

RECIRCULATION READERS GUIDE

This Guide is provided to facilitate reviewing changes between the attached Revised Draft Environmental Impact Report (Revised DEIR) discussions and the DEIR circulated for public review for the Harmony Grove Village South (HGV South) Project. The purpose of this information sheet is to provide clarifications to the Draft Greenhouse Gas (GHG) Analyses Report and circulated as part of the DEIR.

The DEIR was previously circulated for public review from April 20 through June 20, 2017 (a 60-day public review period). All interested persons and organizations had an opportunity during this time to submit their written comments on the DEIR to the County of San Diego.

In response to comments received from the circulation of the DEIR and recent court decisions on greenhouse gases, revisions have been made to portions of the GHG emissions analyses. Due to these additions and changes made to the DEIR, a conservative decision was made to recirculate the Revised DEIR Table S-2 and GHG emissions text from the EIR, as well as a supplement to the GHG Analyses Report.

Pursuant to CEQA Guidelines Section 15088.5(f)(2), reviewers should limit their comments to the revised chapters or portions of the recirculated EIR only. The County requests that comments are provided on only the text indicated in underline format in the Summary. The reader can view all deleted text as indicated in strikethrough format.

The comments submitted during the earlier circulation period (April 20 through June 20, 2017) that relate to chapters or portions of the document that were not revised and are not recirculated here and will be responded to as part of the Final EIR (FEIR). The County also will respond to comments submitted on the specific chapters and portions of the Revised DEIR that are part of this recirculation. Both sets of comments and responses (from the DEIR and these recirculated portions of the Revised DEIR) will be included in the FEIR.

New comments must be submitted. Comments on the recirculated Revised Draft EIR sections must be received no later than April 9, 2018 at 4:00 P.M. and should reference the Project numbers and name: Harmony Grove Village South Project, PDS2015-GPA-15-002, PDS2015-SP-15-002, PDS2015-REZ-15-003, PDS2015-TM-5600, PDS2015-MUP-15-008, PDS2015-ER-15-08-006.

Comments must be sent to the Planning & Development Services address listed below or via email to Ashley Smith.

Planning & Development Services
ATTN: Ashley Smith
5510 Overland Avenue, Suite 310
San Diego, CA 92123

For additional information, please contact: Ashley Smith at Ashley.Smith2@sdcounty.ca.gov | (858) 495-5375.

Files Availability. The recirculated Revised DEIR portions and the previous DEIR circulated from April 20 through June 20, 2017, are available on the Planning & Development Services website: https://www.sandiegocounty.gov/content/sdc/pds/Current_Projects/hgvs.html or at the offices at 5510 Overland Avenue, Suite 310, San Diego, California, 92123.

Recirculated Documents. The following items are being recirculated for review and comment.

- Updated Table S-2, *HGV South Full-build Alternatives Comparison of Impacts* identifying GHG conclusions for Project alternatives.
- Revised Subchapter 2.7, *Greenhouse Gas Emissions*, showing the revisions noted below, as well as some updates to regulatory documents and programs that have occurred since public circulation.
- A Global Climate Change Supplemental Letter (Supplement) prepared by Ldn Consulting, Inc. with the updated supplemental information described below.

The major additions or changes for which new comments will be considered include the following:

- Determination of Significance and Thresholds
- Assessment of Impacts
- Identification of Mitigation Measures
- Revised Conclusion

It is also noted that identification of significant impacts for GHGs resulted in review of alternatives impacts relative to the Project. Because all build alternatives would also be mitigated to net zero, the impacts would be similar to those of the Proposed Project. This is indicated in attached Table S-2, attached at the end of this Readers Guide. An orientation to the new analysis is provided below.

Determination of Significance and Thresholds. The determination of significance in the DEIR was governed by CEQA Guidelines 15064.4, entitled “Determining the Significance of Impacts from Greenhouse Gas Emissions.” CEQA Guidelines 15064.4(a) states, “[t]he determination of the significance of greenhouse gas emissions calls for a *careful judgment by the lead agency consistent with the provisions in section 15064*. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, *in the context of a particular project*, whether to ... [use a quantitative model or qualitative model]” (emphasis added).

