Final
Negative Declaration

CITY OF ENCINITAS
Development Services Department
505 South Vulcan Avenue
Encinitas, CA 92024
Ph. 760-633-2692

Case No. 17-224
SCH #: (n/a)

SUBJECT: City of Encinitas Climate Action Plan. The proposed project consists of a comprehensive update to the 2011 Climate Action Plan (CAP). The 2017 CAP builds upon the 2011 CAP by updating the GHG emissions inventory with 2012 as the baseline year and forecasting emissions for 2020, 2030, and 2050, consistent with current legislative targets and State Executive Order goals. City actions and supporting measures for the 2017 CAP were developed, in part, by evaluating the 2011 CAP measures to assess their current applicability and relevance. Reduction measures from the 2011 CAP were significantly reworked, while obsolete measures were removed and replaced with new actions and supporting measures. City actions and supporting measures in the 2017 CAP include applicable measures from the 2011 CAP and new actions necessary to meet the 2020 and 2030 GHG reduction targets. Applicant: City of Encinitas

I. PROJECT DESCRIPTION: See attached Environmental Initial Study.

II. ENVIRONMENTAL SETTING: See attached Environmental Initial Study.

III. DETERMINATION:

The City of Encinitas conducted an Environmental Initial Study, which determined the proposed project would not have a significant effect on the environment and the preparation of an Environmental Impact Report will not be required.

IV. DOCUMENTATION:

The attached Environmental Initial Study documents the reasons to support the above determination.

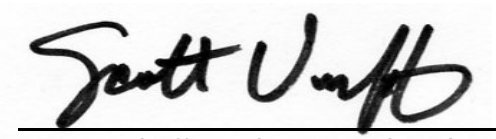
V. RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.

( ) Comments were received but did not address the draft Negative Declaration finding or the accuracy/completeness of the Initial Study. No response is necessary. The letters are attached.

(X) Comments addressing the findings of the draft Negative Declaration and/or accuracy or completeness of the Initial Study were received during the public input period. The letter and responses are provided on the following pages.

Copies of the Negative Declaration and any Environmental Initial Study material are available in the office of the Encinitas Development Services Department for review or for purchase at the cost of reproduction.



Scott Vurbeff, Environmental Project Manager
Development Services Department

September 29, 2017
Date of Draft Report

December 5, 2017
Date of Final Report

RESOLUTION 2018-02

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ENCINITAS ADOPTING THE FINAL NEGATIVE DECLARATION FOR THE CLIMATE ACTION PLAN

WHEREAS, an Environmental Initial Study was prepared for the Climate Action Plan;

WHEREAS, on September 29, 2017, the Environmental Initial Study and Negative Declaration was posted for public review and comment for 20 days;

WHEREAS, the City Council of the City of Encinitas has considered the final Negative Declaration together with the comments received during the public review process;

WHEREAS, the City Council of the City of Encinitas finds on the basis of the whole record before it, including the Environmental Initial Study and comments received, that there is no substantial evidence that the project will have a significant effect on the environment; and

WHEREAS, the City Council of the City of Encinitas finds that the Negative Declaration reflects the lead agency's independent judgment and analysis.

NOW, THEREFORE, BE IT RESOLVED, DETERMINED AND ORDERED that the City Council of the City of Encinitas does, hereby, adopt the final Negative Declaration.

PASSED AND ADOPTED this 17th day of January, 2018, by the following vote, to wit:

AYES: Blakespear, Boerner Horvath, Kranz, Mosca, Muir
NAYS: None
ABSENT: None
ABSTAIN: None

Catherine S. Blakespear, Mayor
City of Encinitas

ATTEST:

Kathy Hollywood, City Clerk

Responses to Comments on the Draft IS/ND

This section includes comments received during the circulation of the Draft Initial Study and Negative Declaration prepared for the City of Encinitas Climate Action Plan (Encinitas CAP).

The Encinitas CAP was circulated for a 20-day public review period that began on September 29, 2017 to October 19, 2017. The City of Encinitas received one comment letter on the Draft Initial Study and Negative Declaration. The commenter and the page number on which the commenter's letter appear is listed below.

The comment letter and responses follow.

Sempra Services Corporation

Francisco J. Urtasun
Reg. Vice President of External Affairs

Sempra Services Corporation

488 8th Avenue, HQ 13S3
San Diego, CA 92101

619-696-2233
furtasun@SempraServices.com

October 19, 2017

Scott Vurbeff
Development Services Department
505 South Vulcan Avenue
Encinitas, CA 92024

Re: Comments of Sempra Services on Draft Negative Declaration for City of Encinitas Climate Action Plan

1 Dear Mr. Vurbeff:

Sempra Services hereby submits its comments on the Draft Negative Declaration on City of Encinitas Climate Action Plan (CAP).

Unfortunately, the City of Encinitas CAP, as written, could result in an increase of GHG emissions associated with serving electricity demand in the City of Encinitas for two reasons:

- The percentage of renewable energy in the electricity supply serving Encinitas would be lower than the percentage of renewable energy that would be provided by SDG&E in 2020 and for a number of years thereafter; and,

2
- The CAP does not require that GHG reductions attributable to renewable energy be additional to those that would occur in the absence of the CAP and could, as a result, shift electricity demand from an entity that relies on long-term contracts that lead to new renewable development and additional emission reductions to an entity that merely procures renewable energy from existing facilities without making investments that lead to real and additional emission reductions.

In order to issue a Negative Declaration, the CAP must be revised to ensure that it will not increase GHG emissions and that any GHG emissions attributable to CAP measures are additional to those that would occur in the absence of CAP implementation. If the CAP is not so modified, a full environmental impact report should be prepared to examine whether an overall increase in real and additional GHG emissions would result from CAP implementation and, if so, to identify what kinds of additional mitigation should be required to mitigate these impacts.

Sempra Services appreciates the opportunity to submit the following comments.

3

I. Background

The City of Encinitas Development Services Department has issued a draft Negative Declaration under CEQA on the City's CAP,which proposes to find that this, "proposed project would not have a significant effect on the environment and the preparation of an Environmental Impact Report will not be required." With limited modifications to the CAP this may be true, but absent revisions in the CAP to ensure that emission reductions in the electricity sector take place in every year and are real and additional to those that are already occurring, the project may result in increased GHG emissions and have a significant impact on the environment. If these revisions are not made, an Environmental Impact Report will have to be prepared to address these impacts.

4

1. A Negative Declaration Cannot be Issued If the CAP Could Have a Significant Impact on the Environment

California Senate Bill (SB)97 (2007)[1] requires that greenhouse gas (GHG) emission impacts be considered under CEQA. Pursuant to the California Code of Regulations, a Negative Declaration can only be issued where:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) The initial study identifies potentially significant effects, but:

(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

(2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

Section 15074 of the California Code of Regulations provides that a negative declaration shall only be issued if the lead agency finds that there is no substantial evidence that the project will have a significant effect on the environment:

> *Prior to approving a project, the decisionmaking body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decisionmaking body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis.*

---

[1] California Public Resources Code, Section 21083.05.

5 Unfortunately, this finding cannot be made herein absent revisions to the CAP. This is for two reasons:

1. Under the Encinitas CAP, a CCA would start at 33% renewables in 2020. This would reduce the percentage of renewable energy serving customers in Encinitas because the SDG&E portfolio already has a significantly higher percentage of renewables (43% in 2016) and will have an even higher percentage when CCA is implemented in Encinitas under the CAP (49% in 2021).
2. Under the Encinitas CAP, there is no requirement that renewable energy be procured under long-term contracts that lead to new renewable generation development; absent new renewable development, no material additional GHG emission reductions will be achieved. If the CAP is implemented in this manner, it may shift electricity demand from an entity that relies on long-term contracts that lead to new renewable development and additional emission reductions to an entity that merely procures renewable energy from existing facilities without making investments that lead to real and additional emission reductions.[2]

In both of the forgoing respects, the CAP could result in a higher level of GHG emissions from electricity consumption in Encinitas, and fail to achieve real and additional GHG emission reductions. In order to issue a negative Declaration, the Encinitas CAP must be revised to ensure that electricity procurement under the CAP does not result in a higher level of GHG emissions than would otherwise occur.

B. Interest of Sempra Services

6 Sempra Services supports CCA under the right conditions. Customer choice, specifically in the sources of energy that power the homes of hard-working San Diego families, is important to us. However, a government-controlled energy program must be designed to accomplish three key objectives:

1. It must be equitable for all of the region's electric customers: Utility customers should not have to subsidize CCA customers.
2. It must provide real and additional environmental benefits: Tangible environmental improvements, beyond what would otherwise occur or are already occurring as a result of governmental action or investments by others are necessary to justify the municipal risk.

---

[2] Existing renewable facilities already are running and are already reducing emissions. As a result, when energy is procured from existing renewables, additional GHG emission reductions are not achieved, except to the limited extent the unit may operate when it otherwise might be economically curtailed as a result of that contract. By contrast, when utilities such as SDG&E procure renewable energy on behalf of customers, they do it through long-term contracts that result in additional renewable construction and additional emission reductions. Therefore, shifting load from long-term to short-term contracts reduces the total level of GHG emission reductions that occur.

6 cont.

3. It must reduce greenhouse gas (GHG) emissions: New renewable energy projects must be built to reduce GHG emissions. Claiming credit for emission reductions that are already occurring through existing renewable energy resources that will run with or without CCA would fail to achieve this objective and fail to create new jobs.

Sempra Services' goal of ensuring that CCA or any other means of electricity procurement result in real and additional emission reductions is consistent with the legal standard that applies to the issuance of a Negative Declaration. If the CAP will result in additional GHG emissions, a Negative Declaration cannot be issued. Without revisions to the CAP, this is likely to occur

7

II. The CAP Relies on An Outdated GHG Emission Baseline that Would Result in Additional GHG Emissions in 2020

The CAP states that it:

> *. . . aims to reduce GHG emissions by 13 percent below 2012 levels by 2020.*[3]

However in the electricity sector, basing CAP measures on this outdated baseline would result in an increase in GHG emissions. This is because the percentage of renewables in the SDG&E electricity portfolio is significantly higher today than it was in 2012 and will be even higher in 2020.

Based on a 2012 baseline level of emissions, the CAP proposes to implement specific renewable energy procurement goals through a "Community Choice Energy" program. As is depicted below, the CAP adopts a goal of achieving 33% renewable energy procurement by 2020:

Table 3-4 Strategy 2: Renewable Energy

Goal 2.1: Achieve 100% Renewable Electricity Supply in Homes and Businesses

City Action: RE-1 Establish a Community Choice Energy Program

Present to City Council for consideration a Community Choice Energy program that increases renewable electricity supply.

Target Year	Performance Metric	GHG Reduction Potential ($MTCO_2e$)
2020	Launch a CCE Program with RPS-compliant (33%) renewable electricity and 80% customer participation.	-
2030	100% renewable electricity supply and 80% customer participation.	43,644

4

While 33% renewables may be a laudable goal in many regions of the Country and would result in an improvement to a 2012 baseline, it would represent a reduction in the amount of renewable energy serving the needs of electricity consumers in Encinitas based on more recent

---

[3] See City of Encinitas CAP, http://www.cityofencinitas.org/Portals/0/City%20Documents/Documents/Development%20Services/Public%20Notices/17-224%20CAP%20Draft_09.28.17.pdf, at p. 2-7.

[4] See, City of Encinitas CAP, http://www.cityofencinitas.org/Portals/0/City%20Documents/Documents/Development%20Services/Public%20Notices/17-224%20CAP%20Draft_09.28.17.pdf, at p. 3-7.

7 cont. information. This is because SDG&E, which is currently serving the majority of consumers in Encinitas, is doing so with a far higher level of renewable energy than both the 2012 baseline and the 2020 goal set forth in the Encinitas CAP.

In 2016, 43% of the energy procured by SDG&E on behalf of customers in Encinitas consisted of renewable energy:

> "SDG&E delivered 43 percent renewable resources to its customers in 2016, far exceeding California's 2020 goal."[5]

This percentage of renewables is well above the 2012 baseline, well above the 2020 CAP goal, and is still growing. In fact, SDG&E anticipates that it will reach 49% renewable energy by 2021:

> *To date, SDG&E has led the state in RPS procurement, achieving 35% renewable energy in 2015 (thereby exceeding the 2020 target of 33% five years early), 100% of which was from long-term contracts (also exceeding the 65% long-term contracting requirement). SDG&E achieved 43% renewable energy in 2016, 100% of which was also from long-term contracts; see Appendix 2 for further detail. SDG&E is forecasted to reach 49% renewable energy in 2021, 98% of which will be from long-term contracts.*[6]

A CAP that shifts electricity demand from an electricity portfolio consisting of between 43% and 49% renewables to one that only includes 33% renewables would increase, and not reduce GHG emissions. The CAP must, at a minimum, be revised to provide for renewable procurement in the amount of at least 49% by 2021 to ensure that it does not result in increased GHG emissions. For the reasons explained below, it must also be revised to ensure that renewable procurement is from long-term contracts so it leads to new renewable development and real and additional GHG emission reductions rather than reduced new renewable development.

8 **III. The CAP Must be Revised to Ensure it Achieves Real and Additional GHG Emission Reductions in the Electricity Sector**

In addition to reducing the amount of renewable energy that would be used to serve electricity customers in Encinitas, the CAP fails to adopt the kinds of contracting requirements that would be necessary to ensure that renewable energy procured on behalf of customers in the City results in real and additional emission reductions.

In the energy industry, emission reductions can only be created by reducing demand or by replacing "dirtier" energy with "cleaner" energy. If electricity procurement practices do not result in additional production of electricity with lower emissions, they will not replace dirtier energy with cleaner energy and will not result in any additional emission reductions. The key to ensuring real and additional

---

[5] See, https://www.sdge.com/renewables.

[6] See, SDG&E Renewable Procurement Plan, filed with CPUC in R.15-02-020 on July 21, 2017, http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M195/K911/195911028.PDF, at Attachment "A," pp. 1-2.

8 cont.

emission reductions is procurement under long-term contracts that result in additional renewable generation development so overall renewable energy production increases.

Renewable procurement from existing renewable generation would not materially reduce GHG emissions because existing renewable generation facilities are dispatched on a "must-run" basis whether or not their output is sold to a government run energy provider. This means that existing renewables will generate zero carbon electricity whenever their energy can be delivered to load and the generation owner can make money by allowing the unit to run. For this reason, once a renewable facility has been constructed, it will reduce emissions whether it has a contract to sell energy to a government run energy provider or not. When a government controlled energy provider enters into a contract with existing renewable generators, it is not creating additional emission reductions, it is merely purchasing the right to claim credit for emission reductions that are already occurring.

The only way renewable procurement can result in material additional GHG reductions is if the procurement leads to additional renewable generation construction. Any CCA program that relies on short-term contracts with existing resources or Renewable Energy Certificates will not result in additional renewable construction because these kinds of purchases fail to provide adequate financial certainty for investors to make a long-term investment in renewable generation facilities.

As is discussed above, all of SDG&E's current renewable procurement is pursuant to long-term contracts. To the extent that the CAP is implemented in a way that moves electricity demand in Encinitas from long-term contracts to short-term contracts, it will result in reduced renewable generation construction to that which would otherwise occur and fail to produce real and additional emission reductions.

9

A. <u>Existing Renewable Generation Will Run and Reduce Emissions Whether or Not it Sells Electricity to A Government Run Energy Provider</u>

Under the existing CAISO market structure, renewable resources will generate electricity whenever the renewable resource is available (i.e., solar generation generates electricity whenever it is sunny, wind generation generates electricity whenever it is windy). This is because the CAISO runs on the basis of security constrained least cost economic dispatch; this basically means that the resource with the lowest cost that can be physically delivered to load will run. The sun and wind are free, while the input fuel for a natural gas plant has a cost. Put another way, renewable generation facilities have a variable cost of near zero.

The United States Department of Energy explained to Congress that renewable resources have a very low marginal cost and, as a result, are run whenever they can be physically dispatched to load:

> *Generally, system operators accept as much electricity as possible from renewable resources, regardless of whether it is utility or non utility generation, because of its low cost and only curtail reliance on these sources when forced to by limits on transmission availability or reliability considerations. Most wind and solar generation units are not dispatchable in the traditional*

9 cont.

sense (i.e., cannot be precisely controlled by the grid operator), but their output is accepted as must-run or must-take production.[7]

Because the renewable generation will generally run whenever it can be delivered to load, it will run whether it has a contract with a utility or a government controlled energy provider or not. For this reason, when a government controlled energy provider purchases electricity from an existing renewable generator rather than from a developer that will build additional renewable generation to serve its demand, it is not creating any material level of real or additional emission reductions. Instead, it is merely claiming credit for emission reductions that are already occurring.

The only way to materially increase GHG emission reductions through renewable energy procurement is to procure energy in a way that increases the amount of renewable generation that exists. New renewable generation will only be constructed with adequate assurance of investment recovery/return, and this generally requires a long-term contract.[8]

For these reasons, a Negative Declaration cannot be legally issued on the Encinitas CAP unless it is revised to require all renewable procurement be pursued through long-term contracts that will lead to additional renewable generation construction and additional emission reductions and/or from facilities that have previously been constructed to serve demand in Encinitas.

10

b. Experience Indicates that, Absent Specific Provisions Requiring Long-Term Contracts, CCA Will Not Result in Additional Renewable Construction or Real and Additional GHG Emission Reductions

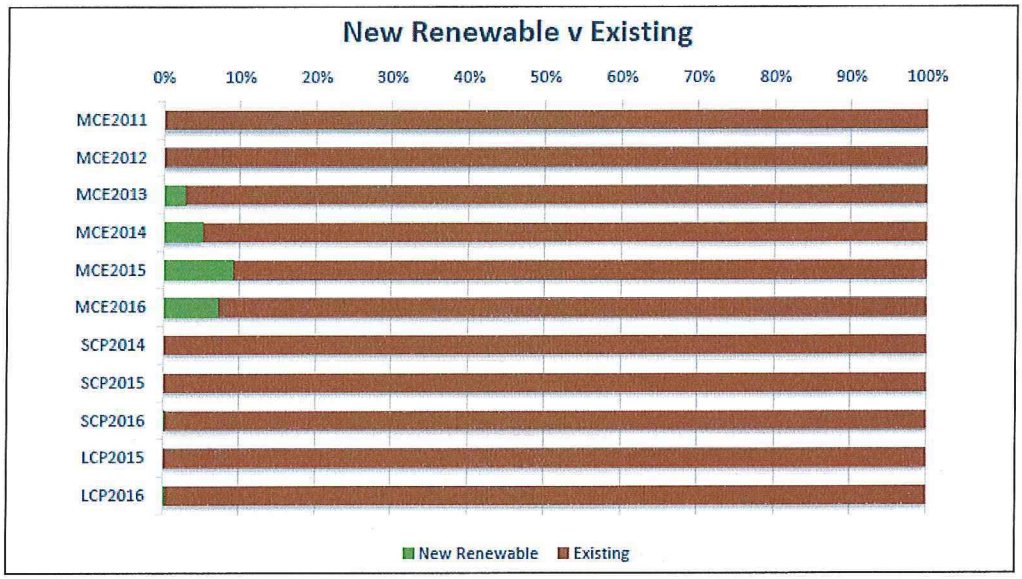
An analysis of the procurement practices of CCA providers in California to date supports an assumption that a government controlled energy program for the City of Encinitas would procure energy primarily from out of state resources and on a short-term basis. The chart set forth below illustrates where CCA providers in California have obtained their energy through 2016. Only a very small amount of renewable energy procured by CCA providers has been generated by new renewable generation that was developed to serve CCA demand.

