



STAY COOL
PROTECT OUR GRANDKIDS FROM GLOBAL WARMING

Letter
X31

January 16, 2018

Leon Brooks, Chair
San Diego County Planning Commission
5510 Overland Ave, Third Floor
San Diego CA 92123

Electronic copies sent to Lisa.Fitzpatrick@sdcounty.ca.gov and Donald Chase at CAP@sdcounty.ca.gov

RE: Climate Action Plan (Item 1, January 18, 2018)

Dear Chairman Brooks and Members of the Commission:

STAY COOL for Grandkids (SC4G) appreciates the opportunity to provide comments to the San Diego County Planning Commission on the final draft County of San Diego Climate Action Plan (CAP) along with other associated documents that you are considering at your meeting on January 18, 2018. *SC4G* is a membership organization of volunteer grandparents, elders and other citizens in the San Diego region dedicated to preserving a livable climate in the name of those too young to have voice: our future generations. Along with other partner organizations in our region, we advocate for meaningful action on climate change and support policies that will have a lasting effect by reducing Greenhouse Gas emissions and protecting our quality of life.

As we understand it, the purpose of the County CAP "is to reduce county GHG emissions consistent with State legislative requirements through implementation of the CAP, which includes strategies and measures to reduce GHG emissions from community and County operations. Community operations refer to GHG emissions generated from activities within the unincorporated county. County operations refer to GHG emissions generated by County facilities and operational activities throughout the county, including facilities and operations located within incorporated cities." Overall, we strongly support the County of San Diego's intent to adopt a new CAP and supporting documents that meet these stated purposes. We feel that the draft CAP and supporting documents provide a thorough explanation of the required contents of a climate action plan, along with a good overview of many of the key factors that need to be considered in formulating the proposed plan. We also feel that many of the proposed strategies and measures that are identified in the draft CAP will be effective in reducing GHG emissions in the unincorporated areas within San Diego County, as well as reducing GHG emissions associated with County operations.

Overall, we believe that the draft Climate Action Plan and its supporting documents reflect a significant effort to move the County of San Diego in a positive direction, both from a community and an operational perspective. However, we do not feel that the final draft CAP documents respond adequately to several concerns that SC4G

Response to Comment Letter X31

STAY COOL for Grandkids
Bob Leiter, Advisory Council Chair
January 16, 2018

X31-1 The comment introduces the commenting organization, Stay Cool for Grandkids, and expresses support for the County's intent to adopt a CAP as well as for the contents of the CAP. However, the comment also notes previously submitted comments on behalf of the organization and expresses concern regarding the 10-day period for final documents. The County appreciates the comment and acknowledges the comment and notes that while the period between publishing final documents and the Planning Commission Hearing was 10 days, it is compliant with state law and County policies. The comment will be included with the Final SEIR and submitted to decision makers for consideration.

X31-1

County of San Diego
January 16, 2018

and other stakeholder groups have raised previously (see **Comment Letter O-23 and County Staff Responses** https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/cap/publicreviewdocuments/FinalPublicReviewDocs/FEIR_Docs/Chapter%208.0_%20Final.pdf, along with **Chapter 8.0 – Comment Letters and Responses** https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/cap/publicreviewdocuments/FinalPublicReviewDocs/FEIR_Docs/Chapter%208.0_%20Final.pdf). It should be noted that many of the County’s individual “responses to comments” to our previous letter refer the reader to “Master Responses” contained in FEIR Chapter 8.0; responses to comments in other individual letters; and other reports and documents, none of which were made available to the public until January 8, 2018. As a result, we have not had adequate time to review the responses to our comments in detail.

MAJOR COMMENTS AND CONCERNS ON FINAL DRAFT CAP

The following are our major remaining comments and concerns on the final draft CAP. As noted above, we have not had adequate time to review all of the County staff responses to our previous letter, along with all of the related CAP documents, so some of these concerns may be resolved through additional review time and/or further clarifications from County staff.

