

4 ENVIRONMENTAL IMPACT ANALYSIS APPROACH

This chapter discusses the environmental impacts of implementing the proposed Plan and identifies mitigation measures to reduce impacts found to be significant. This introductory section describes the resource areas analyzed and the general impact analysis methodology employed.

RESOURCE AREAS ANALYZED

Consistent with the CEQA Guidelines and public scoping input discussed in Chapter 1, *Introduction*, the resource areas analyzed in this EIR because they may have significant impacts are as follows:

- Aesthetics and Visual Resources
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology, Soils, and Paleontological Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Mineral Resources
- Noise and Vibration
- Population and Housing
- Public Services and Utilities
- Transportation
- Tribal Cultural Resources
- Water Supply
- Wildfire

ANALYSIS METHODOLOGY

As discussed in Chapter 1, this is a Program EIR, which may be prepared for a series of related actions that can be characterized as one project (CEQA Guidelines Section 15168). The degree of specificity in an EIR corresponds to the degree of specificity of the underlying activity being evaluated (CEQA Guidelines Section 15146). This EIR analyzes impacts of the proposed Plan at the same level of detail as the proposed Plan. The EIR provides a foundation for second-tier CEQA documents for subsequent projects, but does not analyze the project-specific impacts of individual projects. Project-specific and site-specific details of subsequent transportation and land use projects will vary widely. When a first-tier Program EIR is prepared, “leaving project-specific details to subsequent EIRs when specific projects are considered” is a proper approach to CEQA tiering (In re Bay Delta [2008] 43 Cal. 4th 1143, 1174).

Also, the planning horizon of the proposed Plan is 2050. The programmatic and long-term nature of the proposed Plan necessitates a general and at times qualitative approach to the evaluation of impacts. The EIR analyzes impacts for the two main physical components of the proposed Plan: regional growth and land use

change, and transportation network improvements and programs¹. It also analyzes the combined impacts of these components.

SANDAG is required to update the Regional Plan every 4 years, in collaboration with the 18 cities and County of San Diego, along with regional, state, and federal partners. The 2021 Regional Plan is unique, as it was developed over 6 years rather than 4 years. In October 2019, California Assembly Bill (AB) 1730 (Gonzalez) was signed into law, authorizing a 2-year extension for the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the San Diego region and deeming the 2015 Regional Plan, its SCS, and Final EIR valid for state compliance, funding eligibility, and other purposes through 2021.

Due to this extended timeframe, the 2021 Regional Plan has a baseline of 2016, which is two years older than would be typical in past Regional Plan EIRs. In general, physical conditions as they existed in 2016 are used as the baseline for the impact analysis of this EIR, corresponding with the release of the NOP on November 14, 2016 and the start of EIR preparation. For a few significance criteria, more recent data are used when available to better represent existing conditions. For a few other significance criteria, when 2016 information was not available, older information was used, with an explanation of why the information is representative of 2016 existing conditions. The impact analysis involves comparison of anticipated future physical conditions under implementation of the proposed Plan to the baseline conditions for each resource area. The analysis includes not only future conditions in the 2050 long-term horizon year of the proposed Plan, but also the interim years of 2025 and 2035.

Each resource area section includes the following:

Existing Conditions, consistent with CEQA Guidelines Section 15125(a), are described in the EIR and serve as the baseline physical conditions for the analysis of impacts. As noted above, unless otherwise stated, the *Existing Conditions* sections of the EIR describe conditions existing in 2016. This section also describes the anticipated effects from climate change for each resource area, if any.

Regulatory Setting provides a summary of the federal, state, and local laws, regulations, plans, or policies that are relevant to each resource area and its significance criteria.

Significance Criteria are identifiable quantitative, qualitative, or performance levels used for each resource area to determine whether environmental impacts are significant. Unless otherwise noted, the significance criteria specifically developed for this EIR are based on the checklist questions in Appendix G of the CEQA Guidelines. In some cases, the EIR has combined checklist questions, edited their wording, or changed their location in the document in an effort to develop criteria that reflect the programmatic level of the impact analysis and the unique nature of the proposed Plan or local conditions.