---

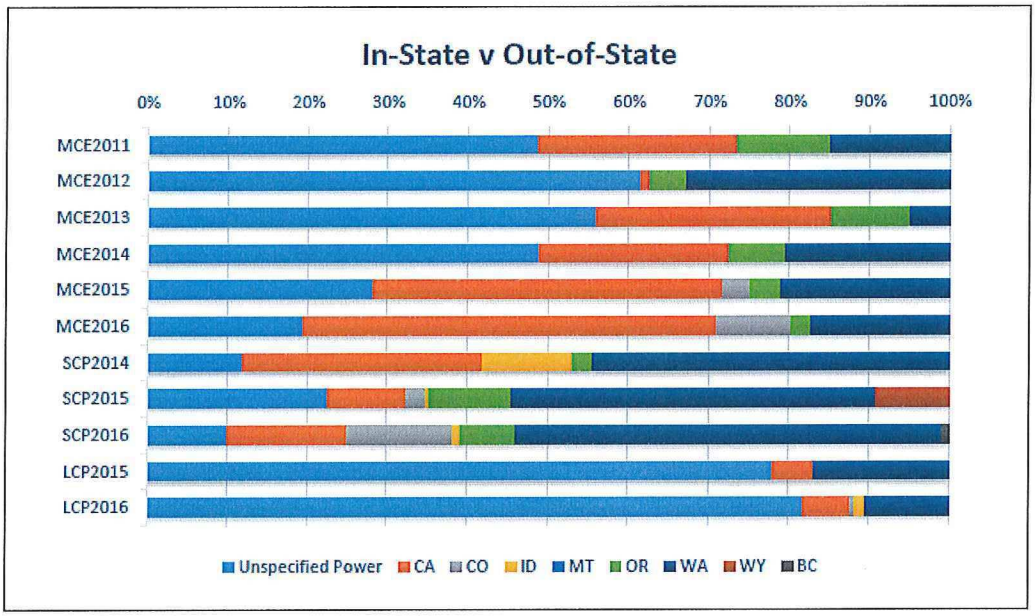
[7] See, U.S. Department of Energy, 2011/2012 Economic Dispatch and Technological Change, Report to Congress, September 2012, at p. 4, https://energy.gov/sites/prod/files/2014/12/f19/2011-2012-EconomicDispatch-TechChange-RptCongress.pdf.

[8] The Sierra Club, for example, has pointed out on several occasions that short-term contracts do not result in additional renewable construction. See, Sierra Club response to questions issued by the IPA following the May workshops on Illinois Long-Term Renewable Resources Plan, June 27, 2017, p.2, https://www.illinois.gov/sites/ipa/Documents/Sierra-Club-IPA-Comments-LTRRPP.pdf; Direct Testimony of R. Thomas Beach on behalf of Idaho Conservation League and the Sierra Club, before the Idaho Public Utilities Commission, docket IPC-E-15-01, April 23, 2015, p. 1, 8, 10-11, http://www.puc.idaho.gov/fileroom/cases/elec/IPC/IPCE1501/intervenor//SIERRA%20CLUB/20150422BEACH%20DIRECT.PDF.

10 cont

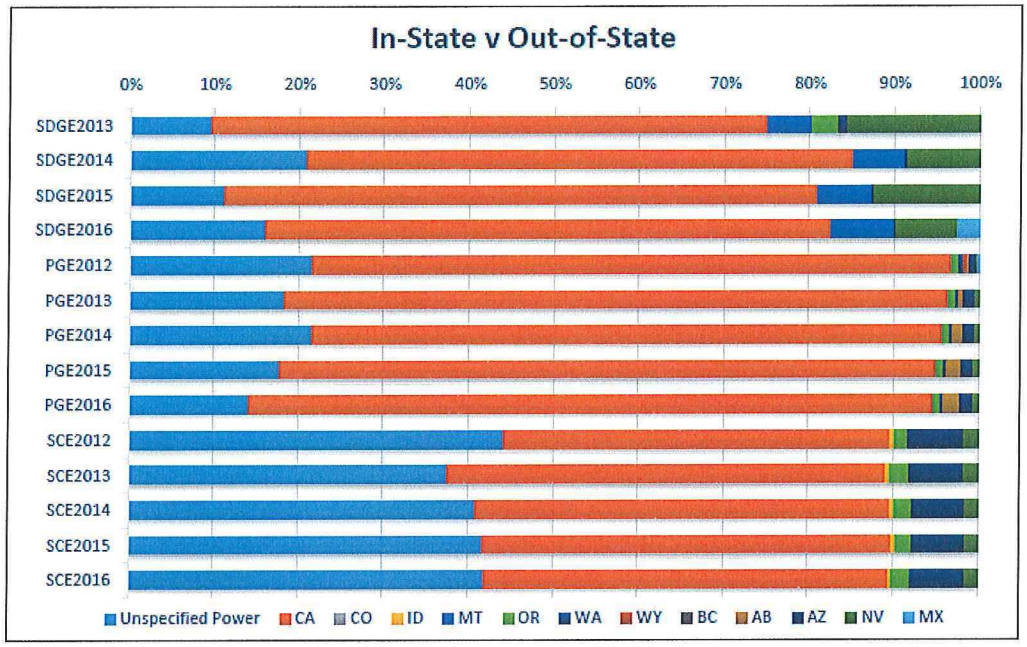


The following chart shows that when CCA providers purchase energy from existing resources, most of those resources are not even located in California.



By contrast, most of the energy procured by SDG&E and other utilities is from California.

10 cont.



Moreover, all of the renewable energy procured by SDG&E in 2016 (43% of its portfolio) was from long-term contracts.[9]

11

IV. Conclusion

Sempra Services applauds the City of Encinitas for its efforts to reduce GHG emissions. However, without revision, the CAP may actually result in increased GHG emissions and a Negative Declaration cannot be issued.

For the reasons articulated above, a Negative Declaration can only be issued if the CAP is revised to specifically provide:

- The renewable content of any electricity supply serving Encinitas must be at least at the level of actual SDG&E level of renewables (by percent of total demand) in every year; and,
- All renewables must be procured from resources that are constructed to meet demand in the City of Encinitas (i.e., through long-term contracts that lead to new construction and/or from units that were previously newly constructed to meet demand in the city of Encinitas).

If the CAP is not amended in this manner, a full environmental impact report must be prepared in order to examine whether an overall increase in real and additional GHG emissions would result under the CAP and the extent to which additional mitigation should be required.

---

[9] See, SDG&E Renewable Procurement Plan, filed with CPUC in R.15-02-020 on July 21, 2017, http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M195/K911/195911028.PDF, at Attachment "A," pp. 1-2.

11 cont. I appreciate the opportunity to submit the forgoing comments.

Respectfully yours,

Frank Urtasun
Sempra Services

cc: The Honorable Catherine S. Blakespear, Mayor
The Honorable Tony Kranz, Deputy Mayor
The Honorable Tasha Boerner Horvath, Council Member
The Honorable Joe Mosca, Council Member
The Honorable Mark Muir, Council Member

Letter 1

COMMENTER: Frank Urtasun, Sempra Services

DATE: October 19, 2017

Response 1.1

The commenter states that the City of Encinitas Climate Action Plan (CAP), as written, could result in an increase of greenhouse gas (GHG) emissions associated with supplying electricity in the City of Encinitas. Specifically, the commenter states that the CAP would result in an increase in emissions because the percentage of renewable energy in the electricity supply portfolio as a result of the CAP would be lower than the percentage of renewable energy that would be provided by San Diego Gas and Electric (SDG&E) in 2020 and for a number of years thereafter.

The proposed CAP would include City Action: RE-1 *Establish a Community Choice Energy (CCE) Program*, which is one of the actions intended to meet CAP Goal 2.1: *Achieve 100% Renewable Electricity Supply in Homes and Businesses*. As stated in CAP Appendix A: *Greenhouse Gas Emissions Inventory and Projections*, it was assumed for this measure that the proposed CCE Program would launch in 2020 and supply its customers with electricity that has at least 33 percent renewable content (i.e., Renewable Portfolio Standard -compliant) initially and provide 100 percent renewable electricity supply by 2030.

The CCE program would not be fully implemented until 2020 and is intended to be compliant with the State's Renewable Portfolio Standard (RPS) requirement at that time (33 percent renewable electricity and increasing to 50 percent by the year 2030). Thus, the GHG inventory for the CAP assumes conservatively that the City would not achieve GHG emissions reductions from the initial implementation of CCE Program by the year 2020. This is because the Program along with SDG&E (who would continue to serve Encinitas customers that would not participate in the CCE Program) would be compliant with existing state requirements associated with Senate Bill (SB) X1-2 (33 percent renewable electricity). Thus, for 2020 the CAP only includes the state reduction associated with SB X1-2 and does not rely upon or include GHG reductions from establishment of the CCE to meet the 2020 target as noted on page 3-7 of the Draft CAP.

Nevertheless, the following change has been included in the CAP to increase the required minimum renewable electricity associated with the CCE Program from 33 percent to a level that is equal to or greater than the SDG&E power mix of renewable electricity at the launch of the program. This would ensure that the percent of renewable electricity provided to Encinitas in 2020 will remain at or above the level provided by SDG&E (43 percent in 2016 and potentially 49 percent in 2021) and at or above the percent of renewable electricity provided by SDG&E from 2020 through 2030. Thus, with the change below, the City's CAP Action RE-1 would not increase GHG emissions compared to levels without the CAP in 2020 or any other year through 2030. This change to measure RE-1would also increase the potential GHG reductions achieved by the City in the year 2020 since the City would exceed the state RPS target of 33 percent. Therefore, this change would remove the potential for increased impacts and would further reduce GHG emissions in the City compared to existing conditions. GHG impacts would continue to be less than significant, as described in the Draft Initial Study and Negative Declaration.

The following has been updated in the Draft 2017 CAP on page 3-7. Updates are shown in ~~strikeout~~/<u>underline</u>.

Goal 2.1: Achieve 100% Renewable Electricity Supply in Homes and Businesses		
City Action: RE-1 Establish a Community Choice Energy Program		
Present to City Council for consideration a Community Choice Energy program that increases renewable electricity supply.		
Target Year	Performance Metric	GHG Reduction Potential (MT of CO_2e)
2020	Launch a CCE Program with renewable electricity sources as a percentage of overall energy supplies equal to or greater than the current percentage of renewable electricity provided by SDG&E* ~~with a RPS-compliant (33%) renewable electricity~~ and 80% customer participation.	--
2030	100% renewable electricity supply and 80% customer participation	43,644
* The renewable electricity supply requirement would be compliant with the State's most current RPS target (at least 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030 (SB 350, §399.15(b)(2)(B))) and would be equal to or exceed the year 2020 power mix of the existing utility provider SDG&E (which was 43% "Eligible Renewable" in 2016 and projected to be approximately 49% in 2021). Current Power Content Labels of utility providers showing the power mix are provided by the California Energy Commission, Utility Annual Power Content Labels (http://www.energy.ca.gov/pcl/labels/).		

Response 1.2

The commenter states that the CAP could result in a shift in electricity demand from an entity that relies on long-term contracts (SDG&E) that lead to new renewable electricity development which result in additional emission reductions to an entity (presumed to be the CCE Program detailed in the 2017 CAP) that procures renewable energy from existing facilities without making investments that lead to real and additional emission reductions compared to existing conditions. The commenter adds that the CAP should be revised to ensure that it would not increase GHG emissions and that any GHG emissions attributable to CAP measures are in addition to those that would occur in absence of CAP implementation. The commenter concludes this comment by suggesting that if the CAP is not modified, a full Environmental Impact Report (EIR) should be prepared.

The commenter speculates that the CCE Program in the 2017 CAP would not follow the same requirements as the existing electric utility provider in Encinitas (SDG&E) in regards to procuring long-term contracts for renewable energy and thus the CAP may result in an increase of GHG compared to existing conditions. This comment is inaccurate as the CCE Program would be subject

to the same requirements under Senate Bill 350 (SB 350) as SDG&E or any other "retail seller"[1]. Like SDG&E, the CCE Program established by the 2017 CAP would be required to ensure that at least 33 percent of the electricity procured would be from eligible renewable energy resources by December 31, 2020, 40 percent by December 31, 2024, 45 percent by December 31, 2027, and 50 percent by December 31, 2030 (SB 350, §399.15(b)(2)(B)). In addition, as stated in §399.13(b) of SB 350, a retail seller (which would include either the CCE Program and SDG&E) may enter into a combination of long- and short-term contracts for electricity and associated renewable energy credits. Additionally, "*Beginning January 1, 2021, at least 65 percent of the procurement a retail seller counts toward the renewables portfolio standard requirement of each compliance period shall be from its contracts of 10 years or more in duration or in its ownership or ownership agreements for eligible renewable energy resourc*es" (Public Utilities Code §399.13(b)). Thus, like SDG&E, by 2021, the CCE Program would be required to have at least 65 percent of its renewable portfolio from long-term contracts. The suggestion that the CCE Program would not result in additional renewable generation development is therefore inaccurate. The CCE Program would be required to have at least 65 percent of its renewable portfolio under long-term contracts.

Further, SB 350 encourages a diversity of both short- and long-term contracts by requiring each load-serving entity (which includes both SDG&E and the CCE Program) to prepare an integrated resource plan. For Community Choice Aggregators such as the CCE Program, the plan would need to achieve the following[2]:

> (A) Economic, reliability, environmental, security, and other benefits and performance characteristics that are consistent with the goals set forth in paragraph (1) of subdivision (a) (*including meeting the greenhouse gas emissions reduction targets established by the State Air Resources Board*)
>
> (B) A diversified procurement portfolio consisting of **both short-term and long-term electricity** and electricity-related and demand reduction products [emphasis added].
>
> (C) The resource adequacy requirements established pursuant to Section 380.

The assumption that the CCE Program (which would not be implemented until 2020) would only procure renewable energy from existing facilities without making investments that lead to real and additional procurement of electricity products that result in GHG emission reductions is inaccurate. The CCE Program would be subject to the same requirements and provisions as SDG&E that ensure "real" and equivalent renewable energy is provided under the plan, would include reductions in GHGs, and would be subject to review and approval by the Public Utilities Commission:

---

[1] According to Public Utilities Code (PUC) § 399.12, "Retail seller" means an entity engaged in the retail sale of electricity to end-use customers located within the state, including any of the following:

(1) An electrical corporation, as defined in Section 218.

(2) A community choice aggregator. A community choice aggregator shall participate in the renewables portfolio standard program subject to the same terms and conditions applicable to an electrical corporation.

(3) An electric service provider, as defined in Section 218.3. The electric service provider shall be subject to the same terms and conditions applicable to an electrical corporation pursuant to this article. This paragraph does not impair a contract entered into between an electric service provider and a retail customer prior to the suspension of direct access by the commission pursuant to Section 80110 of the Water Code.

[2] As stated under Public Utilities Code §454.52(b)(1).

> (d) Permit community choice aggregators to submit proposals for satisfying their portion of the renewable integration need identified in subdivision (a). If the commission finds this need is best met through long-term procurement commitments for resources, community choice aggregators shall also be required to make long-term commitments for resources [emphasis added]. The commission shall approve proposals pursuant to this subdivision if it finds all of the following:
>
> (1) The resources proposed by a community choice aggregator will provide equivalent integration of renewable energy.
>
> (2) The resources proposed by a community choice aggregator will promote the efficient achievement of state energy policy objectives, including reductions in greenhouse gas emissions [emphasis added].
>
> (3) The plan of a community choice aggregator shall be submitted to its governing board for approval and provided to the commission for certification, consistent with paragraph (5) of subdivision (a) of Section 366.2, and shall achieve the following:
>
> (A) Economic, reliability, environmental, security, and other benefits and performance characteristics that are consistent with the goals set forth in paragraph (1) of subdivision (a).
>
> (B) A diversified procurement portfolio consisting of both short-term and long-term electricity and electricity-related and demand reduction products.
>
> (C) The resource adequacy requirements established pursuant to Section 380.

The CCE Program would be required to follow the requirements of SB 350 and the Public Utilities Code by creating or maintaining a diversified procurement portfolio consisting of both short-term and long-term electricity and electricity-related and demand reduction products, as well as meeting the greenhouse gas emissions reduction targets of AB 32 and SB 32. Therefore, the 2017 CAP would not result in an increase of GHG emissions and impacts would be less than significant as stated in the Initial Study and Negative Declaration (page 46). Because no substantial evidence suggests the potential for a significant environmental impact, additional analysis in an EIR is not warranted.

Response 1.3

The commenter states that absent revisions to the CAP to ensure that emission reductions in the electricity sector take place every year and are real and additional to those already occurring, the CAP may result in increased GHG emissions and have a significant impact on the environment. As such, the commenter concludes that if the suggested revisions are not made, an EIR would have to be prepared.

Based on the revisions to the 2017 CAP outlined in Response 1.1 and the fact that the CCE Program would comply with SB 350 and the Public Utilities Code (as discussed in detail in Response 1.2), there is no substantial evidence that the CAP would result in increased emissions or a significant impact related to GHG emissions. Therefore, a Negative Declaration is the appropriate CEQA documentation for the 2017 CAP and preparation of an EIR is not warranted.

Response 1.4

The commenter states that a Negative Declaration cannot be issued if the 2017 CAP could have a significant impact on the environment. The commenter adds that SB 97 requires consideration of GHG impacts. Additionally, the commenter quotes the California Code of Regulations, Section 15070, which outlines the conditions under which a Negative Declaration can be issued. Finally, the commenter quotes the California Code of Regulations, Section 15074, which states that a Negative Declaration shall only be issued if the lead agency finds that there is no substantial evidence that the project would have a significant effect on the environment.

See Response 1.1 for information regarding the renewable portfolio percentage, Response 1.2 for additional information regarding renewable energy procurement and long-term contracts, and Response 1.3 for information regarding the applicability of an Initial Study and Negative Declaration.

Response 1.5

The commenter reiterates an opinion that a Negative Declaration cannot be issued for two reasons. Specifically, the commenter states that under the Encinitas CAP, a CCA would start at 33 percent renewables in 2020. The commenter adds that this would reduce the percentage of renewable energy serving customers in Encinitas because the SDG&E portfolio currently has 43 percent renewables and may have a higher percentage when the CCA is implemented. The commenter also restates their concern about the new renewable energy production. The commenter suggests that because there is no explicit language in the CAP that requires renewable energy to be produced under long-term contracts which may lead to new renewable generation development, no additional GHG reductions would be achieved. The commenter proposes that if the CAP was implemented in this manner, it may shift electricity demand from an entity (SDG&E) that relies on long-term contracts that lead to new development and additional emission reductions to an entity (the City's CCE Program) that merely procures renewable energy from existing facilities without making investments that lead to GHG emission reductions. The commenter suggests that the CAP could result in a higher level of GHG emissions from electricity consumption and fail to achieve real GHG emission reductions. The commenter concludes by stating the CAP must be revised in order to issue a Negative Declaration.

Regarding the first concern about 33 percent renewables in 2020, see Response 1.1. In regard to the comments on long-term contracts and renewable energy procurement, see Response 1.2. In regard to the applicability of Negative Declaration for the proposed 2017 CAP, see Response 1.2 and 1.3.

Response 1.6

The commenter states that they support CCAs under the right conditions and that a government-controlled energy program must be designed to be equitable for all of the region's utility customers; provide new and additional environmental benefits; and reduce GHG emissions. Additionally, the commenter states that GHG emission reductions must come from new renewable energy projects and suggests that claiming credit from emission reductions from renewable energy that is currently being generated would not reduce emissions and or create new jobs. The commenter adds that if the CAP would result in a net increase in GHG emissions, then a Negative Declaration cannot be issued and suggests that absent revisions to the CAP, this may occur.

The CCE Program would be required to be consistent with State law (SB 350 and the Public Utilities Code) and thus in meeting the requirements would be equitable for all of the region's utility

customers; provide new and additional environmental benefits; and reduce GHG emissions. In regards to renewable energy procurement and emissions reductions coming from new energy projects, see Response 1.2. In regards to the applicability of an Initial Study and Negative Declaration, see Response 1.3.

Response 1.7

The commenter suggests that the CAP relies on an outdated GHG emission baseline that would result in additional GHG emissions in 2020. The commenter quotes the 2017 CAP (*…aims to reduce GHG emissions by 13 percent below 2012 levels by 2020*) and states that basing CAP measures on the 2012 baseline would result in an increase in GHG emissions because the percentage of renewables in the SDG&E portfolio is higher than it was in 2012 and will likely be higher yet in 2020. The commenter also states that because the proposed CCA electricity portfolio would not meet or exceed SDG&E's proposed portfolio (anticipated to be approximately 49 percent renewable by 2021), the project would result in an increase of GHG emissions. The commenter adds that shifting electricity demand from an electricity portfolio of between 43 and 49 percent to an electricity portfolio of 33 percent would not reduce emissions. The commenter concludes by stating that the CAP must be revised to provide for renewable procurement of at least 49 percent by 2021 and also be revised to ensure that renewable procurement is from long-term contracts.

