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

RESIDENTIAL AND NON-RESIDENTIAL DEVELOPMENT OPTION (OPTION 3)

The Residential and Non-residential Development Option was developed in response to concerns related to the cost to new development and housing affordability, and requests from the public to include the draft Final SEIR "100% Renewable Energy Alternative." 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;
3. Remove GHG reduction measures T-3.1, E-1.1, E-1.3, E-2.2, and W-1.2; and
4. A Local Direct Investment Program would be implemented to achieve a total reduction of 140,845 $MTCO_2e$.

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 Residential and Non-residential Development Option (Option 3).

1. The Residential and Non-residential Development Option Measure Quantification Table (Attachment O-2) details the changes to the greenhouse gas reduction measures under Option 3. 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 3 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 Residential and Non-residential Development Option Gap Analysis (Attachment O-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 "25" measures

4. Page 3-3: Revise Table 3.1 GHG Reductions by Category from Proposed Strategies and Measures ($MTCO_2e$) as follows:

Category	2020	2030	2050
Built Environment and Transportation	6,020	~~227,842~~ 191,014	~~66,703~~ 64,459
Energy	125,140	~~581,315~~ 613,728	~~729,187~~ 710,464
Solid Waste	0	~~57,103~~ 79,052	~~62,159~~ 86,052
Water and Wastewater	254	~~17,920~~ 386	~~19,738~~ 651
Agriculture and Conservation	791	12,965	16,384
Total Reductions	**132,205**	**897,145**	~~**894,170**~~ **878,010**

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%~~ 11%
Energy	~~32%~~ 34%
Solid Waste	~~3%~~ 4%
Water and Wastewater	~~1%~~ 0.02%
Agriculture and Conservation	1%
State Reductions	50%

6. 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 #5.

7. Page 3-8: The Built Environment and Transportation category is composed of four strategies and ~~13~~ 12 measures with supporting efforts

8. Page 3-8: ~~Measure T-3.1: Use Alternative Fuels in New Residential and Non-residential Construction Projects~~

9. 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.

10. 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

11. 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.

12. Page 3-42: The energy measures included in the CAP aim to further reduce emissions by improving energy efficiency ~~earlier than or beyond state r~~equirements, streamlining access to renewable energy, and increasing the supply of renewable energy for homes and businesses within the county. 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 building~~s, and a water heater replacement program.

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

14. Page 3-42:

    ~~Measure E-1.1: Improve Building Energy Efficiency in New Development~~
    ~~Measure E-1.3: Improve Building Energy Efficiency in Existing Development~~
    ~~Measure E-2.2: Increase Renewable Electricity in Non-Residential Development~~

15. Page 3-43: This strategy focuses on opportunities to increase energy efficiency in ~~both new and existing residential and non-residential buildings, including~~ residential buildings and County facilities.

16. Pages 3-44 and 3-45: Delete both pages to remove Measure E-1.1: Improve Building Energy Efficiency in New Development

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

18. 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.

19. 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.

20. Page 3-55:

OUTCOMES

PERFORMANCE METRIC	TIME FRAME
Electricity from renewable sources accounts for ~~90%~~ 100% of the unincorporated county's electricity consumption	2030

21. Page 3-56 and 3-57: Delete both pages to remove Measure E-2.2: Increase Renewable Electricity in Non-Residential Development

22. 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.

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

24. 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.~~

25. Page 3-65:

OUTCOMES

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

26. Page 3-66: Revise percentage in Figure 3.6 Water and Wastewater Reductions for 2030 to be consistent with revised percentage in Figure 3.1, per change shown in #5.

27. Page 3-66: The measures proposed under this strategy will reduce emissions primarily through water conservation in new and existing facilities. Measures involve revising the County's current ~~o~~rdinances that relates to ~~both~~ indoor ~~and outdoor~~ water efficiency and conservation and providing incentives to encourage rainwater reuse.