¹ The activity-based model (ABM 2+) that SANDAG used to develop the proposed Plan is continually updated and so includes data reflecting a number of transportation projects that opened to traffic or started service between 2016 and the present. As a result, impacts analyzed in this EIR include impacts of some transportation projects that are not newly proposed in the 2021 Regional Plan, but which were constructed or became operational between 2016 and 2021. As a result, the impacts of transportation network improvements analyzed in this EIR are conservative and include impacts beyond those strictly attributable to the new projects reflected in Appendix A to the 2021 Regional Plan and this EIR's project description.

Analysis Methodology describes the methods used to evaluate the impact for each significance criterion and explains how a significant impact is defined for each significance criterion. For some resource areas, technical appendices have been prepared that present more detail on methodology, assumptions, data sheets, and/or results.

Impact Analysis presents scientific or factual data for the cause-and-effect relationship between the proposed Plan and the forecasted changes in baseline physical environmental conditions. The magnitude, duration, extent, frequency, range, or other parameters of an impact may be described to determine whether impacts are significant; all direct effects and reasonably foreseeable indirect effects are considered, with due consideration to both short-term and long-term impacts. Impacts are analyzed for 2025, 2035, and 2050 for the reasons described above.

The EIR provides quantitative analysis of the environmental impacts of the proposed Plan where possible or meaningful. For example, quantitative analysis is provided in the following resource area sections: agricultural and forestry resources, air quality, biological resources, energy, greenhouse gas emissions, mineral resources, population and housing, public services (recreation), transportation, water supply, and wildfire. However, not all the proposed Plan's impacts can meaningfully be analyzed quantitatively through the year 2050. The proposed Plan includes programs related to emerging technologies, transportation system management, and transportation demand management. These programs do not involve additional construction activities that could affect sensitive resources that are not already included as part of a transportation network improvement. Therefore, no GIS-based impact analysis is completed for these programs.

Where quantitative analysis of an impact is not possible or meaningful, qualitative analysis is provided. The EIR provides sufficient information about the proposed Plan's environmental impacts "in light of what is reasonably feasible." (CEQA Guidelines Section 15151.) For example, indirect impacts that may occur on resources in proximity to areas experiencing regional growth and land use change and/or transportation network improvements cannot be quantified because they may be project-specific and are not always foreseeable. They are, therefore, qualitatively analyzed on a broad scale

It is also important to note that climate change may affect most resource areas in the future, and the proposed Plan may exacerbate climate change effects. Thus, the impact analysis evaluates whether the proposed Plan would magnify a climate change impact (e.g., creating more housing development in high wildfire risk zones).

A cumulative impact analysis is provided in Chapter 5, which analyzes whether a significant cumulative impact is created when impacts of the proposed Plan are added to the impacts of one or more related projects, and whether the proposed Plan's contribution to this impact is cumulatively considerable (CEQA Guidelines Section 15130). Cumulative impacts are analyzed for the same resource areas analyzed in Chapter 4.

Mitigation Measures are feasible actions intended to avoid or substantially lessen significant impacts identified in the *Impact Analysis*. Mitigation Measures are provided only for those significance criteria where significant impacts have been identified.

The EIR includes three broad types of mitigation measures: (1) plan- and policy-level mitigation measures assigned to SANDAG; (2) mitigation measures for transportation network improvements and programs, assigned to SANDAG and other transportation project sponsors; and (3) mitigation measures for development projects implementing regional growth and land use changes, which local jurisdictions implement.

The SANDAG Board of Directors has discretion to adopt or reject plan and policy level mitigation measures recommended in the EIR (as well as the other two types). This decision will be reflected in findings made by the Board at the time of Project approval. Plan or policy level mitigation measures that are accepted will be made formal parts of the proposed Plan and monitored to help ensure their implementation.