The CAP uses a 2012 baseline because it aligns with the baseline year of the most recent SANDAG Series (Series 12), and therefore represents the year with the "best available" data. A more current year would not provide the best vehicle miles traveled (VMT) data because any year that is not a Series baseline year is an uncalibrated estimate or projection. This comment also repeats the concern expressed in Comment 1.1 in regards to the 33 percent renewable content compared to 43 or 49 percent. See Response 1.1 and the changes to the 2017 CAP's City Action RE-1. In regards to long-term contracts, see Response 1.2. As stated in Response 1.2, the CCE Program, like SDG&E, is required to prepare a procurement plan that creates or maintains a diversified procurement portfolio consisting of **both short-term and long-term** electricity and electricity-related and demand reduction products.

Response 1.8

The commenter reiterates a suggestion that the CAP does not ensure that renewable energy procured on behalf of the customers results in real and new additional emission reductions since renewable procurement from existing renewable generation would not materially reduce GHG emissions. The commenter adds that the only way renewable procurement can result in material additional GHG reductions is if the procurement leads to additional renewable generation construction and suggests that any CCA program that relies on short-term contracts with existing resources would not result in additional renewable construction. The commenter re-states that all of SDG&E's current renewable procurement is pursuant to long-term contracts.

This comment repeats the concern expressed in Comment 1.2. See Response 1.2 for information regarding renewable energy procurement. As stated in Response 1.2, it is inaccurate to assume the CCE Program will not result in procurement under long-term contracts that would result in additional renewable generation development. The CCE Program would be required to have at least 65 percent of its renewable portfolio under long-term contracts and would be required to provide a diversified portfolio of both short-term and long-term electricity, electricity-related, and demand reduction products.

Response 1.9

The commenter states that existing renewable energy generation will be operable and reduce emissions whether or not it sells electricity to a government-run energy provider. The commenter suggests that when a government-controlled energy provider purchases electricity from an existing renewable generator rather than a developer, it is not creating any material level of real or additional emission reductions, and rather is claiming credit for reductions that are already occurring. The commenter states that the only way to materially increase GHG emission reductions through renewable energy procurement is to procure energy in a way that increases the amount of renewable generation that exists. The commenter concludes by stating that a Negative Declaration cannot be legally issued unless the Encinitas CAP is revised to require pursuit of all renewable procurement through long-term contracts that would lead to additional renewable generation construction and additional emission reductions.

This comment repeats the concern expressed in Comment 1.2. See Response 1.2 for information regarding renewable energy procurement long-term contracts and see Response 1.3 for information regarding the applicability of an Initial Study and Negative Declaration. The claim that the CCE Program would only enter into agreements with existing facilities is speculative and is not supported by evidence in the record. Further, the CCE Program would be required by SB 350 and the Public Utilities Code to have at least 65 percent of its renewable portfolio under long-term contracts and would be required to provide a diversified portfolio of both short-term and long-term electricity, electricity-related, and demand reduction products.

Response 1.10

The commenter states that analysis of the procurement practices of existing CCA providers in California supports the assumption that the Encinitas's CCE Program would procure energy primarily from out-of-state resources on a short-term basis. Additionally, the commenter states that only a small amount of renewable energy procured by existing CCA providers has been generated by new renewable generation that was developed explicitly to serve CCA demand and that CCA providers also purchase energy from existing sources that may not be located in California. The commenter states that, in contrast, most of the energy procured by other utility providers is from California. The commenter concludes by reiterating that all of the energy procured by SDG&E in 2016 was from long-term contracts.

This comment is speculative in that it assumes the CCE Program under Action RE-1 of the 2017 CAP (which would not be implemented until 2020) would follow the same procurement practices of three existing CCAs in California. As described in Response 1.2, the Encinitas CCE Program would be subject to the requirements of SB 350 and the Public Utilities Code at the time of program implementation (anticipated being 2020 and fully operational in 2021). Thus, as stated in Response 1.2, the CCE Program's integrated resource plan would be reviewed by and require approval from the Public Utilities Commission and would need to demonstrate economic, reliability, environmental, security, and other benefits and performance characteristics that are consistent with the goals of SB 350 and the Public Utilities Code (including meeting the greenhouse gas emissions reduction targets established by the State Air Resources Board). The CCE Program would need to demonstrate a diversified procurement portfolio consisting of both short-term and long-term electricity and electricity-related and demand reduction products. Existing state regulations for CCAs counter the assertion the commenter's speculation about the source of renewable energy that the CCE Program would utilize by ensuring that CCA are developed to provide benefits consistent with the state's environmental and regulatory goals.

Response 1.11

The commenter concludes by re-stating that, without revision, the 2017 CAP could result in an increase in GHG emissions and suggests that the Negative Declaration cannot be adopted. And, he suggests a full EIR would be required unless the CAP is amended.

See Response 1.1 for information regarding the renewable portfolio percentage, Response 1.2 for additional information regarding renewable energy procurement and long-term contracts, and Response 1.3 for information regarding the applicability of an Initial Study and Negative Declaration.

Encinitas Climate Action Plan

Environmental Initial Study

prepared by
City of Encinitas
505 South Vulcan Avenue
Encinitas, California 92024

prepared with the assistance of
Rincon Consultants, Inc.
2215 Faraday Avenue Suite A
Carlsbad, California 92008
January 2018

Rincon Consultants, Inc.
Environmental Scientists Planners Engineers
www.rinconconsultants.com

Table of Contents

Tables

Figures

Environmental Initial Study

1. Project Title

City of Encinitas Climate Action Plan (CAP)

2. Lead Agency Name and Address

City of Encinitas
505 South Vulcan Avenue
Encinitas, California 92024

3. Contact Person and Phone Number

Scott Vurbeff, Environmental Project Manager
(760) 633-2692

4. Project Location

The City of Encinitas' Climate Action Plan (CAP) applies to all areas within the City limits. Encinitas covers approximately 20 square miles, 18.8 square miles of which are land and 1.2 square miles of which are water. The City is located 25 miles north of downtown San Diego and approximately 95 miles south of Los Angeles and is bordered by the Pacific Ocean to the west, unincorporated San Diego County to the east, and three cities: Carlsbad, San Marcos, and Solana Beach.

5. Project Sponsor's Name and Address

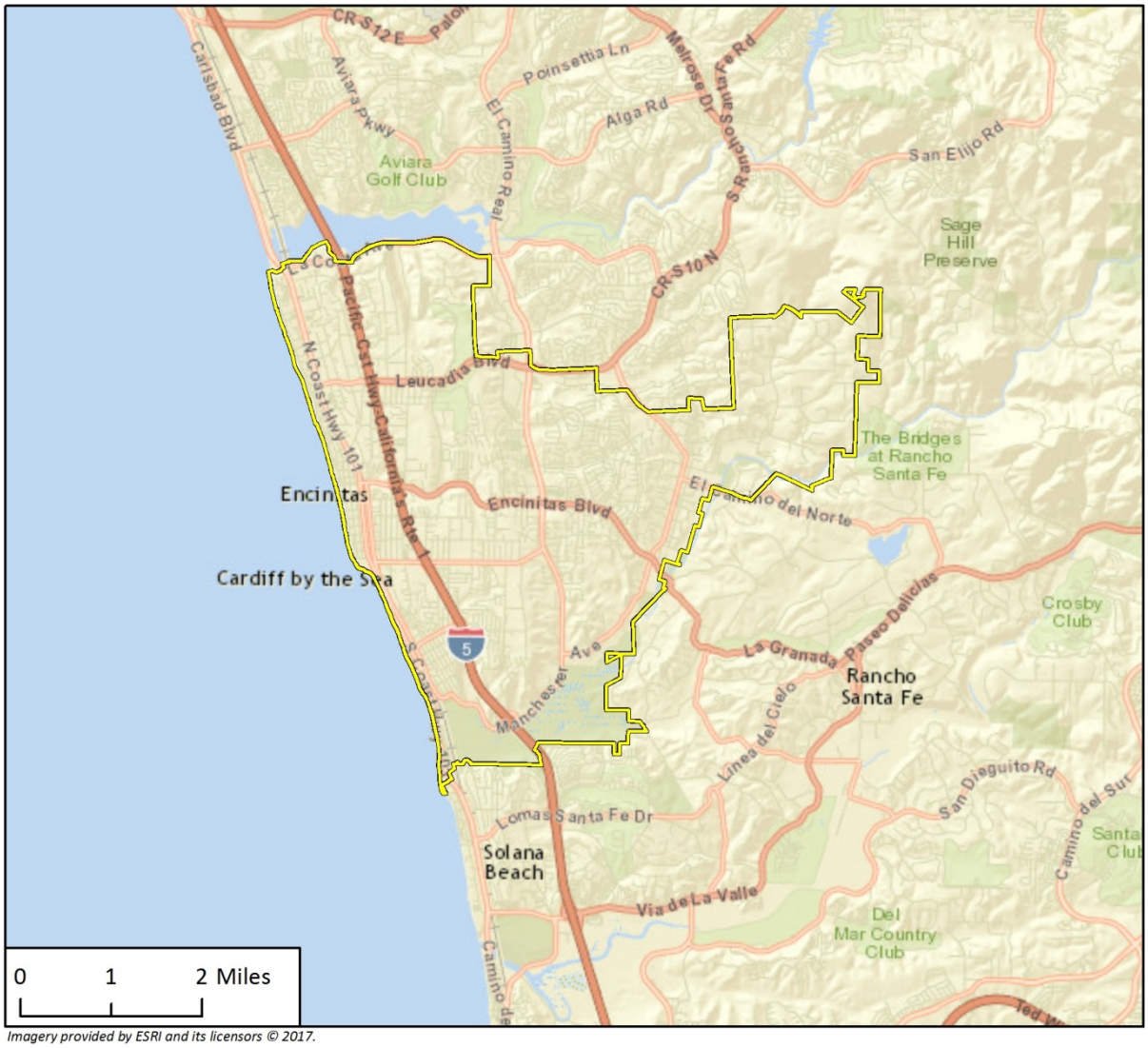
City of Encinitas
505 South Vulcan Avenue
Encinitas, California 92024

6. Existing Setting

Located along the Pacific Ocean in the heart of San Diego County, Encinitas sits south of Carlsbad and north of Solana Beach, bisected by Interstate 5 (I-5). Figure 1 shows the regional location and Figure 2 shows the project site location. The City receives approximately 11 inches of rain annually with a July high temperature of 74°F and a January low temperature of 45°F (Sperling's Best Places 2017). Encinitas has a rich history dating back to the original indigenous people of the area, specifically the San Dieguito, La Jolla, and Diegueno tribes (Encinitas Preservation Association). The modern City of Encinitas was incorporated in 1986 and is divided into five communities: Old Encinitas, New Encinitas, Olivenhain, Leucadia, and Cardiff-by-the-Sea, which are summarized below (Encinitas Preservation Association):

- Old Encinitas occupies the Highway 101 Corridor that parallels the beaches and ocean
- New Encinitas centers on El Camino Real

Figure 1 Regional Location



Imagery provided by ESRI and its licensors © 2017.

Project Location

N

Fig 1 Regional Loc

Figure 2 Project Site Location

- Olivenhain (which means "olive grove" in German) boasts plenty of open horse country, pastures, and a rural way of life
- Leucadia is famous for its giant eucalyptus trees that line the main thoroughfare on the Coast Highway
- Cardiff-by-the-Sea is made up of quaint homes dotting the hillsides overlooking the sea

Encinitas is actively engaged in addressing climate change, sustainability, and reductions in greenhouse gas (GHG) emissions. In March 2011, Encinitas adopted the *City of Encinitas Climate Action Plan* (2011 CAP) to provide guidance to the City to achieve the statewide reduction targets adopted by Assembly Bill (AB) 32 and to respond and adapt to the impacts of climate change. The 2011 CAP quantified GHG emissions for 2005 and provided a forecast for 2020. Based on this analysis, the City adopted both GHG reduction and climate change adaptation measures to demonstrate consistency with statewide goals set forth in AB 32. The 2017 CAP builds upon the goals of the 2011 CAP and provides a more recent inventory for the City (2012).

State GHG Reduction Efforts

The following section summarizes California's GHG emissions reduction efforts which the 2017 CAP is intended to be consistent with.

State Legislation and Guidance

The State of California considers GHG emissions and the impacts of climate change to be a serious threat to the public health, environment, economic well-being, and natural resources of California, and has taken an aggressive stance to mitigate the State's impact on climate change through the adoption of policies and legislation. The following summarizes the various State regulations which have guided the development of the 2011 CAP and now the 2017 CAP.

Executive Order S-3-05

In 2005, the governor issued Executive Order (EO) S-3-05, which identifies statewide GHG emission reduction targets to achieve long-term climate stabilization as follows:

- Reduce GHG emissions to 1990 levels by 2020
- Reduce GHG emissions to 80 percent below 1990 levels by 2050

In response to EO S-3-05, California Environmental Protection Agency (CalEPA) created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report") (CalEPA 2006). The *2006 CAT Report* identified a recommended list of strategies that the State could pursue to reduce GHG emissions. These are strategies that could be implemented by various State agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the State agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, among others.

Assembly Bill 32

California's major initiative for reducing GHG emissions is outlined in AB 32, *the California Global Warming Solutions Act of 2006*, signed into law in 2006. Assembly Bill 32 codifies the statewide target of reducing GHG emissions to 1990 levels by 2020 (essentially a 15 percent reduction below

2005 emission levels; the same requirement as under EO S-3-05), and requires the Air Resources Board (ARB) to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires the ARB to adopt regulations to require reporting and verification of the State's largest industrial emitters.

The ARB approved the initial AB 32 Scoping Plan on December 11, 2008 and a 2020 statewide GHG emission limit of 427 million metric tons (MMT) of carbon dioxide equivalents (CO_2e) was established. The Scoping Plan also included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

Senate Bill 97

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. Specifically, Section 15183.5(b)(1)A-G of Title 14 of the California Code of Regulations was amended to state that a qualified GHG Reduction Plan, or Climate Action Plan, may be used for tiering and streamlining the analysis of GHG emissions in subsequent CEQA project evaluation, provided that the GHG Reduction Plan or CAP does the following:

- Quantifies GHG emissions both existing and projected over a specific period of time, resulting from activities within a defined geographical area
- Establishes a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable
- Identifies and analyzes the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area
- Specifies measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level
- Establishes a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels
- Be adopted in a public process following environmental review

Senate Bill 375

Senate Bill 375 (SB 375), signed in August 2008, enhances the State's ability to reach AB 32 targets by directing the ARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles for 2020 and 2035. In addition, SB 375 directs each of the State's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On September 23, 2010, the ARB adopted final regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035.

Executive Order B-30-15

Executive Order B-30-15 established a statewide mid-term GHG reduction target of 40 percent below 1990 levels by 2030. Targets set beyond 2020 provide market certainty to foster investment and growth in industries like clean energy.

Senate Bill 32

Senate Bill 32 (SB 32) became effective on January 1, 2017 and requires the ARB to develop technologically feasible and cost effective regulations to achieve the targeted 40 percent GHG emission reduction. The ARB is currently working to update the Scoping Plan to provide a framework for achieving the 2030 target. The updated Scoping Plan is expected to be completed and adopted by ARB in late 2017 (ARB 2017). The Proposed Scoping Plan calls for emissions reductions at the State level that meet or exceed the statewide GHG target, and notes that additional effort will be needed to maintain and continue GHG reductions to meet the mid- (2030) and long-term (2050) targets. Additionally, the Proposed Scoping Plan recognizes the need to reach beyond statewide policy and engage local jurisdictions to develop plans to address local conditions and provide a "fair share" contribution towards the achievement of the State's GHG reduction targets. To assist local planning efforts with developing GHG reduction targets, the Proposed Scoping Plan includes annual community-wide thresholds of no more than six metric tons CO_2e per capita by 2030 and no more than two metric tons CO_2e per capita by 2050.[1]

7. General Plan Designation

The CAP would be implemented throughout the City and would occur in all General Plan designations.

8. Zoning

The CAP would be implemented throughout the City in all zoning designations.

9. Description of Project

The 2011 CAP, which serves as foundation for the 2017 CAP, was adopted by City Council on March 9, 2011 to provide a guiding document that outlines the course of action for identifying and implementing strategies to achieve citywide reductions in GHG emissions for both municipal and community operations. The 2011 CAP was designed to:

- Benchmark where the City currently stands relative to statewide emission goals
- Provide a roadmap for achieving statewide GHG emissions reduction targets
- Create a plan that meets specific citywide needs and objectives
- Provide guidance for the City to respond and adapt to the impacts of climate change

The 2011 CAP quantified community GHG emissions for 2005 and provided an emissions forecast for 2020. As part of the 2011 CAP, the City adopted both GHG reduction and climate change adaptation measures to demonstrate consistency with statewide targets set forth in AB 32.

The 2011 CAP included six emissions reduction strategies from the transportation, residential building, non-residential building, solid waste, water, and municipal operations sectors. Examples of

[1] ARB Proposed Climate Change Scoping Plan Update (2017), page 134

GHG reducing measures adopted as a component of the 2011 CAP include the deployment of a Bikeway Master Plan and a Green Building Incentive Program, new requirements for inclusion of solar photovoltaics (PV) for residential and non-residential buildings, and inclusion of transportation demand management strategies for municipal operations. Since 2011, the City has been actively engaged in implementing the measures in the CAP to reduce GHG emissions and address climate change.

Since adoption in 2011, there have been advancements in climate science and resiliency planning, revised formulas for calculating GHG baseline emissions, new regulations adopted (such as SB 32), and new methods conceived for reducing emissions. These changes have shaped an emergent need to update the City's CAP to incorporate the latest science, legislation and planning. The 2017 CAP builds upon the 2011 CAP by including an updated GHG emissions inventory, forecasting emissions, and setting reduction targets for 2020 and 2030, consistent with current legislative targets. City actions and supporting measures for the 2017 CAP were developed, in part, by evaluating the 2011 CAP measures to assess their current applicability and relevance. Reduction measures from the 2011 CAP were significantly reworked, while obsolete measures were removed and replaced with new actions and supporting measures. City actions and supporting measures in the 2017 CAP include applicable measures from the 2011 CAP and new actions needed to meet the updated 2020 and 2030 GHG reduction targets.

The 2017 CAP builds upon the goals of the 2011 CAP and provides a more recent inventory for the City. The inventory performed for baseline year 2012 demonstrated that the activities within the City emitted 483,773 metric tons (MT) of carbon dioxide equivalent units (CO_2e). Consistent with recommendations from the AB 32 2008 Scoping Plan, the City will aim to achieve a 13 percent reduction from 2012 levels by 2020 and a 41 percent reduction from 2012 level by 2030. This equates to reducing emissions by 53,232 MT of CO_2e by 2020 and 197,724 MT of CO_2e by 2030.

The 2017 CAP establishes strategies, goals, and actions based on the sectors evaluated in the 2012 inventory (i.e., on-road transportation, electricity, natural gas, solid waste, water, off-road transportation, and wastewater) to achieve reductions proportionate to Encinitas' fair share of the statewide targets set by AB 32 and SB 32 and work toward the State's longer term target identified in Executive Order S-3-05. Each strategy includes a set of City actions (actions) that, when implemented, would achieve the proposed emission reductions listed above. Accompanying the strategies and City actions are supporting measures which would indirectly aid in reducing emissions.

The action that would achieve the most significant reduction of emissions is the establishment of a Community Choice Energy Program (Action RE-1). This action is expected to reduce emissions by 43,644 MT of CO_2e by 2030. The next most effective action would be the implementation of a Zero Waste Program (Action ZW-1), which would achieve reductions of 2,830 MT of CO_2e and 11,921 MT of CO_2e in 2020 and 2030, respectively. The third most effective action would be to update the City's circulation element, promote active transportation, and plan for complete streets (Action CET-3) which would achieve reductions of 3,671 MT of CO_2e and 2,839 MT of CO_2e in 2020 and 2030, respectively. Related to Action CET-3, Action CET-1 calls for completing and implementing a citywide Active Transportation Plan (ATP). Although this action cannot be quantified until the ATP is completed, it is anticipated that significant emissions reductions could be achieved through the implementation of various proposed mobility projects recommended in the ATP. It is also important to note that the 2017 CAP includes several city actions which aim to promote the purchase and use of electric vehicles, and these actions were absent from the 2011 CAP.

