

**STAFF RECOMMENDATION CLIMATE ACTION PLAN MODIFICATIONS  
ATTACHMENT G-1**

**SUBJECT:** Climate Action Plan; POD 15-002, PDS2016-GPA-16-007, LOG NO. PDS2016-ER-16-00-003

**STAFF RECOMMENDATION (RECOMMENDED PROJECT)**

Staff recommends adoption of draft Final Climate Action Plan (draft Final CAP) with the addition of the “Increased Solid Waste Diversion Alternative” described in the draft Final Supplemental Environmental Impact Report (draft Final SEIR). The Staff Recommendation includes the following elements:

1. Draft Final SEIR “Increased Solid Waste Diversion Alternative” would replace the components of GHG reduction measure SW-1.1, and
2. A Local Direct Investment Program would be implemented to achieve a total reduction of 153,511 MTCO<sub>2</sub>e.

**REQUISITE CHANGES TO THE FINAL CLIMATE ACTION PLAN**

This Climate Action Plan (CAP) Modification document is submitted to the Board of Supervisors (the Board) to make the following modifications to the draft Final County of San Diego CAP and Attachment 1 of Appendix C of the CAP should the Board choose to adopt the Staff Recommendation (Recommended Project).

Deletions are shown in strikeout and additions shown in underline.

1. The Staff Recommendation Measure Quantification Table (Attachment G-2) details the changes to the greenhouse gas reduction measures under the Staff Recommendation. The revised reduction numbers will replace the anticipated reductions for 2030 and 2050 in the “GHG EMISSIONS REDUCTIONS” table for each respective measure. Changes related specifically to the Staff Recommendation are highlighted in yellow. All other changes relate to those made to the Public Draft CAP as they appear in the draft Final CAP.
2. The Staff Recommendation Gap Analysis (Attachment G-3) details the changes to the reduction measures’ quantification within Attachment 1 of Appendix C of the CAP. Changes are highlighted in yellow.

- Page 3-3: Revise Table 3.1 GHG Reductions by Category from Proposed Strategies and Measures (MTCO<sub>2</sub>e) as follows:

Category	2020	2030	2050
<b>Built Environment and Transportation</b>	6,020	<del>227,842</del> <u>205,893</u>	66,703
<b>Energy</b>	125,140	581,315	729,187
<b>Solid Waste</b>	0	<del>57,103</del> <u>79,052</u>	<del>62,159</del> <u>86,052</u>
<b>Water and Wastewater</b>	254	17,920	19,738
<b>Agriculture and Conservation</b>	791	12,965	16,384
<b>Total Reductions</b>	<b>132,205</b>	<b>897,145</b>	<del><b>894,170</b></del> <u><b>918,063</b></u>

- Page 3-3: Revise percentages in Figure 3.1 Total GHG Reductions from Strategies and State Actions in 2030 as follows:

Category	Revised Category Percentages
<b>Built Environment and Transportation</b>	<del>13%</del> <u>11%</u>
<b>Energy</b>	32%
<b>Solid Waste</b>	<del>3%</del> <u>4%</u>
<b>Water and Wastewater</b>	1%
<b>Agriculture and Conservation</b>	1%
<b>State Reductions</b>	50%

- Page 3-8: Revise percentage in Figure 3.3 Built Environment and Transportation Reductions for 2030 to be consistent with revised percentage in Figure 3.1, per change shown in #4.
- Page 3-62: Revise percentage in Figure 3.5 Solid Waste Reductions for 2030 to be consistent with revised percentage in Figure 3.1, per change shown in #4.
- Page 3-63: This strategy ~~includes~~ builds upon this recent Board action as a measure.
- Page 3-64:

**MEASURE SUMMARY**

Achieve ~~75%~~ 80% waste diversion in the unincorporated county by 2030

**DESCRIPTION**

Through this measure, the County will continue to implement the Strategic Plan to Reduce Waste to achieve additional reductions through 2030. ~~By 2025, staff will return to the Board to request direction to establish a higher diversion target to make progress toward the 2050 GHG reduction goal.~~

9. Page 3-65:

OUTCOMES

PERFORMANCE METRIC	TIME FRAME
75% <u>80%</u> of the unincorporated county's solid waste is diverted from landfills	2030

10. Page 5-13:

Revise Table 5.1 CAP Monitoring Program as follows:

- Measure SW-1.1 – revise outcome as follows: 75% 80% of the unincorporated county's solid waste is diverted from landfills

**CHANGES TO THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT**

Pursuant to CEQA Guidelines section 15088.5(a), “[a] lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)

The County recognizes that new information has been added to the SEIR since circulation of the Draft SEIR, but the new information serves simply to clarify or amplify information already found in the Draft SEIR or improve the Project and its protection of the environment. It does not rise to the level of “significant new information”.

Table 1 describes where the changes per the Staff Recommendation were analyzed in the Draft SEIR, whether the change has been evaluated, and whether recirculation of the Draft SEIR would be warranted. Please see Section VII of Attachment K for a complete list and location of changes in the Final SEIR under the Staff Recommendation. Ensuing changes to the draft Final CAP are documented above.

Table 1: Draft SEIR Evaluation of Project Changes under the Staff Recommendation

Project Changes	Where changes were evaluated in Draft SEIR	Would new or substantially more severe impacts result from the change?	Discussion	Would recirculation be required?
Increased Solid Waste Diversion Alternative	Chapter 4	No	As described in the draft Final SEIR, the County prepared an expanded analysis of the Increased Solid Waste Diversion Alternative to identify project-specific impacts, mitigation measures, and resulting conclusions if this alternative were selected for adoption. As described therein, this alternative would reduce environmental impacts compared to the Project and no new significant or substantially more severe impacts would result. Further, this alternative would better fulfill Objective 1 because it provides a mechanism for additional GHG reductions to better achieve the 2050 GHG reduction goal.	No
Local Direct Investment Program at 153,511 MTCO <sub>2e</sub>	General discussion in Chapters 2, 3, and 4. Also see Table 1-1.	No	As described in the Draft SEIR, a total of 190,262 MTCO <sub>2e</sub> of GHG reductions were assumed through a Local Direct Investment Program. The revised amount of GHG reductions under the Staff Recommendation is less than the level evaluated in the Draft SEIR and could result in a reduction in the number or types of local direct investment projects that would be required. As such, the environmental impacts of constructing local direct investment projects to achieve 153,511 MTCO <sub>2e</sub> of	No

Project Changes	Where changes were evaluated in Draft SEIR	Would new or substantially more severe impacts result from the change?	Discussion	Would recirculation be required?
			GHG reductions has been evaluated in the Draft SEIR.	
CAP Consistency Review Checklist	N/A	No	The CAP Consistency Review Checklist would implement the CAP through the discretionary review process for new development. It contains a list of measures and design features that would be implemented at the time of project application and discretionary review. The Checklist was evaluated as part of the proposed project in the Draft SEIR and there are no environmental impacts associated with the Checklist.	No