

From: Tom Kumura
To: CAP
Cc: "Linda Bailey"; Baillings@hilltoparcupinc.com; Andrew.Yancey@lv.com; kathyvanness@soldendoor.com;
"Stephanie Saathoff"; Wardlaw_Mark
Subject: Comments regarding Draft CAP
Date: Friday, September 22, 2017 1:57:05 PM
Attachments: [Twin Oaks Valley CAP 2017 Comment Letter.pdf](#)

Letter
C4

Attached is the Twin Oaks Valley Community Sponsor Group's comments for the Draft CAP. Thank you for the opportunity to submit our comments. Tom Kumura, President

C4-1

Response to Comment Letter C4

Twin Oaks Valley Community Sponsor Group
Tom Kumura, Chair
September 22, 2017

C4- 1: The comment provides an introductory statement and emphasizes support for County's efforts to reduce GHG emissions. No further response is required.



Twin Oaks Valley Community Sponsor Group

P.O. Box 455
San Marcos, Ca. 92079

September 22, 2017

Via email (CAP@sdcounty.ca.gov)

Ms. Maggie Soffel
Land Use/Environmental Planner
San Diego County Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Ms. Soffel,

The Twin Oaks Valley Community Sponsor Group appreciates the opportunity to provide comments on the County's draft Climate Action Plan (CAP). As you are aware, the Twin Oaks Valley Sponsor Group area is approximately 7,835 acres in size and is located west of Interstate 15, adjacent to the Bonsall plan area to the north and the cities of Escondido and San Marcos to the south, as well as, a small portion of the city of Vista to the west.

We appreciate the County's efforts to reduce GHG emissions and comply with state laws aimed at reducing GHG emissions. Fighting climate change is an important mission for the local, national, and international leaders of this generation. While we are not in a position to comment on the detailed technical aspects of the CAP or many of its broader policy proposals, we offer comments with specific emphasis on our unique location in a very rural area that borders one of the region's primary transportation routes in Interstate 15.

We understand that a large portion of the County's estimated GHG emissions come from the transportation sector. We encourage the County to focus on policies in the CAP aimed at reducing reliance on vehicles and on limiting the length of vehicle trips. Land use decisions play an important role in decreasing transportation emissions. The CAP should take into account the role land use decisions play in ensuring the County reduces emissions from the transportation sector. As a rural community, we understand that sprawl development would increase GHG emissions contrary to the goals of the CAP. We encourage the County to include requirements in the CAP that would prevent sprawl development in Twin Oaks Valley and other rural areas that would increase GHG emissions.

C4-2

C4-3

C4-2: The comment provides information related to the Twin Oaks Valley Community Sponsor Group and states that it supports efforts to reduce GHG emissions taken by the County. The County acknowledges this comment. This comment does not address the adequacy of the Draft SEIR and no further response is required. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.

C4-3: This comment states the CAP should include policies that reduce reliance on vehicles, limit the length of vehicle trips, and prevent sprawl development in rural areas. The scope of the CAP is to serve as mitigation to reduce GHG emissions resulting from buildout of the 2011 General Plan Update (GPU) in accordance with GPU Policy COS-20.1 and GPU EIR Mitigation Measure CC-1.2. The CAP is not a land use plan; therefore, it does not propose changes to land use designations that were adopted with the 2011 GPU. The authority for land use policy and regulations continues to be governed by the 2011 GPU. Several GHG reduction measures focus on reducing the number and length of single-occupancy vehicle trips (GHG Reduction Measures T-1.1, T-1.2, and T-1.3) and expanding alternative transportation opportunities (GHG Reduction Measures T-2.1, T-2.2, T-2.3, and T-2.4). Also refer to Master Response 6 related to transportation reduction measures, and Master Response 9 related to GHG reduction measures selection.

TOVCSG Response to Draft CAP
 September 22, 2017
 Page 2

What proposals in the CAP address sprawl development? What requirements do other counties and cities have that reduce GHG emissions from sprawl development, and were these studied as part of the CAP? Why were any such proposals included or not included in the CAP?

C4-4

A target of 40% water reduction seems unrealistic as a typical rural CAP strategy. Please explain how reducing water use will decrease GHG emissions and how this strategy impacts the CAP.

C4-5

Please explain how the Agriculture Conservation Easement Program would lead to GHG reduction. There needs to be a better explanation of how these strategies tie to the goals of the CAP.

C4-6

How do you develop a Transit Village in a rural area? And how is this not cluster and/or leap frog development?

C4-7

How does the CAP address the number of vehicles in the near future? Where in the County are public charging stations being placed? This needs to be shown on a map in the CAP.

C4-8

As traffic congestion increase over the near future, so will the GHG emissions, this assumption was not addressed nor did the CAP address how the GHG from automobiles and trucks will be measured.

C4-9

The CAP listed various strategies but failed to connect those dots with the goals of the CAP. It was poorly written and difficult to follow the various recommendations.

C4-10

Thank you for your efforts to reduce GHG emissions.