General Comments

- #1 While we feel that the final draft CAP provides a good overall explanation of the methodology for establishing the baseline emissions inventory and the method for setting the overall GHG emission targets in the CAP, we do not believe that the CAP documents adequately identify the range of possible reduction measures that were considered for inclusion in the CAP, and the criteria that were used to select the specific measures that were included in the draft CAP, as well as the reasons for not including other measures that could be effective in helping the County to meet its GHG emission targets.
- #2 We are still not clear from reviewing the draft CAP documents and DSEIR how the County will specifically be addressing the environmental impacts of projects that include amendments to the County General Plan, and whether such projects would be able to move forward without further environmental analysis of climate change-related impacts and proposed mitigation measures. We would request that the final CAP documents and EIR provide a clearer explanation of how this would work.
- #3 We are still not clear from reviewing the draft CAP documents how the County is differentiating the GHG reductions that will be obtained as a result of its proposed “Built Environment and Transportation” GHG reduction measures from those transportation and land use planning factors that have already been assumed for the unincorporated portion of the County in the growth forecasts that were used by SANDAG in conducting its regional GHG reduction analysis for the RTP/SCS. It is important to ensure that the County and SANDAG are taking a coordinated approach to helping the region meet its SB 375 GHG reduction targets, and that the County’s proposed reduction measures are not simply a duplication of land use and transportation factors that are already assumed in the RTP/SCS. We would request that the final CAP documents specifically address this concern.
- #4 We are not clear from our review of the draft CAP documents how the County will ensure that any future County General Plan amendments will not inadvertently conflict with land use and transportation factors and/or assumptions for the unincorporated area that were used as the basis for SANDAG’s regional GHG reduction analysis. We would request that the final CAP documents address this concern more clearly.

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X31-3

X31-4

X31-5

X31-2 The comment expresses that the organization has not reviewed all published materials, but has remaining concerns about the Final CAP. The comment also expresses that the Final CAP does not provide enough information about the range of GHG reduction measures that were considered. This comment is addressed in Master Response 9 selection of GHG reduction measures and response to comment O23-6. Please refer to those sections of the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-3 The comment expresses confusion regarding the evaluation process for future GPA projects. GPAs would not qualify for GHG emissions streamlining benefits provided by the CAP and would be required to submit a project-specific GHG study for evaluation by PDS. The County’s discretionary review process for GPA projects requires submittal of project application materials, which includes relevant and necessary technical studies in support of the potential environmental impacts related to the project. Planning & Development Services (PDS) evaluates project materials to determine the level of environmental review required (e.g., Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report). Appropriate project conditioning and mitigation would be applied through this process. All GPA projects are required to undergo discretionary review that includes a public hearing at the Planning Commission and Board of Supervisors and requires approval by the Board of Supervisors. As described on pages 2.7-39 through 2.7-41 of the Final SEIR, GPA projects would be required to reduce project-related GHG emissions so as not to obstruct the implementation for the CAP. Please see a description of SEIR Mitigation Measure M-GHG-1 for the available options. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-4 The comment expresses confusion about the GHG emissions calculations related to GHG reduction measures in the Built Environment and Transportation sector with those calculations already included in SANDAG’s regional analysis. Consistency

of the CAP with SB 375 and SANDAG's regional plans is addressed in Master Response 2 and response to comment O23-9. Please refer to those sections of the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-5 The comment expresses concern regarding the processing of future GPA projects that may conflict with land use and transportation factors and/or assumptions that were used as the basis for SANDAG's regional GHG emissions reduction analysis. Consistency of GPA projects and the application of CAP Mitigation Measure M-GHG-1 with SB 375 and SANDAG's regional plan is addressed in Master Response 2 and response to comment O23-10. Please refer to those sections of the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.

County of San Diego
January 16, 2018

Specific Comments

P. 3-8 The CAP acknowledges that transportation is by far the largest contributor (45%) to its GHG emissions, yet the CAP proposes to implement measures that would produce only a 13% GHG reduction from this sector by 2030. While there is no requirement that each emission sector must be reduced in proportion to its contributions, the CAP appears to under-utilize “transportation” sector reduction opportunities, which then places a much greater burden on the County government, along with its residents and citizens, to reduce emissions from other sectors.

