on the Notice of Preparation were related to noise and vibration (See Appendix A of this Draft EIR).

3.7.1 Regulatory Setting

FEDERAL

U.S. Environmental Protection Agency Office of Noise Abatement and Control

The U.S. Environmental Protection Agency (EPA) Office of Noise Abatement and Control was originally established to coordinate Federal noise control activities. In 1981, EPA administrators determined that subjective issues such as noise would be better addressed at more local levels of government. Consequently, in 1982, responsibilities for regulating noise control policies were transferred to State and local governments. However, documents and research completed by the EPA Office of Noise Abatement and Control continue to provide value in the analysis of noise effects.

Federal Transit Administration

To address the human response to ground vibration, the Federal Transit Administration (FTA) has set forth guidelines for maximum-acceptable vibration criteria for different types of land uses. These guidelines are presented in Table 3.7-1.

Table 3.7-1 Ground-Borne Vibration Impact Criteria for General Assessment

Land Use Category	Ground-Borne Vibration Impact Levels (VdB re 1 micro-inch/second)		
	Frequent Events ¹	Occasional Events ²	Infrequent Events ³
<i>Category 1:</i> Buildings where vibration would interfere with interior operations.	65 ⁴	65 ⁴	65 ⁴
<i>Category 2:</i> Residences and buildings where people normally sleep.	72	75	80
<i>Category 3:</i> Institutional land uses with primarily daytime uses.	75	78	83

Notes: VdB = vibration decibels referenced to 1 μ inch/second and based on the root mean square (RMS) velocity amplitude.

¹ "Frequent Events" is defined as more than 70 vibration events of the same source per day.

² "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.

³ "Infrequent Events" is defined as fewer than 30 vibration events of the same source per day.

⁴ This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research would require detailed evaluation to define acceptable vibration levels.

Source: FTA 2006.

STATE

California General Plan Guidelines

The State of California General Plan Guidelines 2017, published by the California Governor's Office of Planning and Research (OPR) (2017), provides guidance for the compatibility of projects within areas of specific noise exposure. Acceptable and unacceptable community noise exposure limits for various land use categories have been determined to help guide new land use decisions in California communities. In many local jurisdictions, these guidelines are used to derive local noise standards and guidance.

California Department of Transportation

In 2013, Caltrans published the Transportation and Construction Vibration Manual (Caltrans 2013a). The manual provides general guidance on vibration issues associated with construction and operation of projects in relation to human perception and structural damage. Table 3.7-2 presents recommendations for levels of vibration that could result in damage to structures exposed to continuous vibration.

Table 3.7-2 Caltrans Recommendations Regarding Levels of Vibration Exposure

PPV (in/sec)	Effect on Buildings
0.4-0.6	Architectural damage and possible minor structural damage
0.2	Risk of architectural damage to normal dwelling houses
0.1	Virtually no risk of architectural damage to normal buildings
0.08	Recommended upper limit of vibration to which ruins and ancient monuments should be subjected
0.006-0.019	Vibration unlikely to cause damage of any type

Notes: PPV= Peak Particle Velocity; in/sec = inches per second

Source: Caltrans 2013a.

California Department of Resources Recycling and Recovery

The California Department of Resources Recycling and Recovery (CalRecycle) regulates solid waste disposal and composting facilities. All compostable material handling facilities and operations are required to comply with the State minimum standards set forth in Title 14 of the California Code of Regulations (CCR), Division 7, Chapter 3.1, Articles 5, 6, 7, 8, and 9. The CalRecycle minimum standard (14 CCR section 17867(a)(2)) for noise requires that "All handling activities shall be conducted in a manner that minimizes vectors, odor impacts, litter, hazards, nuisances, and noise impacts; and minimizes human contact with, inhalation, ingestion, and transportation of dust, particulates, and pathogenic organisms." Compostable material handling facilities are also required to obtain a Compostable Materials Handling Facility Permit, pursuant to the requirements of Title 27, California Code of Regulations, Division 2, Subdivision 1, Chapter 4, Subchapter 1 and Subchapter 3, Articles 1,2,3, and 3.1 (commencing with section 21450) before commencing operations. Permit requirements include CEQA compliance.

LOCAL

City of El Cajon General Plan

The City of El Cajon General Plan (1991) contains the following policies that pertain to noise and are relevant to this analysis:

- ▶ **Policy 8-3.1:** The City shall develop a new and updated noise contour map using the 65 decibel (dB), day-night average contour as the maximum acceptable standard.
- ▶ **Policy 8-3.2:** Noise-attenuating measures such as special building insulation, increase setbacks, walls, landscaping etc., shall be required whenever any residential noise-sensitive land uses are proposed in the noise impact area of a major transportation facility as indicated on the noise contour map on file in the office of the Department of Community Development.
- ▶ **Policy 8-3.3:** In future transportation planning, the noise impact of all proposed transportation facilities shall be adequately assessed with the purpose of subjecting as few people as possible to a noise level equal to or exceeding 65 dB, day-night average sound level.
- ▶ **Policy 8-3.4:** The City shall waive, modify, or make exceptions to the above standards only where it can be demonstrated that such waiver, modification or exception is for a short, definite duration or prompted by substantial public interest.

- ▶ **Policy 8-3.5:** The City shall require that notice be given to all prospective purchasers of new dwelling units constructed in noise impact areas.
- ▶ **Policy 8-3.7:** Require strict enforcement of the City's noise ordinance.
- ▶ **Policy 8-3.8:** In order to minimize noise impacts from noise sources, the City may require site design considerations such as increased setbacks, sound attenuating walls and landscaping, and may also require building design considerations such as type of construction, insulation and orientation of building openings.
- ▶ **Policy 8-4.1:** In future land use planning, the placement of noise sensitive land uses in existing or projected noise impact areas shall be considered if additional noise-attenuating measures or plans are adopted. The table entitled "Land Use Compatibility in Noise Impact Areas" on file in the Department of Community Development shall be utilized in determining the acceptability of specific land uses in noise impact areas.
- ▶ **Policy 8-4.2:** A city-wide noise control ordinance shall be adopted in order to prohibit excessive noise within the city boundaries.
- ▶ **Policy 8-4.3:** Quiet zones shall be established around certain noise-sensitive land uses; i.e., hospitals, where maximum noise generation standards are more restrictive than elsewhere in the city.
- ▶ **Policy 8-4.4:** Where necessary, truck routes shall be established so as to reduce their effect on noise-sensitive land uses.

City of El Cajon Municipal Code

The City's Municipal Code section 9.44.010, Noise, prohibits loud and disturbing noises. It specifies that no person shall make, continue or cause to be made or continued, within the limits of the City, any loud, disturbing, or unusual noise which injures or endangers the health, peace or safety of persons of reasonable sensibilities: provided, that this section shall not in any way affect, restrict or prohibit any activities incidental to scientific or industrial research or manufacturing, construction or repairing conducted in areas zoned for such purposes. The City of El Cajon Noise Standards are included in Table 3.7-3 below.

Table 3.7-3 City of El Cajon Noise Standards

Zones	Time of Day	One-Hour Average Sound Level Decibels
All residentially zoned properties	7 a.m. to 7 p.m.	50
	7 p.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
All M-U and commercially zoned properties, except the C-M zoned properties	7 a.m. to 7 p.m.	65
	7 p.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	55
All C-M and industrially zoned properties	Any time	75
	Conditionally*	80

*Where outdoor noise levels are higher, additional noise attenuation measures, i.e., earphones for workers, increased insulation, double-pane glass, may make noise levels acceptable.

Section 17.115.130, Performance Standards, contains the following standards regarding noise:

- ▶ The sound level of any individual operation, land use, or activity other than rail, aircraft, street, or highway transportation, shall not exceed the sound levels indicated in the following table. For the purpose of determining compliance with these noise limitations, the sound levels shall be measured at the property lines of the property upon which the operation, land use, or activity is conducted.
- ▶ For the purposes of this section, interior lease lines within a property or building shall comply with the same standards as lot lines. For noise inside a building, the sound level meter shall be placed at least three (3) feet

distant from any wall, ceiling or partition, and the average measurement of at least three (3) different positions throughout the room shall be determined. The sound level limit at a location on a boundary between two (2) adjoining zoning districts shall be that of the more restrictive zone. When any sound level measurement is required it will be made pursuant to the provisions of this chapter and shall be measured with a sound level meter.

- ▶ Equipment noise. It is unlawful for any person within any residential zone, or within a radius of 500 hundred feet from any residential zone, to operate equipment or perform any outside construction, maintenance or repair work on buildings, structures, landscapes or related facilities, or to operate any pile driver, power shovel, pneumatic hammer, power hoist, leaf blower, mower, or any other mechanical device, between the hours of 7 p.m. of one (1) day and 7 a.m. of the next day in such a manner that a reasonable person of normal sensitivities residing in the area is caused discomfort or annoyance. This subsection shall also apply to any property in the Mixed-Use zone having one or more residential units. This restriction does not apply to emergency work made necessary to restore property to a safe condition, restore utility service, or to protect persons or property from an imminent exposure to danger.
- ▶ Refuse vehicles and parking lot sweepers. No person shall operate or permit to be operated a refuse compacting, processing or collection vehicle or parking lot sweeper between the hours of 7 p.m. of one (1) day and 7 a.m. of the next day in any residential zone.
- ▶ Vibrations. Every use shall be so operated that the ground vibration generated by such use is not harmful or injurious to the use or development of surrounding properties. No vibration shall be permitted which is perceptible without instruments at any use along the property line on which such use is located. For the purpose of this determination, the boundary of any lease agreement or operating unit or properties operating as a unit shall be considered the same as the property line.

3.7.2 Environmental Setting

ACOUSTIC FUNDAMENTALS

Acoustics is the scientific study that evaluates perception and properties of sound waves. Table 3.7-4 contains definitions of acoustic terms used to establish the environmental setting and analyze impacts to noise resulting from implementation of the proposed Climate Action Plan (CAP).

Table 3.7-4 Acoustic Term Definitions

Term	Definition
Noise	Noise is generally defined as sound that is loud, disagreeable, unexpected, or unwanted.
Decibel (dB)	Sound levels are measured using the decibel scale, developed to relate to the range of human hearing. A decibel is logarithmic; it does not follow normal algebraic methods and cannot be directly summed. For example, a 65-dB source of sound, such as a truck, when joined by another 65 dB source results in a sound amplitude of 68 dB, not 130 dB (i.e., doubling the source strength increases the sound pressure by 3 dB). A sound level increase of 10 dB corresponds to 10 times the acoustical energy, and an increase of 20 dB equates to a 100-fold increase in acoustical energy.
A-weighted decibel (dBA)	The human ear is not equally sensitive to loudness at all frequencies in the audible spectrum. To better relate overall sound levels and loudness to human perception, frequency-dependent weighting networks were developed, identified as A through E. There is a strong correlation between the way humans perceive sound and A-weighted sound levels. For this reason, the A-weighted sound levels are used to predict community response to noise from the environment, including noise from transportation and stationary sources, and are expressed as A-weighted decibels. All sound levels discussed in this section are A-weighted decibels unless otherwise noted.

Table 3.7-4 Acoustic Term Definitions

Term	Definition
Equivalent Noise Level (L_{eq})	The average noise level during a specified time period; that is, the equivalent steady-State noise level in a stated period of time that would contain the same acoustic energy as the time-varying noise level during the same period (i.e., average noise level).
Maximum Noise Level (L_{max})	The highest instantaneous noise level during a specified time period.
Source: Caltrans 2013a	

Noise Generation and Attenuation

Noise can be generated by several sources, including mobile sources such as automobiles, trucks, and airplanes and stationary sources such as activity at construction sites, machinery, and commercial and industrial operations. As sound travels through the atmosphere from the source to the receiver, noise levels attenuate (i.e., decrease) depending on ground absorption characteristics, atmospheric conditions, and the presence of physical barriers. Noise generated from mobile sources generally attenuate at a rate of 4.5 dB per doubling of distance from the source. Noise from stationary sources spread with more spherical dispersion patterns that attenuate at a rate of 6 to 7.5 dB per doubling of distance from the source.

Atmospheric conditions such as wind speed, wind direction, turbulence, temperature gradients, and humidity also alter the propagation of noise and affect levels at a receiver. Furthermore, the presence of a barrier (e.g., topographic feature, intervening building, and dense vegetation) between the source and the receptor can provide substantial attenuation of noise levels at the receiver. Both natural (e.g., berms, hills, and dense vegetation) and human-made features (e.g., buildings and walls) may function as noise barriers.

To provide context for sound levels described throughout this section, Table 3.7-5 presents sound levels associated with common outdoor and indoor activities.

Table 3.7-5 Typical Noise Levels

Common Outdoor Activities	Noise Level (dB)	Common Indoor Activities
	— 110 —	Rock band
Jet fly-over at 1,000 feet	— 100 —	
Gas lawn mower at 3 feet	— 90 —	
Diesel truck at 50 feet at 50 miles per hour	— 80 —	Food blender at 3 feet, Garbage disposal at 3 feet
Noisy urban area, daytime, Gas lawn mower at 100 feet	— 70 —	Vacuum cleaner at 10 feet, Normal speech at 3 feet
Commercial area, Heavy traffic at 300 feet	— 60 —	
Quiet urban daytime	— 50 —	Large business office, Dishwasher next room
Quiet urban nighttime	— 40 —	Theater, large conference room (background)
Quiet suburban nighttime	— 30 —	Library, Bedroom at night
Quiet rural nighttime	— 20 —	
	— 10 —	Broadcast/recording studio
Lowest threshold of human hearing	— 0 —	Lowest threshold of human hearing

Notes: dB = decibels

Source: Caltrans 2013a

Human Response to Changes in Noise Levels

In typical noisy environments, changes in noise of 1–2 dB are generally not perceptible. However, it is widely accepted that people are able to begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5-dB increase is generally perceived as a distinctly noticeable increase, and a 10-dB increase is generally perceived as a doubling of loudness. Therefore, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dB increase in sound would generally be perceived as barely detectable.

Excessive and chronic (long-term) exposure to elevated noise levels can result in auditory and non-auditory effects on humans. Auditory effects are those related to temporary or permanent hearing loss caused by loud noises. Exposure to noise may result in physical damage to the auditory system, which may lead to gradual or traumatic hearing loss. Gradual hearing loss is caused by sustained exposure to moderately high noise levels over a period of time; traumatic hearing loss is caused by sudden exposure to extremely high noise levels over a short period. Gradual and traumatic hearing loss both may be permanent.

Non-auditory effects are those related to behavior and physiology. The non-auditory behavioral effects of noise on humans are primarily subjective effects such as annoyance, nuisance, and dissatisfaction, which lead to interference with activities such as communications, sleep, and learning. The non-auditory physiological health effects of noise on humans have been the subject of considerable research into possible correlations between exposure to elevated noise levels and health problems, such as hypertension and cardiovascular disease. The mass of research implies that noise-related health issues are predominantly the result of behavioral stressors and not a direct noise-induced response. The degree to which noise contributes to such diseases depends on the frequency, bandwidth, and level of the noise and the exposure time (Caltrans 2013a).

Vibration

Vibration is the periodic oscillation of a medium or object with respect to a given reference point. Sources of vibration include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) and those introduced by human activity (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, (e.g., operating factory machinery) or transient in nature (e.g., explosions). Vibration levels can be depicted in terms of amplitude and frequency, relative to displacement, velocity, or acceleration.

Vibration amplitudes are commonly expressed in peak particle velocity (PPV) or root-mean-square (RMS) vibration velocity. PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is typically used in the monitoring of transient and impact vibration and has been found to correlate well to the stresses experienced by buildings (FTA 2006; Caltrans 2013b). PPV and RMS vibration velocity are normally described in inches per second (in/sec).

Although PPV is appropriate for evaluating the potential for building damage, it is not always suitable for evaluating human response. It takes some time for the human body to respond to vibration signals. In a sense, the human body responds to average vibration amplitude. The RMS of a signal is the average of the squared amplitude of the signal, typically calculated over a 1-second period. As with airborne sound, the RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which serves to compress the range of numbers required to describe vibration (FTA 2006). Table 3.7-6 includes the general human response to different ground vibration-velocity levels.

Table 3.7-6 Human Response to Different Levels of Ground Noise and Vibration

Vibration-Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.

Notes: VdB = vibration decibels referenced to 1 μ inch/second and based on the root mean square (RMS) velocity amplitude.