Sincerely,

Tom Kumura, Chair of the TOVCSG

C4-4: The comment asks what proposals in the CAP address sprawl development, what requirements other counties and cities must address sprawl development, and why those measures were not included in the CAP. As stated in the response to C4-3, the scope of the CAP is to serve as mitigation to reduce GHG emissions resulting from buildout of the 2011 GPU. The 2011 GPU includes policies that address sprawl. The CAP is not a land use plan; therefore, it does not propose changes to land use designations in the 2011 GPU. However, in preparing the CAP, the County conducted an analysis of potential emission reduction opportunities, including review of other CAPs, and developed strategies and measures that are compatible with the character of the unincorporated communities. GHG Reduction Measure T-1.3 is intended to focus growth in and around existing unincorporated communities to maximize existing infrastructure and strengthen town center areas, while preserving the rural landscape that helps define the unique character of the unincorporated county. Under this measure, the County would update its community plans to incorporate a balanced approach to housing, jobs/economic development, services, and infrastructure needs. The community plans would emphasize existing density in core areas and may evaluate possible mechanisms to increase density in appropriate locations. If such changes are proposed, their impacts would be assessed in each of the community plan respective CEQA documents.

C4-5: This comment appears to express concern regarding GHG Reduction Measure W-1.2 and whether it is realistic to achieve a 40% reduction in outdoor water use for landscaping. This comment does not address the adequacy of the Draft SEIR; therefore, no further response is required. However, to clarify how reducing water use reduces GHG emissions, water extraction, conveyance, distribution, and treatment requires the use of large amounts of electricity because of the weight and volume of water being distributed. Therefore, any reduction in water consumption reduces electricity consumption, and in turn results in associated GHG emissions reductions. This explanation can be found on pages 3-64 and 3-65 of the CAP. Please also refer to Master Response 7 regarding outdoor water use.

- C4-6:** The comment requests additional clarification regarding how the Purchase of Agricultural Conservation Easement (PACE) Program (GHG Reduction Measure T-1.2) would lead to future GHG emissions reductions. As described on pages 3-12 and 3-13 of the CAP, the PACE Program promotes the long-term preservation of agriculture in the county. Under the PACE Program, willing agricultural property owners are compensated for placing an easement on their property that limits future uses and extinguishes the development potential otherwise allowed under current zoning and General Plan designations. GHG emissions reductions are realized from the reduction in vehicle miles traveled, energy use, water consumption, and solid waste generation that would have otherwise been generated had such development been constructed.
- C4-7:** The comment asks how a transit village could be developed in a rural area. It is unclear what is meant by the comment. The Draft CAP does not identify any reduction strategies that would develop transit villages in rural areas. This comment does not address the adequacy of the Draft SEIR and no further response is required.
- C4-8:** The comment queries how the CAP addresses the number of vehicles in the near future. It is unclear what specific information the commenter is requesting. Please refer to Master Response 6 on transportation GHG reduction measures. The CAP estimates future GHG emissions from vehicles based on projected vehicle miles traveled data from SANDAG and emission factors from EMFAC, a model developed by the California Air Resources Board to assess emissions from on-road vehicles. The EMFAC model includes projections on vehicle population in each region of California. Please refer to Section 6.1 of Appendix A – 2014 Greenhouse Gas Emissions Inventory and Projections for additional information on how vehicle emissions were estimated for 2020, 2030, and 2050. The comment also requests more information regarding the location of future public electric vehicle stations. Specific location of EV charging stations cannot be provided at the program-level in the CAP. Through GHG Reduction Measure T-3.5 in the CAP, the County will establish a program to designate

priority areas, identify funding, and install a total of 2,040 Level 2 charging stations in the unincorporated county by 2030.

C4-9: The comment requests clarification regarding the methodology for measuring GHG emissions related to future on-road vehicles. As specified in response to comment C4-8, the CAP estimates vehicle emissions based on vehicle miles traveled data from SANDAG and emission factors from the EMFAC model. The EMFAC model is developed by the California Air Resources Board to provide emissions estimates from on-road vehicles in California. The fleet-wide emission factor used for the GHG inventory is based on all vehicle classes (e.g., cars, light duty trucks), vehicle model years, speeds, and fuel types. EMFAC also includes starting emissions from vehicles in addition to emissions from driving; therefore, emissions from idling and congestion are captured in the aggregated emission factors in the inventory. Future updates to the inventory will capture any changes in VMT based on updated SANDAG data and updated emission factors from EMFAC, as applicable.

C4-10: The comment states that the CAP is not clear and does not describe how the strategies will meet the goals. The County has provided a good-faith effort at clearly presenting the scope and details of the CAP. As described on page ES-4, the CAP contains 11 strategies, 30 GHG reduction measures and supporting efforts organized under five GHG emissions categories: Built Environment and Transportation, Energy, Solid Waste, Water and Wastewater, and Agriculture and Conservation. Strategies describe the overall approach and expected results to be achieved, and are linked to General Plan policies as detailed in Appendix F. Measures are specific, locally-based programs and actions that the County would carry out to achieve its climate action strategies. Supporting efforts are additional actions that help reduce GHGs that are not currently quantifiable due to data limitations or lack of an available method to measure results. However, over time, implementation of supporting efforts may result in efficiencies that could be captured in future inventory updates. Within individual chapters of the CAP, a detailed explanation of the methodology used to calculate GHG reductions is provided

along with the specific reductions that were estimated based on facts, current regulations, and available science. This data is supported by detailed calculations provided in Appendix C of the CAP.