



Letter
X36

Response to Comment Letter X36

**Environmental Center of San Diego
Pamela Heatherington, Board of Directors
January 18, 2018**

January 18, 2018
County of San Diego Planning Commission
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Attn: Lisa Fitzpatrick, Planning Commission Secretary
Electronic copies sent to Lisa.Fitzpatrick@sdcounty.ca.gov and Maggie Soffel at
CAP@sdcounty.ca.gov

RE: County of San Diego Final Draft Climate Action Plan and Final SEIR

Dear Commissioners:

On behalf of the Environmental Center of San Diego, a non-profit public benefit organization dedicated to the protection and enhancement of the natural environment throughout San Diego, I submit the following comments.

The Environmental Center is in support of comments previously submitted by Endangered Habitats League and the Southwest Wetlands Interpretive Association.

We support the County's commitment to the state-required Green House Gas reduction target percentages for 2020, 2030 as well as the state's 2050 goal. However, there is room for improvement.

Please, no shifting baselines. Although the County claims the 1990 GHG emissions may not be sufficiently documented to be used as the baseline for future reductions, it is incumbent upon you to document comparability to or improvement on a "1990 baseline." There is sufficient data to back into a sufficiently useable 1990 baseline. This was pointed out to you in the letter from SWIA.

There is also cause for concern about your mitigation approach, which seems to rely heavily on out-of-county carbon credits. There is no stated limitation on the number of off-site credit purchases which gives the impression that any GPA could be satisfied by some off-site credits from out-of-county sources. How do you propose to track the veracity of such outsourcing? Is it really fair to subject another entity with carbon emissions we should be dealing with ourselves? It gives a false sense of security when we send things "away". There is no "away".

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X36-1

X36-2

X36-3

X36-1 The comment provides introductory remarks, and introduces the commenting organization, the Environmental Center of San Diego. The comment also expresses support for comments submitted by Endangered Habitats League and the Southwest Wetlands Interpretive Association as well as support for the County's commitment to meet the State's GHG emissions reduction targets and goal. The County would like to point out that this letter was submitted the morning of the Planning Commission Hearing on January 18, 2018.

X36-2 The comment expresses concern regarding the baseline used to determine GHG reduction targets. This topic has been addressed previously in Master Response 4. Please refer to that Master Response for a description of the methodology that was used to calculate the baseline and subsequent targets. The comment will be included in the administrative record and provided to decision makers for consideration.

X36-3 The comment expresses concern regarding Mitigation Measure M-GHG-1 and the potential for General Plan Amendment (GPA) projects to utilize carbon offset credits as mitigation. This topic has been addressed previously in Master Response 12. Please refer to that Master Response. The comment will be included in the administrative record and provided to decision makers for consideration.

The proposal to reduce VMT by acquiring open space conservation lands, raises a number of questions the county has failed to address in depth. With an incomplete NC MSCP and vague reference to an MSCP East, proposed developments are creeping, no leaping, into PAMA that have already been established. Having no current commitment to conserve open space (and eliminate development from) habitat lands within the MSCP North plan area, it is not certain whether that plan - and the MSCP East - will be approved and how much actual development will be "removed" from the existing conditions.

X36-4

In closing, please continue to improve the current iteration of the CAP. Future generations are counting on you to take seriously the ramifications of increased GHG emissions today.

Sincerely,



Pamela Heatherington
Board of Directors
Environmental Center of San Diego

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X36-4 The comment expresses concern regarding GHG Reduction Measure T-1.1 which would result in the acquisition of additional conservation land and a reduction of GHG emissions by removing land from the inventory slated for development. The commenter incorrectly assumes that the success of this measure would be predicated upon the development and approval of additional multiple species conservation plans (MSCPs). This is incorrect. This comment has been addressed previously in response to comment O15-4. Please refer to that comment letter. The comment also includes closing remarks. The comment will be included in the administrative record and provided to decision makers for consideration.