Chapter 5 of the 2017 CAP evaluates and addresses the City's climate change vulnerability. The chapter proposes a set of adaptation strategies that would improve community sustainability and resilience. Many of the strategies can be implemented as part of existing planning processes, infrastructure improvements, or maintenance operations. However some new policies, programs, and projects are proposed, including some which may involve infrastructure improvements. Community education and awareness-building are also important components of the adaptation strategies presented.

The 2017 CAP represents an important step in acknowledging global climate change, its effects on the City, and the opportunity the City has to take action to reduce climate change impacts.

GHG Emissions Inventory and Forecast

2005 and 2012 GHG Emissions Inventories

As mentioned under *Description of Project*, in preparation of an updated CAP, the City conducted a 2012 community-wide GHG emissions inventory. The 2012 inventory serves as the baseline from which Encinitas' progress towards GHG emissions reduction is measured. The 2012 inventory (referred to as the 2012 baseline) also establishes an updated emissions level which can be tied to the State's GHG reduction targets and from which Encinitas' reduction goals can be established. The 2012 emissions inventory prepared for the 2017 CAP is limited to emissions that are generated from activities within the City from a defined set of sources (e.g., transportation, electricity use, waste disposal, etc.). These include emissions that are within the City's jurisdictional control and can be readily estimated, monitored, and reduced by City action while supporting the efforts of residences and businesses.

The 2012 GHG emissions inventory accounts for six primary GHGs: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), and perfluorocarbons (PFC); however, each GHG has varying levels of potency in the atmosphere. To simplify discussion and comparison of these emissions collectively, CAPs use a measurement referred to as carbon dioxide equivalent (CO_2e), which translates each GHG to an equivalent volume of CO_2 by weighting it by its relative global warming potential (GWP). For example, per the Intergovernmental Panel on Climate Change's (IPCC) Fourth Assessment Report, CH_4 and N_2O are 25 and 298 times more potent, respectively, than CO_2 in their ability to trap heat in the atmosphere (IPCC 2007).

In 2012, community and municipal activities in the City generated 483,773 MT of CO_2e, as summarized in Table 1. The sector with the greatest contribution to global climate change was on-road transportation accounting for 54 percent of the City's total GHG emissions or 260,127 MT of CO_2e. The electricity and natural gas sectors contributed 23 and 13 percent of the City's overall emissions or 113,556 and 62,027 MT of CO_2e, respectively. The City's 2011 CAP developed the initial GHG inventory for the year 2005. The 2005 emissions inventory totaled 548,993 MT of CO_2 per year or 8.78 MT of CO_2e per year per capita. Therefore, the 2012 inventory represents a decrease in emissions of approximately 65,220 MT of CO_2e. It should be noted that this reduction accounts for the fact that some corrections have been made to regional data and some modifications to the way emissions are calculated may affect the inventory totals.

Table 1 Business-as-Usual and Legislative-Adjusted Projections (MT of CO_2e/year)

Emissions Sector	MT of CO_2e	Percent (%)
On-Road Transportation	260,127	54
Electricity	113,556	23
Natural Gas	62,027	13
Solid Waste	22,471	5
Water	14,299	3
On-Road Transportation	9,138	2
Wastewater	2,155	<0.1
Total	483,773	100.0

Source: City of Encinitas 2017 Climate Action Plan, Table 2-1
Note: Numbers in columns may not add up due to rounding.

GHG Emissions Forecasts

The first step in preparing the comprehensive GHG emissions forecasts was developing a business-as-usual (BAU) scenario, which assumed the continuation of conventional behaviors without the inclusion of any additional efforts or legislative actions beyond what has already been adopted at the time of the baseline year (i.e., 2012). Namely, federal, state, and local policies, programs, and regulations designed to take effect in future benchmark years (e.g., 2020, 2030), and the GHG emissions reductions that would occur with their implementation, were not considered. The BAU model also assumes the population, housing, employment, and transportation activity will grow over time, consistent with regional projections. Further, the BAU model does not account for GHG emission reductions that will occur through implementation of the 2017 CAP.

Using these parameters, BAU projections were developed for the years 2020, 2030, and 2050. GHG emissions estimates were determined to be:

- 474,712 MT of CO_2e in 2020 or 2 percent lower than 2012 emissions
- 483,150 MT of CO_2e in 2030 or 0.1 percent higher than 2012 emissions
- 497,811 MT CO_2e in 2050 or 3 percent higher than 2012 emissions

The forecast years of 2020, 2030, and 2050 were selected for BAU projections to provide a comprehensive picture of the City's short and long-term emissions levels without considering reductions realized through federal and state regulations. Further, 2020, 2030, and 2050 represent benchmark years in terms of achieving legislated reductions goals (i.e., 1990 levels of GHGs by 2020 as mandated by AB 32, 40 percent below 1990 levels of GHGs by 2030 as mandated by SB 32, and 80 percent below 1990 levels by 2050 as directed by EO S-3-05).

DEMOGRAPHIC TRENDS

Emission projections were estimated for 2020, 2030, and 2050 using City-specific demographic and vehicle projections from the San Diego Association of Governments' (SANDAG) Series 13 Regional Growth Forecast. The City is expected to experience modest population growth by 2020, 2030, and 2050, as reflected in the emissions projections. Based on data used by the Energy Policy Initiatives Center (EPIC) to estimate projections, the City's population is expected to increase by six percent in 2020, seven percent in 2030, and ten percent in 2050 as compared to 2012 population levels. Total jobs are expected to increase by four percent by 2020, six percent by 2030, and 12 percent by 2050, as compared to 2012 job levels.

LEGISLATIVE REDUCTIONS

The second step in the climate action planning process was to model future emissions for the selected forecast years (i.e., 2020 and 2030) including a variety of legislative actions targeting future GHG emissions reductions without any additional local governmental action contained in the 2017 CAP. The applied legislative reductions include:

- California Renewables Portfolio Standards
- California Solar Policies and Programs
- California Energy Efficiency Standards
- Federal and California Vehicle Efficiency Standards

Table 2 shows the summary of the City's projected BAU GHG emissions with and without legislative action for the years 2020 and 2030. A BAU scenario including emissions reductions from legislative action was not modeled for 2050 because of the inherent uncertainty regarding political climate, advances in technology and climate science, and efficacy of existing or planned programs.

Table 2 Business-as-Usual and Legislative-Adjusted Projections (MT of CO_2e/year)

		2020 Projection		2030	
Emissions Sector	2012	BAU	Legislative-Adjusted	BAU	Legislative-Adjusted
On-Road Transportation	260,127	229,059	213,334	221,787	165,001
Energy	175,583	194,621	157,114	206,743	119,587
Solid Waste	22,471	24,575	24,575	25,014	25,014
Water	14,299	15,055	15,055	15,541	15,541
On-Road Transportation	9,138	8,943	8,943	11,441	11,441
Wastewater	2,155	2,460	2,460	2,625	2,625
Total	483,773	474,712	419,873	483,150	339,209
Percent Change from 2012 (%)	-	(2%)	(13%)	0.1%	(30%)

( ) denotes negative

Source: City of Encinitas 2017 Climate Action Plan, Table 2-2

Note: Numbers in columns may not add up due to rounding.

BUSINESS-AS-USUAL GREENHOUSE GAS EMISSIONS PROJECTIONS WITH LEGISLATIVE REDUCTIONS

Implementation of the legislative actions listed under *Legislative Reductions* would contribute to reductions in GHG emissions in the City, as shown in Table 2. By 2020, emissions are projected to decline by approximately 13 percent below 2012 levels; by 2030, emissions are projected to decrease by approximately 30 percent as compared to 2012 levels. The overall decrease in emissions is because of federal and State policies existing in the baseline year of 2012.

GHG Reduction Goals

The 2017 CAP aims to reduce GHG emissions by 13 percent below 2012 levels by 2020 and 41 percent by 2030. As directed by AB 32, SB 32, EO S-3-05, and B-30-15, the State targets a reduction in statewide GHG emissions of:

- 1990 levels by 2020
- 40 percent below 1990 levels by 2030

- 80 percent below 1990 levels by 2050

Taking the ARB's recommendation in the 2008 Scoping Plan into consideration, the 2011 CAP developed a 12 percent reduction target from 2005 baseline levels (546,548 MT of CO_2e) by 2020 (646,947 MT of CO_2e under the BAU scenario). The ARB's 2017 draft Scoping Plan Update currently recommends local targets of 6 MT of CO_2e per capita by 2030 and 2 MT of CO_2e in 2050. In addition, the statewide 2020 target is to reduce 2020 emissions to 1990 levels. Estimating the equivalent reduction needed from the 2012 baseline based on the State inventory, the City would need to reduce emissions four percent below 2012 levels by 2020 to be consistent with AB 32. Recognizing that anticipated state, federal, and local actions would achieve significant reductions by 2020, the City elected to set a more ambitious goal for 2020. In summary, the City will aim to achieve the following reduction goals:

- 13 percent below 2012 levels by 2020
- 41 percent below 2012 levels by 2030

To reach the short-term reduction goal of 13 percent below 2012 GHG emissions levels, the City will need to reduce emissions by 53,232 MT of CO_2e to 421,481 MT of CO_2e by 2020. These goals will be achieved by implementing a set of local GHG reduction actions established in the 2017 CAP.

Climate Action Plan Actions, Measures, and Adaptation Strategies

The 2017 CAP identifies a set of City actions to achieve the GHG emissions reduction goals. It also establishes supporting measures, which are currently unquantifiable but correspond with specific goals to help reduce GHG emissions. Likewise, the 2017 CAP includes a variety of climate change resiliency and adaptation strategies to help prepare for the anticipated effects of climate change. Proposed City actions were developed to meet the goals established by the City and to achieve or exceed the statewide GHG emissions reduction goals. The 2017 CAP actions are organized into the following focus areas, or categories: Electricity and Natural Gas, Water, On-Road Transportation, Off-Road Transportation, Zero Waste, and Carbon Sequestration. The City actions were selected based on the distribution of emissions sources revealed in the GHG emissions inventories, the emissions reductions needed to achieve the goals, the goals and policies identified in the General Plan, and existing and ongoing efforts and priorities. Collectively, the City actions identified in the 2017 CAP have the potential to reduce GHG emissions in Encinitas by 9,532 MT of CO_2e by 2020 and 69,159 MT of CO_2e by 2030. Therefore, the established set of City actions would provide for GHG reductions sufficient to meet Encinitas' proposed GHG emission reduction goals and the State's established targets. Table 3 shows the list of City actions and their associated GHG emissions reductions, while Table 4 provides a list of climate resiliency and adaptation measures.

Table 3 Summary of Climate Reduction Actions

CAP Actions		Potential 2020 GHG Reduction MT of CO_2e	Potential 2030 GHG Reduction MT of CO_2e
Electricity and Natural Gas			
BE-1:	Require Energy Audits of Existing Residential Units	47	122
BE-2:	Require New Single-Family Homes to Install Solar Water Heaters	130	1,241
BE-3:	Adopt Higher Energy Efficiency Standards for Commercial Buildings	98	220
BE-4:	Adopt Higher Energy Efficiency Standards for Commercial Buildings	612	2,728
MBE-1:	Continue Implementation of Energy Efficient Projects in Municipal Facilities	54	44
RE-1:	Establish a Community Choice Energy Program	--	43,644
RE-2:	Require New Homes to install Solar Photovoltaic Systems	141	614
RE-3:	Require Commercial Buildings to install Solar Photovoltaic Systems	59	452
MRE-1:	Supply Municipal Facilities with Onsite Renewable Energy	233	746
Electricity and Natural Gas Subtotal		**1,374**	**49,811**
Water			
WE-1:	Complete Water Rate Study and Implement New Water Rates	712	735
Water Subtotal		**712**	**735**
On-Road Transportation			
CET-1 :	Complete and Implement the Citywide Active Transportation Plan	Not-Quantified	Not-Quantified
CET-2:	Implement a Local Shuttle System	130	172
CET-3:	Improve Traffic Flow	3,671	2,839
CET-4:	Require Residential Electric Vehicle Charging Stations	185	1,357
CET-5:	Require Commercial Electric Vehicle Charging Stations	440	1,789
MCET-1:	Transition to Zero Emission Vehicle (ZEV) Municipal Fleet	55	370
On-Road Transportation Subtotal		**4,481**	**6,526**
Off-Road Transportation			
OR-1:	Adopt a Leaf Blower Ordinance to Limit Use of 2-stroke Leaf Blowers	128	142
Off-Road Transportation Subtotal		**128**	**142**
Solid Waste			
ZW-1:	Implement a Zero Waste Program	2,830	11,921
Solid Waste Subtotal		**2,830**	**11,921**
Carbon Sequestration			
CS-1:	Develop and implement an Urban Tree Planting Program	5	23
Urban Forestry Subtotal		**5**	**23**
Total		**9,532**	**69,159**

Source: Encinitas 2017 CAP Chapter 3: Greenhouse Gas Reduction Strategies, Goals, and Actions

Note: Numbers in columns may not add up due to rounding.

Resiliency and adaptation strategies are classified into five categories to address the climate change impacts identified in the City's Vulnerability Assessment (i.e., temperature, precipitation, flooding, wildfire, and sea-level rise). Each category includes programs and policies to support climate

resiliency and adaptation, focusing on specific vulnerabilities and impacts that have the potential to impact the community's populations, functions, and structures. The proposed strategies also have the potential to provide other important benefits to the community, or co-benefits. The strategies are categorized as follows:

- Prepare for Increase in Temperatures and Extreme Heat
- Prepare for Changes in Precipitation Patterns and Water Supply
- Prepare for Increased Wildfire Risk
- Prepare for Increase Flood Risk
- Prepare for Sea-Level Rise

Table 4 Summary of Climate Resiliency and Adaptation Strategies

Adaptation Strategies
Prepare for Increase in Temperatures and Extreme Heat
Strategy 1: Incorporate green infrastructure strategies into new and existing infrastructure to mitigate the effects of the UHIE by reducing the area of heat-absorbing paved surfaces and increasing landscaped area with planted vegetation, including shade trees. Examples of green infrastructure include street trees, climate-appropriate landscaping, green and cool roofs, and heat-reflective surfaces and materials. These actions will decrease instances of heat-related illness, improve air quality, and lower energy costs associated with indoor cooling.
Strategy 2: Promote the use of solar carports on new and existing surface parking lots to mitigate heat absorption and increase shaded areas for the City's population. Implementation priority will be given to City-owned parking lots to serve as example solar carports. Solar carports would additionally provide GHG-reducing co-benefits by increasing distributed solar generation and, if electric vehicle charging stations are added, improving charging accessibility.
Strategy 3: Promote the use of passive cooling design (e.g. appropriate building orientation, shade trees, window shading, cool roofs) and use the California Building Standards Code (CalGreen) voluntary measures for residential and nonresidential buildings to improve energy efficiency. Other energy efficiency measures (e.g. air sealing improvements, whole house fans, energy efficient air-conditioning units) should be encouraged in new development within the City to reduce demand for air conditioning and help reduce energy costs.
Strategy 4: Conduct outreach to educate City residents on the health risks associated with extreme heat events and strategies to prepare for these events. Alongside general outreach, particular focus should be given to educating populations vulnerable to extreme heat including children and the elderly.
Strategy 5: Coordinate with relevant agencies including, but not limited to, the San Diego County Office of Emergency Services, San Diego Unified Disaster Council, and San Diego Fire Department to better plan and prepare for extreme heat events and the increased demand for emergency services associated with these events. Coordinated efforts should include improving Heat-Health Alert Warning Systems, identifying key vulnerable populations within the City in preparation for heat related events, and coordinating with local health care institutions (e.g. Scripps Memorial Hospital) to increase extreme heat preparedness and resiliency.
Strategy 6: Work with local and regional employers to ensure worker protection measures are in place for extreme heat events. Measures may include assurance of adequate water, shade, rest breaks, and training on heat risks for all employees working in the City.
Strategy 7: Work with local businesses and institutions to provide a network of "Cool Zone" areas (i.e., cooling centers) for vulnerable residents to rest in air-conditioned environments during high temperature periods and heat wave events. Cooling centers can include locations like he Encinitas Library and the Encinitas Community and Senior Center. Work with the local school districts to ensure every school has air conditioning.
Strategy 8: Beaches are considered "Cool Zones" therefore by providing wide sandy beaches and participating in beach nourishment projects, in the future, it will expand the footprint of the beach and the City will be able to handle a larger population when needed and keep the public a safe distance from the bluffs.
Prepare for Changes in Precipitation Patterns and Water Supply
Strategy 1: Coordinate with local and regional partners (SDWD, OMWD, SDCWA) to support and improve water conservation efforts and programs for City residents. Coordinate with these agencies to provide educational outreach to residents on how best to conserve water and reduce water demand.

Adaptation Strategies
Strategy 2: Expand and/or improve the recycled water efforts currently in place at the San Elijo Water Reclamation Facility along with corresponding water conservation efforts to ensure that, when economically viable, all current and future city landscaping can source the majority of landscaping water needs from recycled sources.
Strategy 3: Work with relevant water agencies including SDCWA, OMWD, and SDWD to evaluate current and future water supply systems and vulnerabilities and how water resources may be impacted by climate change.
Strategy 4: Continue marketing and outreach program to promote participation in existing water conservation rebate and incentive programs in the region. Current programs for southern California include Water Smart San Diego (SDCWA), SoCal WaterSmart (Metropolitan Water District), and SDWD's free sprinkler nozzle program.
Strategy 5: Expand upon the City's existing Water Efficient Landscape Regulation to promote the use of climate appropriate landscaping (e.g., xeriscaping) to reduce demand for potable water resources among City residents. Promote current funding available through the Save Our Water Turf Replacement Rebate Program sponsored by DWR.
Prepare for Increased Wildfire Risk
Strategy 1: Coordinate with relevant agencies including OES, the California Department of Forestry and Fire Protection (CAL FIRE), and the Encinitas Fire Department to map and identify current and future land uses, neighborhoods, and infrastructure that are at a high risk of experiencing wildfire impacts.
Strategy 2: Continue to update the MHMP every five years as required by the State to comprehensively plan for current and future wildfire risks within the City and work to implement all strategies in the City's current MHMP.
Strategy 3: Update the Safety Element of the City's General Plan consistent with the Office of Planning and Research (OPR) General Plan Guidelines, which requires adopted safety elements to consider climate change and climate adaptation strategies pursuant to SB 379.
Strategy 4: Work with relevant State agencies, including OES and CAL FIRE, to improve coordination for emergency services related wildfire and related events in the City. Consider the development of a Community Wildfire Protection Plan to increase community resilience too wildfire events.
Strategy 5: Consider new development standards for City residents and businesses within the UWI, such as incorporating defensible space practices into landscape requirements for neighborhoods at increased risk of wildfire. Residential areas that should be considered for new standards include neighborhoods surrounding Lux Canyon, Saxony Canyon, the Manchester Preserve, and Escondido Creek.
Prepare for Increase Flood Risk
Strategy 1: Conduct a comprehensive assessment of all stormwater and wastewater infrastructure in the City and analyze how this infrastructure may be affected or compromised by increased risk of flooding events.
Strategy 2: Coordinate with relevant agencies such as OES and the Encinitas Public Works Department to map and identify all critical facilities and infrastructure that may be compromised by increased flood risk. The City should plan accordingly for upgrades, relocation of facilities and infrastructure or identify beach nourishment projects to better prepare for increased risk of flooding events.
Strategy 3: Coordinate with relevant agencies such as FEMA, OES and the Encinitas Fire Department to better plan and prepare emergency services required for flooding events including evacuation services, flood management services and recovery services.
Strategy 4: Continue local and regional ecosystem restoration efforts that will result in increased climate resiliency for flooding events within the City.
Prepare for Sea-Level Rise
Strategy 1: Support and monitor ongoing analysis of sea-level rise data relevant to the City's planning efforts. Continue to incorporate the most up-to-date information on sea-level rise into relevant planning documents including the Safety Element of the City's General Plan.
Strategy 2: Develop a Coastal Resiliency Mitigation Report to coordinate FEMA, tsunami mapping and the CoSMoS predictions for sea level rise. Utilize maps and FEMA Hazus software to estimate potential losses from tsunamis or sea level rise to map and display hazard data and the results of damage and economic loss estimates for building and infrastructure. By estimating losses, it provides a basis for developing mitigation plans and policies, emergency preparedness and response and recovery planning. Additionally, provide assistance to residents currently at risk of coastal erosions in preparing for future impacts.

