

**RENEWABLE ENERGY OPTION (OPTION 1) CLIMATE ACTION PLAN MODIFICATIONS  
ATTACHMENT M-1**

**SUBJECT:** COUNTY OF SAN DIEGO CLIMATE ACTION PLAN AND GENERAL PLAN AMENDMENT; POD15-002; GPA16-007

**RENEWABLE ENERGY OPTION (OPTION 1)**

The Renewable Energy Option was developed in response to comments related to increasing Measure E-2.1: Increase Renewable Electricity from 90% to 100% renewable electricity by 2030. This option includes the following elements:

1. Draft Final SEIR “Increased Solid Waste Diversion Alternative” would replace the components of GHG reduction measure SW-1.1;
2. Draft Final SEIR “100% Renewable Energy Alternative” would replace the components of GHG reduction measure E-2.1; and
3. A Local Direct Investment Program would be implemented to achieve a total reduction of 100,294 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 Renewable Energy Option (Option 1).

Deletions are shown in strikethrough and additions shown in underline.

1. The Renewable Energy Option Measure Quantification Table (Attachment M-2) details the changes to the greenhouse gas reduction measures under Option 1. 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 Option 1 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 Renewable Energy Option Gap Analysis (Attachment M-3) details the changes to the reduction measures’ quantification within Attachment 1 of Appendix C of the Climate Action Plan. 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>152,676</u>	66,703
<b>Energy</b>	125,140	<del>581,315</del> <b>634,532</b>	<del>729,187</del> <u>781,351</u>
<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>894,170</del> <u>970,407</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>8%</u>
<b>Energy</b>	<del>32%</del> <u>35%</u>
<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 3-42: Revise percentage in Figure 3.4 Energy Reductions for 2030 to be consistent with revised percentage in Figure 3.1, per change shown in #4.
- Page 3-42: Major measures include achievement of ~~90%~~ 100% renewable energy in the county by 2030, increased installation of rooftop photovoltaics (PV) in new and existing development, achievement of energy efficiency in existing buildings, and a water heater replacement program.
- Page 3-53: Transitioning from fossil fuels to renewable energy for electricity generation will reduce emissions and provide a more sustainable source of electricity. This strategy focuses on increasing the amount of onsite renewable electricity at existing and new residential and non-residential development, including at County facilities. In addition, the strategy also establishes a Renewable Energy Program to achieve ~~90%~~ 100% renewable electricity county-wide by 2030.

9. Page 3-54:

MEASURE SUMMARY

Achieve ~~90%~~ 100% renewable electricity for the unincorporated county by 2030

DESCRIPTION

This measure will achieve ~~90%~~ 100% renewable electricity for the unincorporated county by 2030 to lower GHG emissions by relying on cleaner electricity. This measure will exceed the State’s RPS requirements for 2030. The renewable electricity generated to achieve ~~90%~~ 100% reflects only the electricity transmitted through the grid and does not include electricity generated by individual sources, such as a home with rooftop solar or wind.

10. Page 3-55:

OUTCOMES

PERFORMANCE METRIC	TIME FRAME
Electricity from renewable sources accounts for <del>90%</del> <u>100%</u> of the unincorporated county’s electricity consumption	2030

11. 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.

12. Page 3-63: This strategy ~~includes~~ builds upon this recent Board action as a measure.

13. 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.~~

14. Page 3-65:

OUTCOMES

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

15. Page 5-13:

Revise Table 5.1 CAP Monitoring Program as follows:

- Measure E-2.1 – revise outcome as follows: electricity from renewable sources accounts for ~~90%~~ 100% of the unincorporated county’s electricity consumption by 2030
- 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 Option 1 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 M-4 for a complete list and location of changes in the Final SEIR under Option 1. Ensuing changes to the draft Final CAP are documented above.

Table 1: Draft SEIR Evaluation of Project Changes under Option 1

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 this objective because it provides a mechanism for additional GHG reductions to better achieve the 2050 GHG reduction goal.	No
100% Renewable Energy Alternative	Chapter 4	No	As described in the draft Final SEIR, the County prepared an expanded analysis of the 100% Renewable Energy Alternative to identify project-specific impacts, mitigation measures, and resulting conclusions if this alternative were selected for adoption. As described therein, this alternative could increase environmental impacts across most issue areas compared to the Project because of the potential to result in a greater number of small and large-scale renewable energy projects. However, this alternative would better fulfill this objective because it provides a mechanism for additional GHG reductions to better achieve the 2050 GHG reduction goal. No new significant impacts would occur.	No
Local Direct Investment Program at 100,294 MTCO <sub>2</sub> e	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>2</sub> e of GHG reductions were assumed through a Local Direct Investment Program. The revised amount of GHG reductions under	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?
			Option 1 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 100,294 MTCO <sub>2</sub> e of 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. There are no changes to the Checklist associated with Option 1.	No