X31-6

P. 3-14 GHG Reduction Measure T-1.3 (Updating Community Plans) appears to be a feasible measure, but needs more description and clearer performance metrics. This approach is a central tenet of SB 375 (regional transportation plan/sustainable community strategy), and the CAP should explain how this approach fits within the larger RTP/SCS for the San Diego Region. The proposed performance metric (update of 19 community plans) is not sufficient; a brief summary must be included to identify what criteria the County will apply to the community plan updates in order to ensure that the plans are leading to measurable GHG reductions. In addition, the County should make its best effort to expedite the completion of all 19 community plan updates that include villages; the proposed measure assumes that nearly half of the updates would not be completed until after 2030.

X31-7

P. 3-18 GHG Reduction Measure T-2.1 (Improve Roadway Segments as Multi-modal) should provide a better explanation for how the County will integrate this with other CAP measures (e.g., Update Community Plans) and the regional RTP/SCS, and how the prioritization for improvements can best implement that integration.

X31-8

P. 3-20 GHG Reduction Measure T-2.2 (Reduce New Non-residential Development Vehicle Miles Traveled) proposes to reduce commuter VMT in new non-residential development in the unincorporated County by 15% by 2030. It is our understanding that the County would implement this measure by adopting a Transportation Demand Management (TDM) ordinance that would apply to all new non-residential development. However, the draft CAP does not explain how the County would monitor the effectiveness of this measure; this should be clarified.

X31-9

Also, it is not clear why the County is not also recommending a similar measure for new residential development in the unincorporated County. There are a variety of feasible means by which the County could require developers of new residential and mixed-use development projects to reduce VMT associated with their projects. We would strongly recommend that the County consider such a measure, which would likely lead to significant additional GHG reductions in the “Built Environment and Transportation” category.

Pp. 3-40 to 41 GHG Reduction Measure T-4.1 (Establish a Direct Investment Program) It appeared from the description in DSEIR Section 2.7.5.1 that the County would allow “offsite” mitigation not only through “direct investment” credits from within San Diego County but also from any approved carbon credit providers outside of San Diego County. While the CAP suggests that all onsite mitigation measures would be applied before direct investment credits are used, the CAP provides no limits to how much offsite mitigation could be used. We have serious concerns regarding whether this option might undercut other feasible local transportation-

X31-10

X31-6 The comment expresses concern that the County’s greatest amount of GHG emissions are related to transportation, but the CAP relies on other sectors more to reduce emissions. This comment is addressed in Master Response 6 related to transportation and GHG reduction measures and response to comment O23-12. Please refer to those sections of the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-7 The comment expresses concern regarding how GHG Reduction Measure T-1.3 would be implemented and would ensure the plans are leading to measurable GHG emissions reductions. This comment is addressed in Master Response 5 related to community plan updates and response to comment O23-15. Please refer to those sections of the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-8 The comment requests that additional clarification be provided related to GHG Reduction Measure T-2.1 and how it would be implemented in coordination with other measures. This comment is addressed in response to comment O23-16. Please refer to that response to comment letter in the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-9 The comment expresses concern about how GHG Reduction Measure T-2.2 would be monitored and why a similar measure that would limit VMT for new residential was not included. The comment is addressed in responses to comments O23-18 and O23-19 and Master Response 2. Please refer to that comment letter in the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-10 The comment expresses concern with GHG Reduction Measure T-4.1 and potential to undermine transportation-related GHG emissions. The comment is addressed in response to comment O23-22. Please refer to that comment letter in the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.

County of San Diego
January 16, 2018

related GHG reduction measures, which could offer significantly greater co-benefits to the communities that they serve.