Adaptation Strategies
Strategy 3: Develop a comprehensive outreach strategy to receive stakeholder input and educate residents about sea-level rise and how the community can best prepare for these impacts.
Strategy 4: Continue to implement current efforts focused on beach nourishment, coastal bluff improvements and wetland restoration, prioritizing projects that will mitigate the impacts sea level rise including coastal erosion and saltwater inundation.
Strategy 5: Coordinate with relevant agencies including FEMA, and OES to prepare and plan for the impacts of coastal erosion, sea-level rise, and coastal storm surge, continuously updating and utilizing the most relevant strategies and guidance provided by relevant agencies and institutions.
Strategy 6: Continue to map critical infrastructure in the City that may be impacted by sea-level rise and work with City's Public Works Department to plan accordingly.
Community Education
Strategy 1: Work with local community organizations to develop a climate change education outreach program focused on residents.
Strategy 2: Work with local businesses and business organizations to develop a climate change education outreach program focused on local businesses and the economy.
Strategy 3: Work with local schools, school districts and other educational organizations to develop a climate change education outreach program focused on children and future generations.
Source: Encinitas 2017 CAP Chapter 5: Climate Change Vulnerability, Resiliency, and Adaptation

Implementation and Monitoring

Implementation of the 2017 CAP will require the City to develop and implement new ordinances, programs, and projects, or modify existing ones, which will necessitate careful consideration of the operational and capital resources required, as well as the timing and phasing of implementation. As such, Chapter 4 of the 2017 CAP identifies implementation and monitoring mechanisms that will help the City ensure that the actions are completed and the goals are achieved. In addition to Chapter 4, a separate and detailed Implementation Plan will be prepared to supplement the final 2017 CAP and identify the key staffing needs, budget, funding sources, and specific timeline for implementation of each GHG reduction action and supporting measure.

The 2017 CAP does not involve any growth or development beyond that included in the General Plan, nor does it involve any land use or zoning changes. Rather, the 2017 CAP would promote development that could already occur under the General Plan. Specifically, the 2017 CAP would result in increased bikeways, pedestrian walkways, trails, bus stops, energy and water efficient improvements, installation of on-site solar, electric vehicle (EV) charging, and tree coverage, as well as reduced waste and traffic.

10. Required Approvals

The project requires the City Council approval of the 2017 CAP and adoption of the Negative Declaration. Although individual projects may be implemented under the 2017 CAP, each project would be subject to separate environmental review under CEQA.

11. Surrounding Land Uses and Setting

As mentioned under *Project Location*, the City is located 25 miles north of downtown San Diego and approximately 95 miles south of Los Angeles and is bordered by the Pacific Ocean to the west,

unincorporated San Diego County to the east, and three cities: Carlsbad, San Marcos, and Solana Beach.

12. Other Public Agencies Whose Approval is Required

The City of Encinitas has sole approval authority over the 2017 CAP. There are no other public agencies whose approval is required.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology and Soils
☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials	☐ Hydrology / Water Quality
☐ Land Use/ Planning	☐ Mineral Resources	☐ Noise
☐ Population / Housing	☐ Public Services	☐ Recreation
☐ Transportation / Traffic	☐ Tribal Cultural Resources	☐ Utilities / Service Systems
☐ Mandatory Findings of Significance		

Determination

Based on this initial evaluation:

■ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	Date
Scott Vurbeff	Environmental Project Manager
Printed Name	Title

This page intentionally left blank

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	■	☐
b. Substantially damage to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings along a State scenic highway?	☐	☐	■	☐
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	■	☐

a. Would the project have a substantial adverse effect on a scenic vista?

c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Encinitas is located along six miles of Pacific coastline in northern San Diego County. Topography is characterized by cliffs, coastal beaches, flat topped coastal areas, rolling hills, and steep mesa bluffs. Scenic resources in the City are defined in the Resource Management Element of the City's General Plan and include vista points, critical viewsheds, and scenic roads and view corridors.

Scenic vista points include areas that are currently vista points as well as areas to be acquired and developed as vista points, such as (City of Encinitas 2011):

- Vista points to be acquired and developed:
  - San Elijo and Kilkenny (overlooking lagoon and coast)
  - Highway 101, north of La Costa Avenue
  - Northeast and northwest corner of Interstate 5 (I-5) and La Costa Avenue
  - Encinitas Community Park site
- Vista points to be developed and maintained:
  - Orpheus Street Park site
  - Oak Crest Park site
  - West end of "D" Street

  - West end of "F" Street
  - West end of "H" Street
  - West end of "J" Street
- Vista points to be maintained and upgraded as necessary:
  - Leucadia Beach State Park
  - Cardiff Sports Park
  - West end of "I" Street
  - Moonlight State Beach
  - Swami's City Park
  - Existing Vista Point on southbound I-5
  - Cardiff Beach State Park (south parking lot)
  - Self-Realization Fellowship

Critical viewsheds are defined in the Resource Management Element as those areas that extend radially for 2,000 feet from the vista point and cover areas upon which development could potentially obstruct, limit, or degrade the view (City of Encinitas 2011).

The Resource Management Element also designates the following roads as scenic highway/visual corridor viewsheds (City of Encinitas 2011):

- Saxony Road, from Leucadia Boulevard, north to La Costa Avenue
- Highway 101 from Encinitas Boulevard south to Santa Fe Drive
- El Camino Real from La Costa Boulevard south to Manchester Avenue
- Highway 101, La Costa Avenue, to South Carlsbad Beach
- La Costa Avenue, from just west of I-5 to El Camino Real
- Highway 101, from Encinitas Boulevard to La Costa Avenue
- Leucadia Boulevard, between Highway 101 and El Camino Real
- San Elijo Avenue (and Highway 101) south of Cardiff Beach State Park to Santa Fe Drive
- Manchester Avenue from San Elijo Avenue to Encinitas Boulevard
- I-5, crossing San Elijo Lagoon
- Rancho Santa Fe Road within Olivenhain
- Lone Jack Road from Rancho Santa Fe Road to Lone Hill Lane
- Santa Fe Drive from South Vulcan Avenue to El Camino Real

The 2017 CAP serves as a roadmap for the City to reduce GHG emissions and prepare for the impacts of climate change. The 2017 CAP builds on the goals and policies of the 2011 CAP as well as the General Plan, and complements the State's objectives to address climate change.

The 2017 CAP is designed to reduce the City's GHG emissions and combat climate change. It establishes near- and long-term goals for reducing emissions. In order to meet these GHG reduction goals, the CAP identifies local climate reduction actions. These actions focus on reducing emissions in the following sectors: Electricity and Natural Gas, Water, On-Road Transportation, Off-Road Transportation, Zero Waste, and Carbon Sequestration, as mentioned in *Climate Action Measures and Adaptation Strategies* subsection. Most of these actions will have quantifiable reductions in GHG emissions, while others are difficult to measure. Many of these actions are intended to achieve broader sustainability objectives, such as improving air quality and public health, conserving water and other natural resources, and promoting economic vitality and "green jobs."

The 2017 CAP does not involve any land use or zoning changes. Rather, the 2017 CAP would promote development that could already occur under the General Plan. As a policy document, the

2017 CAP would not affect scenic vistas or the visual character or quality of the area. Implementation of the climate reduction actions and supporting measures would generally encourage energy efficiency and conservation, as well as the use of solar energy; encourage walking, bicycling, and use of existing public transit; and increase solid waste diversion.

The 2017 CAP includes climate reduction actions (Actions RE-2, RE-3, and MRE-1) to pursue small-scale onsite solar energy systems at City buildings and facilities as well as new residential and commercial developments. Additionally, climate reduction Actions BE-2 and BE-4 require residential and commercial developments to install solar-powered hot water heaters. In 2011, the California Legislature signed Senate Bill 226 (SB 266) and created a statutory exemption (CEQA exemption 21080.35) for solar projects installed on rooftops or existing parking lots that meet specified conditions. In addition, Assembly Bill 2188 (AB 2188) took effect on January 1, 2015 and required local governments to adopt a streamlined and expedited permit approval process for small residential solar energy panels. Encinitas adopted an ordinance (Encinitas Municipal Code: 23.13, *Small Residential Rooftop Solar Systems*) to comply with AB 2188 regulations. Solar PV array installations that are exempt from CEQA are the type of solar energy projects anticipated to result from implementation of the CAP actions. Large-scale substantial renewable energy facilities, such as a wind or solar farm or large solar panel installations that could have visual impacts are not included in the 2017 CAP actions, and thus no aesthetics impact would occur related to those types of facilities.

The 2017 CAP also includes a climate reduction action (Action CS-1) that facilitates the development and implementation of an Urban Tree Planting Program. Similarly, the 2017 CAP has a variety of resiliency and adaptation strategies that encourage making use of the natural climate in Encinitas to increase energy efficiency and reduce residential energy costs. This would include maximizing the cooling of buildings through tree planting and associated shade created by the trees to reduce building electricity demands. These resiliency and adaptation strategies include:

- **Strategy 1, Prepare for Increases in Temperature and Extreme Heat.** Incorporate green infrastructure strategies into new and existing infrastructure to mitigate the effects of the Urban Heat Island Effect (UHIE) by reducing the area of heat-absorbing paved surfaces and increasing landscaped area with planted vegetation, including shade trees. Examples of green infrastructure include street trees, climate-appropriate landscaping, green and cool roofs, and heat-reflective surfaces and materials. These actions will decrease instances of heat-related illness, improve air quality, and lower energy costs associated with indoor cooling.
- **Strategy 2, Prepare for Increases in Temperature and Extreme Heat.** Promote the use of solar carports on new and existing surface parking lots to mitigate heat absorption and increase shaded areas for the City's population. Implementation priority will be given to City owned parking lots to serve as example solar carports. Solar carports would additionally provide GHG-reducing co-benefits by increasing distributed solar generation and, if electric vehicle charging stations are added, improving charging accessibility.
- **Strategy 3, Prepare for Increases in Temperature and Extreme Heat.** Promote the use of passive cooling design (e.g. appropriate building orientation, shade trees, window shading, cool roofs) and use the California Building Standards Code (CalGreen) voluntary measures for residential and nonresidential buildings to improve energy efficiency. Other energy efficiency measures (e.g. air sealing improvements, whole house fans, energy efficient air-conditioning units) should be encouraged in new development within the City to reduce demand for air conditioning and help reduce energy costs.

Planting new street trees and private trees may change the visual character of the City. Encinitas' urban forest is managed by the Department of Public Works, which oversees the Urban Forestry Management Program. As part of the Urban Forestry Management Program, Encinitas has a Tree Ordinance and Urban Forest Management Policy. The Tree Ordinance and Urban Forest Management Policy aim to provide an orderly protection of trees; promote the health, safety, welfare, and quality of life for the residents of the City; protect property values; and avoid significant negative impacts on adjacent properties. Additionally, the City has developed an Administrative Manual which establishes specific technical standards and specifications necessary to implement the Urban Forest Management Policy. However, the Administrative Manual is currently under review (City of Encinitas 2016a).

With respect to trees on private property, the City recognizes that public education regarding the importance of proper private tree care is an essential component of urban forest management and the Administrative Manual includes goals to raise the level of public understanding for trees and urban forest systems, resulting in improved private tree selection, placement, care, and more sustainable urban forest benefits. Therefore, it is anticipated that the implementation of Action CS-1 and the applicable resiliency and adaptation strategies would not result in a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of the City. Rather, trees would be planted in a way that promotes the scenic vistas mentioned above as well as the existing character and quality of the City.

Further, the 2017 CAP includes an action (Action MBE-1) to pursue energy efficiency and conservation at City buildings and facilities, as well as actions (Actions BE-1 and BE-3) to encourage energy efficiency improvements in new and existing buildings throughout the City. Making buildings more energy efficient does not generally involve any design features that would adversely affect scenic vistas or negatively affect the visual character or quality. Implementation of 2017 CAP actions and supporting measures would not result in substantial effects on a scenic vista or substantially degrade the existing visual character or quality of the City because they would not affect the height, bulk, or scale of development or otherwise result in the development of large structures that could block or highly modify the visual environment. Further, any future site-specific discretionary projects would be subject to subsequent environmental review wherein any site-specific aesthetic impacts would be addressed accordingly. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings in a State scenic highway?

The majority of Interstate 5 (I-5) located in San Diego County is eligible to be designated as a State Scenic Highway, including the portion that runs through Encinitas. Specifically, in San Diego County, eligibility for Scenic Highway designation of I-5 begins approximately at San Clemente and extends south to the City of San Diego, and then from San Diego south to the community of Otay Mesa, which is located at the United States/Mexico border (Caltrans 2011).

The 2017 CAP is a policy document that does not include any development or other physical changes to the environment, nor does it grant any entitlements for development that would potentially damage scenic resources such as trees, rock outcroppings, and historic buildings in a State scenic highway. Proposed climate reduction actions and supporting measures would generally encourage energy efficiency and conservation, as well as the use of solar energy; facilitate walking, bicycling, and use of public transit; and increase solid waste diversion. Furthermore, Goal 9 included in the Land Use Element of the General Plan aims to preserve the existence of present natural open

spaces, slopes, bluffs, lagoon areas, and maintain the sense of spaciousness and semirural living within the I-5 view corridor and within other view corridors, scenic highways, and vista/view sheds as identified in the Resource Management Element of the General Plan (City of Encinitas 2011). Because implementation of 2017 CAP actions would not potentially damage scenic resources, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Implementation of the 2017 CAP would not result in the development of new significant sources of light or glare. Distributed installation of small-scale solar PV systems is encouraged by the 2017 CAP to reduce community-wide GHG emissions within Encinitas. Solar panels are designed to absorb light to generate energy, not reflect it. Thus, their placement and orientation on structures would not adversely affect day or nighttime views in the area. Moreover, home and business owners may choose to install solar PV panels regardless of whether the 2017 CAP is implemented.

The 2017 CAP also includes climate reduction actions (Actions BE-1 and BE-3), under Goal 1.1, *Reduce Building Energy Consumption*, to encourage energy efficiency improvements in new and existing buildings throughout the City. Likewise, the CAP includes a climate reduction action (Action MBE-1), under Goal 1.2, *Reduce Municipal Operation Energy Consumption*, to pursue energy efficiency and conservation at City buildings. Both Goal 1.1, *Reduce Building Energy Consumption*, and Goal 1.2, *Reduce Municipal Operation Energy Consumption*, also have supporting measures. Implementation of these climate reduction actions and supporting measures may include replacing existing lighting such as streetlights, traffic signals, and other outdoor lighting with energy efficient lighting, but would not create new sources of light and glare and, in some instances, may reduce lighting levels.

Furthermore, Encinitas' Municipal Code (EMC) Section 30.40.010(I) requires new lighting in all residential and commercial zones to be shielded in such a manner that the light is directed away from streets or adjoining properties (City of Encinitas 2017). Specifically, in all residential zones and commercial uses adjoining residential zones there must not be a measured sustained light standard in excess of one-half foot-candle at the property line. Additionally, all outdoor lighting fixtures must be fully shielded so as to cause all emitted sustained light to be projected below an imaginary horizontal plane passing through the lowest point of the luminary, lamp, or light source used in the fixture. Implementation of the 2017 CAP is not expected to create a new source of substantial light or glare that would adversely affect daytime or nighttime views. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank

2 Agriculture and Forest Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. Conflict with existing zoning for or cause rezoning of forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	☐	☐	☐	■

a. Would the project convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

e. Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

Agricultural activities occur within the City on a small scale, particularly ornamental flower cultivation in commercial greenhouses, comprising approximately three percent of total land use acreage. Other agricultural operations occur within the City in the form of private and community gardens. No large-scale, commercial agricultural cultivation occurs within the City. Likewise, the City does not contain any forest resources. Furthermore, the 2017 CAP is a policy document that does not involve any land use or zone changes, nor does it involve any development or other physical changes to the environment. As such, implementation of the 2017 CAP would not have the potential to substantially degrade agricultural resources or convert agricultural or forest land to non-agricultural or non-forest uses, nor would it conflict with existing zoning. Impacts to agricultural and forestry resources would not occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	■	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	■	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	■	☐

Encinitas is in the San Diego Air Basin (Basin), which is under the jurisdiction of San Diego Air Pollution Control District (SDAPCD). As the local air quality management agency, the SDAPCD is required to monitor air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether or not standards are met or exceeded, the Basin is classified as being in "attainment" or "non-attainment." The Basin is a non-attainment area for the federal standards for ozone (8-hour), and the State standards for ozone (8-hour and 1-hour), PM_{10}, and $PM_{2.5}$. The Basin is designated unclassifiable or in attainment for all other federal and state standards (SDAPCD). Thus, the SDAPCD is required to implement strategies to reduce pollutant levels to recognized acceptable standards. The sources, health effects, and typical controls associated with criteria pollutants are described in Table 5.

Table 5 Sources, Health Effects, and Typical Controls Associated with Criteria Pollutants

Pollutant	Sources	Health Effects	Typical Controls
Ozone (O_3)	Formed when reactive organic gases (ROG) and nitrogen oxides react in the presence of sunlight. ROG sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage.	Breathing difficulties, lung tissue damage, vegetation damage, damage to rubber and some plastics.	Reduce motor vehicle reactive organic gas (ROG) and nitrogen oxide (NO_X) emissions through emission standards, reformulated fuels, inspections programs, and reduced vehicle use. Limit ROG emissions from commercial operations, gasoline refueling facilities, and consumer products. Limit ROG and NO_X emissions from industrial sources such as power plants and manufacturing facilities.
Carbon monoxide (CO)	Any source that burns fuel such as automobiles, trucks, heavy construction and farming equipment, residential heating.	Chest pain in heart patients, headaches, reduced mental alertness.	Control motor vehicle and industrial emissions. Use oxygenated gasoline during winter months. Conserve energy
Nitrogen dioxide (NO_2)	See Carbon Monoxide.	Lung irritation and damage. Reacts in the atmosphere to form ozone and acid rain.	Control motor vehicle and industrial combustion emissions. Conserve energy.
Sulfur dioxide (SO_2)	Coal or oil burning power plants and industries, refineries, diesel engines.	Increases lung disease and breathing problems for asthmatics. Reacts in the atmosphere to form acid rain.	Reduce use of high sulfur fuels (e.g., use low sulfur reformulated diesel or natural gas). Conserve energy.
Respirable particulate matter (PM_{10})	Road dust, windblown dust, agriculture and construction, fireplaces. Also formed from other pollutants (NO_X, SO_X, organics).	Increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling.	Control dust sources, industrial particulate emissions, woodburning stoves and fireplaces. Reduce secondary pollutants which react to form PM_{10}. Conserve energy.
Fine particulate matter ($PM_{2.5}$)	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning. Also formed from reaction of other pollutants (NO_X, SO_X, organics, and NH3).	Increases respiratory disease, lung damage, cancer, and premature death, reduced visibility, surface soiling. Particles can aggravate heart diseases such as congestive heart failure and coronary artery disease.	Reduce combustion emissions from motor vehicles, equipment, industries, and agricultural and residential burning. Precursor controls, like those for ozone, reduce fine particle formation in the atmosphere.
Lead	Metal smelters, resource recovery, leaded gasoline, deterioration of lead paint.	Learning disabilities, brain and kidney damage. Control metal smelters.	No lead in gasoline or paint.
Sulfur Dioxide (SO_2)	Coal or oil burning power plants and industries, refineries, diesel engines.	Increases lung disease and breathing problems for asthmatics. Reacts in the atmosphere to form acid rain.	Reduce use of high sulfur fuels (e.g., use low sulfur reformulated diesel or natural gas). Conserve energy.
Sulfates	Produced by reaction in the air of SO2, (see SO2 sources), a component of acid rain.	Breathing difficulties, aggravates asthma, reduced visibility.	See SO2

Pollutant	Sources	Health Effects	Typical Controls
Hydrogen Sulfide	Geothermal power plants, petroleum production and refining, sewer gas.	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations).	Control emissions from geothermal power plants, petroleum production and refining, sewers, and sewage treatment plants.
Visibility Reducing Particulates	See $PM_{2.5}$	Reduced visibility (e.g. obscures mountains and other scenery), reduced airport safety.	See $PM_{2.5}$
Vinyl Chloride	Exhaust gases from factories that manufacture or process vinyl chloride (construction, packaging, and transportation industries).	Central nervous system effects (e.g. dizziness, drowsiness, headaches), kidney irritation, liver damage, liver cancer.	Control emissions from plants that manufacture or process vinyl chloride, installation of monitoring systems.
Toxic Air Contaminant (TAC)	Combustion engines (stationary and mobile), diesel combustion, storage and use of TAC-containing substances (i.e. gasoline, lead smelting, etc.)	Depends on TAC, but may include cancer, mutagenic and/or teratogenic effects, other acute or chronic health effects.	Toxic Best Available Control Technologies (T-BACT), limit emissions from known sources.