Source: FTA 2006:7-8

The typical background vibration-velocity level in residential areas is approximately 50 VdB. Typical outdoor sources of perceptible ground vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. Construction activities can generate sufficient ground vibrations to pose a risk to nearby structures. Constant or transient vibrations can weaken structures, crack facades, and disturb occupants (FTA 2006).

SENSITIVE LAND USES

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, schools, historic sites, cemeteries, and recreation areas are also generally considered sensitive to increases in exterior noise levels. Those noted above are also considered vibration-sensitive land uses in addition to commercial and industrial buildings where vibration would interfere with operations within the building, including levels that may be well below those associated with human annoyance.

EXISTING NOISE ENVIRONMENT

Transportation noise sources within the City include roadways, trolleys, and the Gillespie Field airport. Interstate 8, State Route (SR) 125, and SR 67 are major sources of traffic noise in the City. Some roads, primarily those that serve as collectors and arterials, are also significant sources of traffic noise. Daytime noise levels were measured along several major roadways in the City, including the intersection of El Cajon Boulevard and Richfield Avenue, West Main Street and Richardson Avenue, and in the parking lot of the El Cajon Transit Center. Daytime noise levels in those areas range from 64 to 67 dB L_{eq} and are typical of an urban environment (City of El Cajon 2018).

3.7.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

This analysis is based on a review of existing noise and vibration sources, sensitive land uses, and reference noise levels from FTA's Guide on Transit Noise and Vibration Impact Assessment methodology (FTA 2006). Reference levels are noise and vibration emissions for specific equipment or activity types that are well documented and the usage thereof common practice in the field of acoustics. Effects related to noise and vibration are analyzed qualitatively and focused on the CAP's potential to expose people to noise levels in excess of local standards.

PROPOSED CAP GREENHOUSE GAS REDUCTION MEASURES

Table 2-5 of the EIR, provides a list of proposed GHG reduction measures that would be implemented by the CAP. None of the proposed measures indicate where specific improvements would be constructed, their size, or specific characteristics. As a program EIR, the Draft EIR does not, and cannot, speculate on the individual environmental impacts of specific future projects/improvements. However, implementation of all GHG reduction measures were considered during preparation of the Draft EIR to the degree specific information about implementation is known. Consistent with the requirements of the CEQA Guidelines section 15168, this Draft EIR provides a program-level discussion of the potential general impacts of implementing these measures, rather than project-level or site-specific physical impacts of such actions. Only those measures that have the potential to result in noise or vibration impacts are listed below. All other measures in Table 2-5 would have no effect on noise or vibration and are not discussed further.

- ▶ **Measure RE-1: Increase Behind-the-Meter Renewable Supply.** This measure would support and incentivize installation of PV solar systems on commercial buildings and schools, resulting in the installation of new PV solar systems on roofs. Implementation of this measure could result in temporary and minor noise associated with construction activities.
- ▶ **Measure RE-2: Increase Grid Renewable and Zero-Carbon Electricity.** This measure would encourage the City to research methods to increase grid supply of renewable and zero-carbon electricity and achieve 80 percent renewable and zero carbon electricity supply by 2030, 20 percent beyond the 60 percent Renewables Portfolio Standard mandate for 2030 per SB 100. To achieve a 20 percent reduction the City would need to offset 14,924 MTCO₂e, which could be achieved through the installation of renewable energy systems such as small-scale ground-mounted solar or rooftop PV solar systems. Implementation of this measure could result in temporary and minor noise associated with construction activities.
- ▶ **Measure SW-1: Implement Reduce Solid Waste and Increase Recycling.** This measure could result in new/expanded composting facilities in areas in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, this measure could result in a variety of physical impacts related to the construction and operation of new compost facilities. Implementation of this measure could result in construction and operational noise, including additional haul truck traffic on existing routes or new haul truck traffic on new routes.

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines, a noise impact is considered significant if implementation of the proposed project would:

- ▶ expose persons to or generate noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies;
- ▶ expose persons to or generate excessive groundborne noise levels;
- ▶ result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- ▶ result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- ▶ for a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels; or
- ▶ for a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

ISSUES NOT DISCUSSED FURTHER

The analysis below has been written against the backdrop of recent CEQA case law addressing the scope of analysis required in EIRs for potential impacts resulting from existing environmental hazards near a site for a proposed project. In *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 377 ("CBIA"), the California Supreme Court held that "agencies subject to CEQA generally are *not* required to analyze the impact of existing environmental conditions on a project's future users or residents." (Italics added.) However, the court did not hold that CEQA never requires consideration of the effects of existing environmental conditions on the future occupants or users of a proposed project. But the circumstances in which such conditions may be considered are narrow: "when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project's impact on the environment—and not the environment's impact on the project—that

compels an evaluation of how future residents or users could be affected by exacerbated conditions.” (*Id.* at pp. 377-378, italics added.)

Implementation of the proposed CAP would not include development of sensitive land uses such as residential or commercial projects, result in changes in air traffic or existing airport noise levels, nor would the project have the potential to exacerbate these noise impacts. Therefore, no adverse impact would occur, and issues related to exposure to excessive airport noise levels are not discussed further in this Draft EIR.

IMPACTS ANALYSIS

Impact 3.7-1: Short-Term Construction Noise Impacts

Implementation of the CAP generally would not result in substantial short-term noise impacts because the scale and nature of future improvements which may occur are generally small, localized, and would require little use of heavy-duty construction equipment. Additionally, all projects within the City’s jurisdiction would adhere to the City’s Municipal Code section 9.44.010, Noise.

GHG Reduction Measure SW-1 could result in the construction of new or expanded composting facilities outside of the City’s jurisdiction, which may expose receptors to temporary and intermittent noise from mechanical equipment and haul trucks. All compostable materials handling activities must obtain a permit pursuant to the requirements of 27 CCR section 21450, which includes CEQA compliance. Thus, all future projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate noise impacts to the extent feasible in compliance with CEQA Guidelines section 15126.4. Impacts would be **less than significant**.

The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development; however, GHG reduction measures that would be implemented with the CAP have the potential to result in short-term construction, which would use heavy equipment such as excavators, graders, scrapers, bulldozers, backhoes, pile drivers, jackhammers, and concrete mixing trucks, and could result in temporary vehicle trips that generate noise. Depending on the type and model of equipment used for construction, typical noise levels for these kinds of construction equipment would range from 80 to 95 dB maximum noise level (L_{max}) at 50 feet (FTA 2006). Actual exposure levels would depend on the intensity of the construction activity, the distance of sensitive receptors to the noise source, and any intervening structures or topography that might affect noise attenuation.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings (RE-1, RE-2) would require some mechanical equipment and worker trips during construction, resulting in short-term noise. Because of the scale and nature of proposed improvements, which are generally small, localized, and because the project would require little use of heavy-duty construction equipment, excessive construction-related noise would not be anticipated. Furthermore, the City’s Municipal Code restricts construction within 500 feet of a residential zone or mixed-use zone to between the hours of 7:00 a.m. and 7:00 p.m, but does not restrict construction noise levels.

Waste Diversion and Compost Measure

This measure could result in new/expanded composting facilities in or outside of the City’s jurisdiction. Although the City’s waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new or expanded composting facilities in the region. This would require the use of heavy mechanical equipment and worker trips during construction, resulting in short-term noise. It is possible that measure SW-1 could result in new or expanded composting facilities inside or outside of the City’s jurisdiction, in the unincorporated County. Although these activities would generally be located in areas that are undeveloped and that are not highly urbanized, noise sensitive receptors could be located nearby. Construction of new or expanded composting facilities would adhere to the City’s Municipal Code section 9.44.010, Noise, or if outside of the City’s jurisdiction, would be required

to comply with similar noise ordinances in that local jurisdiction. Additionally, all compostable materials handling activities must obtain a permit pursuant to the requirements of 27 CCR section 21450, which includes CEQA compliance. Thus, all future projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate noise impacts to the extent feasible in compliance with CEQA Guidelines section 15126.4.

Impact Summary

With the exception of GHG Reduction Measure SW-1, implementation of the CAP would not result in substantial short-term noise impacts due to the scale and nature of the construction activities, which are generally small, localized, and would require little use of heavy-duty construction equipment. Additionally, the City's Municipal Code section 9.44.010, Noise, restricts distances from construction to sensitive receptors between the hours of 7:00 a.m. and 7:00 p.m. Thus, construction of infrastructure associated with implementation of the CAP within the City would comply with the Municipal Code.

It is possible that measure SW-1 could result in the construction of new or expanded composting facilities outside of the City's jurisdiction, in areas where construction noise may be regulated at different levels. All compostable materials handling activities must obtain a conditional use permit pursuant to the requirements of 27 CCR section 21450, which includes CEQA compliance. Thus, all future projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would be required to minimize or avoid noise impacts to the extent feasible in compliance with CEQA Guidelines section 15126.4. This impact is routinely addressed with standard mitigation identified during project-level review such as employing noise-reducing construction practices including muffling construction equipment exhaust, prohibiting construction activities to certain days and times, and using noise-reducing enclosures or shielding around noise-generating equipment. Therefore, impacts would be **less than significant**.

Impact 3.7-2: Long-Term Operational Noise Impacts

The GHG reduction measures would not result in future improvements that would produce substantial operational noise due to the minor nature of maintenance activities and few new operational vehicle trips. Although GHG Reduction Measure SW-1 could result in new stationary sources of noise, properly installed, operated, and maintained equipment would not be expected to generate excessive operational noise levels at sensitive receptors. Furthermore, all compostable material handling facilities and operations are subject to 14 CCR section 17867(a)(2). Therefore, impacts would be **less than significant**.

The CAP is a policy-level document that does not include any site-specific designs, or locations for future improvements. However, GHG reduction measures that would be implemented with the CAP have the potential to result in long-term operational noise from the operation of new stationary equipment or additional vehicle traffic.

Small-Scale Renewable Energy and Efficiency Measures

GHG reduction measures that could result in the construction of ground-mounted or rooftop PV solar systems on residential, commercial, and school buildings (RE-1, RE-2) would not involve new stationary sources of noise or substantial long-term maintenance activities.

Waste Diversion and Compost Measure

This measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new or expanded composting facilities in the region. This would result in operational noise from additional stationary equipment and haul trucks.

The loudest equipment that would be in operation at a composting facility would be the grinder and front-end loader. Equipment would operate continuously and would be dependent on the volume of materials received and the need to move materials. In the case of the aerated static pile composting, large blowers would push and pull air through the piles. These blowers have the potential to operate 24 hours per day. Composting methods use electric

motors to power pumps, impellers, or compressors, and when properly installed, operated, and maintained generally produce noise levels less than 54 dB at 30 feet (SWRCB 2015). Furthermore, all compostable material handling facilities and operations are subject to 14 CCR section 17867(a)(2) which requires that “all handling activities shall be conducted in a manner that minimizes vectors, odor impacts, litter, hazards, nuisances, and noise impacts; and minimizes human contact with, inhalation, ingestion, and transportation of dust, particulates, and pathogenic organisms.”

It is anticipated that the haul truck trips to new or expanded facilities would displace haul trucks trips that would be diverted from landfills, and no net increase in the number of haul truck trips and associated traffic-related noise would occur. As discussed in Section 3.7.2, “Environmental Setting,” a doubling of traffic volume on a roadway would have to occur before it would be detectable. Thus, in the case that a few additional haul truck trips are required, long-term operational noise impacts would still not occur.

Impact Summary

GHG reduction measures would not result in future improvements that would produce substantial operational noise due to the minor nature of maintenance activities and few new operational vehicle trips. Although GHG Reduction Measure SW-1 could result in new stationary sources of noise, composting facilities are subject to 14 CCR section 17867(a)(2) which requires noise impacts be minimized; and properly installed, operated, and maintained equipment would not be expected to generate excessive operational noise levels.

Furthermore, future waste diversion projects that would result from implementation of the CAP would be required to undergo the City’s discretionary review process which would include CEQA, and which would require project-specific mitigation to minimize or eliminate impacts related to operational noise in compliance with CEQA Guidelines Section 15126.4. This impact is routinely addressed with standard mitigation identified during project-level review such as siting stationary equipment at a sufficient distance from receptors or housing stationary equipment in enclosures. Therefore, the GHG reduction measures would not result in a substantial permanent increase in ambient noise levels or the exposure of sensitive receptors to excessive operational noise. Impacts would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.8-3: Excessive Groundborne Vibration

Implementation of GHG reduction measures that involve the operation of heavy-duty construction equipment could generate localized groundborne vibration in the vicinity of the construction activity. Given the required setback distances for siting of solid waste facilities within the City, as well as the low likelihood that construction activities or haul truck trips would occur within 43 feet of receptors, it is unlikely that construction or operational vibration impacts would occur. Where there is the potential for these impacts, they are routinely addressed through project-level environmental review and permitting. Future waste diversion projects would be required to evaluate project-specific impacts under CEQA at the time of application and project-specific mitigation would be required to minimize or avoid vibration impacts to the extent feasible in compliance with CEQA Guidelines section 15126.4. Thus, impacts related to excessive groundborne vibration would be **less than significant**.

The CAP is a policy-level document that does not include any site-specific designs, or locations for future improvements. However, GHG reduction measures that would be implemented with the CAP have the potential to result in groundborne vibration from the use of heavy equipment such as bulldozers, loaded haul trucks, and jackhammers during project construction, and from haul trucks during the operational phase. These types of equipment could generate groundborne vibrations ranging from 0.035 to 0.089 in/sec PPV at 25 feet and 79 to 87 VdB at 25 feet (FTA 2006) and could expose sensitive receptors to elevated vibration levels. Vibration levels dissipate rapidly at increasing distance from the vibration source. Applying FTA’s recommended procedure for determining vibration levels at various distances from the source, the predicted most-conservative ground vibration levels would exceed the threshold of 80 VdB for human disturbance for a large bulldozer at distances within 43 feet. With regard

to structural damage, the threshold of 0.2 inch/second PPV would be exceeded for large bulldozers at distances within 15 feet. Actual exposure levels would depend on equipment types, haul truck routes, and proximity to and characteristics of sensitive receptors.

Small-Scale Renewable Energy and Efficiency Measures

GHG Reduction Measure RE-2 could result in the construction of ground-mounted PV solar systems, which may require the use of construction equipment that would generate groundborne vibration.

Waste Diversion and Compost Measure

This measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have sufficient capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new or expanded composting facilities in the region. This would require the use of heavy mechanical equipment and haul trucks during construction, resulting in short-term vibration. Within the City, solid waste processing facilities are permitted in the Manufacturing Industrial Zones only, which requires 150 feet of frontage on a dedicated public street. This is a sufficient distance for construction-generated vibration to attenuate to imperceptible levels. Additionally, all compostable material handling facilities and operations are subject to 14 CCR section 17867(a)(2) which requires that "all handling activities be conducted in a manner that minimizes vectors, odor impacts, litter, hazards, nuisances, and noise impacts; and minimizes human contact with, inhalation, ingestion, and transportation of dust, particulates, and pathogenic organisms."

Impact Summary

Implementation of GHG reduction measures that involve the operation of heavy-duty construction equipment and haul trucks could generate localized groundborne vibration in the vicinity of the activity. However, given the required setback distances for siting of solid waste facilities within the City, state regulations regarding composting facilities, as well as the low likelihood that construction activities or haul truck trips would occur within 43 feet of receptors, it is unlikely that construction or operational vibration impacts would occur. Furthermore, these activities would occur during daytime hours, when people are less sensitive to vibration. Where there is the potential for impacts, it would be routinely addressed with standard mitigation identified during project-level review such as preparing vibration monitoring plans and incorporating project-specific methods for minimizing or reducing vibrational impacts on nearby vibration-sensitive structures. Future discretionary projects would be required to evaluate project-specific impacts under CEQA at the time of application and project-specific mitigation would be required to minimize or avoid vibration impacts to the extent feasible in compliance with CEQA Guidelines section 15126.4. Thus, impacts related to excessive groundborne vibration would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

3.8 TRANSPORTATION/TRAFFIC

This section describes the existing circulation patterns in the City of El Cajon and evaluates the potential for transportation impacts that may result from implementation of the CAP.

No comments received on the Notice of Preparation were related to traffic and transportation (See Appendix A of this Draft EIR).