The DEIR evaluated the potential environmental impacts associated with the Proposed Project’s emissions of GHG using the “County Efficiency Metric” post the November 2015 California Supreme Court ruling in the Center for Biological Diversity vs. California Department of Fish and Wildlife case (commonly referred to as the Newhall Ranch case). The GHG legal and regulatory environment and best practices on CEQA analyses of GHGs continue to be in flux. During the public review period of the Project’s DEIR, the Superior Court in *Sierra Club v. County of San Diego*, Case No. 2012-0101054/*Golden Door Properties LLC v. County of San Diego*, Case No. 2016-0037402 (April 28, 2017) ruled that the 2016 Guidance Document and its “County Efficiency Metric” may not be used to provide the basis for CEQA review of GHG impacts for development proposals within the unincorporated County lands. As a result, the Ldn Consulting, Inc. Supplement was prepared to utilize

the significance criteria in Appendix G of the CEQA Guidelines related to GHG emissions to evaluate the project's GHG emissions.

Assessment of Impacts. Sequestration modeling was undertaken, to evaluate the amounts of carbon dioxide (CO₂) sequestered by existing vegetation contrasted with amounts anticipated under the Project landscaping plan. Project implementation would increase CO₂ sequestration by approximately 100 percent over the existing condition through the planting of new trees (a minimum of 2,045). Taking a conservative position, the positive effects of the large number of trees planted by the Project as replacement of scrub and isolated trees removed by the Project were not included in the modeling to lower Project impacts; only the *impact* of vegetation removal was included in the GHG analysis. Also, an independent third-party review was undertaken of anticipated electrical energy off-sets provided by Project-implemented PV panels on Project structures. This review confirmed that 100 percent of Project electrical uses could be satisfied through on-site solar (PV) panels. The Applicant has independently committed to offsetting 100 percent of Project electrical uses through measures including on-site photovoltaic (PV; solar) panels. Both of these efforts were folded into the Ldn Consulting, Inc. Supplement. In addition, a correction to trip types information was made in response to a comment received, and that only impacted GHGs. This is also addressed in the Supplement text and Attachment C.

The Supplement concludes that, after incorporation of all current regulatory reductions and design features, the Project would generate approximately 4,411 MT CO₂e during construction and 5,222 MT CO₂e annually during operations at full buildout. These emissions, even with all Project design features, are identified as significant impacts, and mitigation is identified.

Identification of Mitigation Measures. The Applicant has committed to achieve carbon neutrality for HGV South. As detailed in the Supplement and GHG emissions Revised DEIR discussion (see Mitigation Measures M-GHG-1 and M-GHG-2), the Project Applicant will purchase and retire GHG credits from a recognized and reputable, accredited carbon registry to reduce the Project's GHG emissions to net zero. These purchases will be made independently for construction and operational emissions, and will occur in a timely fashion, with construction period-related credits being purchased prior to grading and operations-related credits being purchased prior to issuance of the first building permit.

Revised Conclusion. Through the purchase of carbon credits as identified in Project mitigation measures, construction- and operation-related GHG emissions would be reduced to net zero and would therefore result in a less-than-significant contribution to cumulative GHG impacts.

As indicated above, under State CEQA Guidelines Section 15088.5(c), if a revision to an EIR is limited to a few chapters or portions of the EIR, only chapters or portions that have been modified need to be recirculated. Consistent with CEQA Guidelines Section 15088.5(c), this Revised DEIR contains only the portions of the DEIR that have modified with significant new information. Please only comment on these revised and recirculated portions indicated in the underline format.

The County will respond to comments submitted on the Revised DEIR sections and the original DEIR in the FEIR, which may include revisions for which recirculation is not necessary under the legal standards set forth above.

Table S-2 HGV SOUTH FULL-BUILD ALTERNATIVES COMPARISON OF IMPACTS						
Environmental Issue	Proposed Project (453 SFR and MFR)	No Project/ No Development	General Plan Consistent with Septic Alternative (49 SFR)	General Plan Consistent with Sewer Alternative (119 SFR)	Senior Care/ Traffic Reduction Alternative (386 units)	Biologically Superior Alternative (424 MFR)
Aesthetics	SU Construction Period, SM Long-term	Less	Similar	Less	Similar	Greater
Transportation/Traffic	SU (City of Escondido), SM (County of San Diego)	Less	Less	Less	Less	Similar
Biological Resources	SM	Less	Greater	Similar	Greater	Less
Cultural Resources and Tribal Cultural Resources	SM	Less	Similar	Similar	Similar	Similar
Noise	SM	Less	Less	Less	Less	Less
Air Quality	LTS Construction Period, SU Long-term	Less	Less	Less	Less	Less
<u>Greenhouse Gas Emissions</u>	<u>SM</u>	<u>Similar</u>	<u>Similar</u>	<u>Similar</u>	<u>Similar</u>	<u>Similar</u>