Source: County of San Diego 2007

The federal Clean Air Act Amendments (CAAA) mandates that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. The SIP includes pollution control measures to demonstrate how the standards will be met through those measures. The SIP is established by incorporating measures established during the preparation of Air Quality Management Plans (AQMP) and adopted rules and regulations by each local APCD and AQMD, which are submitted for approval to the ARB and the U.S. EPA (ARB 2016). The goal of an AQMP is to reduce pollutant concentrations below the National Ambient Air Quality Standards (NAAQS) through the implementation of air pollutant emissions controls.

The San Diego Regional Air Quality Strategy (RAQS) was developed pursuant to CCAA requirements. The RAQS was initially adopted in 1991 and was updated in 1995, 1998, 2001, 2004, 2009, and most recently in December 2016 (SDAPCD 2016). The RAQS identifies feasible emission control measures to provide progress in San Diego County toward attaining the State ozone standard. The pollutants addressed in the RAQS are VOC and NO_X, precursors to the photochemical formation of ozone (the primary component of smog). The RAQS was initially adopted by the SDAPCD Board on June 30, 1992, and amended on March 2, 1993, in response to ARB comments. At present, no attainment plan for PM_{10} or $PM_{2.5}$ is required by the state regulations. However, SDAPCD has also adopted measures to reduce particulate matter in San Diego County. These measures range from regulation against open burning to incentive programs that introduce cleaner technology. These measures are included in the SDAPCD report titled "*Measures to Reduce Particulate Matter in San Diego County*" (SDAPCD 2005).

The RAQS relies on information from the ARB and San Diego Association of Governments (SANDAG), including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

d. Would the project expose sensitive receptors to substantial pollutant concentrations?

The 2017 CAP is a policy document that does not facilitate new development or other physical changes to the environment. Rather, the 2017 CAP would support development that could already occur under the General Plan. Thus, it is consistent with the AQMP. Furthermore, the purpose and intended effect of the 2017 CAP is to reduce GHG emissions generated in the City to help reduce the effects of climate change.

The proposed actions and supporting measures, when implemented, may require construction activities (e.g., bicycle facilities, energy retrofits, increased access to recycled water, etc.). Emissions from construction activities represent temporary impacts that are typically short in duration, depending on the size, phasing, and type of project. These impacts are generally associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction vehicles and soil hauling trucks, in addition to ROG that would be released during the drying phase upon application of architectural coatings. Construction emissions would not likely exceed SDAPCD air quality emissions thresholds; however, implementation of development projects would require project-level analysis under CEQA.

With respect to operational emissions, many programs to reduce GHG emissions would have the secondary benefit of reducing criteria pollutant emissions. For example, actions and supporting measures identified in the 2017 CAP aim to reduce building consumption and increase energy efficiency (Actions BE-1, BE-2, BE-3, BE-4, and MBE-1); promote renewable energy (Actions RE-1, RE-2, RE-3, and MRE-1); reduce vehicle miles traveled (Actions CET-1 and CET-2); improve traffic flow (Action CET-3); increase and promote travel via low- and zero- emissions modes (i.e., walking, bicycling, transit, electric vehicles, and other alternatively fueled vehicles (Actions CET-1, CET-2, CET-4, CET-5, and MCET-1)); reduce on-road gasoline and diesel fuel use (Actions CET-1, CET-2, CET-3, CET-4, CET-5, and MCET-1); reduce off-road gasoline and diesel fuel use (Action OR-1); reduce potable water use (Action WE-1); increase urban tree cover (Action CS-1); and improve waste management efficiency (Action ZW-1). Implementation of these CAP actions and the supporting measures would be beneficial by helping Encinitas meet applicable air quality plan goals and generally reduce sensitive receptor exposure to pollutant concentrations. In addition, as mentioned above, any development projects constructed in the City would undergo project-level CEQA review. Impacts related to air quality would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project create objectionable odors affecting a substantial number of people?

The ARB *Air Quality Land Use Handbook: A Community Health Perspective* (2005) identifies land uses associated with odor complaints which include: sewage treatment plants, landfills, recycling facilities, waste transfer stations, petroleum refineries, biomass operations, auto body shops,

coating operations, fiberglass manufacturing, foundries, rendering plants, and livestock operations (ARB 2005).

Climate reduction Action ZW-1, included under Goal 6.1, *Divert Solid Waste*, would encourage backyard composting and supplemental measures included under Goal 6.1, *Divert Solid Waste*, would encourage compost systems at appropriate community facilities throughout the City. Backyard and City compost systems are not identified on the list of "Sources of Odor Complaints" (Table 1-4) as provided in the ARB *Air Quality Land Use Handbook* and would not be anticipated to generate odors affecting a substantial number of people. Therefore, the 2017 CAP would not facilitate any development that would create odors and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. 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 the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	■	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	■	☐
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	■	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	■	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	■	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	■

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

c. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The 2017 CAP does not include any site-specific development, designs, or proposals, nor does it grant any entitlements for development that would result in biological resource impacts. Encinitas is a primarily urbanized community; nevertheless, the General Plan Land Use Element incorporates goals and policies to protect biological/ecological resources and preserve sensitive areas. For example, Policy 8.10, included under Goal 8, states that the Ecological Resource/Open Space/Parks category is intended to be applied to both active and passive park lands; lagoons; wetland habitat areas and their adjacent buffers; and other areas of significant environmental quality or public resource value. Policy 8.10 also states that lands in this category, other than public parks, and similar areas for active recreation will be limited to uses and activities related to habitat enhancement; educational and scientific nature study; passive recreation which will have no significant adverse effect or negative visual impact on natural processes or scenic quality.

Additionally, the Resource Management Element of the General Plan provides a blueprint for open space and conservation, including specific goals and policies that have been developed to protect Encinitas' natural open space and support conservation efforts. Implementation of the 2017 CAP would not have a substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special status, or wildlife movement. In addition, the 2017 CAP itself would not have a substantial adverse effect on any riparian habitat or sensitive natural community. Furthermore, CAP Action CS-1, included under Goal 7.1, *Increase Urban Tree Cover*, supports the development and implementation of an Urban Tree Planting Program, including standards to right-size trees and minimizing pruning and irrigation needs.

Furthermore, the actions and supporting measures included in the 2017 CAP would generally apply to the urbanized areas of the City, with little application to parks, open spaces area, or other locations where sensitive biological resources may be present. In addition, as discussed above, Action CS-1 is specifically aimed at the preservation of trees and biological habitats. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The 2017 CAP does not include any development, nor would it add or enable any new development that would conflict with local goals, policies, or ordinances protecting biological resources. Rather, the 2017 CAP would facilitate development that could already occur under the General Plan. In addition, the 2017 CAP contains actions and supporting measures that are consistent with the General Plan, which contains Land Use and Resource Management Elements with goals and policies to identify, protect, and enhance significant ecological and biological resources in Encinitas.

Specifically, the General Plan Resource Management Element includes policies 10.1 through 10.11, under Goal 10 which aims to preserve the integrity, function, productivity, and long-term viability of environmentally sensitive habitats throughout the City, including kelp-beds, ocean recreational areas, coastal water, beaches, lagoons and their up-lands, riparian areas, coastal strand areas, coastal sage scrub, and coastal mixed chaparral habitats (City of Encinitas 2011).

Additionally, the City passed the Municipal Tree Ordinance (EMC Chapter 15.02). The Municipal Tree Ordinance was established to promote and protect the public health, safety, and general welfare of City trees by providing for the regulation of planting, management, maintenance, preservation, and where necessary, removal of public and heritage trees.

The 2017 CAP includes a climate reduction action (Action CS-1), as mentioned above under Impacts "a-d" of the *Biological Resources* Section. Action CS-1, included under Goal 7.1, *Increase Urban Tree Cover*, supports the development and implementation of an Urban Tree Planting Program, including standards to right-size trees and minimizing pruning and irrigation needs. The 2017 CAP would not affect the City's ability to attain goals and policies that protect biological resources, including the Municipal Tree Ordinance. Therefore, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

The 2017 CAP would not facilitate any specific development projects nor would it add or enable any new development that would conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	■	☐
b. Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	☐	☐	■	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	■	☐
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	■	☐

a. *Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*

b. *Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?*

c. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

d. *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

The 2017 CAP is a policy document containing programs that are consistent with Encinitas' General Plan. The General Plan includes goals and policies in the Resource Management Element that protect and preserve historic resources. For example, General Plan Goal 7 included in the Resource Management Element requires the City to make every effort to ensure significant scientific and cultural resources in the Planning Area are preserved for future generations (City of Encinitas 2011). Additionally, Policies 7.1 – 7.4 included under Goal 7 aim to: require that paleontological, historical, and archaeological resources in the planning area are documented, preserved, or salvaged if threatened by new development; require completion of a survey to identify historic structures and archaeological/cultural sites throughout the community and ensure that every action is taken to ensure their preservation; pursue the development of a historic resources program to assist in the identification, preservation, and restoration of those buildings, structures, and places within the City that have historic significance; and encourage the development of cultural facilities to be made available to the public, such as performing arts theaters, museums, and libraries (City of Encinitas 2011).

The City also has Historic Preservation Strategies included in the *Encinitas Downtown Specific Plan* (Chapter 8.0) and the *Encinitas North 101 Corridor Specific Plan* (Chapter 7.0). The Historic Preservation Strategies provide guidance for regulatory mechanisms, incentive strategies, and additional measures.

The 2017 CAP includes measures that would encourage the retrofit of older buildings to be more energy efficient, as well as installation of solar PV systems on structures in the City. Physical alteration to historical buildings could adversely affect listing and/or eligibility. However, the City currently has policies in place to protect historical resources (including City-owned buildings), such as the goals/policies in the Resource Conservation Element of the General Plan. Although the 2017 CAP does not include any development, nor does it grant any entitlements for development that could cause a substantial adverse change in the significance of a historical, cultural, or archaeological resource, the 2017 CAP would be implemented in a manner consistent with the General Plan goals and policies, including those related to the protection and preservation of historic and cultural resources. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

6 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	■	☐
ii. Strong seismic ground shaking?	☐	☐	■	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	■	☐
iv. Landslides?	☐	☐	■	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c. Be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	■	☐
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property?	☐	☐	■	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	■	☐

a.i Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

a.ii Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

a.iii Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

a.iv Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

b Would the project result in substantial soil erosion or the loss of topsoil?

c. Would the project be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

d. Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property?

The 2017 CAP is a policy document containing climate actions and supporting measures to reduce GHG emissions. The proposed 2017 CAP is consistent with Encinitas' General Plan and does not include any site-specific development, designs, or proposals, nor does it grant any entitlements for development that would impact or be impacted by geology and soils. Encinitas is located in a seismically active region and is susceptible to other various geological hazards such as the potential for liquefaction, landslides, subsidence, and expansive soils. However, all development projects are required to conform to applicable provisions of the current California Building Code (CBC). Additionally, the Public Safety Element of the General Plan includes policies to minimize injury, loss of life, property damage, and other impacts caused by seismic shaking, fault rupture, ground failure, earthquake induced landslides, and other earthquake-induced ground deformation.

For example, Policies 1.2, 1.3, 1.6, 1.7, 1.9, 1.12, and 2.3 included under Goals 1 and 2, fully cover the necessity to address seismic and geologic hazards (City of Encinitas 1995):

Goal 1. Public health and safety will be considered in future Land Use Planning

Policy 1.2 Restrict development in those areas where slope exceeds 25% as specified in the Hillside/ Inland Bluff overlay zone regulations of the zoning code. Encroachment into slopes as detailed in the Hillside/ Inland Bluff overlay may range from 0 percent to a maximum of 20 percent, based on a sliding scale of encroachment allowances reflective of the amount of slopes, the property within steep upon the discretionary judgement that there is no feasible alternative siting or design which eliminates or substantially reduces the need for such encroachment, and it is found that the bulk and scale of the proposed structure has been minimized to the greatest extent feasible and such encroachment is necessary for minimum site development and that the maximum contiguous area of sensitive slopes shall be preserved. Within the Coastal Zone and for the purposes of this section, " encroachment" shall constitute any activity which involves grading, construction, placement of structures or materials, paving, removal of native vegetation

including clear- cutting for brush management purposes, or other operations which would render the area incapable of supporting native vegetation or being used as wildlife habitat. Modification from this policy may be made upon the finding that strict application of this Policy would preclude any reasonable use of property (one dwelling unit per legal parcel). Exceptions may also be made for development of circulation element roads, local public streets or private roads and driveways which are necessary for access to the more developable portions of a site on slopes of less than 25% grade, and other vital public facilities, but only to the extent that no other feasible alternatives exist, and minimum disruption to the natural slope is made.

Policy 1.3 The City will rely on the Coastal Bluff and Hillside/ Inland Bluff Overlay Zones to prevent future development or redevelopment that will represent a hazard to its owners or occupants, and which may require structural measures to prevent destructive erosion or collapse.

Policy 1.6 The City shall provide for the reduction of unnatural causes of bluff erosion, as detailed in the Zoning Code, by:

a. Only permitting public access stairways and no private stairways, and otherwise discouraging climbing upon and defacement of the bluff face

b. Improving local drainage systems to divert surface water away from the bluff

c. Studying the underground water system and looking for potential solution to bluff instability/ erosion caused by such water

d. Reducing the infusion of ground water from domestic sources through, among other actions, requiring the removal of existing irrigation systems within forty feet of the bluff edge and prohibiting the installation of such systems in new development

e. Permitting pursuant to the Coastal Bluff Overlay Zone, bluff repair and erosion control measures on the face and at t:he top of the bluff that are necessary to repair human- caused damage to the bluff, and to retard erosion which may be caused or accelerated by land- based forces such as surface drainage or ground water seepage, providing that no alteration of the natural character of the bluff shall result from such measures, where such measures are designed to minimize encroachment onto beach areas through an alignment at and parallel to the toe of the coastal bluff, where such measures receive coloring and other exterior treatments and provided that such measures shall be permitted only when required to serve coastal- dependent uses or to protect existing principal structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply

f. Requiring new structures and improvements to existing structures to be set back 25 feet from the inland blufftop edge, and 40 feet from coastal blufftop edge with exceptions to allow a minimum coastal blufftop setback of no less than 25 feet. For all development proposed on coastal blufftops, a site- specific geotechnical report shall be required. The report shall indicate that the coastal blufftop setback will not result in risk of foundation damage resulting from

bluff erosion or retreat to the principal structure within its economic life and with other engineering evidence to justify the coastal blufftop setback.

On coastal bluffs, exceptions to allow a minimum setback of no less than 25 feet shall be limited to additions or expansions to existing principal structures which are already located seaward of the 40 foot coastal blufftop setback, provided the proposed addition or expansion is located no further seaward than the existing principal structure, is set back a minimum of 25 feet from the coastal blufftop edge, and the applicant agrees to remove the proposed addition or expansion, either in part or entirely, should it become threatened in the future.

In all cases, all new construction shall be specifically designed and constructed such that it could be removed in the event of endangerment and the applicant shall agree to participate in any comprehensive plan adopted by the City to address coastal bluff recession and shoreline erosion problems in the City.

This does not apply to minor structures that do not require a building permit, except that no structures, including walkways, patios, patio covers, cabanas, windscreens, sundecks, lighting standards, walls, temporary accessory buildings not exceeding 200 square feet in area, and similar structures shall be allowed within five feet from the bluff top edge.

g. Permanently conserving the bluff face within an open space easement or other suitable instrument.

Policy 1.7 The City shall develop and adopt a comprehensive plan, based on the Beach Bluff Erosion Technical Report (prepared by Zeiser Kling Consultants Inc. , dated January 24, 1994) , to address the coastal bluff recession and shoreline erosion problems in the City. Said plan shall include, at minimum, components that deal with all the factors affecting the bluffs in Encinitas. These include, but are not limited to, minimum blufftop setback requirements for new development/ redevelopment; alternatives to shore/ bluff protection such as beach sand replenishment; removal of threatened portions of a residence or the entire residence or underpinning existing structures; addressing bluff stability and the need for protective measures over the entire bluff (lower, mid and upper) ; impacts of shoreline structures on beach and sand areas as well as mitigation for such impacts; impacts of groundwater and irrigation on bluff stability; and, visual impacts of necessary/ required protective structures.

If a comprehensive plan is not submitted to, reviewed and approved by the Coastal Commission as an amendment to this land use plan November 17, by 1995, then no additions or expansions to existing structures shall be permitted on coastal blufftop lots except for minor additions or expansions that comprise no greater than a 10 percent increase above the existing gross floor area or 250 square feet whichever is greater, provided such additions/ expansions are located at least 40 feet from the coastal blufftop edge, the addition/expansion is constructed in a manner so that it could be removed in its entirety, and the applicant agrees, in writing, to participate in any comprehensive plan adopted by the City to address coastal bluff recession and shoreline erosion problems in the City. In addition, until such a comprehensive plan is approved by the City of Encinitas and the Coastal

Commission as an amendment to the LCP, the City shall not permit the construction of seawalls, revetments, breakwaters, cribbing, or similar structures for coastal erosion except under circumstances where an existing principal structure is imminently threatened and, based on a thorough alternatives analysis, an emergency coastal development permit is issued and all emergency measures authorized by the emergency coastal development permit are designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Policy 1.7 amended 5111195 (Reso. 95- 32)

Policy 1.9 Adequate safety service levels shall be maintained and provided for by new development.

Policy 1.12 The City will observe and apply measures to reduce earthquake structural risk through building and construction codes.

Goal 2. The City of Encinitas will make an effort to minimize potential hazards to public health, safety, and welfare and to prevent the loss of life and damage to health and property resulting from both natural and man- made phenomena.

Policy 2.3 Conduct a survey to identify all structures in the City constructed of unreinforced masonry and partially unreinforced masonry. Once inventoried, based on need, the City shall undertake necessary programs to assure reasonable structural safety.

Furthermore, Encinitas has a Grading, Erosion, and Sediment Control Ordinance (EMC Chapter 23.24). The Grading, Erosion, and Sediment Control Ordinance establishes minimum requirements for grading, excavation, and filling of land to provide for the issuance of grading permits and the enforcement of requirements (City of Encinitas 2017).

As mentioned above, the 2017 CAP does not propose any site-specific development that would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

With respect to septic tanks, most developments in Encinitas are connected to the City of Encinitas' or the Leucadia Wastewater District's sewer systems and do not require the use of alternative wastewater disposal or septic tanks. Additionally, the recommended measures in the 2017 CAP would not require the use of septic tanks or alternative waste water disposal systems. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank

7 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with any applicable plan, policy, or regulation adopted to reduce the emissions of greenhouse gases?	☐	☐	■	☐

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. Climate change is the result of numerous, cumulative sources of GHGs, which contribute to the "greenhouse effect," a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the sun hits the earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions. This process is essential to support life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that both trap heat and contribute to an average increase in Earth's temperature.

GHGs occur naturally and from human activities. Human activities that produce GHGs include the burning of fossil fuels (coal, oil, and natural gas for heating and electricity, gasoline and diesel for transportation); methane generated by landfill wastes and raising livestock; deforestation activities; and some agricultural practices. GHGs produced by human activities include CO_2, CH_4, N_2O, HFCs, PFC, and sulfur hexafluoride (SF_6). Since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by over 36 percent, 148 percent, and 18 percent respectively, primarily due to human activity. Emissions of GHGs affect the atmosphere directly by changing its chemical composition. Changes to land surface indirectly affect the atmosphere by changing the way in which the Earth absorbs gases from the atmosphere. Potential impacts in California due to climate change may include loss of snow pack, sea level rise, more extreme heat days per year, more high ozone days, increased forest fires, and more drought years (California Energy Commission [CEC] 2009).