3.8.1 Regulatory Setting

FEDERAL

Americans with Disabilities Act

The Americans with Disabilities Act (ADA) (1990) is a wide-ranging civil rights law that prohibits, under certain circumstances, discrimination based on disability. Pedestrian facility design must comply with the accessibility standards identified in the ADA, which applies to all projects involving new or altered pedestrian facilities. The scoping and technical provisions for new construction and alterations identified in the ADA Accessibility Guidelines (sections 4.3, 4.7 and 4.8) can be used to help design pedestrian facilities that are ADA compliant. For example, Title II-6.600 of the Technical Assistance Manual states, "When streets, roads, or highways are newly built or altered, they must have ramps or sloped areas whenever there are curbs or other barriers to entry from a sidewalk or path." Certain facilities, such as historic buildings, may be exempt from ADA requirements.

Highway Capacity Model 2000 prepared by the federal Transportation Research Board

The Highway Capacity Manual 2000 (HCM 2000), prepared by the federal Transportation Research Board (TRB), is the result of a collaborative multiagency effort between the TRB, the Federal Highway Administration, and American Association of State Highway and Transportation Officials. The HCM 2000 contains concepts, guidelines, and computational procedures for computing the capacity and quality of service of various highway facilities, including freeways, signalized and unsignalized intersections, rural highways, and the effects of transit, pedestrians, and bicycles on the performance of these systems.

Title 23, Code of Federal Regulations, Section 450.220 as revised on April 1, 2005

Title 23, Code of Federal Regulations Revised in April 1, 2005, section 450.220 of Title 23 Highways in the Code of Federal Regulations requires each State to carry out a continuing, comprehensive, and intermodal statewide transportation planning process. This planning process must include the development of a statewide transportation plan and transportation improvement program that facilitates the efficient, economic movement of people and goods in all areas of the State.

Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users

On August 10, 2005, Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) was signed into law. SAFETEA-LU addresses the many challenges facing transportation systems and sets funding and programs to improve safety, reduce traffic congestion, improve efficiency in freight movement, increase intermodal connectivity, and protect the environment. SAFETEA-LU promotes more efficient and effective federal surface transportation programs by focusing on transportation issues of national significance, while giving state and local transportation decision makers more flexibility for solving transportation problems in their communities.

STATE

California Department of Transportation

The California Department of Transportation (Caltrans) is responsible for planning, designing, building, operating, and maintaining California's \$300 billion, 50,000-lane-mile State road system. Caltrans sets standards, policies, and strategic plans that aim to do the following: 1) provide the safest transportation system in the nation for users and workers; 2) maximize transportation system performance and accessibility; 3) efficiently deliver quality transportation projects and services; 4) preserve and enhance California's resources and assets; and 5) promote quality service. Caltrans has the discretionary authority to issue special permits for the use of California State highways for other than normal transportation purposes. Caltrans also reviews all requests from utility companies, developers, volunteers, nonprofit organizations, and others desiring to conduct various activities within the California Highway right of way. The Caltrans Highway Design Manual, prepared by the Office of Geometric Design Standards (Caltrans 2008), establishes uniform policies and procedures to carry out the highway design functions of Caltrans. Caltrans has also prepared a Guide for the Preparation of Traffic Impact Studies (Caltrans 2002). Objectives for the preparation of this guide include providing consistency and uniformity in the identification of traffic impacts generated by local land use proposals.

The California Transportation Improvement Program

The California Transportation Commission (CTC) administers transportation programming, which is the public decision-making process that sets priorities and funds projects that have been envisioned in long-range transportation plans. The CTC commits expected revenues for transportation projects over a multi-year period. The State Transportation Improvement Program (STIP) is a multi-year capital improvement program for transportation projects both on and off the State Highway System. The STIP is funded with revenues from the State Highway Account and other sources. STIP programming typically occurs every 2 years.

Caltrans adopted its California Transportation Plan 2040 (CTP 2040) in 2016. CTP 2040 presents a long-term vision with a set of supporting goals, policies, and recommendations to help guide transportation-related decisions and investments to meet our future mobility needs and reduce greenhouse gas (GHG) emissions. The CTP 2040 takes a "whole system" approach of integrating long-range statewide and regional transportation planning documents and programs with the latest tools and technologies to evaluate transportation and land use scenarios and policies.

The following implementation highlights illustrate the vision and direction of the CTP 2040:

- ▶ improve transit;
- ▶ reduce long-run repair and maintenance costs;
- ▶ improve highways and roads;
- ▶ improve freight efficiency and the economy;
- ▶ improve communities;
- ▶ reduce transportation-system deaths and injuries;
- ▶ expand the use and safety of bike and pedestrian facilities;
- ▶ make our vehicles and transportation fuels cleaner;
- ▶ improve public health and achieve climate and other environmental goals; and
- ▶ secure permanent, stable, and sufficient transportation revenue.

Senate Bill 743

Senate Bill 743, passed in 2013, requires the Governor's Office of Planning and Research (OPR) to develop new CEQA guidelines that address traffic metrics under CEQA. OPR published its proposal for the comprehensive updates to the CEQA Guidelines in November 2017 which included proposed updates related to analyzing transportation impacts

pursuant to SB 743. These updates indicated that vehicle miles traveled (VMT) be the primary metric used to identify transportation impacts. In December of 2018, OPR published the most recent version of the Technical Advisory on Evaluating Transportation Impacts (December 2018) which provides guidance for VMT analysis. The Office of Administrative Law approved the updated CEQA Guidelines and lead agencies will have an opt-in period until July 1, 2020 to implement the updated guidelines.

REGIONAL

San Diego Forward

San Diego Forward, adopted by the San Diego Association of Governments (SANDAG) in 2015 which includes the City of El Cajon, provides a vision for the region's growth through the year 2050. The plan reflects a strategy for a more sustainable future which includes investing in a transportation network that would provide people more travel choices, protects the environment, creates healthy communities, and stimulates economic growth (SANDAG 2015). San Diego Forward also includes a detailed blueprint for transportation improvements over the next 35 years. The plan outlines the investment of nearly \$204 billion in year of expenditure dollars in local, State, and federal dollars to build a regional comprehensive, interconnected transportation system that provides choices.

REGIONAL TRANSPORTATION IMPROVEMENT PROGRAM

The Regional Transportation Improvement Program (RTIP), adopted by SANDAG in December 2018, is a multi-year program that includes all proposed major highway, arterial, transit, and non-motorized projects in the San Diego region. The RTIP covers five fiscal years and incrementally implements San Diego Forward.

LOCAL

City of El Cajon General Plan

The City of El Cajon General Plan (1991) includes the following policies that pertain to the City's transportation system and are relevant to this analysis:

- ▶ **Policy 6-5.3:** Sound design practices should be used to minimize traffic conflicts along primary and secondary streets.
- ▶ **Policy 6-7.1:** The planning, development, and operation of the various elements in the transportation system (road, rail, mass transit, bicycle facilities, etc.) should be coordinated to recognize interrelationships both between one element and another, and between each element and land uses they serve or affect.
- ▶ **Policy 6-7.3:** Pedestrian and bicycle routes separated from auto traffic should be provided wherever possible. It is particularly desirable that adequate provision be made for pedestrian or bicycle movement at freeway grade separations and interchanges affecting the local street system. Bicycle and pedestrian facilities should be considered as alternative modes of transportation, not just recreational features. The City should take positive action in this area.
- ▶ **Policy 6-7.4:** The City should adopt Caltrans' standards for development for bicycle routes, lanes and paths.
- ▶ **Policy 6-8.1:** Efforts to encourage the use of public transit should be implemented such as cross-town transit, use of shuttle buses, carpooling, Transportation Demand Management Systems and other methods to reduce auto traffic.

Bicycle Master Plan

The Bicycle Master Plan, adopted in 2011, provides a regulatory framework to guide future development of a balanced circulation system for all modes of travel within the City of El Cajon. The overall goal is to maximize the connections between mass transit, employment and residential sectors and activity centers with bikeways to promote a viable alternative to automobile travel. The Bicycle Master Plan also includes a description of existing bicycle

facilities, a needs assessment, recommended improvements, proposed bikeway projects, and potential funding sources.

3.8.2 Environmental Setting

This section describes the existing transportation and traffic systems within the City of El Cajon. The primary source of this information is the City of El Cajon General Plan (City of El Cajon 1991) and the City of El Cajon Bicycle Master Plan (City of El Cajon 2011).

EXISTING ROADWAY NETWORK

The circulation system within the City of El Cajon includes three freeways, thoroughfares, collector streets, and local streets. Each roadway type was carefully designed to complement the land use pattern in the area and functionally integrate with the overall circulation system in the City.

The roadway system within the City of El Cajon includes three freeways; Interstate 8 (I-8), State Route (SR) 125, and SR 67. I-8 is the main east-west interstate highway serving the San Diego metropolitan area. It begins in western San Diego County and travels east through the City of El Cajon and into Arizona. SR 125 extends from SR 54 and travels in the north-south direction along the western boundary of the City. The SR 125 provides access to Chula Vista, Downtown San Diego, East County, Otay Mesa, and Mexico. SR 67 extends from I-8 near the center of the City and extends north to SR 78 in the City of Ramona. SR 67 is mostly a two-lane mountainous route with passing lanes and expressway segments.

Primary thoroughfares are designed to receive traffic from subordinate streets and carry it across the City. This type of street also serves as an intermediate link between the freeway and subordinate streets or between two freeways. Examples of primary thoroughfares include Fletcher Parkway, Broadway, and Johnson Avenue. Secondary thoroughfares are designed to receive traffic from subordinate streets and carry it to major destination points within the community. Examples of secondary thoroughfares include West Main Street, Marshall Avenue, and Washington Avenue. Both primary and secondary thoroughfares are considered major streets within the City. Collector streets are designed to serve neighborhood traffic and provide circulation links to thoroughfares. Examples of collector streets include Chambers Street, Lexington Avenue, and Madison Avenue. Local streets are low capacity streets that provide direct access to residential areas.

TRANSIT AND BICYCLE FACILITIES

The Metropolitan Transit System (MTS) provides bus and light rail trolley services to the City of El Cajon. A total of fifteen bus routes (Route 115, 815, 816, 833, 848, 864, 870, 872, 874, 875, 888, 891, 892, and 894) run through major corridors within the City. Service frequency can vary between 30 and 60 minutes depending on the route. In general, the service frequency increases during peak hours and decreases during evenings, weekends and holidays.

RideFACT provides dial-a-ride services to individuals who are 60 years and older. RideFACT services are available in all cities within San Diego County. The service is provided to seniors that do not have any other transportation options. MTS Access provides paratransit services to individuals who are unable to independently use the transit system because of a physical or mental disability. MTS Access is comparable to MTS's fixed bus route system and designed to serve the needs of individuals with disabilities with San Diego County.

As of 2011, there was a total of 20.4 miles of bicycle facilities within the City of El Cajon (City of El Cajon 2011: 10). The City of El Cajon Bicycle Master Plan classifies bicycle facilities as follows:

- ▶ Class I Bikeway (Bike Path). A completely separate facility designated for the exclusive use of bicycles and pedestrians, with vehicle and pedestrian cross-flow minimized.
- ▶ Class II Bikeway (Bike Lane). A striped lane designated for the use of bicycles on a street or highway. Vehicle parking and vehicle pedestrian/ cross-flow are permitted at designated locations.

- ▶ Class III Bikeway (Bike Route). A route designated by signs of pavement markings for bicyclists within the vehicular travel lane (i.e. shared use) of a roadway.
- ▶ Two bicycles can be carried on most MTS buses. Bike rack space is on a first-come, first-served basis. One bicycle is allowed per Trolley car during peak travel, and two are allowed at all other times.

3.8.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

The project and cumulative impact analysis study area for transportation and traffic is the jurisdictional lands within the City and portions of the roadway network that are adjacent to the City.

PROPOSED CAP GHG REDUCTION MEASURES

Table 2-5 of the Draft EIR provides a list of proposed GHG reduction measures that would be implemented by the CAP. However, only those measures that are relevant to transportation and traffic conditions within the city and immediate roadway network are described and evaluated below. None of the proposed measures indicate where specific improvements would be constructed, their size, or specific characteristics. As a program EIR, the Draft EIR does not, and cannot, speculate on the individual environmental impacts of specific future projects/improvements. However, implementation of all GHG reduction measures were considered during preparation of the Draft EIR to the degree specific information about implementation is known. Consistent with the requirements of CEQA Guidelines section 15168, this Draft EIR provides a program-level discussion of the potential general impacts of implementing these measures, rather than project-level or site-specific physical impacts of such actions. Only those measures that have the potential to affect transportation and traffic are listed below. All other measures in Table 2-5 would have no effect on transportation and traffic and are not discussed further.

- ▶ **Measure SW-1: Reduce Solid Waste Reduction and Increase Recycling.** This measure could result in new/expanded composting facilities in areas outside of the City's jurisdiction. This could result in a variety of physical impacts related to the construction and operation of such facilities dependent upon the scale of facilities. New truck trips related to the collection of compost materials may result but would displace existing trips to the landfill. Construction activities may result in temporary changes in traffic patterns and temporary increases in construction-related traffic.

THRESHOLDS OF SIGNIFICANCE

Consistent with the City's transit thresholds based on Appendix G of the State CEQA Guidelines, a project would have a significant impact on transportation and traffic if it would:

- ▶ conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities,
- ▶ conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b),
- ▶ substantially increase hazards due to a geometric design feature or incompatible uses, or
- ▶ result in inadequate emergency access.

ISSUES NOT DISCUSSED FURTHER

In October 2009, the San Diego region elected to be exempt from the State Congestion Management Program pursuant to Assembly Bill 2419. To ensure the region's continued compliance with the federal congestion management process, SANDAG has been abiding by the Federal Highway Administration's 23 Code of Federal

Regulations 450.322. Therefore, implementation of the proposed CAP would not conflict with an applicable congestion management program, and this issue is not evaluated further.

In November 2017, OPR published its proposal for the comprehensive update of the CEQA Guidelines which indicated that VMT be the primary metric used to identify transportation impacts. VMT is defined as one vehicle traveling on a roadway for one mile and has long been a primary indicator of travel. Agencies may adopt their own, or rely on thresholds recommended by other agencies, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence. However, lead agencies will have an opt-in period until July 1, 2020 to implement the updated guidelines. Implementation of the proposed GHG reduction measures would reduce the use of gasoline or diesel-powered vehicles and equipment, increasing the efficiency and effectiveness of alternative fuel vehicles, and reducing local VMT. Specifically, implementation of GHG Reduction Measures T-5, T-6, and T-7 would reduce the total VMT locally and reduce the City's GHG emissions by approximately 1,800 by 2030. Therefore, implementation of the CAP would not conflict with VMT standards and this issue is not evaluated further.

IMPACT ANALYSIS

Impact 3.8-1: Conflict with a Program, Plan, Ordinance Addressing the Circulation System

GHG reduction measures promote a reduction in VMT and are generally consistent with general plan transportation system policies by encouraging the construction of infrastructure that promotes the use of transportation modes other than the private automobile (bicycling and walking). While these projects may result in a temporary increase in construction traffic, the projects would remain consistent with the programs, plans, policies, and ordinances relevant to transportation and circulation systems. This impact would be **less than significant**.

The CAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development; however, implementation of the proposed GHG reduction measures could directly or indirectly affect transportation systems and traffic patterns within the City.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could result in temporary impacts related to traffic and circulation during construction. However, all future transportation and waste diversion projects would be evaluated under CEQA for physical impacts and would be required to implement mitigation, if applicable. Additionally, projects would be evaluated for compliance with applicable local, State, and federal regulations related to traffic planning and design, and would be coordinated with interested agencies including Caltrans and SANDAG which would ensure that projects would not interfere with circulation plans. Additionally, as described above in Section 3.8.1, "Regulatory Setting," State and local regulation policies (e.g., El Cajon General Plan policies listed above) are in place to improve transportation systems within the City. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 3.8-2: Substantially Increase Hazards due to a Geometric Design Feature

Future projects that would occur with implementation of the CAP would largely be constructed in developed areas or along existing roadways and would not change the existing configuration of the roadways. GHG measures that encourage a shift in transportation modes and reduction in travel demand would result in minor changes to the existing streetscape. Any streetscape improvements involving pedestrian and bicycle facilities would be required to comply with Caltrans and local design guidelines for roadway facilities as applicable. Compliance with State and local regulations and design guidelines would ensure that roadway improvements promoted by the CAP would not substantially increase hazards due to geometric design features or incompatible uses. This impact would be **less than significant**.

The CAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development; however, implementation of proposed GHG reduction measures could directly or indirectly affect transportation systems and traffic patterns.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could result in temporary construction activities that may affect traffic patterns. However, it is unlikely that these projects would require the modification or expansion of existing roadway infrastructure.

All future transportation and waste diversion projects would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate design hazards and incompatible uses. Additionally, any streetscape improvements would be required to comply with Caltrans and local design guidelines for roadway facilities as applicable. Consistency with established General Plan policies, federal, State, and local roadway design regulations would be required. Compliance with these regulations and design guidelines, would ensure that roadway improvements promoted by the CAP would not substantially increase hazards because of design features or incompatible uses. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 3.8-3: Result in Inadequate Emergency Access

Implementation of some GHG reduction measures may temporarily disrupt traffic flows on area roadways increasing the amount of construction vehicles sharing the roadways with normal vehicle traffic. All future development projects would be required to follow the City of El Cajon standards for development and construction which include provisions for emergency vehicle access. Therefore, this impact would be **less than significant**.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could result in construction activities may temporarily disrupt traffic flows on area roadways by increasing the amount of construction vehicles sharing the roadways with normal vehicle traffic or result in lane closures that could delay the movement of emergency vehicles. During the construction period, construction activities or the increased amount of heavy-duty construction vehicles on roadways could result in inadequate emergency access. However, all future development projects would be required to comply with emergency access standards outlined in Chapter 15.04 of the Municipal Code which includes emergency vehicle access requirements. Compliance with these City regulations would ensure that roadway improvements promoted by the CAP would not result in inadequate emergency access. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required.

Impact 3.8-4: Conflict with Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities, or Otherwise Decrease the Performance or Safety of Such Facilities

Implementation of some of the GHG reduction measures may temporarily disrupt traffic flows on area roadways increasing the amount of construction vehicles sharing the roadways with normal vehicle traffic. All future development projects would be required to follow the City El Cajon standards for development and construction standards which include provisions for emergency vehicle access. Therefore, this impact would be **less than significant**.

Waste Diversion and Compost Measure

This GHG reduction measure could result in new/expanded composting facilities in or outside of the City's jurisdiction. Although the City's waste transfer stations have capacity to handle increased waste processing, GHG Reduction Measure SW-1 could result in new/expanded composting facilities in the region which could temporarily disrupt traffic flows on area roadways by increasing the amount of construction vehicles sharing the roadways with normal vehicle traffic or result in lane closures that could temporarily impede the use of bike lanes and sidewalks. However, these periods of obstruction would be brief, and all projects would be required to comply with the City of El Cajon development and standards outlined in Chapter 15.04, of the Municipal Code. Implementation of the proposed CAP would result in new pedestrian and bicycle infrastructure, which would promote a viable alternative to automobile travel. Compliance with these City regulations would ensure that roadway improvements promoted by the CAP would not decrease the performance or safety of transit, bicycle, or pedestrian facilities. This impact would be **less than significant**.

4 CUMULATIVE IMPACTS

4.1 CEQA REQUIREMENTS

Section 15130(a) of the State CEQA Guidelines requires a discussion of the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Cumulatively considerable, as defined in CEQA Guidelines section 15065(a)(3), means that the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The State CEQA Guidelines section 15355 defines a cumulative impact as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

4.2 GEOGRAPHIC SCOPE OF THE CUMULATIVE ANALYSIS AND RELATED PLANS AND PROJECTS

CEQA Guidelines section 15130 identifies two basic methods for establishing the cumulative environment in which a project is considered: the use of a list of past, present, and probable future projects or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. These other projects may be identified either through the provision of a list of cumulative projects, or via a summary of projections contained in an adopted General Plan or a certified EIR. This Draft EIR uses a combination of the two methods, using projections contained in adopted General Plans and related planning documents, as well as known major reasonably foreseeable other projects.

4.2.1 Geographic Context

The geographic area that could be affected by implementation of the CAP varies depending on the type, scale, and location of future infrastructure improvements that may result from its implementation and is also dependent on the environmental resource being considered. When the effects of the project are considered in combination with those other past, present, and probable future projects to identify cumulative impacts, the other projects that are considered may also vary depending on the type of environmental effects being assessed.

4.2.2 List of Related Plans and Projects

The list of past, present, and probable future projects used for this cumulative analysis is restricted to those projects that have occurred or are planned to occur (i.e., pending applications at the time of the NOP release) within the City, or the use of adopted projections from a general plan, or other regional planning document or a certified EIR for such a planning document. This analysis uses a combination of list and planning document approach. Physical improvements resulting from implementation of the CAP have the potential to combine with the physical impacts of other past, present, or probable future projects in the City and could result in a cumulative impact based upon proximity and construction schedule. For the purposes of this discussion, the adopted plans under which build-out projects could result in a cumulative effect are described below in Table 4-1.

Significance criteria, unless otherwise specified, are the same for cumulative impacts as project impacts for each environmental topic area. When considered in relation to other reasonably foreseeable projects, cumulative impacts to some resources would be significant and more severe than those caused by the project alone.

Table 4-1 List of Related Plans/Projects in the City of El Cajon

Project/Owner Name	Location	Description	Project Status
City of El Cajon General Plan	Entire incorporated area within the El Cajon City limit.	Framework for planning development and land use in the City of El Cajon.	Adopted in 1991.
City of El Cajon Housing Element	Entire incorporated area within the City limit.	Framework for planning housing development in the City of El Cajon.	Adopted in 2013.
City of El Cajon Housing Element Rezoning	Major commercial areas in El Cajon	Application of mixed-use overlay to accommodate future housing needs.	Adopted in 2017.
Transit District Specific Plan	227-acre project area located within the City.	Framework for planning development within the 227-acre project area.	Adopted in 2018.
San Diego County General Plan	Entire unincorporated area within the County.	Framework for planning development and land use in San Diego County.	Adopted in 2011.
City of La Mesa General Plan	Entire incorporated area within the La Mesa City limit.	Framework for planning development and land use in the City of La Mesa.	Adopted in 2012.
City of Santee General Plan	Entire incorporated area within the Santee City limit.	Framework for planning development and land use in the City Santee.	Adopted in 2003.

Source: Data compiled by Ascent Environmental in 2018

4.3 CUMULATIVE IMPACTS ANALYSIS

For purposes of this EIR, the CAP would result in a significant cumulative effect if:

- ▶ the cumulative effects of related projects (past, current, and probable future projects) are not significant, and the incremental impact of implementing the CAP is substantial enough, when added to the cumulative effects of related projects, to result in a new cumulatively significant impact; or
- ▶ the cumulative effects of related projects (past, current, and probable future projects) are already significant, and implementation of the CAP makes a considerable contribution to the effect. The standards used herein to determine a considerable contribution are that either the impact must be substantial or must exceed an established threshold of significance.

The setting for this cumulative analysis is the same as that included for the City's and includes existing, proposed, planned and approved projects as well as growth planned under general plans in neighboring communities.

4.3.1 Aesthetics

CUMULATIVE SETTING

The City is in a valley which is surrounded by the Cuyamaca foothills, and views are characterized by rolling to hilly uplands that contain frequent narrow, winding valleys. El Cajon is generally characterized by a granitic valley floor surrounded by rising hills and rocky terrain which can be viewed from many locations within the City. Hillside areas are preserved in open space in the City's General Plan Land Use Map. There are no formally designated scenic highways or corridors within the City. The City's General Plan polices and Zoning Code guide development such that no significant visual impacts are currently identified. Therefore, there are no existing significant cumulative visual impacts.

CUMULATIVE IMPACTS EVALUATION

Implementation of the CAP would result in future projects such as electric vehicle charging stations, bicycle and pedestrian infrastructure, new rooftop PV solar systems, ground-mounted solar, and new/expanded waste facilities. As described throughout this Draft EIR, the CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development, and specific locations for future infrastructure improvements have not been proposed. Future projects would typically be small in scale and would occur in the urbanized area or along existing right-of-way or utility easements. New infrastructure would not be substantially different than the type of development found in the existing conditions. Future projects with potential to result in environmental impacts would be required to undergo the City's discretionary approval process which would require additional CEQA analysis. Mitigation would be required to minimize impacts, which would ensure that future project would not result in a considerable contribution such that a new significant cumulative impact related to visual resources or public views, or symbols or landmarks of value within the city. Therefore, cumulative impacts would be **less than significant**.

4.3.2 Air Quality

CUMULATIVE SETTING

The City is in the San Diego Air Basin (SDAB). The ambient concentrations of air pollutant emissions are determined by the amount of emissions released by the sources of air pollutants and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind atmospheric stability, and sunlight. The SDAB is designated as non-attainment status in the CAAQS and NAAQS for several types of air pollutants as described above in Chapter 3.2 Air Quality. Therefore, there is an existing significant cumulative air quality impact.

CUMULATIVE IMPACTS EVALUATION

The proposed measures identified in the CAP are not growth-inducing, nor are they substantial employment generators such that an increase in VMT would be included. While some measures may result in a temporary increase in the number of construction workers, workers would likely be from the San Diego region and permanent relocation would not be required. Furthermore, a co-benefit of many of the reduction measures is to improve air quality through reduction of criteria air pollutant emissions.

The CAP measures would result in minor air pollutant emissions during construction activities which would be mitigated at the time of permitting. Therefore, the CAP would not result in the violation of any air quality standard or result in a cumulative air quality impact. Given that the CAP would not induce substantial population growth or increase VMT, would result in beneficial impacts, and would not violate any air quality standards, the CAP would not result in a considerable contribution to the existing significant cumulative air quality impact. The project's cumulative air quality impacts would be **less than significant**.

4.3.3 Biological Resources

CUMULATIVE SETTING

The City is a participant in the County of San Diego Multiple Species Conservation Program (MSCP) which is a comprehensive habitat conservation planning program that addresses multiple species habitat needs and the preservation of native vegetation communities within southwestern San Diego County. The MSCP allows local jurisdictions to maintain land use control and development flexibility by planning a regional preserve system that can

meet future public and private project mitigation needs. Local jurisdictions implement their respective portions of the MSCP through subarea plans which describe specific implementing mechanisms.

Most of the City is developed with urban uses, and has no agricultural areas, forests, permanent streams, lakes, or beaches. The City consists primarily of buildings, paved roads, parking lots, and ornamental landscaping. As such, most of the City is not likely to support any native species, special-status species, or any natural habitat community. There are no identified Biological Core Areas or Linkages within the City, as identified in the County MSCP. However, the city is surrounded by hillsides that constitute the foothill of nearby mountain ranges. The City's General Plan recognizes open space and protects undeveloped hillside land through open space conservation policies. The City contains approximately 80 acres of smaller urban open spaces, parks, green belts, and common open space in residential developments. The City's General Plan polices and Municipal Code guide development such that no significant biological resources impacts are currently identified. Therefore, there are no existing significant cumulative biological resource impacts.

CUMULATIVE IMPACTS EVALUATION

Most future projects that would result from implementation of the CAP would be small in nature and would occur within the urbanized areas of the city. These project types would be required to comply with existing federal, State, and local regulations that protect sensitive resources and complete subsequent project-level planning and environmental review where applicable. Future projects would also be required to comply with the County MSCP. Therefore, the project would not result in a cumulatively considerable contribution such that a new significant cumulative impact would occur. Cumulative impacts would be **less than significant**.

4.3.4 Archaeological, Historical, and Tribal Cultural Resources

CUMULATIVE SETTING

Although a comprehensive inventory of historical, cultural, or tribal cultural resources has not been prepared, there are known resources within the City. Additionally, it is likely that other resources not yet evaluated within the City may be eligible for historic designation, and there is a high likelihood of discovering new, previously unidentified cultural or tribal resource within the City during construction activities. The City's General Plan policies and Municipal Code ordinances guide development projects such that potential significant impacts to cultural resources are minimized. Therefore, there are no existing significant cumulative cultural resource impacts.

CUMULATIVE IMPACTS DISCUSSION

Reduction measures identified in the CAP that would require construction of new or modification of existing structures could result in impacts to historical, archeological, or tribal cultural resources, if they are associated with improvements to a historical building or if the introduction of new infrastructure could disrupt the historical context of the resource or other resources in the vicinity. Future projects with potential to result in environmental impacts would result from the implementation of CAP would be required to undergo discretionary review by the City. The City is required to consult with appropriate Native American tribes to minimize or eliminate impacts to tribal cultural resources, and all potential impacts to archeological or historical resources would undergo project specific environmental review. Therefore, the project would not result in a cumulatively considerable contribution such that a new significant cumulative impact would occur. Cumulative impacts would be **less than significant**.

4.3.5 Energy

CUMULATIVE SETTING

Energy is primarily used to heat and cool buildings, and by vehicles for travel and transportation. California relies on a regional power system comprised of a diverse mix of natural gas, renewable, hydroelectric, and nuclear generation resources. One-third of energy commodities consumed in California is natural gas. SDG&E is the primary electric utility in the City and is powered by approximately 43 percent renewables, including biomass, solar, and wind. Energy generation and storage facilities within the City include the 48.7 MW Cuyamaca Peak Energy facility, 49.9 MW El Cajon Energy Center, and the 7.5 MW El Cajon Energy Storage Facility. On-road vehicles use about 90 percent of the petroleum consumed in California. The City's General Plan polices and Municipal Code ordinances guide development such that potential significant energy impacts are minimized. Therefore, there are no existing significant cumulative energy impacts.

CUMULATIVE IMPACTS EVALUATION

While other cumulative development within the City could result in the consumption of energy resources, all development would be required to comply with current building code requirements including requirements for achieving appropriate energy standards (e.g., Title 24 standards or better), and would be required to comply with the General Plan policies related to energy. Further, the project would not result in any significant cumulative energy impacts because the project would decrease the City's reliance on fossil fuels and would reduce energy consumption. Many of the GHG reduction measures proposed in the CAP would establish new standards and requirements that would be applicable to new development projects. Enforcement of these standards would reduce GHG emissions related to municipal and citywide operations and overall energy demand. Therefore, with implementation of the project, cumulative development would become more energy efficient. This would be a benefit of the project. Overall, implementation of the project would not result in a cumulative contribution such that a new significant energy impact would occur. Cumulative impacts would be **less than significant** and **beneficial**.

4.3.6 Greenhouse Gas Emissions and Climate Change

CUMULATIVE SETTING

GHGs are global pollutants contributing to climate change, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Effects of climate change include changes to average temperature and precipitation patterns. The total GHG inventory for California in 2016 was 429 million metric tons of carbon dioxide equivalent (MMT CO₂e) (CARB 2018a). This is less than the 2020 target of 431 MMT CO₂e (CARB 2018b:1). The quantity of GHGs in the atmosphere responsible for climate change is not precisely known. No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

CUMULATIVE IMPACTS EVALUATION

The issue of global climate change is inherently a cumulative issue, as the GHG emissions of individual projects cannot be shown to have any material effect on global climate. Impacts would be cumulative in nature if they lead to a substantial increase in GHG emissions, when combined with other development allowed under the City's General Plan and subsequent adopted plans and projects. The goal of the CAP is to reduce GHG emissions in the City consistent with state legislation. Emissions forecasts in the CAP are based on growth projections from SANDAG's regional growth model.

The discussions of GHG emissions generated by implementing the CAP and subsequent future projects, is also a cumulative impact discussion. GHG emissions from one project cannot, on their own, result in changes to climatic conditions; therefore, the emissions from one project must be considered in the context of their contribution to cumulative global emissions, which is a significant cumulative impact. GHG emissions resulting from the project would result in a net future reduction in GHG emissions compared with the existing condition and inherently consistent with the goals of the CAP which is a greenhouse gas reduction plan. Therefore, the project would not result in a considerable contribution to a significant cumulative GHG impact.

Overall, the CAP is intended to reduce GHG emissions by 2030 in the City, consistent with legislatively-adopted State target, by using alternatively fueled vehicles, reducing VMT, using renewable energy, reducing waste generation, reducing energy consumption, and increasing water conservation. The effects associated with the reduction of GHG emissions in the City would be beneficial. Thus, implementation of the GHG reduction measures would not generate GHG emissions, either directly or indirectly, that would make a considerable contribution to a significant cumulative impact. Cumulative impacts would be **less than significant**.

