



Associated General Contractors of America, San Diego Chapter Incorporated
6212 Ferris Square, San Diego, CA 92121

"The Voice of Construction"

Letter
X35

January 17, 2018

Michael De La Rosa
Group Program Manager
Planning and Development Services
County of San Diego
5510 Overland Avenue
San Diego, CA 92123

Subject: County of San Diego Climate Action Plan and General Plan Amendment

Dear Michael:

Background

Thank for the opportunity to discuss and provide additional comments on the County of San Diego's Climate Action Plan and General Plan Amendment. The following is an outline of the area of the plan that is the focus of our comments. Starting with the following proposed measures to reduce greenhouse gas emissions.

Measure T-3.1--Use Alternative Fuels in new residential and non-residential construction projects.

Measure T-3.2--Use Alternative Fuels in County Projects

- These two measures apply only to off-road heavy construction equipment used on a project that is County initiated or permitted by the County
- Minimum threshold where measure applies is 10 or more applicable pieces of equipment operating on any given day
- If project meets the threshold requirement, then 25% of equipment in use that day, on the project, must use alternative fuels
- Applies to equipment such as bulldozers, loaders, excavators.
- Alternative fuels include; renewable diesel, renewable natural gas, compressed natural gas, electric or hybrid electric.
- The requirement would be implemented and detailed by ordinance in 2020
- For County initiated projects, the T-3.2 requirement will not in general apply to most county public works projects, such as road maintenance and rehabilitation projects,

X35-1

Response to Comment Letter X35

**Associated General Contractors of America,
San Diego Chapter Incorporated**

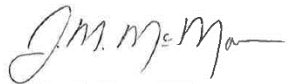
**Mike McManus P.E., Director of Engineering Construction &
Industry Relations**

January 17, 2018

X35-1 This comment summarizes the commenter's understanding of the applicability of GHG Reduction Measures T-3.1 and T-3.2. The comment contains similar content to comment letter X21. Please refer to response to comment letter X21 for additional response. No further response is required.

<p>because the amount of equipment on a jobsite on a given day would be below the threshold.</p> <p>Not included in the Climate Action Plan is any discussion about the aggregate shortages in San Diego County that have an impact on greenhouse gas emissions. Presently, aggregates for construction are increasingly imported by truck from surrounding counties. We would propose that a program of focusing on developing mining resources in San Diego County would help reduce costs for new housing and infrastructure, reduce greenhouse gas emissions and could be used as a tradeoff to the implementation of T-3.1.</p> <p>Relevant options being considered by the Planning Commission</p> <p>Option 1 Implement staff's recommendation above Option 2 Eliminate the T-3.1 requirement on residential projects only Option 3 Eliminated the T-3.1 requirement entirely</p> <p>Comments</p> <ol style="list-style-type: none"> 1. The market is still fairly limited for construction equipment that is powered by alternative fuels. There are prototypes being developed. Cost is still a major factor 2. The life cycle of construction equipment is long and includes; purchase, use, depreciation. Options 1 and 2 are so immediate that they would have an outsized impact construction firms' equipment costs. 3. Many of our member firms are relatively small contractors who have already made expensive investments in equipment to comply with the state of California's diesel emission standards. Options 1 and 2 would require additional equipment investments. These measures have a significant impact on small business if enacted 4. We are opposed to Options 1 and 2 5. We support Option 3 6. We would recommend the county consider the following: <ol style="list-style-type: none"> a. Evaluate the effect on greenhouse gas emissions that could occur if the County partnered with aggregate producers to develop "in-County" sources of construction aggregates and reduced or eliminated the need for long hauling of aggregates from surrounding regions. <p>If you have any questions, or comments please contact me at the listed phone and email information below.</p>	<p>X35-2 This comment expresses concern about the shortage of construction aggregate in the County and the resulting GHG emissions that are related to trucking the material into the region. The commenter suggests that a program to develop local mining resources could be substituted for implementation of T-3.1. This comment is noted. Please refer to response to comment letter O8 which expresses similar concerns.</p> <p>X35-3 This comment describes a portion of the CAP Options considered by the Planning Commission. This comment is noted, however no further response is required.</p> <p>X35-4 This comment describes several concerns related to the availability of construction equipment that is powered by alternative fuels, the cost of this type of equipment, the potential impacts of Options 1 and 2 related to the cost of equipment, and the potential impacts on small construction firms. Please refer to the Attachment H-2 Climate Action Plan Cost-Effectiveness Analysis which includes an estimate of the net benefits or costs to residents, businesses, and County operations that participate in, or comply with, the GHG reduction measures. This comment is noted and will be included in the administrative record.</p> <p>X35-5 The comment expresses opposition to CAP Options 1 and 2 and expresses support for Option 3. This comment is noted and will be included with the Final SEIR and submitted to decision makers.</p> <p>X35-6 This comment suggests that the County consider a partnership with aggregate mining producers to develop in-County resources. This would minimize GHG emissions related to trucking. The County appreciates this comment and will consider the potential for GHG emissions reductions related to this topic during future updates to the CAP. This comment will be included with the Final SEIR and submitted to decision makers.</p>
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Sincerely,

A handwritten signature in cursive script that reads "Mike McManus".

Mike McManus P.E.
Director of Engineering Construction &
Industry Relations
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