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

The 2017 CAP is a policy document containing climate reduction actions and supporting measures to reduce GHG emissions. The proposed 2017 CAP creates a GHG emission reduction strategy

(consistent with Section 15183.5 of the CEQA Guidelines)[2] for the City of Encinitas. The 2017 CAP contains a series of climate reduction actions to reduce emissions by approximately 9,532 MT of CO_2e in 2020 and 69,159 MT of CO_2e in 2030. In combination with the emissions reductions attributed to federal and state legislative actions, cumulative GHG emissions would be reduced by 13 percent below 2012 levels by 2020, which exceeds the target established by AB 32, and 41 percent below 2012 levels by 2030, consistent with SB 32. As such, the 2017 CAP would result in the reduction of GHG emissions, rather than generating GHG emissions, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As mentioned above under Impact "a" of the *Greenhouse Gas* Section, the 2017 CAP includes climate reduction actions and supporting measures to reduce the City's GHG emissions by approximately 13 percent below 2012 levels by 2020, which exceeds the targets of AB 32, and 41 percent below 2012 levels by 2030, which is consistent with SB 32. The ARB is currently updating the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32. As described in the *Description of Project*, the purpose of the 2017 CAP is to reduce Encinitas' proportionate fair share of the statewide target set by AB 32 and SB 32 and work toward the State's longer term target identified in Executive Order S-3-05.[3] The 2017 CAP would not conflict with any applicable GHG reduction plan, including the AB 32 Scoping Plan or the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The San Diego Association of Governments (SANDAG) adopted *San Diego Forward: The Regional Plan* (Regional Plan) in October 2015, which reflects the region's commitment to provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. Additionally, the Plan demonstrates how the region will reduce emissions from transportation sources to comply with SB 375. The 2017 CAP includes measures and reduction goals that align with the Scoping Plan and Regional Plan. Therefore, this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

[2] Per the CEQA Statutes and Guidelines Section 15183.5(b)(1), a qualified GHG reduction plan should: quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area; establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable; identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area; specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and be adopted in a public process following environmental review.

[3] Note, Executive Order S-03-05 is intended to guide State agencies' efforts to control and regulate GHG emissions, but has no direct binding effect on local government or private actions.

8 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	■	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	■	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	■	☐
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	■	☐
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	■	☐

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

d. Would the project be located on a site included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

h. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The 2017 CAP is a policy document containing actions and supporting measures to reduce GHG emissions. The proposed 2017 CAP does not involve any site-specific development nor would it facilitate new development. The Public Safety Element of the General Plan includes goals and policies to reduce the potential for hazardous contamination. For example, Goal 3 states that the City will make every effort to ensure that all City residents and workers are protected from exposure to hazardous materials and wastes and the transport of such materials (City of Encinitas 1995). Additionally, Policy 3.4 states that land uses involved in the production, storage, transportation, handling, or disposal of hazardous materials will be located a safe distance from land uses that may be adversely impacted by such activities.

Implementation of the 2017 CAP actions and supporting measures would not involve the routine transport, use, or disposal of hazardous materials, and would not create reasonably foreseeable upset and/or accidental conditions involving the release of hazardous materials into the environment. Construction activities (e.g., bicycle facilities, energy retrofits, increased access to recycled water, etc.) could involve the use of onsite fueling/servicing of construction equipment, and the transport of fuels, lubricating fluids, and solvents. These types of materials are not

considered acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control (DTSC), United States Environmental Protection Agency, Occupational Safety & Health Administration (OSHA), and the San Diego County Department of Environmental Health Hazardous Materials Division. The transport, use, and disposal of construction-related hazardous materials would be in conformance with applicable federal, State, and local regulations governing such activities.

The 2017 CAP would encourage the renovation of older structures to support energy retrofits (Action BE-1) and the installation of solar PV systems (Actions BE-2, BE-4, RE-2, RE-3, and RE-4). Structures built prior to 1978 may contain asbestos-containing building materials and lead paint. If not properly handled and released into the environment in large enough quantities, these materials could pose a threat to construction workers and residents. However, these retrofits would primarily be small-scale and no single renovation would likely result in releases large enough to pose a health hazard to the general public. In addition, demolition and construction activities involving hazardous materials removal are regulated at the federal, State, and local level and construction workers must comply with applicable safety regulations.

The Scripps Memorial Hospital Heliport is the only heliport located in Encinitas. The 2017 CAP is a policy document and implementation of CAP actions would not increase helicopter activity or otherwise increase potential exposure to aircraft-related hazards. Additionally, discretionary development projects associated with the 2017 CAP would undergo project-level CEQA review.

No impact with regard to hazards to the public or environment, hazardous materials with ¼-mile of a school, development on a hazardous material site, or development near an airport or airstrip would occur. Further, the 2017 CAP would not expose people or structures to wildland fires, consistent with Policy 1.13, included under Goal 1, *Public health and safety will be considered in future Land Use Planning (Coastal Act/30253)*, of the General Plan Public Safety Element, which states: in areas identified as susceptible to brush or wildfire hazards, the City shall provide construction standards to reduce structural susceptibility and increase protection (City of Encinitas 1995). Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The 2017 CAP includes climate reduction actions to promote bicycle, pedestrian, and transit facilities (CAP Actions CET-1 and CET-2), but would not impair implementation of an adopted emergency response plan. The 2017 CAP contains a climate reduction action (Action CET-3) to improve traffic flow by retiming traffic signals and installing roundabouts at intersections, which would help to alleviate traffic congestion and benefit emergency evacuation procedures. Moreover, the 2017 CAP would be consistent with the General Plan Safety Element, which includes goals and policies to provide and enhance emergency response. For example, Policy 2.2 aims to implement an emergency preparedness program (referenced by the State as a Multi-hazard Function Plan) to ensure that emergency shelters and emergency evacuation and response routes are provided and clearly identified (City of Encinitas 1995). Additionally, Policy 2.4 states that setbacks, easements, and accesses, necessary to assure that emergency services can function with available equipment, shall be required and maintained, while Policy 2.5 states that emergency equipment response routes and evacuation procedures shall be defined and provided for.

Similarly, the 2017 CAP has a resiliency and adaptation strategy that aims to update the Safety Element of the City's General Plan consistent with the Office of Planning and Research (OPR) General Plan Guidelines, which requires adopted safety elements to consider climate change and climate adaptation strategies pursuant to SB 379. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

9 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☐	■
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	■	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	■	☐
d. Substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite?	☐	☐	■	☐
e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	■	☐
f. Otherwise substantially degrade water quality?	☐	☐	■	☐
g. Place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?	☐	☐	■	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
h. Place structures in a 100-year flood hazard area that would impede or redirect flood flows?	☐	☐	■	☐
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including that occurring as a result of the failure of a levee or dam?	☐	☐	■	☐
j. Result in inundation by seiche, tsunami, or mudflow?	☐	☐	■	☐

a. Would the project violate any water quality standards or waste discharge requirements?

The 2017 CAP is a policy document containing programs that are consistent with Encinitas' General Plan. Implementation of the 2017 CAP actions would not violate water quality standards or waste discharge requirements. Furthermore, climate reduction Goal 3.1, *Reduce City-wide Potable Water Consumption*, aims to reduce potable water consumption. In addition to the overarching goal of potable water reduction, the supporting measures for Goal 3.1, *Reduce City-wide Potable Water Consumption,* include: working with developers to implement Low Impact Development (LID) and other stormwater features on new and redeveloped projects; implementing a LID outreach and incentive program for residents and businesses; offering incentive programs to reduce water consumption; and supports the need for the City's Clean Water Program to continue to be actively involved with the Carlsbad Watershed Water Quality Improvement Plan development and implementation. Therefore, the 2017 CAP would not violate any water quality standards or waste discharge requirements and no impact would result.

NO IMPACT

b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?

d. Would the project substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite?

e. Would the project Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

f. Would the project otherwise substantially degrade water quality?

The 2017 CAP is a policy document containing programs that are consistent with the General Plan and does not include any site-specific development, designs, or proposals, nor does it grant any entitlements for development. As a result, no negative impacts related to groundwater or surface water quality, groundwater resources, runoff, or sensitive areas would occur. Further, as mentioned above under Impact "a" of the *Hydrology and Water Quality* Section, Goal 3.1, *Reduce City-wide Potable Water Consumption*, aims to reduce potable water consumption. Additionally, Action WE-1, under Goal 3.1, *Reduce City-wide Potable Water Consumption,* requires the water districts within Encinitas to implement new rate structures based on approved water rate studies. Likewise, there are a variety of supporting measures for Goal 3.1, *Reduce City-wide Potable Water Consumption,* such as:

- Facilitate homeowner and business owner financing on water efficiency measures by expanding PACE financing options.
- Educate homeowners and businesses about water efficiency rebate and incentive programs offered to SDWD and OMWD customers.
- Evaluate the key challenges that were identified in the 2016 SDWD Potable Reuse Feasibility Study.
- Conduct audits and retrofit all municipal facilities with water-efficient features to reduce potable water use at municipal facilities.
- Convert all current municipal landscape adjacent to recycled water pipelines to recycled water. Look for opportunities to work with the San Elijo Joint Powers Authority to extend recycled water pipelines to additional municipal facilities, when economically viable.
- Evaluate lowering the landscape area thresholds for projects to meet the Encinitas Water-Efficient Landscape Regulations.
- The City's Clean Water Program will continue to be actively involved in the Carlsbad Watershed Water Quality Improvement Plan development and implementation.
- Implement a Low Impact Development Outreach and Incentive Program for residents and businesses.
- Work with developers to implement Low Impact Development and other stormwater features on new and redevelopment projects.
- Source water from least-cost sources first, whenever possible.

Water conservation strategies included under Goal 3.1 may have a beneficial effect on water quality and may incrementally reduce communitywide surface runoff. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

g. Would the project place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?

h. Would the project place structures in a 100-year flood hazard area that would impede or redirect flood flows?

i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including that occurring as a result of the failure of a levee or dam?

j. Result in inundation by seiche, tsunami, or mudflow?

The 2017 CAP is a policy document containing programs that are consistent with Encinitas' General Plan and does not propose any land use or zoning changes, nor does it include any site-specific development, although portions of the City are within a FEMA 100-year flood zone. Likewise, portions of the City are located within a dam inundation area. The areas of potential dam inundation are generally along the Cottonwood Creek, Encinitas Creek, and Escondido Creek; portions of tributary stream channels; and the low-lying areas near the coastal portions of the City. However, as mentioned throughout this document, the 2017 CAP is a policy document that does not propose any land use or zoning changes, nor does it include any site-specific development.

Goal 1 included in the Public Safety Element of the General Plan aims to consider public health and safety in future land use planning. For example, the policies outlined below specifically aim to minimize injury, loss of life, property damage, and economic and social disruption by flood and inundation hazards (City of Encinitas 1995):

Policy 1.1 Development and grading or filling in drainage courses, floodways, and floodplains shall be prohibited except as provided by Land Use Element Policy 8.2. An exception may be made upon the finding that strict application of this policy would preclude any reasonable use of property (one dwelling unit per legal parcel). Exceptions may also be made for development of circulation element roads; necessary water supply projects; flood control projects where no other method for protecting existing structures in the floodplain is feasible and where such protection is necessary for public safety or to protect existing development; developments where the primary function is the improvement of fish and wildlife habitat; and other vital public facilities, but only to the extent that no other feasible alternatives exist, and minimum disruption to the natural floodplain, floodway or drainage course is made. When flood/ drainage improvements are warranted, require developers to mitigate flood hazards in those areas identified as being subject to periodic flooding prior to actual development.

Policy 1.4 Develop a master plan for drainage and flood control.

Policy 1.15 The City shall establish and implement standards, based on the 50- or 100- year storm, for flood control and drainage improvements, and the maintenance of such improvements, designed to assure adequate public safety. Such standards and improvements shall be consistent with the policies of this Plan to respect community character and maintain natural or natural- appearing drainage courses whenever feasible.

Additionally, Goal 2 included in the Public Safety Element of the General Plan aims to minimize the potential hazards to public health, safety, and welfare, and to prevent the loss of life and damage to health and property resulting from both natural and man-made phenomena. Specifically, Policy 2.6 states, except as provided in Public Safety Policy 1. 1, no development or filling shall be permitted within any 100- year floodplain (City of Encinitas 1995). Implementation of the 2017 CAP would be consistent with the General Plan and would not expose people or structures to potential flood hazards or impede or redirect flood flows. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

10 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	■	☐
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	■	☐
c. Conflict with an applicable habitat conservation plan or natural community conservation plan?	☐	☐	■	☐

a. Would the project physically divide an established community?

The 2017 CAP is a policy document containing programs that are consistent with Encinitas' General Plan and does not include any climate action measures or any specific development projects that would divide an established community. The 2017 CAP includes actions (CET-1 and CET-2) that would support pedestrian and bicycle circulation and improved transportation alternatives, as identified in the General Plan, which would improve connectivity throughout the City. Actions CET-1 and CET-2 correspond with Goal 4.1, *Reduce Vehicle Miles Traveled*. Action CET-1 aims to complete and implement the Citywide Active Transportation Plan (ATP), which is currently under development and will integrate the existing transportation and mobility plans such as the Bikeway Master Plan, Pedestrian Travel and Safe Routes to School Plan, and Trails Master Plan. Action CET-2 aims to implement a local shuttle system which would be established on routes recommended in the Encinitas Transit Feasibility Study and would use buses that run on condensed natural gas (CNG). Goal 4.1 also has supporting measures which include developing and implementing a complete streets policy, completing Safe Routes to School projects, and developing and implementing a City bike rack program. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The 2017 CAP is consistent with and builds upon the goals and policies of the Encinitas General Plan. The 2017 CAP is primarily intended to implement policies and programs of the General Plan and therefore does not conflict with the General Plan. Nonetheless, implementing the 2017 CAP could require some modification of existing City policies, including developing and implementing new ordinances, programs, and projects, or modifying existing ones. For example, Action OR-1 aims to adopt a leaf blower ordinance to limit use of two-stroke leaf blowers. In addition, a supporting measure associated with Goal 1.2, *Reduce Municipal Operation Energy Consumption*, aims to adopt a policy that would require new municipal buildings to be zero net energy (ZNE). Additionally, Action RE-2 would establish a policy to require new single family homes to install solar PV systems, while Action RE-3 would establish a policy to require new commercial buildings to install solar PV systems. In order to implement these measures the Municipal Code, Zoning Code, and other applicable documents would need to be amended to reflect new or modified requirements. While the proposed actions could require changes to some existing policies, the 2017 CAP is designed to mitigate adverse environmental impacts associated with climate change. Where modifications of existing policies are needed, such as updates to policies related to solar PV systems, the 2017 CAP actions would generally result in greater avoidance or mitigation of environmental effects. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project conflict with an applicable habitat conservation plan or natural community conservation plan?

The 2017 CAP would not facilitate any specific development projects nor would it add or enable any new development that would conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

11 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The 2017 CAP is a policy document containing programs that are consistent with Encinitas' General Plan. The General Plan does not identify any mineral resources in the City (City of Encinitas 2011). Additionally, the 2017 CAP would not facilitate any specific development projects and would not add or enable development that could result in the loss of mineral resources. No impact to mineral resources would occur.

NO IMPACT

This page intentionally left blank

12 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	■	☐
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
c. A substantial permanent increase in ambient noise levels above those existing prior to implementation of the project?	☐	☐	■	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above those existing prior to implementation of the project?	☐	☐	■	☐
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	■
f. For a project near a private airstrip, would it expose people residing or working in the project area to excessive noise?	☐	☐	☐	■

Noise is unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). Because of the way the human ear works, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range.

Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources (such as construction equipment). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance; while noise from a point source typically attenuates at about 6 dBA per doubling of distance. Noise levels may also be reduced by the introduction of intervening structures. For example, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm that breaks the line-of-sight reduces noise levels by 5 to 10 dBA. The construction style for dwelling units in California generally provides a reduction of exterior-to-interior noise levels of about 30 dBA with closed windows (Federal Highway Administration [FHWA] 2006).

Some land uses are more sensitive to ambient noise levels than other uses due to the amount of noise exposure and the types of activities involved. In Encinitas, noise sensitive land uses are land uses associated with indoor and/or outdoor human activities that may be subject to stress and/or significant interference from noise (City of Encinitas 1989). They include residential (single and multi-family dwellings, mobile home parks, dormitories and similar uses); transient lodging (including hotels, motels and similar uses); hospitals, nursing homes, convalescent hospitals and other facilities for long-term medical care; and public or private educational facilities, libraries, churches and other places of public gathering (City of Encinitas 1989).

The General Plan Noise Element includes the following:

- A description of existing noise levels and sources
- Several goals and supporting policies on noise and acceptable noise levels, which emphasize noise reduction through standards, site planning, and in the construction of new development that focus on noise mitigation
- Description of potential noise mitigation plans, including discussions regarding site planning, architectural layout, noise barriers, and construction modifications

To implement the City's noise policies, the City has adopted performance standards to regulate noise levels generated by existing land uses. These standards are part of the EMC and are shown in Table 6.

Table 6 Noise Standard

	Maximum One Hour Average Sound Level	
Adjacent Zone	**7:00 AM – 10:00 PM**	**10:00 PM -7:00 AM**
RR, RR-1, RR-2, R-3, R-5, R-8	50 dB	45 dB
R-11, RS-11, R-15, R-20, R-25, MHP	55 dB	50 dB
OP, LLC, LC, GC, L-VSC, VSC	60 dB	55 dB
L-I, BP	60 dB	55 dB

Source: Encinitas Municipal Code Chapter 30.40.010(A)

The City has also adopted standards addressing vibration, see Table 7. Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise (e.g., the rattling of windows from passing trucks). This phenomenon

is caused by the coupling of the acoustic energy at frequencies that are close to the resonant frequency of the material being vibrated. Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB) in the United States.

Table 7 Vibration Standard

	Vibration in Inches per Sound	
Adjacent Zone	**Impact**	**Steady-State**
Residential	0.006	0.003
Commercial	0.010	0.005
Light Industrial	0.040	0.020
Public/Semi-Public	0.010	0.005

Source: Encinitas Municipal Code Chapter 30.40.010(B)

The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources inside buildings such as the operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads.

a. *Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

b. *Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

c. *Would the project result in a substantial permanent increase in ambient noise levels above levels existing without the project?*

d. *Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

The 2017 CAP is a policy document containing programs that are consistent with the General Plan. Construction activity associated with implementation of the 2017 CAP actions could result in a temporary increase in noise levels. The City has jurisdiction over noise regulation, as stated in the Municipal Code, Title 30, Chapter 40 *Performance Standards* (City of Encinitas 2017).

Construction noise is regulated by Section 9.32.410 of the EMC, which restricts construction activities at a level in excess of 75 decibels for more than eight hours during any 24-hour period when measured at or within the property lines of any property which is developed and used either in part or in whole for residential purposes (City of Encinitas 2017). Additionally, Section 9.32.410 of the EMC states that in the event that lower noise limit standards are established for construction equipment pursuant to state or federal law, said lower limits shall be used as a basis for revising and amending the noise level limits specified in this subsection.

A majority of the proposed measures would involve small scale construction projects, such as energy efficient retrofits; however, the 2017 CAP includes some transportation and land use measures that could lead to the development of expanded bicycle and pedestrian paths or transit

upgrades. Noise generated by construction activity would be variable depending on the project and intensity of equipment use. Roadway widening and roundabout projects would likely require the operation of many pieces of heavy-duty equipment that generate high noise levels. Alternatively, repainting/restriping would typically be less intense, requiring minimal, if any, use of heavy equipment. As mentioned throughout the document, the 2017 CAP does not facilitate development projects beyond what could occur under the General Plan. Additionally, all construction activities would be required to comply with the City's Noise Ordinance which would reduce construction noise to a less than significant level.

The On-Road Transportation actions within the 2017 CAP focus on reducing the amount of vehicle miles traveled by providing enhanced access to alternative modes of transportation. As a result, no permanent increase in local traffic volumes or associated noise is anticipated. Therefore, implementation of 2017 CAP actions would not result in exposure of persons to noise in excess of established standards or groundborne vibration or noise, nor would it result in a temporary, periodic, or permanent increase in ambient noise levels above existing levels. Further, any future site-specific discretionary projects would be subject to subsequent environmental review wherein any site-specific noise impacts would be addressed accordingly. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise?

There are no airports or airstrips within Encinitas. However, as mentioned in Section 9, *Hazards and Hazardous Materials*, there is a heliport in the City. The 2017 CAP does not propose any land use or zoning changes related to airports, airstrips, or heliports, nor does it include any development that would increase exposure to excessive noise levels associated with airports, airstrips, or heliports. No impact would occur.