4.3.7 Noise

CUMULATIVE SETTING

Transportation noise sources within the City include roadways, trolleys, and the Gillespie Field airport. Interstate 8, State Route (SR) 125, and SR 67 are major sources of traffic noise in the City. Some roads, primarily those that serve as collectors and arterials, are also significant sources of traffic noise. Daytime noise levels were measured along several major roadways in the City, including the intersection of El Cajon Boulevard and Richfield Avenue, West Main Street and Richardson Avenue, and in the parking lot of the El Cajon Transit Center. Daytime noise levels in those areas range from 64 to 67 dB L_{eq} and are typical of an urban environment (City of El Cajon 2018). The City's General Plan polices and Municipal Code ordinances guide development such that potential significant noise impacts are minimized. Therefore, there are no existing significant cumulative noise impacts.

CUMULATIVE IMPACTS EVALUATION

Impacts would be cumulative in nature if operational noise associated with cumulative regional land use projects combined with projects related to the CAP would have the potential to expose noise sensitive land uses to excessive noise levels, groundborne vibration, or temporarily or permanently increase ambient noise levels to a level of significance. As described above in Section 3.7, "Noise", the CAP would result in implementation of a variety of small-scale project types such as electric vehicle charging stations, bicycle and pedestrian infrastructure, new rooftop PV solar systems, ground-mounted solar, and new/expanded waste facilities. Construction activities associated with the implementation of future projects have the potential to result in short-term construction activities, which would use heavy equipment such as excavators, graders, scrapers, bulldozers, backhoes, pile drivers, jackhammers, and concrete mixing trucks, and could result in temporary vehicle trips that generate noise. However, in general, future projects would not result in substantial short-term noise impacts due to the scale and nature of the construction activities, which are generally small, localized, and would require minimal use of heavy-duty construction equipment. Operational sources of noise associated with most future projects under the CAP would be minor (e.g., not increasing roadway- or railway-generated levels) and would be expected to occur within already urbanized environments, occurring nearby, or within, similar existing source types of noise (e.g., parking lots) or nearby to major sources (e.g., roadways, commercial areas). Thus, in general, projects implemented under the CAP would not result in the exposure of sensitive receptors to excessive noise levels over the existing environment. Future projects with the potential to result in environmental impacts would require discretionary review and projects would be conditioned to mitigate excessive noise related to construction activities or operations, thereby resulting in consistency with the City's Noise Ordinance. In addition, future projects would be required to be evaluated for project-specific impacts under CEQA at the time of application, where applicable, and project-specific mitigation would be required to minimize or avoid noise impacts to the extent feasible in compliance with CEQA Guidelines section 15126.4. Therefore, the project

would not result in a substantial contribution such that a new significant cumulative noise impact would occur. Cumulative noise impacts would be **less than significant**.

4.3.8 Transportation and Circulation

CUMULATIVE SETTING

The roadway system within the City of El Cajon includes three freeways; I-8, SR 125, and SR 67. SR 54 is not located within the City limits; however, it is included in the City's General Plan Circulation Element. I-8 is the main east-west interstate highway serving the San Diego metropolitan area. It begins in western San Diego County and travels east through the City of El Cajon and into Arizona. SR 125 is a toll road that extends from SR 54 and travels in the north-south direction along the western boundary of the City. The SR 125 provides access to Chula Vista, Downtown San Diego, East County, Otay Mesa, and Mexico. SR 67 extends from I-8 near the center of the City and extends north to SR 78 in the City of Ramona. SR 67 is mostly a two-lane mountainous route with passing lanes and expressway segments. The City's General Plan policies and Municipal Code ordinances guide development such that significant transportation impacts are minimized. Therefore, there are no existing significant cumulative transportation impacts.

The Metropolitan Transit System (MTS) provides bus and light rail trolley services to the City of El Cajon. A total of fifteen bus routes (Route 115, 815, 816, 833, 848, 864, 870, 872, 874, 875, 888, 891, 892, and 894) run through major corridors within the City. RideFACT provides dial-a-ride services to individuals who are 60 years and older. RideFACT services are available in all cities within San Diego County. The service is provided to seniors that do not have any other transportation options.

CUMULATIVE IMPACTS EVALUATION

Impacts would be cumulative if construction or operational impacts associated with cumulative regional land use projects would conflict with plans, or policies that enable circulation including all modes of travel; conflict with CEQA Guidelines Section 15064.3 subdivision (b);, or would result in design hazards, or inadequate emergency management. Physical improvements resulting from CAP implementation have the potential to combine with the physical impacts of past, present, or probable future projects in the City and could result in a cumulative impact based upon proximity and construction schedule. In general, projects resulting from the implementation of the CAP would be small, discrete active transportation projects that would have limited operational traffic-related impacts because they are not substantial employment generators and would not result in the construction of unplanned housing. It is possible that bicycle and pedestrian facilities could be temporarily closed during construction activities, but these would be short-term conditions and would not result in significant impacts. Additionally, these project types would result in improved operations and the overall functionality of the transportation network. All future projects with the potential to result in environmental impacts would be required to be evaluated for project-specific impacts under CEQA at the time of application and project-specific mitigation would minimize or eliminate design hazards and incompatible uses. Additionally, any streetscape improvements would be required to comply with Caltrans and local design guidelines for roadway facilities as applicable. Consistency with established General Plan policies, federal, State, and local roadway design regulations would be required. Compliance with these regulations and design guidelines, would ensure that roadway improvements promoted by the CAP would not result in a contribution such that a new significant cumulative traffic impact would occur. Cumulative impacts would be **less than significant**.

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5 ALTERNATIVES

5.1 INTRODUCTION TO ALTERNATIVES

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 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.

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 the El Cajon City Council. (See PRC sections 21081.5, 21081[a] [3].)

5.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

5.2.1 Attainment of Project Objectives

The fundamental purpose of the CAP is to provide a comprehensive roadmap to address the challenges of climate change in the City of El Cajon. Acting on climate change means both reducing GHG emissions from local sources in the City and helping the community to adapt to climate change and improve its resilience over the long term.

The City has developed the following objectives for the project:

- ▶ prepare a baseline GHG emissions inventory including municipal and community-wide sources of emissions in the City, and analyze the potential growth of these emissions over time;
- ▶ identify GHG reduction strategies and measures that reduce GHG emissions from activities in the City, along with climate adaptation measures that address the challenges of a changing climate and improve resilience in the city over the long term;
- ▶ reduce municipal and community-wide GHG emissions to meet the City's GHG reduction targets for 2020 and 2030; and
- ▶ provide an implementation strategy that provides guidance to the community on how to achieve consistency with the CAP and an overview of the CEQA tiering/streamlining options for future projects pursuant to the requirements of CEQA Guidelines section 15183.5(b)(2).

5.2.2 Summary of Project Impacts

Sections 3.1 through 3.8 of this Draft EIR address the environmental impacts of implementation of the CAP. Potentially feasible alternatives were developed with consideration of avoiding or lessening the significant, and potentially significant, adverse impacts of the project, as identified in Chapter 3 and 4 of this Draft EIR and summarized below. If an environmental issue area analyzed in this Draft EIR is not listed below, it is because no potentially significant or significant impacts were identified for that issue area. There were no significant, potentially significant, or significant and unavoidable environmental impacts identified in the Draft EIR.

5.3 ALTERNATIVES CONSIDERED BUT REJECTED FOR DETAILED ANALYSIS

Consistent with CEQA Guidelines section 15126.6(c), a brief discussion of those alternatives considered by rejected as infeasible is included below.

5.3.1 Alternative Location

The CAP is a programmatic approach to reduce GHG emissions within the City's jurisdiction in accordance with State GHG emissions reduction targets. The CAP accomplishes this by adopting measures that reduce GHG emissions. These GHG reduction measures would apply to all land within the City's jurisdiction and would not be limited to one area or property. Therefore, an alternative site where the project could be implemented would not be feasible or appropriate because the City 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 EIR.

5.3.2 Other Variations/Combinations of GHG Reduction Measures

The CAP includes 28 actions under 15 measures, all within the eight strategies, with supporting measures for each strategy, that the City would implement to reduce GHG emissions. Implementation of the CAP would result in total mass GHG emissions reduction of 33,000 MTCO₂e by 2030. The two sectors of GHG reductions where most significant impacts would result are the Energy Sector (measures associated with producing renewable energy and reducing building energy use) and the Waste and Water Sector (measures associated with increased water efficiency).

The City could consider varying degrees of implementation of each GHG reduction measure, to the degree implementation would be feasible to reach its ultimate 2030 target. However, the CAP that is proposed and evaluated throughout this Draft EIR has recommended the full spectrum of feasible GHG reduction measures at the levels that reductions can be feasibly attained, estimated, and substantiated. This Draft EIR has programmatically evaluated the potential environmental impacts of implementation of the suite of reduction measures based on the best available information regarding the technical and economic feasibility of those measures. These measures would be implemented in an adaptive management format, where implementation of the measures would be monitored on a periodic basis and adjustments to the CAP would be made as needed to ensure that consistent and demonstrated progress toward achieving reduction targets would occur. Therefore, this Draft EIR appropriately evaluates the landscape of environmental impacts that could potentially occur with all reduction measures considered.

The purpose of an alternatives analysis is to identify alternatives that reduce or avoid the significant impacts of the project. As summarized above and evaluated throughout the Draft EIR, environmental impacts were primarily associated with construction effects from implementation of many of the measures across all sectors and construction and operational impacts associated with implementation of renewable energy measures and expanded solid waste facilities. Because significant construction-related impacts would occur across all sectors, an alternative that would reduce the construction-related impacts in one sector, would require implementation of additional projects in another sector such that the overall magnitude and type of construction-related impacts would not change substantially. Within the context of CEQA, this would not offer an alternative that would reduce or avoid the environmental impacts of the project.

While commenters may suggest that certain GHG reduction measures be pursued, funded, or supported to a greater degree than others, as described above, the City has proposed a CAP that based on its assessment of local conditions, regulatory requirements, and feasibility, provides a full spectrum of feasible GHG reduction measures at levels that can be feasibly achieved and estimated based upon the information and technology available today. As described in CEQA Guidelines section 15126.6(a),

An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which 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.

The Draft EIR provides a reasonable range of alternatives for consideration by decisionmakers. The City has considered and evaluated the categories of alternatives that reduce or avoid the significant impacts of the project. As such, evaluation of additional combinations or levels of implementation of the GHG reduction measures is not required nor would it be meaningful to the analysis.

5.3.3 Net Zero by 2030 Alternative

The City's CAP is designed to reduce local GHG emissions by setting local GHG reduction targets and implementing local GHG reduction measures that are aligned with and complement State targets and actions, as established by AB 32, SB 32, and the 2017 Scoping Plan. As described in Chapter 2, Project Description, Executive Order S-3-05 recommends a longer-term 2050 statewide goal of reducing GHG emissions to 80 percent below 1990 levels. The City's CAP has set 2020 and 2030 targets. While the project would meet 2020 and 2030 emissions targets consistent with the State's targets, and some of the GHG reductions required to achieve the 2050 goal could be realized beyond

2030, additional reductions would be required to achieve 2050 GHG reduction goals for which the feasibility of, at this time, is unknown.

This alternative has been designed to accelerate achievement of additional GHG reductions, while also accelerating the timeframe for achieving such reductions in combination with a framework for offsetting emissions by 2030.

The CAP includes provisions to regularly monitor and adjust the CAP to ensure that the 2030 target would be met. The State has also established its intent to continue to make progress towards reducing statewide GHG reductions beyond 2030, and that future legislative actions will be required to do so. However, the 2017 Scoping Plan does not currently identify a feasible pathway to achieve any post-2030 statewide target.

With the exception of the State's action to mandate zero-net carbon electricity generation by 2045 required by SB 100 (2018), no other legislative actions are currently known that can be credited in a local CAP that would result in "net zero" emission levels in all sectors by 2030; thus, a CAP that achieves a "net zero" GHG emissions target by 2030 without known legislative actions would have to rely exclusively on known legislative actions in place, combined with aggressive local actions within a 10-year period, some of which may not be within the realm of technological feasibility or local jurisdictional authority.

The City contemplated additional actions that would be needed on a local level to achieve net zero emissions by 2030. The Net Zero by 2030 Alternative contemplates the acceleration of actions and activities the City could implement, either alone or in partnership with others, to achieve sufficient reductions needed to either (a) eliminate all GHG emissions by 2030 or (b) result in a combination of locally-based GHG reductions and GHG offsets sufficient to achieve a "net zero" GHG emission level by 2030.

While the CAP already includes a substantial menu of reduction measures in a variety of sectors designed to achieve a 2030 target that is aligned with SB 32 and the 2017 Scoping Plan, in general this alternative would require the City to expand many of the current GHG reduction measures or include additional measures that would achieve further reductions such that "net zero" would be achieved. Specifically, the following measures could be included as part of such an alternative.

ON-ROAD TRANSPORTATION AND OFF-ROAD EQUIPMENT SECTORS

- ▶ Expand measures that support, encourage, incentivize, or require alternative modes of transportation, primarily in the form of transit or other similar shared-mobility options, to further reduce trips and VMT beyond what is already assumed in the existing transportation GHG measures. However, under a Net Zero by 2030 Alternative, major transit service expansions or new transit services would need to be identified, funded, constructed (if applicable), and be operating at planned capacity by 2030. The feasibility of achieving this is unknown.
- ▶ The City does not have jurisdictional control over on-road vehicle emissions standards; only the State and federal governments have the authority to regulate vehicle emissions standards. Thus, any local acceleration of a transition to zero- or low-emission vehicles by the year 2030 must be incentive-based. The City could include new measures that further incentivize the conversion to cleaner vehicles, such as a local incentive program, or a regional incentive program coordinated with the local air district, that would encourage citizens to upgrade or exchange fossil fuel powered vehicles with zero-emission vehicles such as battery electric or fuel cell vehicles.

The State already provides similar incentives through programs such as the Clean Vehicle Rebate Program (CVRP), and a locally- or regionally-based incentive could be paired with CVRP incentives and federal tax credits to leverage increased participation beyond what would only be achieved through State rebates and federal tax credits or assumed fleet turnover under existing regulations. Any specific subsidy or incentive program would need to be developed through more detailed study and coordination with local and regional agencies and privately-owned automobile dealers.

While such a local or regional incentive program could result in some additional GHG reductions, it's unlikely that the scale of reductions achieved in the transportation sector by 2030 would be sufficient to achieve net zero emissions by 2030, without future legislative actions by the State to mandate more stringent emissions standards in new vehicles manufactured after 2025.

- ▶ Similar to on-road vehicles, the City does not have jurisdictional control over emissions standards for off-road vehicles and equipment. The City could develop incentive-based measures to encourage the conversion of off-road vehicles from fossil-fuel to battery electric or fuel-cell vehicles, beyond what is already included in the CAP for agricultural equipment and construction and mining equipment. Any specific subsidy or incentive program would need to be developed through more detailed study and coordination with local and regional agencies and privately-owned off-road vehicle or equipment dealers. The feasibility of such a program is unknown.

ENERGY SECTOR

- ▶ An additional measure could be added to the CAP to incentivize all-electric homes or buildings in all new development. The City does not have jurisdictional authority to mandate all-electric new construction or mandate the conversion of existing homes or buildings to all electric appliances or space heating because of federal and State preemption regarding energy sources in buildings. Local incentive-based programs could still be applied, however, and by doing so, the City would be able to achieve further GHG reductions tied to natural gas usage reductions in new and existing buildings, beyond what is achieved in the CAP.

While some measurable GHG reductions could be attributed to an incentive-based program, the City's limited jurisdictional authority to reduce or eliminate natural gas in new and existing buildings would still present a formidable barrier to achieving the scale of energy-sector GHG reductions required to achieve net zero GHG by 2030.

SOLID WASTE SECTOR

- ▶ Increase citywide waste diversion goals to 100 percent by 2030 for all waste types. Organic waste will soon be the subject of regulations that would require diversion pursuant to SB 1383; however, SB 1383 does not require 100 percent organic waste diversion by 2030. Because the City's waste stream is not directly within the City's jurisdictional control, it would be speculative to assume that an aggressive 2030 goal that exceeds SB 1383 targets would be feasible, without further study and coordination with existing waste management agencies.

