

**HOUSING AFFORDABILITY OPTION (OPTION 2) CLIMATE ACTION PLAN MODIFICATIONS
ATTACHMENT N-1**

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

HOUSING AFFORDABILITY OPTION (OPTION 2)

The Housing Affordability Option was developed in response to comments related to concerns about potential increases to housing costs. This option would remove three measures, or portions thereof, that go beyond State requirements and affect new and existing residential development. 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. Remove GHG reduction measures T-3.1, E-1.1 (for new residential development), and E-1.3; and
3. A Local Direct Investment Program would be implemented to achieve a total reduction of 177,248 MTCO₂e.

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 Housing Affordability Option (Option 2).

1. The Housing Affordability Option Measure Quantification Table (Attachment N-2) details the changes to the greenhouse gas reduction measures under Option 2. 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 2 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 Housing Affordability Option Gap Analysis (Attachment N-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.
3. Universal Revision: Replace all references to “30” measures with “28” measures

4. Page 3-3: Revise Table 3.1 GHG Reductions by Category from Proposed Strategies and Measures (MTCO₂e) as follows:

Category	2020	2030	2050
Built Environment and Transportation	6,020	227,842 <u>227,417</u>	66,703 <u>64,459</u>
Energy	125,140	581,315 559,790	729,187 <u>686,791</u>
Solid Waste	0	57,103 <u>79,052</u>	62,159 <u>86,052</u>
Water and Wastewater	254	17,920	19,738
Agriculture and Conservation	791	12,965	16,384
Total Reductions	132,205	897,145	894,170 873,424

5. 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
Built Environment and Transportation	13%
Energy	32% <u>31%</u>
Solid Waste	3% <u>4%</u>
Water and Wastewater	1%
Agriculture and Conservation	1%
State Reductions	50%

6. Page 3-8: The Built Environment and Transportation category is composed of four strategies and ~~13~~ 12 measures with supporting efforts
7. Page 3-8: ~~Measure T-3.1: Use Alternative Fuels in New Residential and Non-residential Construction Projects~~
8. Page 3-27: This strategy emphasizes transitioning fossil fuel-based County fleet vehicles and equipment to alternative fuels such as renewable diesel, renewable natural gas, and electric, and facilitating the replacement of older on-road vehicles to meet state and federal fuel economy standards. This strategy emphasizes opportunities to transition County construction equipment fuel types from petroleum-diesel to renewable diesel, as well as their conversion to electric or hybrid-electric options, including bulldozers, excavators or loaders, all of which are available on the market.
9. Pages 3-28 and 3-29: Delete both pages to remove Measure T-3.1: Use Alternative Fuels in New Residential and Non-residential Construction Projects.

10. 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 #5.

11. Page 3-42: The Energy category is composed of two strategies and ~~eight~~ seven measures with supporting efforts

12. Page 3-42:

Measure E-1.1: Improve Building Energy Efficiency in New Non-Residential Development
~~Measure E-1.3: Improve Building Energy Efficiency in Existing Development~~

13. Pages 3-44 and 3-45: Revise Measure title as follows:

E-1.1: Improve Building Energy Efficiency in New Non-Residential Development

14. Page 3-44:

MEASURE SUMMARY

Achieve 10% greater building energy efficiency in all new non-residential development than is required by the 2016 State Energy Code (Title 24 Part 6) by 2020; ~~require all new residential development to meet the State’s Zero Net Energy (ZNE) standards by 2020;~~ and require all new non-residential development to meet the State’s ZNE standards by 2030

DESCRIPTION

It is also anticipated that the State will require ZNE for new residential development by 2020, at which time the County will implement the State’s ZNE standards. ~~If the State does not adopt the residential ZNE standards, then the County Construction Codes will be amended to require the ZNE standards for residential development by 2020.~~ The State has demonstrated that ZNE can be achieved through a combination of high-performance energy efficient design and maximizing on-site renewable energy production (e.g., solar and storage). This measure will be enforced through the County’s current permitting processes.