NO IMPACT

13 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	■
b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

a. Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

b. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

The 2017 CAP is a policy document containing programs that are consistent with Encinitas' General Plan and would not result in increases in population and does not accommodate growth beyond that anticipated by the General Plan or induce additional population growth. While Encinitas is largely built out and there are not large amounts of vacant land, mixed-use, transit-oriented, and infill development is anticipated under the current General Plan. Such development would facilitate population growth consistent with SANDAG forecasts. The 2017 CAP would not facilitate any population or housing growth beyond that allowed under the General Plan. New development could potentially displace existing housing in some instances, but the General Plan would generally facilitate an overall increase in housing in the City and 2017 CAP actions would not increase the potential for displacement. Therefore, no impacts related to population and housing would result.

NO IMPACT

This page intentionally left blank

14 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☐	■
ii. Police protection?	☐	☐	☐	■
iii. Schools?	☐	☐	☐	■
iv. Parks?	☐	☐	☐	■
v. Other public facilities?	☐	☐	☐	■

a.i. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

a.ii. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

a.iii. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

a.iv. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

a.v. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

The 2017 CAP is a policy document containing programs that are consistent with Encinitas' General Plan. New development facilitated by the General Plan could increase public service needs in the City by adding population and housing. Implementation of the 2017 CAP would not accommodate additional growth beyond that anticipated by the General Plan and, therefore, would not in itself increase demand for public services or facilities. As such, the 2017 CAP would not require the construction of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. Furthermore, any future site-specific discretionary projects would be subject to subsequent environmental review wherein any site-specific public service impacts would be addressed accordingly. Therefore, no impact on public services causing the need for new governmental facilities would occur.

NO IMPACT

15 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	■	☐
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	■	☐

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The 2017 CAP is a policy document containing programs that are consistent with Encinitas' General Plan. The 2017 CAP would not result in population growth beyond that which would be facilitated by the General Plan. Additionally, the CAP would align with Policy 4.4 included in the General Plan Circulation Element (City of Encinitas 2003):

> **Policy 4.4** The City has adopted a Citywide Recreation Amended 1122103 Trails Master Plan to establish a separate system of hiking Reso. No. 03- 07 trails, bicycle paths and equestrian trails from which motorized vehicles shall be banned. The general location and type of each trail is shown on the Recreational 'Trails Master Plan Map (Recreation Element, Figure 3) any proposed modifications or additions to the Recreational Trails Master Plan or Recreational Trails Master Plan Map that may directly affect coastal zone resources shall require an LCP amendment.

Therefore, implementation of the 2017 CAP would not result in a substantial physical deterioration of parks or other recreational facilities or result in the need to expand recreational facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank

16 Transportation and Traffic

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	■	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	■	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	■
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	☐	■
e. Result in inadequate emergency access?	☐	☐	☐	■
f. Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?	☐	☐	■	☐

a. *Would the project conflict with an applicable plan, ordinance or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?*

b. *Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

The 2017 CAP is a policy document containing goals and actions that are consistent with Encinitas' General Plan, many of which are aimed at reducing motor vehicle trips and vehicle miles traveled (VMT). For example, Goal 4.1, *Reduce Vehicle Miles Traveled*, has two actions (Action CET-1 and CET-2) associated with it that are directly aimed at reducing VMT within the City. For example, Action CET-1 encourages completion and implementation of the Citywide Transportation Plan, while Action CET-2 promotes implementing a local shuttle system. Additionally, Goal 4.1, *Reduce Vehicle Miles Traveled*, has a variety of supporting measures associated with it that also aim to reduce VMT, such as:

- Develop and implement a complete streets policy.
- Develop program to support car sharing and bike sharing for the community.
- Complete Safe Routes to Schools projects to decrease need to drive students to school.
- Coordinate with regional transit authorities and local school districts to improve student busing and public transit options.
- Support SANDAG iCommute Program for guaranteed ride home for the community.
- Develop and implement a City Bike Rack Program.
- Develop and implement a program to incentivize City employees commuting to work by bike or other modes of alternative transport as a model for other local employers.
- Adopt the National Association of City Transportation Officials *Urban Bikeway Design Guide* and utilize as a policy in the Capital Improvement Program (CIP) roadway projects.

The 2017 CAP also includes climate reduction Action CET-3 to improve traffic flow by retiming traffic signals and installing roundabouts at intersections in the City. Signal coordination and synchronization as well as roundabouts would reduce congestion and the amount of time vehicles spend idling while on City streets. These actions would align with the goals and policies included in the General Plan Circulation Element (City of Encinitas 2003):

Policy 1.12 The City will require increased off- street parking for expansions and additions to existing and future commercial and residential uses in the near coast area, will minimize curb cuts for new development in the vicinity of beach access points in order that the maximum amount of curb parking will be available to beach users, and will encourage remote parking/ shuttle service and park- and- ride facilities in the Coastal Zone. The City will require that all commercial, industrial and residential uses be designed and constructed with sufficient off- street parking and loading facilities to assure adequate parking is provided with new development such that no adverse impacts on coastal access are documented. Parking ratios shall be utilized as specified and detailed in the City' s Zoning Code and in

implementing Specific Plans which provide sufficient parking spaces so as not to require patrons/ employees/ residents to utilize parking which is necessary/ required for other approved uses or street and other public parking that should otherwise be available for public use.

Policy 1.14 A coordinated traffic signal system shall be developed and implemented.

Policy 3.4 Cooperate with San Diego County, SANDAG, and other jurisdictions to help plan and implement: a regional multi- modal transportation system that is accessible to residents in the City.

Policy 3.7 The City will carefully review plans for transit service, while encouraging such service, so as to identify and minimize any adverse visual, noise, land use, or other development and operation impacts on the City's communities.

Policy 4.4 The City has adopted a Citywide Recreation Amended 1122103 Trails Master Plan to establish a separate system of hiking Reso. No. 03- 07 trails, bicycle paths and equestrian trails from which motorized vehicles shall be banned. The general location and type of each trail is shown on the Recreational 'Trails Master Plan Map (Recreation Element, Figure 3) any proposed modifications or additions to the Recreational Trails Master Plan or Recreational Trails Master Plan Map that may directly affect coastal zone resources shall require an LCP amendment.

Policy 4.5 Design and construct attractive bike paths and pedestrian ways along existing freeway overpasses and underpasses. Discourage separate pedestrian overpasses.

As discussed above, the 2017 CAP would implement a range of General Plan objectives and policies aimed at reducing VMT and encouraging the use of alternative transportation modes. In addition, it would not accommodate growth or development beyond that facilitated by the General Plan. Moreover, climate action measures would be consistent with the goals, policies, and strategies included in the Bikeway Master Plan, Pedestrian Travel and Safe Routes to School Plan, and Trails Master Plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

There are no airports in Encinitas; however, as mentioned in Section 9, *Hazards and Hazardous Materials*, there is a heliport in the City. Nonetheless, because implementation of the 2017 CAP would not result in a change in air traffic patterns, no impact related to air traffic or safety would occur.

NO IMPACT

d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

e. Would the project result in inadequate emergency access?

The 2017 CAP would not facilitate development beyond that allowed under the General Plan. As such, it would not create any traffic hazards or result in inadequate emergency access. The proposed actions and supporting measures included in the 2017 CAP are aimed at providing alternative modes of transportation and reducing the amount of vehicle miles traveled throughout

Encinitas. Additionally, the 2017 CAP promotes design guidelines to enhance bicycle, pedestrian, and transit connectivity, which would provide greater safety. The CAP does not include measures that would substantially increase hazards due to a design feature or incompatible uses. Further, any future site-specific discretionary projects would be subject to subsequent environmental review wherein any site-specific impacts related to hazards or emergency access would be addressed accordingly. No impact would occur.

NO IMPACT

f. Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?

Implementation of the 2017 CAP would encourage alternatives to single-occupancy vehicles, consistent with the General Plan, Bikeway Master Plan, and Pedestrian Travel and Safe Routes to School Plan, and would not result in negative effects on the safety or performance of transit, bicycle, or pedestrian facilities. Therefore, the 2017 CAP would not conflict with any policies or plans supporting alternative transportation. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

17 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	■	☐
b. 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 Public Resources Cod Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significant of the resource to a California Native American tribe?	☐	☐	■	☐

a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1 (k), or*

b. *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 Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.*

The 2017 CAP is a policy document containing goals and actions that are consistent with Encinitas' General Plan and does not involve any development or other physical changes to the environment. The 2017 CAP does not include any development, nor does it grant any entitlements for development that could cause a substantial adverse change in the significance of a tribal cultural resource. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

This page intentionally left blank

18 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	■	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	■	☐
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	■	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	■	☐
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	■	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	■	☐
g. Comply with federal, State, and local statutes and regulations related to solid waste?	☐	☐	■	☐

a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

c. Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

e. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The San Dieguito Water District provides potable and recycled water to over 38,000 citizens in the communities of Leucadia, Old Encinitas, Cardiff, and portions of New Encinitas. The remainder of Encinitas is served by the Olivenhain Municipal Water District. The San Dieguito Water District is a subsidiary district of the City of Encinitas (City of Encinitas 2016b). For the San Dieguito Water District (SDWD), potable water is provided from local runoff from Lake Hodges and imported raw water from the San Diego County Water Authority (SDCWA). Both sources are treated at the R.E. Badger Filtration Plant located in Rancho Santa Fe. Treated water from the SDCWA can also be delivered directly to the SDWD. Recycled water became available within the SDWD in August of 2000. The source of the recycled water is tertiary treated wastewater from the San Elijo Water Reclamation Facility. Currently, recycled water is used for the Encinitas Ranch Golf Course, landscaped traffic medians, homeowner association common areas, and parks (City of Encinitas 2016b).

The Olivenhain Municipal Water District (OMWD) is a member of the San Diego County Water Authority, and thus purchases all of its water supply from SDCWA (Olivenhain Municipal Water District 2017a). The OMWD currently collects wastewater from 4S Ranch and Rancho Cielo areas, which enters the recycling process at 4S Ranch Water Reclamation Facility. The facility produces over one million gallons of recycled water per day which is delivered to irrigation customers in the southeastern portion of OMWD's service area for use at home owner association common areas, schools, parks, streetscapes, and golf courses. The OMWD supplements the recycled water it produces with recycled water purchased from Rancho Santa Fe Community Services District and the City of San Diego (Olivenhain Municipal Water District 2017b).

The 2017 CAP is a policy document containing goals, actions, and supporting measures that are consistent with Encinitas' General Plan. The 2017 CAP would not accommodate growth beyond that anticipated by the General Plan nor does it propose any development projects that would increase wastewater generation, water demand, or stormwater runoff. The 2017 CAP includes climate reduction Action WE-1 under Goal 3.1, *Reduce City-wide Potable Water Consumption*, which aims to implement approved water rates based on already completed water rate studies. Additionally, there are a variety of supporting measures listed under Goal 3.1 that would reduce water use in Encinitas, which include:

- Facilitate homeowner and business owner financing of water efficiency measures by expanding PACE financing options
- Educate homeowners and businesses about water efficiency rebate and incentive programs offered to SDWD and OMWD customers.

- Evaluate key challenges that were identified in the 2016 SDWD Potable Reuse Feasibility Study.
- Conduct audits and retrofit all municipal facilities with water-efficient features to reduce potable water use at municipal facilities
- Convert all current municipal landscape adjacent to recycled water pipelines to recycled water. Look for opportunities to work with the San Elijo Joint Powers Authority to extend recycled water pipelines to additional municipal facilities, when economically viable.
- Evaluate lowering the landscape area thresholds for projects to meet the Encinitas Water-Efficient Landscape Regulations
- The City's Clean Water Program will continue to be actively involved in the Carlsbad Watershed Water Quality Improvement Plan development and implementation
- Implement a Low Impact Development Outreach and Incentive Program for residents and businesses
- Work with developers to implement Low Impact Development and other stormwater features on new and redevelopment projects
- Source water from least-cost sources first, whenever possible.

Because the 2017 CAP is a policy document that would not facilitate growth beyond that anticipated by the General Plan, the project would not exceed wastewater treatment requirements; require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities; require or result in the construction of new stormwater drainage facilities or expansion of existing facilities; have insufficient water supplies available to serve the project; or result in a determination by the wastewater treatment provider that there is inadequate capacity to serve the projected demand. Further, any future site-specific discretionary projects would be subject to subsequent environmental review wherein any site-specific water, wastewater or stormwater impacts would be addressed accordingly. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

g. Would the project comply with federal, State, and local statutes and regulations related to solid waste?

The 2017 CAP includes a zero waste goal, Goal 6.1, *Divert Solid Waste*, which has one corresponding climate reduction action (Action ZW-1) that focuses on waste reduction. Specifically, climate reduction Action ZW-1 has an objective of implementing a Zero Waste Program to reduce waste disposal from residents and businesses in the community. Additionally, there are a variety of supporting measures that correspond with Goal 6.1, which include:

- Implement an Organic Waste Recycling Program through the following measures:
  - Support regional efforts to plan for and develop residential and commercial food scrap composting programs.
  - Facilitate the establishment of fully-permitted community appropriate compost facilities in the City.

  - Continue to support at-home management of food waste through educational workshops and subsidies of compost bins and worm bins.
  - Continue to support Zero Waste programs at local schools.
  - Provide free audits of restaurants and grocery stores to reduce waste generation.
  - Develop City Hall waste audits and consider pilot composting project based on audit results.
- Develop education program for textile recycling.
- Enforce recycling at City permitted event and activities.
- Expand outreach and education on the City's C&D Ordinance that has a lower threshold for covered projects.
- Support product stewardship and extended producer responsibility initiatives.

Implementation of Action ZW-1 and the supporting measures associated with Goal 6.1, *Divert Solid Waste*, would reduce the amount of solid waste sent to the Otay Landfill, which serves Encinitas. This would align with Policy 6.1 in the Resource Management Element of the General Plan which aims to phase in all practical forms of mandatory recycling as soon as possible (City of Encinitas 2011). Additionally, climate action measure ZW-1 would comply with Assembly Bill 939, which calls for a 50 percent diversion rate and Assembly Bill 341, which has a statewide solid waste diversion goal of 75 percent for businesses by 2020. Thus, solid waste in Encinitas would be reduced as a result of implementation of the 2017 CAP. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

19 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	■	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	■	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	■	☐

a. Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The intent of the 2017 CAP is to reduce GHG emissions from Encinitas operations and within the City through implementation of GHG reduction actions and supporting measures. The 2017 CAP actions are consistent with the General Plan and encourage actions by residents, businesses, and the City to reduce energy, water, and fuel use, as well as the associated GHG emissions. The 2017 CAP would not facilitate any development that would diminish wildlife habitats or eliminate important examples of the major periods of California history or prehistory. As discussed in Sections 4, *Biological Resources*, and 5, *Cultural Resources*, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Implementation of the 2017 CAP would result in a cumulatively considerable beneficial reduction of GHG emissions and would not facilitate any development that would make a considerable contribution to any significant cumulative impacts. To the contrary, as discussed throughout this Initial Study, implementation of the 2017 CAP would be consistent with many General Plan policies aimed at reducing emissions of GHGs and air pollutants, reducing vehicle trips and vehicle miles traveled, reducing demands on utilities and service systems, and preserving biological, cultural, and other resources. The 2017 CAP would not make a substantial contribution to any cumulative impacts related to growth in accordance with the General Plan.

LESS THAN SIGNIFICANT IMPACT

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The 2017 CAP does not have any effects that would cause a direct or indirect adverse effect on human beings. Rather, as discussed throughout this Initial Study, the CAP would serve as a pathway to reduce GHG emissions as well as have many other positive environmental effects. These include reduction in air pollution, reduction in transportation congestion, reduction in solid waste sent to a landfill, energy efficiency, and water conservation. Therefore, CAP implementation would have less than significant impacts with respect to adverse effects on humans.

LESS THAN SIGNIFICANT IMPACT

References

Bibliography

California Air Resources Board (CARB). 2017. AB 32 Scoping Plan. https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm

_____. April 2005. Air Quality and Land Use Handbook: A Community Health Perspective. http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf?sfvrsn=0

_____. 2016. San Diego Air Quality Management Plans. http://www.arb.ca.gov/planning/sip/planarea/sansip.htm

_____. April 2005. Air Quality and Land Use Handbook: A Community Health Perspective. https://www.arb.ca.gov/ch/handbook.pdf

California Department of Transportation (Caltrans). 2011. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm

California Energy Commission. Environmental Health and Equity Impacts from Climate Change and Mitigation Policies in California: A Review of the Literature. March 2009.

California Environmental Protection Agency (CalEPA), March 2006. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

California Legislative Information. Bill Information, AB-2188 Solar energy: permits. http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB2188

Circulate San Diego. Let's Move, Encinitas! Pedestrian Travel and Safe Routes to School Plan. http://www.dot.ca.gov/dist11/departments/planning/pdfs/grantprograms/2015_Lets_Move_Encinitas.pdf

County of San Diego. Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality. March 19, 2007. http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf

Encinitas, City of. Urban Forest Management Program. 2016a. http://www.ci.encinitas.ca.us/Government/Departments/Public-Works/Field-Operations/Urban-Forest-Management-Program

_____. Circulation Element. 2003. http://archive.ci.encinitas.ca.us/weblink8/0/doc/699889/Page1.aspx

_____. Housing Element. 2007. http://archive.ci.encinitas.ca.us/weblink8/0/doc/665675/Page1.aspx

_____. Land Use Element. 2013. http://archive.ci.encinitas.ca.us/weblink8/0/doc/699888/Page1.aspx

_____. Noise Element. 1989. http://archive.ci.encinitas.ca.us/weblink8/0/doc/665680/Page1.aspx

_____. Public Safety Element. 1995. http://archive.ci.encinitas.ca.us/weblink8/0/doc/699886/Page1.aspx

_____. Recreation Element. 2003b. http://archive.ci.encinitas.ca.us/weblink8/0/doc/699887/Page1.aspx

_____. Resource Management Element. 2011. http://archive.ci.encinitas.ca.us/weblink8/0/doc/724656/Page1.aspx

_____. Encinitas Municipal Code. 2017. http://www.qcode.us/codes/encinitas/?view=desktop&topic=30-30_40-30_40_010

_____. San Dieguito Water District. 2016b. http://www.encinitasca.gov/Government/Departments/San-Dieguito-Water-District

_____. Bikeway Master Plan. January 2005. http://www.ci.encinitas.ca.us/Portals/0/City%20Documents/Documents/Parks/Trails/Encinitas%20Recreational%20Trails%20Master%20Plan.pdf

_____. Trails Master Plan. April 2002. http://www.ci.encinitas.ca.us/Portals/0/City%20Documents/Documents/Development%20Services/Planning/Advanced%20Planning/CMLS/Bikeway%20Master%20Plan.pdf

Encinitas Preservation Association. History of Encinitas. http://encinitaspreservationfoundation.org/history-of-encinitas/

Intergovernmental Panel on Climate Change (IPCC). Summary for Policymakers. In: Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. 2007.

Federal Highway Administration (FHWA). 2006. FHWA Highway Construction Noise Handbook. (FHWAHEP-06-015; DOT-VNTSC-FHWA-06-02). http://www.fhwa.dot.gov/environment/construction_noise/handbook

Olivenhain Municipal Water District (OMWD). 2017a. Potable Water. https://www.olivenhain.com/your-water-supplies/potable-water/

_____. 2017b. Recycled Water. https://www.olivenhain.com/your-water-supplies/recycled/

San Diego County Air Pollution Control District. 2005. Measures to Reduce Particulate Matter in San Diego County. http://sandiegohealth.org/air/SB656StaffRpt.pdf

_____. December 2016. 2016 Revision of the Regional Air Quality Strategy for San Diego County. http://www.sdapcd.org/content/dam/sdc/apcd/PDF/Air%20Quality%20Planning/2016%20RAQS.pdf

_____. Attainment Status. http://www.sdapcd.org/content/sdc/apcd/en/air-quality-planning/attainment-status.html

Sperling's Best Places. 2017. Encinitas, California. http://www.bestplaces.net/climate/city/california/encinitas

List of Preparers

Rincon prepared this Initial Study under contract to the City of Encinitas. Scott Vurbeff is the Project Manager from the City. Persons involved in data gathering analysis, project management, and quality control include the following.

RINCON CONSULTANTS, INC.

Erik Feldman, Principal
Matt Maddox, Senior Program Manager
Hannah Mize, Lead Analyst
Debra Jane Seltzer, Document Formatting and Production Specialist

This page intentionally left blank