While it may be possible to accelerate the implementation of some projects to achieve additional GHG reductions by 2030 to make progress beyond that year, the complexity and feasibility of many of the projects is unknown and the jurisdictional and legal responsibility for such projects is not within the City's control. . To achieve net zero emissions by 2030 would require the City to implement all GHG reduction measures included in the CAP plus additional new or modified measures identified above. Ultimately, the City would need to dedicate additional resources and funding towards implementation of these measures, the feasibility of which is unknown and partly reliant upon State legislation that has yet to be implemented and whose timing of implementation is unknown. Further, the additional menu of projects that would be required by 2030, assuming they are feasible, would result in a greater level of construction and development activity compared to the project. This activity would increase the level of construction- and operational-related impacts that would occur throughout the City. While this alternative would have greater GHG benefits than the project, it would not fulfill CEQA's mandate of identifying an alternative that reduces or avoids the significant effects of a project. Further, because the feasibility of whether a net zero emissions standard could be achieved based on the technology and legislative requirements available today is not known, the City has rejected this alternative from further evaluation.

5.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

As indicated by the objectives listed above, the project is designed to achieve consistency with state law regarding GHG emissions reduction targets. The CAP is intended to reduce GHGs by improving multi-modal transportation options, promoting the use of alternative fuels, increasing building energy efficiency, and increasing waste diversion.

A total of two representative alternatives, including the CEQA required No Project Alternative, are evaluated in this Draft EIR. For each alternative, a brief discussion of its principal characteristics is followed by an analysis of anticipated environmental impacts. The emphasis of the analysis is on the alternative's relative adverse effects compared to the project and a determination of whether the alternative would reduce, eliminate, or create new or greater significant impacts. The analysis also considers each alternative's potential achievement of project objectives. The alternatives are described below.

5.4.1 No Project Alternative

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the environmental impacts of the No Project Alternative, to examine and compare the potential environmental consequences associated with not approving the CAP.

This alternative assumes that development would occur under the existing 1991 El Cajon General Plan as adopted, but without a qualified CAP as a mechanism to mitigate the GHG emissions that are resultant from the build-out of the 1991 General Plan.

DESCRIPTION AND SETTING

The No Project Alternative assumes that the CAP would not be adopted or implemented. As a result, the City would not adopt measures to reduce GHG emissions in accordance with state-legislated reduction targets. Existing conditions for each environmental issue as described in Chapter 3.0 of this Draft EIR would be unchanged.

Under the No Project Alternative, none of the GHG reduction measures set forth by this CAP would be implemented to reduce GHG emissions from buildout of the General Plan. While new development in the City would continue to be reviewed for project consistency with screening levels established by the guidance provided by California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change White Paper (2008), energy efficiency and GHG reduction measures at the level anticipated under the CAP would likely not be implemented. While individual projects would need to demonstrate compliance with applicable regulations, a mechanism by which the City could enforce reductions (i.e., ordinance and policy adoption) and ensure communitywide targets could be met would not be in place. The City also would not have a tracking and monitoring system in place to monitor its progress towards achieving state reduction targets. Without a CAP, individual projects would be responsible for demonstrating GHG reductions on a project-by-project basis through a variety of mechanisms (e.g., design features, offsets, incentives).

COMPARISON OF THE EFFECTS OF THE NO PROJECT ALTERNATIVE TO THE SIGNIFICANT EFFECTS ASSOCIATED WITH THE CAP

Under the No Project Alternative, the City would not have a program in place to meet the 2030 target. In addition, without a CAP in place, the No Project Alternative would not achieve any of the EIR's project objectives and would not provide a streamlining mechanism for future development projects to evaluate their GHG impacts.

Under the No Project Alternative, compliance with legislative requirements would be achieved through individual project-level analysis for all development projects subject to discretionary review. As a result, many of the physical environmental impacts identified in the Draft EIR could still occur.

While GHG impacts would be assessed on a project-by-project basis, without the project in place, it may be more difficult for the City to achieve compliance and could result in inconsistencies with legislative requirements. Therefore, this alternative could result in greater GHG impacts. Further, this alternative would not provide a streamlining mechanism for future development projects to evaluate their GHG impacts and would not advance any of the project objectives. This alternative would result in the same suite of environmental impacts as the project but could potentially result in greater GHG impacts because a consistent mechanism by which GHG reduction measures are implemented on a project-by-project basis would not be provided.

5.4.2 Alternative 2: Rooftop Solar for Commercial Properties Alternative

While no significant environmental impacts would occur with implementation of the CAP, many of the GHG reduction measures would result in construction- and operational-related environmental impacts as described throughout this Draft EIR. To reduce or eliminate the impacts associated with larger construction projects, this alternative would modify GHG Reduction Measure RE-1 to require that solar systems be installed on all new or modified commercial rooftops throughout the City as part of the discretionary approval process. This alternative would not replace renewable energy measures. Commercial solar systems are small-scale power generation and storage systems that are located close to the source and are typically 1kW to 10,000 kW in size. Often these systems are located on rooftops or consist of small ground-mounted systems.

This alternative would instead require the construction of solar systems on new commercial construction or modifications to commercial properties throughout the City. This alternative would increase GHG reductions through increased installations of distributed generation systems that are not currently assumed in the CAP and would offset the need to construct a comparable amount of other GHG reduction measures that would have larger-scale construction impacts. Distributed generation systems are typically small in scale and located in urban areas. As such, construction-related environmental impacts would be minimal. In addition, because of their small size, no routine management or maintenance of the systems are required and, therefore, would not have any associated operational impacts. As a result, incentivizing and relying on distributed generation systems for additional GHG emissions reductions could reduce construction and operational impacts compared to the current suite of GHG reduction measures in the CAP.

Upon approval, new development in the City would be reviewed for consistency with the CAP and may be eligible for a streamlined environmental review under CEQA Guidelines section 15183.5. All energy efficiency or renewable energy measures would be implemented as described under the CAP, which would result in a reduction of energy consumption and the production of associated GHG emissions. Under this alternative, the City would reduce community-wide and City operations GHG emissions in compliance with State-legislative targets, would meet the 2020 and 2030 reduction targets of the CAP, and would achieve the same level of GHG reductions compared to the project. Therefore, the Rooftop Solar for Commercial Properties Alternative would achieve all project objectives and would reduce GHG emissions in the City consistent with State legislative requirements.

COMPARISON OF THE EFFECTS OF THE DISTRIBUTED GENERATION ALTERNATIVE TO THE SIGNIFICANT EFFECTS ASSOCIATED WITH THE CAP

Aesthetics: This alternative would result in an increase in the number of commercial rooftop PV solar projects that would occur throughout the City. As described for the project, rooftop solar projects would have less-than-significant scenic vista, scenic resource, and nighttime lighting and glare impacts because infrastructure improvements would occur within developed facilities or in areas designated for such uses. Further, all development proposals with the potential to result in environmental impacts would be required to undergo review by the City and would be required to comply with adopted City policies that would minimize visual resources impacts. Under this alternative, fewer large-scale construction activities would be required for a comparable amount of other GHG reduction measures (e.g., solid waste facilities, transportation improvements, etc.), because reliance on these measures would not be

needed to meet the 2030 reduction target. Further no operational impacts would occur. The types of visual impacts that would occur under this alternative would be similar to the project because the same suite of remaining GHG reduction measures would be implemented; however, it is likely that the number of projects producing significant visual impacts from either construction or operational activities would be less. This alternative would have less-than-significant scenic vista, scenic resource, and nighttime lighting and glare impacts and would not have a considerable contribution to significant cumulative impacts, similar to the project. Overall, visual resources impacts would be less under this alternative.

Air Quality: This alternative would result in an increase in the number of rooftop PV solar projects that would occur on commercial facilities throughout the City. As described for the project, rooftop PV solar projects would have less-than-significant air quality impacts because infrastructure would be limited in size, would not generate emissions, would have limited construction requirements, and would occur within developed facilities. Minimal land disturbance would be required. Under this alternative, fewer large-scale construction activities would be required for a comparable amount of other GHG reduction measures (e.g., solid waste facilities, transportation improvements, etc.), because reliance on these measures would be needed to meet 2030 reduction target. As such, fewer projects that could result in significant construction and operational-related air quality impacts would occur. The types of air quality impacts that would occur under this alternative would be similar to the project because the same suite of remaining GHG reduction measures would be implemented; however, it is likely that number projects producing significant air quality impacts from either construction or operational activities would be less. This alternative would have less-than-significant air quality impacts and would not have a considerable contribution to significant cumulative impacts, similar to the project. Overall, air quality impacts would be less under this alternative.

Biological Resources: This alternative would result in an increase in the number of rooftop PV solar projects that would occur on commercial facilities throughout the City. As described for the project, rooftop PV solar projects would have less-than-significant biological impacts because infrastructure would be limited in size and would occur within developed facilities. Minimal land disturbance would be required. Under this alternative, fewer large-scale construction activities would be required for a comparable amount of other GHG reduction measures (e.g., solid waste facilities, ground-mounted solar, and transportation improvements, etc.), because reliance on these measures would be needed to meet 2030 reduction target. As such, fewer projects that could result in significant construction and operational-related biological impacts would occur. The types of biological impacts that would occur under this alternative would be similar to the project because the same suite of remaining GHG reduction measures would be implemented; however, it is likely that number projects producing significant biological impacts from either construction or operational activities would be less. This alternative would have less-than-significant biological impacts and would not have a considerable contribution to significant cumulative impacts, similar to the project. Overall, biological impacts would be less under this alternative.

Cultural Resources: This alternative would result in an increase in the number of rooftop PV solar projects that would occur on commercial facilities throughout the City. As described for the project, rooftop PV solar projects would have less-than-significant cultural resources impacts because infrastructure would be limited in size and would occur within developed facilities. Minimal land disturbance would be required. Under this alternative, less large-scale construction activities would be required for other GHG reduction measures (e.g., solid waste facilities, ground-mounted solar, and transportation improvements, etc.), because less reliance on these measures would be needed to meet 2030 reduction target. As such, fewer projects that could result in significant construction-related cultural resources impacts would occur. The types of cultural resource impacts that would occur under this alternative would be similar to the project because the same suite of remaining GHG reduction measures would be implemented; however, it is likely that the number of projects producing significant cultural resources impacts from either construction or operational activities would be less. This alternative would have less-than-significant cultural resources impacts and would not have a considerable contribution to significant cumulative impacts, similar to the project. Overall, cultural resources impacts would be less under this alternative.

Energy: This alternative would result in an increase in the number of rooftop PV solar projects that would occur on commercial facilities throughout the City. As described for the project, rooftop PV solar projects would have less-than-significant energy impacts because they would use renewable resources to power commercial facilities and they

would support strategies related to renewable energy, the supply and reliability of electricity, and achieving climate targets. The project also would result in the efficient use of energy resources to achieve climate targets. This alternative would result in similar energy impacts compared to the project.

Greenhouse Gas Emissions: This alternative would result in an increase in the number of rooftop PV solar projects that would occur on commercial facilities throughout the City. As described for the project, rooftop PV solar projects would have less-than-significant GHG impacts because infrastructure would be limited in size and would require minimal construction activities. As described for the project, no significant GHG impacts would occur related to 2020 and 2030 targets because while individual measures may have GHG emissions associated with construction or operation, the overall purpose of the measures would be to reduce the amount of GHG emissions citywide, and achieve the GHG emission reduction targets identified in the CAP. Therefore, this alternative would result in similar GHG impacts compared to the project.

Noise: This alternative would result in an increase in the number of rooftop PV solar projects that would occur on commercial facilities throughout the City. As described for the project, rooftop PV solar projects would have less-than-significant noise impacts because infrastructure would be limited in size and would occur within existing developed facilities. Minimal construction would be required and would be conducted in compliance with the City's noise ordinance. No operational noise impacts would occur under this alternative, fewer large-scale construction operational activities would be required for a comparable amount of other GHG reduction measures (e.g., solid waste facilities, transportation improvements, etc.), because reliance on these measures would be needed to meet 2030 reduction target. As such, fewer projects that could result in significant construction-related noise impacts would occur. The types of noise impacts that would occur under this alternative would be similar to the project because the same suite of remaining GHG reduction measures would be implemented; however, it is likely that number projects producing significant noise impacts from either construction or operational activities would be less. This alternative would have less-than-significant noise impacts and would not have a considerable contribution such that a new significant cumulative noise impact would occur, similar to the project. Overall, noise impacts would be less under this alternative.

Transportation: This alternative would result in an increase in the number of rooftop PV solar projects that would occur on commercial facilities throughout the City. As described for the project, rooftop PV solar projects would have less-than-significant transportation impacts because infrastructure would be limited in size and would occur within existing developed facilities. Minimal land disturbance would be required, and no operational impacts would occur. Under this alternative, less large-scale construction and operational activities would be required for other GHG reduction measures (e.g., solid waste facilities, transportation improvements, etc.), because less reliance on these measures would be needed to meet 2030 reduction target. As such, fewer projects that could result in significant construction-related traffic impacts would occur. The types of traffic impacts that would occur under this alternative would be similar to the project because the same suite of remaining GHG reduction measures would be implemented; however, it is likely that number projects producing significant traffic impacts from either construction or operational activities would be less. This alternative would have less-than-significant traffic impacts and would not have a considerable contribution to significant cumulative traffic impacts, similar to the project. Overall, traffic impacts would be less under this alternative.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines section 15126.6(e)(2) requires that if an EIR determines that the No Project Alternative is environmentally superior to the project, the EIR must identify an environmentally superior alternative among the other alternatives considered. Table 5-1 provides a summary comparison of the impacts of the project and alternatives. As described above, the No Project Alternative would not be environmentally superior to the project because it would not meet SB 32 reduction targets and would not reduce any of the project's impacts. Therefore, this alternative would result in a new significant GHG impact that was not previously identified for the project.

Based on review of the other alternatives considered, the City has determined that the Rooftop Solar for Commercial Properties Alternative would be environmentally superior to the project because it would reduce impacts related to

construction and operation of larger-scale GHG reduction measures (e.g., solid waste facilities, transportation improvements, etc.) while still achieving both the primary objective of GHG emissions reductions consistent with SB 32 and all other supporting project objectives.

Table 5-1 CAP Alternatives Comparison of Impacts

Environmental Topic	Proposed Project	Alternative 1: No Project	Alternative 2: Rooftop Solar for Commercial Properties Alternative
Aesthetics	LTS	▼	▼
Air Quality	LTS	▼	▼
Biological Resources	LTS	▼	▼
Archaeological, Historical, and Tribal Cultural Resources	LTS	▼	▼
Energy	LTS	▲	—
Greenhouse Gas Emissions and Climate Change	LTS	▲	—
Noise	LTS	▼	▼
Transportation/Traffic	LTS	▼	▼
<p>▲ Alternative is likely to result in greater impacts to issue when compared to project.</p> <p>— Alternative is likely to result in similar impacts to issue when compared to project.</p> <p>▼ Alternative is likely to result in reduced impacts to issue when compared to project.</p> <p>LTS Less than Significant with mitigation measures</p>			

6 OTHER CEQA SECTIONS

6.1 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 21100(b)(2)(A) of the State CEQA Guidelines provides that an EIR shall include a detailed statement setting forth "in a separate section: any significant effect on the environment that cannot be avoided if the project is implemented."

Sections 3.1 through 3.8 of this Draft EIR describe the potential environmental impacts of the project and recommend various mitigation measures to reduce impacts. Chapter 4, "Cumulative Impacts," determines whether the incremental effects of this project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. No significant and unavoidable impacts were identified in the Draft EIR.

6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines (section 15126) require a discussion of the significant irreversible environmental changes that would be involved in a project should it be implemented. The irreversible and irretrievable commitment of resources is the permanent loss of resources for future or alternative purposes. Irreversible and irretrievable resources are those that cannot be recovered or recycled or those that are consumed or reduced to unrecoverable forms.

The Draft EIR includes a comprehensive evaluation of energy use related to the project in Section 3.5, "Energy." The primary focus of the project is to reduce community and City operations GHG emissions to meet the City's GHG reduction targets for 2020 and 2030. The measures encourage improvements to alternative transportation infrastructure, energy efficiency, and waste processing, and some of the measures may indirectly result in the construction of some improvements which would require the use of fuel and building materials during construction; however, the result of the improvements would be a long-term reduction in energy consumption and a reduction in the use of nonrenewable energy sources. Continued operation and maintenance of some of the facilities may require the use of additional fuel and water consumption; however, such use would be insignificant compared to the overall reduction in use of these resources that would result from CAP implementation. Therefore, no significant irreversible environmental changes would occur.