X31-10
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Nearly 20% of the County's required reductions will reportedly come from carbon offsets. And yet, there is nothing that requires these offsets to be something that will occur in the County, nor are they verifiable for the long term. For example, "tree planting" is successful if, in the first few years, the tree is watered and given adequate care. Even if that is done, a wildfire can erase any carbon offsets. Would there be long-term tracking and records of the offset project? What happens if the projects are not successful? None of that is addressed.

X31-11

We are also still concerned that while this measure is listed in the category of "Built Environment and Transportation," the measure itself is not limited to projects that are directly related to GHG reductions in this category. As a result, the report appears to overstate the actual amount of GHG reductions from this category that are likely to occur.

P. 3-42 The "Energy" portion of Chapter 3 of the CAP presents a comprehensive approach and set of measures that could substantially reduce this sector's GHG emissions. While we agree that the proposed achievement of 90% renewable electricity by 2030 (see GHG Reduction Measure E-2.1) is a strong commitment, many of the cities have committed to the goal of 100% renewable electricity by 2030, and we recommend the County set a 100% RE goal, similar to commitments adopted by the City of San Diego and other local governments.

X31-12

P. 3-48 GHG Reduction Measure E-1.3 (Improve Building Energy Efficiency in Existing Developments). We agree that any remodel/renovation should be required to complete an energy audit. The audit should also include specific recommendations (including prioritizing by cost-effectiveness) for reducing energy use. However, we recommend that the County also consider establishing a minimum energy use reduction requirement for remodels and renovations, while at the same time helping to identify financial incentives and/or rebates that would offset some or all of the direct costs for meeting this requirement.

X31-13

P. 3-54 GHG Reduction Measure E-2.1 (Increase Renewable Electricity). As stated in the previous comment, we recommend the County consider adopting a 100% renewable electricity goal by 2030. We note that the DSEIR includes increasing renewable electricity as a reasonable and feasible alternative -- albeit with potentially additional environmental impacts. Options like Community Choice Energy (CCE) could provide opportunities for reducing or at least moderating energy costs compared to existing costs.

X31-14

There are a number of new requirements that are detailed in the "Energy" section of the CAP that are specifically related to building code updates. However, those measures, if successful, are dwarfed by the GHG reduction that can be achieved through a renewable energy program. This has the most significant projected reductions in the CAP that is County initiated; however, it appears to be the least developed, and as written may not be legally enforceable.

X31-15

P. 3-58 GHG Reduction Measure E-2.3 (Install Solar Photovoltaics in Existing Homes). This measure projects the voluntary installation of a significant number of new residential solar PV units based on historical installation rates. However, historical installations benefitted greatly from federal and/or state credits (e.g., tax deductions) and there is no assurance that these tax credits will continue at past levels. We strongly support the continued/increased installation of rooftop

X31-16

X31-11 The comment expresses concern that a significant proportion of GHG emissions reductions committed to by the County may come from carbon offsets. However, the commenter appears to be confusing the local direct investment program that would result from implementation of GHG Reduction Measure T-4.1 with the carbon offset credits that may be purchased to offset project-related emissions by GPA projects (CAP Mitigation Measure M-GHG-1). Contrary to the assertion by the commenter, the County would achieve GHG emissions targets by investing in local direct investment programs. Please refer to Master Response 3 for a comprehensive description about the local direct investment program and the Preliminary Assessment of the County of San Diego Local Direct Investment Program which is Attachment H-3 to the Planning Commission Hearing Report.

Related to the placement of the measure within the Built Environment and Transportation Sector, please refer to response to comment O23-23. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-12 The comment expresses interest in the County establishing a 100% Renewable Energy goal. The County acknowledges this comment and notes that it has included the 100% Renewable Energy Alternative in the Final SEIR, and for consideration in Options 1 and 3. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-13 The comment suggests that the County establish a minimum energy reduction requirement for remodels and renovations, but also aid in the identification of rebates and other incentives that would help offset related costs. The County acknowledges the suggestion. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-14 The comment expresses support for the 100% Renewable Energy Alternative. The County appreciates the comment. No further response is required. The comment will be included in