15. Page 3-45:

ACTIONS

DESCRIPTION	RESPONSIBILITY	TIME FRAME	RELATIVE COST
Amend the County Construction Codes to require all new residential development to meet the State’s Zero Net Energy (ZNE) standards	PDS	2020	Low

OUTCOMES

PERFORMANCE METRIC	TIME FRAME
All new residential development meets the State’s ZNE standards	2020

16. Pages 3-48 and 3-49: Delete both pages to remove Measure E-1.3: Improve Building Energy Efficiency in Existing Development

17. Page 3-56:

DESCRIPTION

This measure is not applicable to residential development because the State’s residential ZNE standards are anticipated to go into effect by 2020. ~~Therefore, incorporation of renewable electricity into new residential development will occur under Measure E-1.1 and associated GHG reductions have been accounted for in Measure E-1.1~~

18. 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 #5.

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

20. 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.~~

21. Page 3-65:

OUTCOMES

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

22. Pages 5-12 and 5-13:

Revise Table 5.1 CAP Monitoring Program as follows:

- Measure T-3.1 – delete measure and associated rows from table
- Measure E-1.1 – delete second action point and all associated cells in that row; and revise measure title as follows: Improve Building Energy Efficiency in New Non-Residential Development
- Measure E-1.3 – delete all measure rows from table
- 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 2 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 N-4 for a complete list and location of changes in the Final SEIR under Option 2. Ensuing changes to the draft Final CAP are documented above.

Table 1: Draft SEIR Evaluation of Project Changes under Option 2

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	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?
			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.	
Local Direct Investment Program at 177,248 MTCO ₂ 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 ₂ e of GHG reductions were assumed through a Local Direct Investment Program. The revised amount of GHG reductions under Option 2 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 177,248 MTCO ₂ e of GHG reductions has been evaluated in the Draft SEIR.	No
Remove GHG Reduction Measure T-3.1	General discussion in Chapters 2, 3, and 4. Also see Table 1-1.	No	<p>Removal of this measure would eliminate the requirements for the use of alternative fuels in construction equipment. Removal of this measure would not lead to any new significant impacts and would reduce total GHG reductions by 885 MTCO₂e under Option 2.</p> <p>As described in the Housing Affordability Option Measure Quantification Table (Attachment N-2), these reductions would be replaced by reductions achieved from the Enhanced Solid Waste Alternative and through the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 177,248 MTCO₂e under Option 2, which would not exceed the level of</p>	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?
Remove a portion of GHG Reduction Measure E-1.1	General discussion in Chapters 2, 3, and 4. Also see Table 1-1.	No	<p>local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 MTCO₂e).</p> <p>Removal of a portion of this measure would eliminate the requirement for Zero Net Energy (ZNE) standards in new residential development. The requirement for ZNE standards in new non-residential development would remain. Removal of the ZNE requirements for new residential development within this measure would not lead to any new significant impacts and would reduce total GHG reductions by 36,189 MTCO₂e under Option 2.</p> <p>As described in the Housing Affordability Option Measure Quantification Table (Attachment N-2), these reductions would be replaced by reductions achieved from the Enhanced Solid Waste Alternative and through the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 177,248 MTCO₂e under Option 2, which would not exceed the level of local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 MTCO₂e).</p>	No
Remove GHG Reduction Measure E-1.3	General discussion in Chapters 2, 3, and 4. Also see Table 1-1.	No	<p>Removal of this measure would eliminate the requirements for energy efficiency audits. Removal of this measure would not lead to any new significant impacts and would reduce total GHG reductions by 3,694 MTCO₂e under Option 2.</p> <p>As described in the Housing Affordability Option Measure Quantification Table (Attachment N-2), these reductions would be</p>	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?
			replaced by reductions achieved from the Enhanced Solid Waste Alternative and through the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 177,248 MTCO ₂ e under Option 2, which would not exceed the level of local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 MTCO ₂ e).	
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. Option 2 would result in the removal of GHG reduction measures T-3.1, E-1.1 (for new residential development), and E-1.3, which would be removed from the Checklist as requirements.	No