While the EIR provides as much detail as needed in the mitigation measures to evaluate their ability to avoid or substantially lessen impacts, some flexibility must be maintained to present mitigation approaches for impacts occurring under different circumstances. Many of the mitigation measures include lists of mitigation actions that can be implemented in connection with individual future transportation and development projects that would implement the proposed Plan; development projects would be undertaken under the land use authority of local governments. These individual future projects will occur over a wide and diverse geographic scope over the 30-year time span addressed in the proposed Plan. Some will require approvals from multiple public agencies, each with different legal, regulatory, or other authority relevant to the proposed Plan. Because the nature of individual future projects, resources, and legal authority of the approving agency or agencies, physical circumstances of the project, and local policy considerations for all future projects implementing the proposed Plan will vary widely, the mitigation actions included, while generally feasible for many projects, may not be feasible for specific projects. In each case, the lead agency (and any responsible agencies) for an individual project will have to determine which mitigation actions are specifically applicable to the project, and the degree to which the recommended mitigation actions can feasibly be implemented based on project-specific circumstances.

Laws and regulations that are applied routinely to similar projects are generally considered in the impact analysis and not repeated as mitigation. However, some mitigation measures do describe specific impact-reducing actions that would be taken to achieve compliance with laws and regulations. In addition, many policies and programs already included in the proposed Plan would have the effect of reducing environmental effects that might otherwise occur from regional growth and land use change, and transportation network improvements and programs. The effects of these intrinsic elements of the proposed Plan are accounted for in the impact analysis. These intrinsic measures may be identified in the impact analysis text; however, they are not considered “mitigation measures” for purposes of the EIR.

SANDAG is responsible for implementing those mitigation measures within its responsibility, jurisdiction, and statutory authority. Mitigation can also include measures that are within the responsibility and jurisdiction of another public agency (CEQA Guidelines Section 15091 [a][2]). In many instances, mitigation measures included in this EIR that would avoid or substantially lessen significant impacts of the proposed Plan fall under the responsibility and jurisdiction of other implementation agencies, such as cities, the County, Caltrans, public transit agencies, or other special districts. Because other project agencies would be responsible for certain mitigation measures identified in this EIR, SANDAG in its CEQA findings may find that those measures, if feasible, can and should be adopted by those other agencies (CEQA Guidelines Section 15091(a)(2)). Details regarding responsibilities for mitigation measure implementation will be provided in a separate mitigation monitoring and reporting program (MMRP) that the SANDAG Board of Directors will consider for approval in conjunction with approval of the proposed Plan.

Significance After Mitigation describes the effect of the mitigation measure(s) on the significant impact(s) and determines whether the mitigation measure(s) will reduce the impact to less than significant, or whether the impact will remain significant. Impacts that remain significant after feasible mitigation measures are applied are identified as “significant and unavoidable impacts.” For some impacts, infeasible mitigation

measures are also discussed, with explanations of why they are infeasible; this discussion is provided for informational purposes only and is not required by CEQA.

As mentioned previously, with respect to land use changes implemented by local jurisdictions and transportation network improvements implemented by other transportation project sponsors, SANDAG has no authority to require implementing agencies to implement or enforce project-specific mitigation measures. In addition, some programmatic mitigation may not be feasible or effective for particular projects based on project- or site-specific circumstances. This results in many significant impacts being significant and unavoidable.

In each resource area section, this EIR identifies mitigation measures that generally are performance standards-based, which SANDAG shall and other implementing agencies “can and should” comply with in mitigating project-specific impacts. Where applicable, SANDAG then identifies examples of project-level mitigation measures that may be required by lead agencies to meet performance standards. In project-specific CEQA reviews, lead agencies may also identify other comparable measures capable of reducing impacts below the specified threshold. SANDAG cannot require other lead agencies to adopt mitigation, and it is ultimately the responsibility of the lead agency to determine and adopt project-specific mitigation as appropriate and feasible for each individual project. As a result, this EIR concludes significant and unavoidable for many impacts where SANDAG does not have authority to implement or enforce project-specific mitigation measures, or where State or local action might be needed to reduce impacts to less-than-significant levels.