6.3 GROWTH-INDUCING IMPACTS

6.3.1 CEQA Requirements

CEQA specifies that growth-inducing impacts of a project must be addressed in an EIR (CCR section 21100[b][5]). Specifically, section 15126.2(d) of the State CEQA Guidelines states that the EIR shall:

Discuss the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Direct growth inducement would result if a project involved construction of new housing, which would facilitate new population to an area. Indirect growth inducement would result, for instance, if implementing a project resulted in any one or more of the following:

- ▶ substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- ▶ substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; or
- ▶ removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

The State CEQA Guidelines do not distinguish between planned and unplanned growth for purposes of considering whether a project would foster additional growth. Therefore, for purposes of this Draft EIR, to reach the conclusion that a project is growth inducing as defined by CEQA, the Draft EIR must find that it would foster (i.e., promote, encourage, allow) additional growth in economic activity, population, or housing, regardless of whether the growth is already approved by and consistent with local plans. The conclusion does not determine that induced growth is beneficial or detrimental, consistent with section 15126.2(d) of the State CEQA Guidelines.

If the analysis conducted for the EIR results in a determination that a project is growth-inducing, the next question is whether that growth may cause adverse effects on the environment. Environmental effects resulting from induced growth (i.e., growth-induced effects) fit the CEQA definition of “indirect” effects in section 15358(a)(2) of the State CEQA Guidelines. These indirect or secondary effects of growth may result in significant environmental impacts. CEQA does not require that the Draft EIR speculate unduly about the precise location and site-specific characteristics of significant, indirect effects caused by induced growth, but a good-faith effort is required to disclose what is feasible to assess. Potential secondary effects of growth could include consequences – such as conversion of open space to developed uses, increased demand on community and public services and infrastructure, increased traffic and noise, degradation of air and water quality, or degradation or loss of plant and wildlife habitat – that are the result of growth fostered by the project.

The decision to allow/approve projects that result from induced growth (e.g., new commercial areas, new housing) is the subject of separate discretionary processes by individual lead agency(ies) responsible for considering such projects, in this case, the El Cajon Planning Commission or the El Cajon City Council. Projects resulting from induced growth would themselves be discretionary and subject to CEQA. Therefore, the following discussion is intended to disclose the potential for environmental effects that could occur more generally because of the project rather than the site-specific impacts of induced growth. Its purpose is to inform the City decision-making body that additional environmental effects may be a possibility if growth-inducing projects are approved. However, the decision of whether projects are approved, and the impacts associated with them still rests with the City decision-making body at such times as complete applications for development are submitted.

6.3.2 Growth-Inducing Impacts of the Project

The CAP is not by itself directly growth inducing because it does not increase densities or modify intensities of allowable land uses. Approval and implementation of the project may result in improvements to alternative modes of transportation, including bicycle and pedestrian infrastructure but would not increase access to any areas within the City such as constructing new roadways. Similarly, the project would not result in the expansion of a wastewater treatment plant or eliminate any other constraint to development. Therefore, implementation of the CAP would not remove any obstacles to growth which could result in growth inducement.

As described above, the CAP is a plan to reduce GHG emissions consistent with state legislation and does not directly result in the construction of any improvements. However, implementation of the project would likely result in some capital improvements on behalf of the City and may result in incentivization of energy efficiency and renewable energy improvements, expansion of alternatively fueled vehicles, and expansion of composting facilities. These actions would result in a small number of new jobs, specifically related to construction services, but are not expected

to result in a substantial increase in the demand for additional housing or services. These jobs would likely be filled from the existing labor pool within the City, and are, therefore, not expected to be growth inducing.

The project would result in the adoption and implementation of GHG reduction measures that would need to be undertaken to reduce GHG emissions consistent with state legislative requirements. The project would not result in growth inducing impacts associated with removing obstacles to growth, such as the extension of a roadway, or expansion of water and sewer services. Similarly, the project would not result in the expansion of public services.

Therefore, the project would not result in direct growth inducement related to land use changes. Finally, although the project may result in a small increase in jobs related to the expansion of alternative transportation, energy, and composting infrastructure, it is not expected to be growth inducing because the locally available labor pool is anticipated to be able to fill any resultant positions.

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7 LIST OF PREPARERS

LEAD AGENCY

City of El Cajon

Melissa Devine.....Senior Planner
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PREPARERS OF THE ENVIRONMENTAL DOCUMENT

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Chapter 5 Alternatives

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Chapter 6 Other CEQA Sections

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Appendix A

Notice of Preparation and Comments



CITY OF EL CAJON COMMUNITY DEVELOPMENT DEPARTMENT

NOTICE OF SCOPING MEETING AND PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

Date: February 28, 2019

To: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations, and Interested Persons

Lead Agency: City of El Cajon, Community Development Department
200 Civic Center Way, 3rd Floor
El Cajon, CA 92020
Contact: Melissa Devine or Lorena Cordova, Project Managers
Phone: 619-441-1742
E-Mail: mdevine@cityofelcajon.us or lcordova@cityofelcajon.us

Project Title: El Cajon Climate Action Plan

Project Location: Encompasses the entire jurisdiction of the City of El Cajon

Project Applicant: City of El Cajon

SCOPING MEETING

On March 18, 2019 starting at 6:00 P.M, the City of El Cajon Community Development Department will conduct a public scoping open house to solicit input and comments from public agencies and the general public on the proposed Draft Environmental Impact Report (EIR) for the El Cajon Climate Action Plan.

This meeting will be held at the Renette Recreation Center in the Meeting Room West, located at 935 Emerald Avenue, El Cajon, CA 92020. The open house meeting will run from 6:00 P.M. to 7:00 P.M., and interested parties may drop in during this time to discuss the project and submit verbal or written comments on the scope of the Draft EIR during the meeting. Representatives from the Community Development Department and the EIR consultant will be available to address questions regarding the EIR process.

Information is also available at: www.cityofelcajon.us/cap.

If you have any questions regarding this scoping meeting, please contact Melissa Devine or Lorena Cordova, Project Managers, via e-mail mdevine@cityofelcajon.us or lcordova@cityofelcajon.us or phone 619-441-1742.

NOTICE OF PREPARATION (NOP)

In accordance with the California Environmental Quality Act (CEQA), this is to notify public agencies and the general public that the City of El Cajon, as the Lead Agency, will prepare an EIR for the El Cajon Climate Action Plan (project). The City is interested in the input and/or comments of public agencies as to the scope and content of the environmental information that will be studied in connection with the project. Public agencies may need to use the EIR prepared by the City when considering applicable permits or other approvals for the project. The general public is also encouraged to provide input on the scope of the EIR.

NOP Comment Period

Due to the time limits mandated by state law, your response must be sent at the earliest possible date but not later than 5:00 P.M. on April 1, 2019. Please send your response to the City of El Cajon Community Development Department, c/o Melissa Devine, at the above address.

Project Background

The City of El Cajon proposes to prepare and adopt a Climate Action Plan (CAP) to both reduce greenhouse gas (GHG) emissions and help the community adapt to the effects of climate change in the City, consistent with State and local guidance. A CAP is a document that includes policies, measures, and strategies to reduce GHG emissions and adapt to climate change, as well as to improve the health, safety, mobility, and livability of the greater community. The objectives of the CAP are to reduce GHG emissions, streamline project reviews consistent with CEQA by serving as a “qualified GHG reduction plan” under CEQA Guidelines Section 15183.5, provide strategies for the community to use in adapting to the effects of climate change, and prioritize measures to comply with California environmental and land use planning laws.

Project Area

The City of El Cajon is in eastern San Diego County, east of the cities of San Diego and La Mesa, south of the City of Santee and about 15 miles inland (Figure 1).

The planning area for the CAP is the entire City of El Cajon, which encompasses approximately 14.4 square miles (Figure 2).

Project Description

The CAP has been prepared to be consistent with the requirements of AB 32 (2006), which tasked the California Air Resources Board (ARB) with developing a Climate Change Scoping Plan to establish an interim target to achieve 1990 levels of GHG emissions by 2020 and provide a path for local governments to contribute to the GHG reductions necessary to achieve the target and SB 32 (2016), which requires a 2030 statewide GHG reduction target of 40 percent below 1990 levels.

To achieve these objectives and align with the State’s 2020 and 2030 targets, the CAP will:

- ▶ include a summary of baseline GHG emissions and forecasted growth of these emissions in 2020 and 2030;
- ▶ identify GHG emissions reduction targets and goals to reduce the City’s GHG emissions in 2020 and 2030; and
- ▶ identify and evaluate strategies, measures, and actions to comply with statewide GHG reduction targets and goals.

The CAP will also be used for future project-specific environmental documents by maintaining consistency with the tiering and streamlining provisions of Section 15183.5 of the State CEQA Guidelines. Where projects are determined to be consistent with the CAP, the EIR will provide the appropriate level of environmental review to allow future projects to tier from and streamline their analyses of GHG emissions pursuant to CEQA Guidelines Section 15183.5(b)(2).

As part of ongoing implementation and monitoring of the CAP, the CAP strategies, measures, and actions will be assessed and monitored. Reporting on the status of the actions, periodic updates to the GHG emissions inventory, and other monitoring activities will provide the mechanisms to ensure that the City is making progress towards the CAP’s stated goals.

The CAP will also include provisions for how the City’s operations contribute to GHG reductions through local actions and operations.

The CAP will consider GHG reduction strategies for the following sectors:

- | | |
|---|------------------------|
| ▶ On-Road Transportation | ▶ Solid Waste |
| ▶ Off-Road Transportation | ▶ Water and Wastewater |
| ▶ Building Energy (Electricity & Natural Gas) | |

The proposed GHG Reduction Measures and Adaption Measures under consideration for inclusion in the Draft CAP are listed in Attachment A of this NOP. This list of proposed measures is a good faith attempt at disclosing project details at the time the NOP is prepared, and the list may be modified or changed in the Draft CAP document or as a result of public comments on the Draft CAP.

ACTIONS REQUIRED:

Adoption of the CAP and Certification of the EIR

ENVIRONMENTAL IMPACT REPORT:

Pursuant to CEQA and California Code of Regulations (CCR) Section 15064, the discussion of potential effects on the environment in the EIR shall be focused on those impacts that the City has determined may be potentially significant. The EIR will also evaluate the cumulative impacts of the project when considered in conjunction with other related past, current, and reasonably foreseeable future projects. The City has determined that the project could result in potential environmental impacts in the following topic areas, which will be further evaluated in the EIR:

- ▶ Aesthetics,
- ▶ Air Quality,
- ▶ Biological Resources,
- ▶ Cultural and Tribal Cultural Resources,
- ▶ Greenhouse Gas Emissions,
- ▶ Energy,
- ▶ Noise, and
- ▶ Transportation and Traffic.

CEQA allows a lead agency to limit the detail of discussion of the environmental effects that are not considered potentially significant (PRC Section 21100, CCR Sections 15126.2[a] and 15128). CEQA requires that the discussion of any significant effect on the environment be limited to substantial, or potentially substantial, adverse changes in physical conditions that exist within the affected area, as defined in PRC Section 21060.5 (statutory definition of "environment"). Environmental issue areas scoped out of the focused EIR will include an explanation of why these issues would not result in significant environmental effects and are not required to be evaluated further. Environmental issue areas that would be scoped out of the focused EIR are listed below.

- ▶ Agricultural and Forest Resources
- ▶ Geology and Soils
- ▶ Hazards and Hazardous Materials,
- ▶ Hydrology and Water Quality
- ▶ Land Use and Planning
- ▶ Mineral Resources
- ▶ Population and Housing
- ▶ Public Services
- ▶ Recreation, and
- ▶ Utilities and Service Systems

Alternatives to be Evaluated in the EIR

In accordance with the State CEQA Guidelines (14 CCR Section 15126.6), the EIR will describe a range of reasonable alternatives to the project that are capable of meeting most of the project's objectives and that would avoid or substantially lessen any of the significant effects of the project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The EIR will provide an analysis of the No Project Alternative and will also identify the environmentally superior alternative.

DOCUMENTS AVAILABLE FOR PUBLIC REVIEW

The NOP is available for public review at the following locations:

City of El Cajon
Community Development Dept.
200 Civic Center Way
El Cajon, CA 92020

El Cajon Branch Library
201 East Douglas Ave
El Cajon, CA 92020

Fletcher Hills Branch Library
576 Garfield Avenue
El Cajon, CA 92020

The NOP is also available for public review online at: www.cityofelcajon.us/cap

Figures

Figure 1: Regional Map

Figure 2: Planning Area

Attachments

Attachment A: Proposed GHG Reduction Strategies, Measures, and Actions under Consideration

