

4 ENVIRONMENTAL IMPACT ANALYSIS APPROACH

This chapter discusses the environmental impacts of implementing the proposed Amendment 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

As discussed in Chapter 1, *Introduction*, and consistent with the CEQA Guidelines, the following resources may experience new or greater impacts than those identified in the approved Plan PEIR and are evaluated in detail in this SEIR:

- Air Quality
- Energy
- Greenhouse Gas Emissions
- Noise and Vibration
- Transportation

ANALYSIS METHODOLOGY

As discussed in Chapter 1, this is a Supplemental EIR, which may be prepared when “[a]ny of the conditions described in Section 15162 would require the preparation of a subsequent EIR” and when “only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation” (CEQA Guidelines Section 15163 (a)(1)–(2)). A supplement to an EIR “need only contain the information necessary to make the previous EIR adequate for the project as revised” (CEQA Guidelines Section 15163(b)).

The analysis in this SEIR focuses on the activities associated with the proposed Amendment. This approach is taken because CEQA review has already occurred for the approved Plan, including identification of environmental effects, feasible mitigation measures, and feasible alternatives. This SEIR is a supplement to the originally certified 2021 Regional Plan PEIR (adopted December 10, 2021; SCH No. 2010041061) and incorporates the information necessary to make the EIR adequate for approval of the proposed Amendment,

The degree of specificity in an EIR corresponds to the degree of specificity of the underlying activity being evaluated (CEQA Guidelines Section 15146). This SEIR, in conjunction with the approved Plan PEIR, 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.

This SEIR uses the same baseline conditions that were used in the approved Plan PEIR. The approved Plan PEIR, unless otherwise stated, used the physical conditions as they existed in 2016 as the baseline for the impact analysis, corresponding with the release of the Notice of Preparation (NOP) on November 14, 2016, and the start of Draft PEIR preparation. For a few significance criteria, more recent data was used when available to better represent existing conditions. The impact analysis compares anticipated future physical conditions under implementation of the proposed Amendment to the baseline conditions for each resource area.

Each resource area section includes the following:

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

Regulatory Setting provides a summary of any updates to federal, state, and local laws, regulations, plans, or policies since the preparation of the approved Plan PEIR 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. The SEIR uses the same significance criteria specifically developed for the approved Plan PEIR. Unless otherwise noted, the significance criteria were based on the checklist questions in Appendix G of the CEQA Guidelines. In some cases, the approved Plan PEIR 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 approved Plan or local conditions. It was determined that the project modifications associated with the proposed Amendment would not alter impact conclusions for certain significance criteria for Air Quality, Noise and Vibration, and Transportation. An explanation for why the proposed Amendment would not result in changes to the impact conclusions for these significance criteria is included in Chapter 1 of this SEIR.

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. Unless stated otherwise, the SEIR uses the same analysis methodology used in the approved Plan PEIR. The analysis methodology for certain resource area sections has been revised to reflect new information, including CARB's 2022 Scoping Plan, the updated Safer Affordable Fuel Efficient (SAFE) Vehicles Rule, and minor modeling corrections. These changes are discussed further in the individual resource area sections.

Impact Analysis examines whether the changes associated with the proposed Amendment would result in new or substantially more significant impacts than what was discussed in the approved Plan PEIR. 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.

The SEIR provides quantitative analysis of the environmental impacts of the proposed Amendment where possible or meaningful. For example, quantitative analysis is provided in air quality and greenhouse gas emissions sections. However, not all the proposed Amendment's impacts can meaningfully be analyzed quantitatively through the year 2050. Where quantitative analysis of an impact is not possible or meaningful, qualitative analysis is provided.

Chapter 5, *Cumulative Impact Analysis*, examines whether a significant cumulative impact is created when impacts of the proposed Amendment are added to the impacts of one or more related projects, and whether the proposed Amendment's contribution to this impact would be cumulatively considerable (CEQA Guidelines Section 15130). Cumulative impacts are analyzed for the same resource areas analyzed in this chapter.

Mitigation Measures are feasible actions intended to avoid or substantially lessen significant impacts identified in the *Impact Analysis* sections. This SEIR includes prior mitigation measures from the approved Plan PEIR that are still applicable to the proposed Amendment, as well as new mitigation measures, only for those significance criteria where significant impacts have been identified.

The SANDAG Board of Directors has discretion to adopt or reject mitigation measures recommended in the SEIR. 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 Amendment and monitored to help ensure their implementation. 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 approved 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 approved 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 SEIR.

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]). Mitigation measures included in this SEIR to avoid or substantially lessen significant impacts of the proposed Amendment may 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 SEIR, 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 Amendment.

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.”

In each resource area section, this SEIR 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 SEIR concludes significant and unavoidable for 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.