

Letter
170

From: [Kathe Robbins](#)
To: CAP
Cc: [Slovick, Mark](#); [Tom Kumura](#); [Bob Peterson](#); [Erin Robbins Veit](#); [Hom, Bill](#)
Subject: San Diego Climate Action Plan Review
Date: Friday, September 22, 2017 10:52:34 AM

September 22, 2017

To: SD County Planning and Maggie Soffel

It's about time San Diego had a Climate Action Plan. The one under review is a positive step but lacks needed controls on urban sprawl and a reduction in air pollution caused by commuters. Carbon offsets should not be permitted. If they must be allowed, then certainly not allowed to be placed outside of the county and country. I understand your plan would allow offsets out of the country! It's bad enough that the Newland- Sierra Development plan would allow an offset from the Merriam Mountain area to be placed in the hills outside of Ramona. I can't imagine an offset from the city of Julian to be placed in central China. I suggest you take this plan back to the drawing board and reconsider the environmental consequences of traffic. I live 3 miles from both the 78 and 15 Freeways and can hear the traffic. My family is also affected by the gas emissions from those freeways. We need to use what controls we have at hand to encourage people to live and work near city centers. Anyone who has traveled in Europe knows the amount of green space that is mandated both in cities and in the countryside. I believe most Americans travel to Europe to enjoy the green spaces. I think the United States, and San Diego in particular, need to move into a new "Green century" of land use planning.

| 170-1
|
| 170-2
|
| 170-3
|

Sincerely,
 Kathe Robbins
 2480 Tamara Lane
 San Marcos, CA 92069-7501
katherobbins@gmail.com

--
 Kathe

Response to Comment Letter I70

Kathe Robbins
September 22, 2017

- I70-1** The County acknowledges support for the CAP and the need to control urban sprawl. The County acknowledges this comment. The comment does not address the adequacy of the Draft SEIR and no further response is required.
- I70-2** The comment states that carbon offset credits should not be allowed outside the country. Refer to Master Response 12 related to mitigation hierarchy and the use of carbon offset credits. The CAP does not rely on the purchase of carbon offset credits to meet its reduction targets and goal. CAP Mitigation Measure M-GHG-1 allows off-site mitigation for General Plan Amendments(GPAs) after all project design features and on-site reduction measures have been incorporated. The mitigation measure establishes the following geographic priorities for GHG reduction features, and GHG reduction projects and programs: 1) project design features/on-site reduction measures; 2) off-site within the unincorporated areas of the County of San Diego; 3) off-site within the County of San Diego; 4) off-site within the State of California; 5) off-site within the United States; and 6) off-site internationally. Geographic priorities would focus first on local reduction features (including projects and programs that would reduce GHG emissions) to ensure that reduction efforts achieved locally would provide co-benefits. The GPA applicant or its designee shall first pursue carbon offset projects and programs locally within unincorporated areas of the County of San Diego to the extent such carbon offset projects and programs are available and are financially feasible, as reasonably determined by the Director of PDS. As specified in M-GHG-1, international carbon offset credits would be last on the geographic hierarchy and would only be allowed if the applicant demonstrates infeasibility on the other options in the order of hierarchy.

170-3 The comment states that the environmental consequences of traffic should be considered. The transportation and traffic impacts of the CAP were thoroughly evaluated in Chapter 2.12 of the Draft SEIR. The comment offers no evidence on why the analysis in the Draft SEIR is inadequate; therefore, no further response can be provided.