

Response to Comment Letter X24

**John Suhr
December 26, 2017**

Letter
X24

From: John Suhr [mailto:johnsuhr@aol.com]
Sent: Tuesday, December 26, 2017 1:52 PM
To: CAP <CAP@sdcounty.ca.gov>
Cc: Cox, Greg <Greg.Cox@sdcounty.ca.gov>; Horn, Bill <Bill.Horn@sdcounty.ca.gov>; Jacob, Dianne <Dianne.Jacob@sdcounty.ca.gov>; Roberts, Ron <Ron.Roberts@sdcounty.ca.gov>; Gaspar, Kristin <Kristin.Gaspar@sdcounty.ca.gov>; FGG, CAO Mail <caomail@sdcounty.ca.gov>; Montgomery, Thomas E <Thomas.Montgomery@sdcounty.ca.gov>; joshua.smith@sduniontribune.com; blanca.gonzalez@utsandiego.com
Subject: Rehear or appeal the Sierra Club CAP court case

Recently it's become clear that EPIC's estimates of County GHG emissions are faulty calling the entire CAP process into question. See this UT article. This has been the case in San Diego and also La Mesa:

<http://www.sandiegouniontribune.com/news/environment/sd-me-climate-plan-vmt-20171129-story.html>

The entire CAP process should be delayed until a method of independently verifying that these estimates are accurate can be developed. Hundreds of million dollars may be a stake.

If the court case against the County has used EPIC's estimates it should be reheard or appealed.

Fully quantified data and scientific proof the County's GHG emissions are significant under CEQA Guidelines 15064(b) should also require a rehearing/appeal of the case. This has not been done previously, violating the intent of CEQA.

The intent of CEQA is to fully inform the public. Thus a fully quantified cost and benefit analysis of any mitigation proposals should be included in the CAP.

The Schwarenegger 80% GHG reduction by 2050 executive order S-3-05 should be removed from the court case and also any CAP calculations as it was rejected by the state Supreme Court in July.

John Suhr
La Mesa

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In a message dated 8/25/2017 5:13:06 PM Pacific Standard Time, johnsuhr@aol.com writes:

On review the updated draft CAP notes County GHG emissions at 3.2 MMTCO_{2e} annually for a population of 460,000 or $3,200,000/460,000 = 6.96$ MMTCO_{2e}/capita. Note that the CARB 2030 Scoping Plan recommends 6 MMTCO_{2e}/capita based on the 40% SB 32 GHG reduction requirement so the County need only reduce emissions 0.96 MMTCO_{2e} /capita or $0.96 \times 460,000 = 0.44$ MMTCO_{2e} to meet that recommendation.

X24-1

X24-2

- X24-1** The comment expresses concern regarding the accuracy of the GHG emissions inventories; however, the commenter does not provide evidence of such inaccuracies. The commenter also mistakenly refers to EPIC as the consultant who prepared the inventories when this is incorrect. The commenter also suggests that the CAP should be delayed until the inventories can be verified. The County has thoroughly reviewed the GHG emissions inventories and disagrees with the commenter that the inventories are flawed. Finally, the commenter also raises concerns that are duplicative to those previously raised in comment letters I8 and I9. Please see responses to those comment letters. This comment will be included with the Final SEIR submitted to decision makers.
- X24-2** The comment expresses the same concerns that the commenter raised in previously submitted comment letters I8 and I9. Please refer to those responses to comments.

Also I had previously used 4.5 MMTCO₂e for County emissions instead of 3.2 MMTCO₂e so the revised reduction of global temperatures if the County ended emissions entirely would be $3.2/7800 = 0.00041 \times 0.007 = \underline{0.0000028 \text{ degrees C.}}$

Surely that impact cannot be *scientifically or factually significant* as required by CEQA Guidelines 15064 (b) so *no action is necessary*. This should also affect the revised SEIR.

The updated draft CAP includes the Schwarzenegger 80% GHG reduction Executive Order which the State Supreme Court has just rejected so it should be revised to remove the 80% reduction in addition to finding County emissions insignificant. And again, the Sierra Club vs. the County Appeals Court decision should be reheard or appealed based on the updated information. No action should be taken on the CAP until this is done.

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X24-2
cont.