

Letter
X-27



San Diego County Planning Commissioners
c/o Lisa Fitzpatrick, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123
Lisa.Fitzpatrick@sdcounty.ca.gov

Dear Commissioners,

The Golden Door is a world class spa and resort committed to sustainability and environmental stewardship. But we are much more than just a spa, we are also owners and operators of a significant agricultural operation, continuing a long agricultural tradition in our rural community. We have developed new water sources to feed our groves, prepared our soil with natural nutrient sources, and cultivated our trees for optimal health. At Golden Door, we believe in renewing our land to help revitalize the environment. We have transplanted thirty-five 30-year-old Manzanillo olive trees from a commercial orchard, recently added 131-acres of citrus groves to our agricultural holdings, and brought new life to over 75 acres of now fruitful avocado groves. With the growing threat of climate change, the Golden Door is committed to ensuring it reduces its on-site greenhouse gas (GHG) emissions. As such, we ask that the County of San Diego (County) does its part to ensure GHG emissions are reduced within the County.

X27-1

We are concerned that the Climate Action Plan (CAP) does not do its part to ensure California will achieve GHG reduction mandates set by the legislature. For example, the CAP should require that GHG impacts resulting from general plan amendments (sprawl projects) are mitigated using local GHG emission reductions projects. Local emission reductions projects include local boiler efficiency upgrades, reforestation projects, compost additions to rangeland, organic waste digestion, livestock management, urban forest and urban tree planting, and weatherization.

X27-2

But, the CAP doesn't require mitigation projects for general plan amendments to be local. Instead, the CAP allows offset mitigation projects to occur off-shore, anywhere in the world unrestrained. A private developer can merely buy offset credits from a foreign entity, claiming to have reduced GHG emissions. Doing so may be hard to enforce, and off-shore offsets deprive County residents the localized reductions necessary to meet the County's goals, and the economic benefits associated with conducting offset projects within the County. Reducing GHG emissions in the County also has the important benefit of reducing other toxic air pollutants, known as co-pollutants, so that San Diego County residents will be able to breathe cleaner air. In fact, the California Air Resources Board has recognized the important "co-benefits" of reducing GHGs, such as contributions to the "green economy" and improving public health.

X27-3

The CAP does provide one conceptual program for investment in local emissions-reducing projects. However, these local direct investment projects are "already spoken for," because they are needed to reduce GHG emissions from planned development already in the approved general plan. The development projects that

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Response to Comment Letter XX

Golden Door

Kathy VanNess, Chief Operating Officer/General Manager

January 16, 2018

- X27-1** The comment provides introductory information related to the commenting organization, the Golden Door Spa, and reasons for commenting on the project. No environmental issues were raised in this comment; therefore, no response can be provided.
- X27-2** The comment states that the CAP should require that GHG impacts resulting from GPAs be mitigated using local GHG emission reduction projects. As described on pages 2.7-36 through 2.7-41 of the Final EIR, CAP Mitigation Measure M-GHG-1 would require the use of a comprehensive mitigation program that would include onsite and offsite mitigation, and could be supplemented as needed upon the exhaustion of all feasible mitigation, with carbon offset credits. The mitigation program would result in no new net GHG emissions above what was considered by the 2011 GPU and would include all GHG emissions associated with project-related VMT. The use of carbon offset credits is supported through previous case law as described in Master Response 12. Please refer to the response to comment O22-8 and the responses to comments within letter O-14. The comment will be included in the administrative record and provided to decisionmakers.
- X27-3** The comment states that the use of offsets for GPA projects would not meet the County's obligation to reduce its fair share of GHG emissions within the County and would deprive County residents of important co-benefits. The County disagrees. Please refer to the response to comment O22-8 and the responses to comments within letter O-14. Regarding the allowance of offsets, please refer to response to comment X27-2 and Master Response 12. As described therein, the County would require that all feasible GHG reduction

measures be located onsite first followed by within the unincorporated County, and then within the County of San Diego. Only when it is determined to the satisfaction of the Director of PDS that no other feasible onsite or in-county GHG reductions could be achieved, then projects would be allowed to pursue out-of-County offsets. Projects would be required to demonstrate as a part their project-specific conditions of approval or other permitting requirements that they have provided substantial evidence supporting feasibility or infeasibility of onsite or in-County reductions consistent with the requirements of CEQA PRC 21081(a)(3). Regarding co-benefits, as the mitigation for GPAs is currently established, projects would have a requirement to implement onsite GHG reduction projects to the degree feasible. Therefore, these projects and the County would benefit from any co-benefits provided by these reduction measures. The comment will be included in the administrative record and provided to decisionmakers.

require amendments to the general plan create new additional GHG emissions. The County must identify new local emissions-reducing projects that will mitigate these new additional GHG emissions before amending the general plan to allow more development in rural areas. Unfortunately, the CAP's proposal allows for unlimited sprawl development to move forward in reliance on a program of off-shore offsets that reneges on the County's promises and deprives its residents of important co-benefits.

27-3
cont.

The County's proposed off-shore offset program for sprawl projects would not meet the County's obligation to reduce its fair share of GHG emissions within the County and would deprive County residents of important co-benefits. County residents would miss out on potential reductions in toxic co-pollutants and commute times on our already congested roadways. The County's proposal would also deprive the local San Diego economy of important investment in green projects.

Also, off-shore offset projects encourage the setting aside of land in low- and lower-middle-income countries, which may impair economic development in those countries. Land that might otherwise be used by local governments for housing or other infrastructure projects, projects which might enable those developing economies to grow, is instead set aside by private developers. Similar impacts have occurred here in California, such as in Owens Valley, where residents were deprived of water in order to fuel Los Angeles' growth at the cost of Owens Valley's environment and economy. The County should not similarly depress low- and lower-middle-income countries in order to develop San Diego. We simply have no way to know what the ripple effects will be from imposing offset mitigation requirements in other states or countries where the County lacks authority and oversight. Environmental justice considerations at home and abroad must be taken into consideration.


X27-4

Further, the effects of paying landowners not to farm their land (one such potential offset measure) may have unintentional consequences. Allowing land to lay fallow may result in greater flooding, as the land may not appropriately drain without assistance from crops. The County must consider the effects of these types of offset projects and others.

We ask that the County live up to its promises and require that offset projects and measures occur within San Diego County first. Action can be taken in the County to combat GHG emissions, and local businesses and landowners should be allowed to innovate before the County looks to other parts of the globe. The County's proposal in the Final CAP, to rely on off-shore offsets as justification for approving sprawl development projects, is a dereliction of duty and should be re-visited and revised before the County approves this important plan to reduce GHG emissions.

X27-5

We thank you for your time and attention to our comments.

Best Regards,

 Kathy VanNess
 Chief Operating Officer/General Manager
 Golden Door Properties

X27-4 The comment states that offshore offset projects may impair economic development in those countries. The comment states that these types of impacts should be considered. The commenter offers no evidence to support this assertion. Nonetheless, the County did appropriately consider the types of carbon offset projects that could be implemented as described in Section 2.7.5.1 of the SEIR and established that carbon offset projects must be obtained from one of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard, (ii) any registry approved by CARB to act as a registry under the state's cap-and-trade program, (iii) through the CAPCOA GHG Rx and the SDAPCD, or (iv) if no registry is in existence as identified in options (i), (ii), or (iii), above, then any other reputable registry or entity that issues carbon offsets consistent with Cal. Health & Saf. Code section 38562(d)(1)), to the satisfaction of the Director of PDS. The comment will be included in the administrative record and provided to decisionmakers.

X27-5 The comment offers concluding summary remarks. No response is required.