	<p>the administrative record and provided to decision makers for consideration.</p> <p>X31-15 The comment expresses concern that a greater amount of GHG emissions may be achieved through the adoption of a renewable energy program than through the combination of measures included in the Energy Sector. The County appreciates the comment. No further response is required. The comment will be included in the administrative record and provided to decision makers for consideration.</p> <p>X31-16 The comment expresses concern regarding the use of historical rates of PV installation to predict future rates of PV installation and suggests that the County should address availability of subsidies that could drive this measure. The comment is addressed in response to comment O23-28. Please refer to that comment letter in the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.</p>
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County of San Diego
January 16, 2018

solar installations but recommend the County provide some assurances that it will pursue other sources of financial incentives if the federal and/or state tax credits are removed or reduced.

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P. 3-60 GHG Reduction Measure E-2.4 (Increase the Use of Renewable Electricity for County Operations). It is not clear why the County is targeting only 10% renewable electricity by 2020 and 20% renewable electricity by 2030 for County operations – when the overall County target for renewable electricity (Measure E-2.1) specifies 90% by 2030. The County should require higher use of renewable electricity for its operations that is more closely aligned with the overall County targets for renewable electricity.

X31-17

Pp. 3-64 to 65 Water is and will continue to be a limited resource in San Diego and throughout California. We concur that reducing water consumption has multiple co-benefits beyond GHG emission reductions, and water conservation measures should be given a high priority. In particular, we support past efforts by the County and City of San Diego to promote the use of graywater for landscaping and other beneficial purposes, and to streamline the permitting requirements for installing graywater systems. We would encourage the County to continue to look for opportunities to promote graywater use, consistent with environmental health best practices.

X31-18

Pp. 3-82 to 90 We support the inclusion in the CAP of specific measures to increase carbon sequestration. The County should work with nurseries, native plant societies and forest advisory boards/groups to identify tree species that are effective and appropriate for carbon sequestration and are compatible with surrounding natural areas. It is also important to incentivize and promote the preservation of mature trees – trees with diameters over 16 inches—in addition to planting new trees. We urge the County to work with certified arborists and tree preservation societies to conduct educational campaigns to homeowners on how to water trees efficiently during a drought.

X31-19

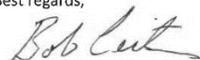
Conclusions

We appreciate the opportunity to have participated in the County’s CAP planning process, including the review of the previous draft CAP documents, and we hope that our remaining comments and concerns on the latest drafts as set forth above can be given due consideration as the Planning Commission forwards its recommendations to the Board of Supervisors on this extremely important matter. We also wish to note that we have worked collaboratively with other stakeholder organizations, such as the Endangered Habitats League and the Southwest Wetlands Interpretive Association, over the past week in our review of the latest draft CAP documents, and we support the written comments that these organizations have submitted to you.

X31-20

Please feel free to contact STAY COOL Advisory Council members Bob Leiter at rleiter9@cox.net or Linda Pratt at lpratt@sbcglobal.net, if you have specific questions regarding the comments contained in this letter.

Best regards,



Bob Leiter
STAY COOL for Grandkids - Advisory Council Chair

X31-17 The comment expresses concern that the County has only committed to 20% renewable energy on its own facilities by 2030 and suggests that it should be higher. The comment is addressed in response to comment O23-29. Please refer to that comment letter in the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-18 The comment suggests that the County should continue to pursue water conservation strategies, including using graywater. The comment is addressed in response to comment O23-30. Please refer to that comment letter in the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-19 The comment expresses support for the inclusion of measures to increase carbon sequestration and incentivize the preservation of mature trees. The comment is addressed in response to comment O23-31. Please refer to that comment letter in the Final SEIR. The comment will be included in the administrative record and provided to decision makers for consideration.

X31-20 The comment provides concluding remarks and expresses support for comments submitted by the Endangered Habitats League and the Southwest Wetlands Interpretive Association. No response is required. The comment will be included in the administrative record and provided to decision makers for consideration.