28. Page 3-66: The Water and Wastewater category is composed of two strategies and ~~four~~ three measures with supporting efforts

29. Page 3-66:

~~Measure W-1.2: Reduce Outdoor Water Use~~

30. Pages 3-70 and 3-71: Delete both pages to remove Measure W-1.2: Reduce Outdoor Water Use

31. Pages 5-11, 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 measure and associated rows from table
- Measure E-1.3 – delete measure and associated rows from table
- 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 E-2.2 – delete measure and associated rows from table
- Measure SW-1.1 – revise outcome as follows: ~~75%~~ 80% of the unincorporated county's solid waste is diverted from landfills
- Measure W-1.2 – delete measure and associated rows from table

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 3 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 O-4 for a complete list and location of changes in the Final SEIR under Option 3. Ensuing changes to the draft Final CAP are documented above.

Table 1: Draft SEIR Evaluation of Project Changes under Option 3

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	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?
			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.	
Local Direct Investment Program at 140,845 $MTCO_2e$	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 $MTCO_2e$ of GHG reductions were assumed through a Local Direct Investment Program. The revised amount of GHG reductions under Option 3 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 140,845 $MTCO_2e$ 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	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 $MTCO_2e$ under Option 3. As described in the Residential and Non-residential Development Option Measure Quantification	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?
			Table (Attachment O-2), these reductions would be replaced by reductions achieved from the Enhanced Solid Waste Alternative, the 100% Renewable Energy Alternative, and through the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 140,845 $MTCO_2e$ under Option 3, which would not exceed the level of local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 $MTCO_2e$).	
Remove GHG Reduction Measure E-1.1	General discussion in Chapters 2, 3, and 4. Also see Table 1-1.	No	Removal of this measure would eliminate the requirements for Zero Net Energy (ZNE) standards in both new residential and non-residential development. Removal of this measure would not lead to any new significant impacts and would reduce total GHG reductions by 38,708 $MTCO_2e$ under Option 3. As described in the Residential and Non-residential Development Option Measure Quantification Table (Attachment O-2), these reductions would be replaced by reductions achieved from the Enhanced Solid Waste Alternative, the 100% Renewable Energy Alternative, and through the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 140,845 $MTCO_2e$ under Option 3, which would not exceed the level of local direct investments assumed in the	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?
			Draft CAP and evaluated in the Draft SEIR (190,262 $MTCO_2e$).	
Remove GHG Reduction Measure E-1.3	General discussion in Chapters 2, 3, and 4. Also see Table 1-1.	No	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 $MTCO_2e$ under Option 3. As described in the Residential and Non-residential Development Option Measure Quantification Table (Attachment O-2), these reductions would be replaced by reductions achieved from the Enhanced Solid Waste Alternative, the 100% Renewable Energy Alternative, and through the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 140,845 $MTCO_2e$ under Option 3, which would not exceed the level of local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 $MTCO_2e$).	No
Remove GHG Reduction Measure E-2.2	General discussion in Chapters 2, 3, and 4. Also see Table 1-1.	No	Removal of this measure would eliminate the requirements for the installation of renewable electricity systems on new non-residential development. Removal of this measure could reduce the potential environmental impacts that would occur because less structures would be modified and would reduced total GHG reductions by 13,444 $MTCO_2e$ under Option 3. As described in the Residential and Non-residential Development	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 Measure Quantification Table (Attachment O-2), these reductions would be replaced by reductions achieved from the Enhanced Solid Waste Alternative, the 100% Renewable Energy Alternative, and through the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 140,845 $MTCO_2e$ under Option 3, which would not exceed the level of local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 $MTCO_2e$).	
Remove GHG Reduction Measure W-1.2	General discussion in Chapters 2, 3, and 4. Also see Table 1-1.	No	Removal of this measure would eliminate the requirements for reducing potable water use in outdoor landscaping for residential and non-residential development. Removal of this measure would not lead to any new significant impacts and would reduce total GHG reductions by 17,535 $MTCO_2e$ under Option 3. As described in the Residential and Non-residential Development Option Measure Quantification Table (Attachment O-2), these reductions would be replaced by reductions achieved from the Enhanced Solid Waste Alternative, the 100% Renewable Energy Alternative, and through the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 140,845 $MTCO_2e$ under Option 3, which	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?
			would not exceed the level of local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 $MTCO_2e$).	
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 3 would result in the removal of GHG reduction measures T-3.1, E-1.1, E-1.3, and W-1.2, which would be removed from the Checklist as requirements.	No