

**PLANNING COMMISSION RECOMMENDATION
CLIMATE ACTION PLAN MODIFICATIONS
ATTACHMENT Q-1**

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

PLANNING COMMISSION RECOMMENDATION

On January 18, 2018, the Planning Commission considered the draft Final Climate Action Plan and related information, and the draft Final Supplemental Environmental Impact Report. The Planning Commission recommended Option 3 (Residential and Non-residential Development) to the Board of Supervisors, with one modification. This 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;
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;
4. A Local Direct Investment Program would be implemented to achieve a total reduction of 140,845 MTCO₂e; and
5. Measure E-1.2 would be modified to include a program for existing homeowners meeting certain income criteria to reduce the cost to replace natural gas tank-based water heaters with solar, electric, or tankless gas.

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 Planning Commission Recommendation.

1. The Planning Commission Recommendation Measure Quantification Table (Attachment Q-2) details the changes to the greenhouse gas reduction measures under the Planning Commission 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 Planning Commission 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 Planning Commission Recommendation Gap Analysis (Attachment Q-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 (MTCO₂e) as follows:

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

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% <u>11%</u>
Energy	32% <u>34%</u>
Solid Waste	3% <u>4%</u>
Water and Wastewater	1% <u>0.02%</u>
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 requirements~~, 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 buildings~~, 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 3-46:

DESCRIPTION

This measure is a requirement, and will include a subsidy for replacement water heaters for participants meeting certain income criteria. The average life span of a residential natural gas water heater is 13 years. This measure will require all new and replacement water heaters to transition away from tank-based natural gas systems. The County will develop a program for existing homeowners meeting certain income criteria to reduce the cost to replace natural gas

tank-based water heaters with solar, electric, or tankless gas. The measure will be enforced through the County’s current permitting processes.

18. Page 3-47:

ACTIONS

DESCRIPTION	RESPONSIBILITY	TIME FRAME	RELATIVE COST
<u>Develop a program for existing homeowners meeting certain income criteria to reduce the cost to replace natural gas tank-based water heaters with solar, electric, or tankless gas</u>	<u>PDS</u>	<u>2020</u>	<u>Medium</u>

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

20. 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.

21. 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.

22. Page 3-55:

OUTCOMES

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

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

24. 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.

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

26. 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.

27. Page 3-65:

OUTCOMES

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

28. 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.

29. 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 ordinances that relates to ~~both indoor and outdoor~~ water efficiency and conservation and providing incentives to encourage rainwater reuse.

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

31. Page 3-66:

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

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

33. 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-1.2 – add the following information in a new row:
 - Measure Title & Action(s): Develop a program for existing homeowners meeting certain income criteria to reduce the cost to replace natural gas tank-based water heaters with solar, electric, or tankless gas

- Outcome(s): All new an replacement water heaters in residential development are solar, electrically-powered, or tankless gas
- Enforcement: Subsidy as part of requirement
- Lead: PDS
- Implementation Time Frame: 2020
- Relative Cost: Medium
- Potential Funding Source: Check box for County
- 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 the Planning Commission 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 Q-4 for a complete list and location of changes in the Final SEIR under the Planning Commission Recommendation. Ensuing changes to the draft Final CAP are documented above.

Table 1: Draft SEIR Evaluation of Project Changes under the Planning Commission 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 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

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?
Local Direct Investment Program at 140,845 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 the Planning Commission 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 140,845 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 the Planning Commission Recommendation.</p> <p>As described in the Planning Commission Recommendation Measure Quantification Table (Attachment Q-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 MTCO₂e under the Planning Commission Recommendation, which would not</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?
			exceed the level of local direct investments assumed in the Draft CAP and evaluated in the Draft SEIR (190,262 MTCO ₂ e).	
Remove GHG Reduction Measure E-1.1	General discussion in Chapters 2, 3, and 4. Also see Table 1-1.	No	<p>Removal of this measure would eliminate the requirements for 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 MTCO₂e under the Planning Commission Recommendation.</p> <p>As described in the Planning Commission Recommendation Measure Quantification Table (Attachment Q-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 MTCO₂e under the Planning Commission Recommendation, 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	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 ₂ e under 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?
			<p>Planning Commission Recommendation.</p> <p>As described in the Planning Commission Recommendation Measure Quantification Table (Attachment Q-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 MTCO₂e under the Planning Commission Recommendation, 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>	
Remove GHG Reduction Measure E-2.2	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 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 MTCO₂e under the Planning Commission Recommendation.</p> <p>As described in the Planning Commission Recommendation Measure Quantification Table (Attachment Q-2), these reductions would be replaced by reductions achieved from the Enhanced Solid Waste Alternative, the 100% Renewable Energy Alternative, and</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?
			through the Local Direct Investment Program. Total GHG reductions from the Local Direct Investment Program would be 140,845 MTCO ₂ e under the Planning Commission Recommendation, 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).	
Remove GHG Reduction Measure W-1.2	General discussion in Chapters 2, 3, and 4. Also see Table 1-1.	No	<p>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 MTCO₂e under the Planning Commission Recommendation.</p> <p>As described in the Planning Commission Recommendation Measure Quantification Table (Attachment Q-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 MTCO₂e under the Planning Commission Recommendation, 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

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?
Update GHG Reduction Measure E-1.2	General discussion in Chapter 1 and Table 1-1.	No	Update of the measure to state that GHG Reduction Measure E-1.2 would be a requirement and would include a subsidy for replacement water heaters for participants meeting certain income criteria. This update would not lead to any new significant impacts as this measure would continue to be implemented at the levels proposed in the Final SEIR.	No
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. The Planning Commission Recommendation 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