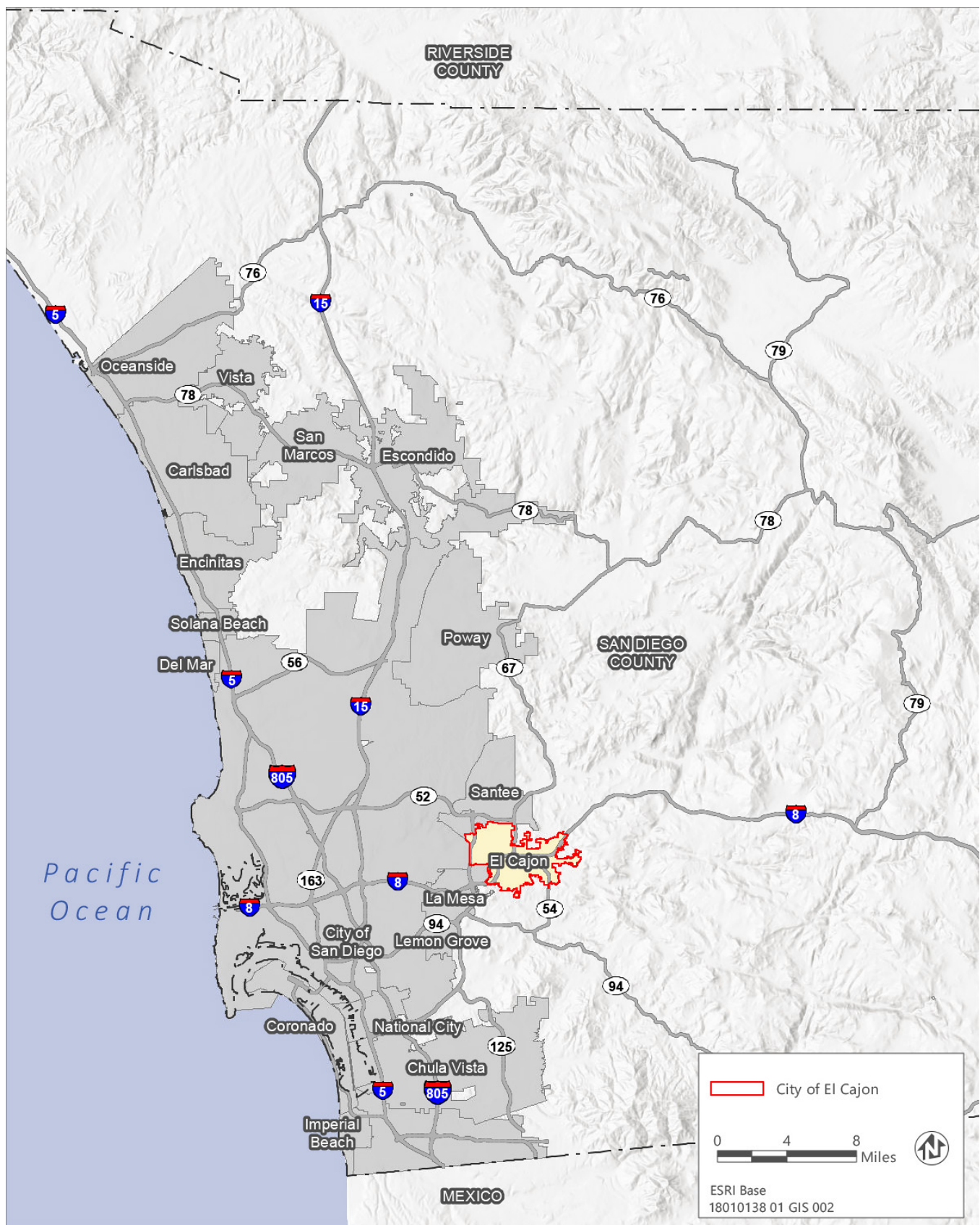


Figure 1 Regional Location

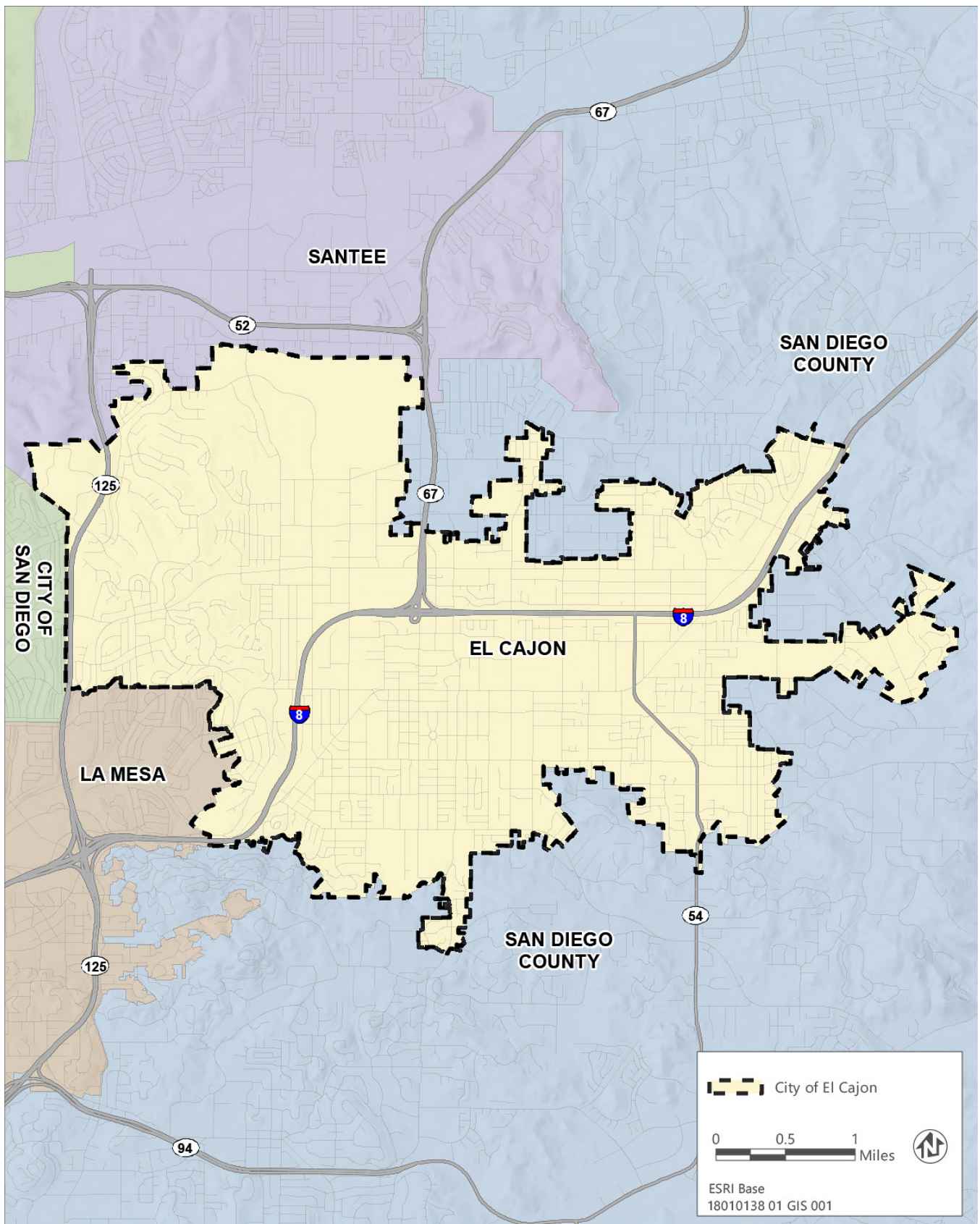


Figure 2 Planning Area

Attachment A

Proposed GHG Reduction Strategies,
Measures, and Actions Under
Consideration

Number	GHG Strategies, Measures, and Actions
Strategy 1	Increase Use of Zero Emission/Alternative Fuel Vehicles
T-1	Transition to a More Fuel-Efficient Municipal Vehicle Fleet
T-1.1	Develop a Fleet Management Program
T-2	Increase Electric Vehicle and Electric Vehicle Charging Infrastructure Citywide
T-2.1	Install Electric Vehicle Charging Stations
T-2.2	Incentivize the Installation of Electric Vehicle Charging Stations
T-2.3	Increase Preferential Parking Spaces
T-2.4	Convert School Bus Fleet to Electric
Strategy 2	Reduce Fuel Use
T-3	Improve Fuel Use Efficiency Through Transportation Systems Management
T-3.1	Increase the Number of Synchronized Traffic Lights and Roundabouts
T-4	Improve Fuel Use Efficiency in Construction Equipment
T-4.1	Increase Renewable and Alternative Fuel in Construction Equipment
Strategy 3	Reduce Vehicle Miles Traveled
T-5	Increase Use of Alternative Modes of Travel
T-5.1	Increase Alternative Modes of Travel Through Transportation Demand Management
T-6	Encourage Active Transportation
T-6.1	Complete an Active Transportation Plan
T-7	Reduce Household Vehicle Miles Traveled Through Smart Growth Development
T-7.1	Increase Residential Dwelling Units in Transit Oriented Development Areas
T-7.2	Encourage Development in Mixed-Use Residential Overlay Areas
T-7.3	Implement the Transit District Specific Plan
T-7.4	Transition to an Online Submittal Permitting System
Strategy 4	Increase Building Energy Efficiency
BE-1	Increase Residential Building Efficiency
BE-1.1	Require Energy Audits of Existing Residential Additions
BE-1.2	Continue the Critical Home Repair Program
BE-2	Increase Commercial Building Efficiency
BE-2.1	Require Energy Audits of Non-Residential Additions
BE-3	Increase Municipal Operation Energy Efficiency
BE-3.1	Continue Energy Efficiency Projects in Municipal Facilities
BE-3.2	Retrofit High Pressure Sodium Street Lights
Strategy 5	Increase Renewable Energy
RE-1	Increase Behind-the-Meter Renewable Energy Supply
RE-1.1	Incentivize Photovoltaic Installation on Commercial Buildings
RE-1.2	Install Photovoltaic Systems at School Sites
RE-2	Increase Grid Renewable Electricity
RE-2.1	Establish or Join a Program that Increases Renewable Electricity Supply
Strategy 6	Increase Water Efficiency

Number	GHG Strategies, Measures, and Actions
WE-1	Increase Outdoor Water Efficiency
WE-1.1	Require Covers on New Pools
WE-1.2	Require Weather-Based Irrigation Systems
Strategy 7	Reduce and Recycle Solid Waste
SW-1	Reduce Solid Waste and Increase Recycling
SW-1.1	Implement Solid Waste Reduction and Recycling Targets
Strategy 8	Carbon Sequestration
CS-1	Increase Urban Tree Planting
CS-1.1	Increase Shaded Landscape Area
CS-1.2	Increase Tree Shade in Surface Parking Lots

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department

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West Sacramento, CA 95691 Phone (916) 373-3710

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Twitter: @CA_NAHC



March 28, 2019

Melissa Devine
City of El Cajon
200 Civic Center Way, 3rd Floor
El Cajon, CA 92020

RE: SCH# 2019039003 City of El Cajon Climate Action Plan, San Diego County

Dear Ms. Devine:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email
address: Steven.Quinn@nahc.ca.gov.

Sincerely,



for
Steven Quinn
Associate Governmental Program Analyst

cc: State Clearinghouse



Partnership for the
Advancement of
New Americans



April 1, 2019

Melissa Devine and Lorena Cordova (MDevine@cityofelcajon.us and lcordova@cityofelcajon.us)

Re: Comments on California Environmental Quality Act (CEQA) Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the City of El Cajon Climate Action Plan

Dear Ms. Devine and Ms. Cordova,

Climate Action Campaign, the Partnership for the Advancement of New Americans, and San Diego 350 have reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the City of El Cajon Climate Action Plan, and submit the following comments:

Climate Action Campaign (CAC) is an environmental nonprofit organization with a simple mission: to stop climate change and protect our quality of life.

The Partnership for the Advancement of New Americans (PANA) is a research, public policy, and community organizing hub dedicated to advancing the full economic, social, and civic inclusion of refugees.

San Diego 350 is an inclusive volunteer organization devoted to inspiring a movement to prevent the worst impacts of climate change and climate injustice. We represent approximately 10,000 local volunteers and supporters in the San Diego area.

The UN Intergovernmental Panel on Climate Change (IPCC) report, *Global Warming of Degrees Celsius*, released in fall 2018 warns that in order to limit climate catastrophe, we must limit global warming to 1.5°C above pre-industrial levels, citing drought, floods, extreme heat and poverty for hundreds of millions of people if temperatures rise above 1.5°C. The report states that to achieve 1.5°C, we must cut global emissions by 45% by 2030 and achieve net-zero emissions by 2050. This critical moment in history demands that every level of government, including the local level, take unprecedented action to significantly reduce greenhouse gas emissions and ensure a safe, livable, and dignified future for all.



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In order for the City of El Cajon to do its part to slash greenhouse gas emissions and create sustainable, equitable, and prosperous communities, we recommend that the Draft EIR consider the following project alternative and following recommendations regarding GHG significance thresholds:

CEQA Requires Enforceable Measures with Detailed Deadlines

CEQA is clear about what is required for a qualified CAP. For a CAP to function meaningfully as a roadmap to its reduction target, the measures in the plan must be enforceable — which means they must be specific, unambiguous, and contain clear requirements. Voluntary measures violate these CEQA guidelines.

In *California Riverwatch v. County of Sonoma et. al* (2017), the court stated that in CAPs used for tiering, “any measures or requirements imposed [must] be sufficiently defined to be enforceable.” This means that for the CAP as a whole to be legally binding, the measures that comprise it must be enforceable. The measures within the CAP must be specific, evidence-based, and contain mandatory requirements, all of which serve to make the CAP as a whole meaningfully enforceable.

Significance Thresholds In Line With State Targets

The thresholds of significance for GHGs should be any level of emissions that will cause a violation of the state’s GHG emission targets, which include:

- SB 32, which mandates statewide GHG emissions reductions of 40 percent below 1990 levels by 2030.
- Executive Order S-3-05, which mandates statewide GHG emissions reductions of 80 percent below 1990 levels by 2050. Compliance with S-3-05 should be of particular legal concern given the precedent set in the SANDAG RTP lawsuit.
- Executive Order B-55-18, which mandates statewide carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.

Local targets that would contribute to emissions above these levels should be considered to have a significant impact.



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Recommend Development of Deep Decarbonization and Equity Alternative

In the EIR, the City of El Cajon should evaluate an alternative that would plan for emissions reductions in line with Executive Orders S-3-05 and B-55-18, which require long-term commitments to decarbonization, and that would reduce emissions in a way that maximizes housing affordability and access to a safe, convenient, and affordable biking, walking, and transit network.

In order to meet state greenhouse gas goals, avoid the worst impacts of climate change, and prepare residents for a changing climate, the City should include the following policies and strategies in the Deep Decarbonization and Equity Alternative:

- **100% Clean Energy:** Not only is 100% Clean Energy the nation-leading standard, it is also necessary to meet California GHG targets. Accordingly, Chula Vista, Del Mar, Encinitas, La Mesa, the City of San Diego, and Solana Beach have committed to 100% clean and renewable electricity by 2030 or 2035. Shifting to clean and renewable energy not only reduces greenhouse gas emissions, but it also spurs local investment and family-sustaining jobs from clean energy technologies. A 100% clean energy goal would be consistent with the goals of other Climate Action Plans in the region.
- **Community Choice Energy (CCE):** Community Choice is the single most powerful emissions reductions strategy at the local level, and it is the only viable pathway to 100% clean energy. El Cajon should integrate Community Choice Energy into the Deep Decarbonization and Equity alternative as a way to help steeply reduce carbon emissions, and provide choice and competitive energy rates.
- **Energy and Water Efficiency:** This alternative should set targets for water conservation and energy efficiency for single-family, multifamily, commercial, and municipal buildings, as well as plan for ordinances to help reach those targets.
- **Zero Emissions Vehicles:** The City should include in this alternative a strategy to transition to a fully electric municipal fleet.
- **Transit, Walking, Biking:** This alternative should include mode share targets that define the percent of commuters who will walk, bike, and take transit to work by the plan's horizon year. Mode share goals help municipalities plan and budget to facilitate a shift away from car-centric growth, advocate for assistance for better transit infrastructure,



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and help communities plan for anticipated or desired health outcomes. The alternative should define specific and actionable strategies to meet the mode share targets by fostering safe and convenient biking, walking, and transit opportunities.

- **Smart Land Use Policies with Affordable Housing Near Transit:** The alternative should include a goal to reduce Vehicle Miles Travelled (VMT) to be achieved through smart growth policies that increase mixed-use density and affordable housing near job centers and transit. Building affordable housing near transit is a necessary strategy to reduce VMT and reduce GHG emissions.¹

The alternative should further specify where smart growth and density should be targeted and what transportation mode share, VMT, and land use goals should be set for specific communities throughout the city so there is clarity for the public and City Staff. The City of San Diego's ongoing struggle to ensure that community plan updates in urban, transit-priority communities are aligned with CAP targets, and to agree upon what goals each community is responsible for meeting, highlights the importance of including both neighborhood-level specificity and a jurisdiction-wide approach in the CAP.

- **Urban Tree Canopy and Climate Resilience:** With proper management and appropriate choice in tree variety, trees help sequester carbon, filter the air, and provide much needed shade in a warming environment. The alternative should commit to a specific urban tree canopy coverage goal.
- **Zero Waste:** Waste decaying in landfills emits methane, a potent greenhouse gas. The alternative should analyze the impact of achieving zero waste through strategies such as eliminating single-use materials, composting and capturing landfill gas.
- **Social Equity & Environmental Justice:** Climate change hits hardest in communities that are disproportionately burdened by multiple sources of pollution and face health and socioeconomic challenges. California's Environmental Health Screening Tool, CalEnviroScreen 3.0, identifies communities most vulnerable to pollution and climate impacts so that the state and local governments can direct attention and resources toward the pursuit of environmental justice in those places.

¹ Center for Neighborhood Technology, California Housing Partnership Corporation. (2016). *Location Matters: Affordable Housing and VMT Reduction in San Diego County*. Retrieved from: <https://static1.squarespace.com/static/5a6bd016f9a61e52e8379751/t/5a80f33bec212d81181be01d/1518400319715/Climate+Action+-+Affordable+Housing+And+VMT+Reduction.pdf>



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In El Cajon, two census tracts fall in the top 15 percent of CalEnviroScreen's statewide rankings. The alternative should explicitly define how El Cajon will ensure that these communities are prioritized in the implementation of GHG reduction strategies, including affordable housing development and investments in urban forestry, active transportation, renewable energy, and energy efficiency measures.

Conclusion

We appreciate the opportunity to provide comments on the NOP of the Draft Environmental Impact Report for the City of El Cajon Climate Action Plan, and we are available as a resource throughout the process of CAP development.

Sincerely,

A handwritten signature in black ink, appearing to read "Maleeka Marsden".

Maleeka Marsden
Climate Justice Advocate and Organizer
Climate Action Campaign

A handwritten signature in black ink, appearing to read "Ramla Sahid".

Ramla Sahid
Executive Director
Partnership for the Advancement of New Americans

Ryan O'Connor
Policy Organizer
San Diego 350

Appendix B

Air Quality Modeling Data

GHG Reduction Measure SW-1 Waste Diversion: Anticipated Rerouted Truck Trips

Assumptions:

Tons of compost/recycling per truck	10
Trips per truck (pick up and drop-off)	2
Business days per year	261

	2012 Baseline Year	2030 Projections	Source
Waste Diversion Rate (%)	67	75	<i>2012 baseline waste diversion rate from EPIC 2019</i>
Annual Amount of Waste to Landfill (tons)	88407	72661	<i>2012 tonnage from CalRecycle 2019, 2030 from EPIC 2019</i>
Annual Amount of Recycled/Composted Waste (tons)	179493	217983	<i>calculated</i>
Annual Truck Loads	17949	21798	<i>calculated</i>
Average Daily Truck Loads	69	84	<i>calculated</i>
Average Daily Truck Trips	138	167	<i>calculated</i>
Increased Average Daily Truck Trips Due to SW-1	29		<i>calculated</i>