

<p>From: Sandra Farrell To: Sandra Farrell Subject: comments to Draft County Climate Action Plan Date: Sunday, September 24, 2017 10:25:02 PM</p> <p>Sandra Farrell 1900 Escalante Ave Vista, California 92084 760-415-3349</p> <p>September 23, 2017</p> <p>Mrs. Maggie Sofiel County of San Diego 5510 Overland Avenue, Suite 310 San Diego, CA 92123 Via email: CAF@sdcounty.ca.gov</p> <p>RE: Draft County Climate Action Plan</p> <p>Dear Ms. Sofiel:</p> <p>I've been reading comment letters submitted by Sierra Club, Endangered Habitats League and others. I would like to add, as someone who sits on a County Sponsor Group, their concerns are valid.</p> <p>Frankly, I don't think the County's CAP will work. First, most of the County doesn't seem to be able to direct growth in a manner that allows limiting the production of greenhouse gasses. Secondly, the methods currently being proposed by developers to reduce greenhouse gasses, don't have any data to show they actually will work. It is hard to understand how the proposed CAP will actually meet needed objectives.</p> <p>The County General Plan set growth targets but I know of at least one case where county PAMA land zoned for 19 home is planned to be annexed by an adjacent city who just approved a development of 136 homes. Adjacent properties in the County likely will want to annex to the city in order to profit from a higher density of population and less cost with water and other public services. The higher density of population may be being generated. In addition, the County is considering approving a number of Property Specific Requests along with increased density of County properties through annexation may prevent the County and the region as a whole from meeting greenhouse gas reduction targets. How will the County offset these impacts if all these projects are approved? Will it reduce the density elsewhere in the County? How is the County coordinating these increased densities with other jurisdictions?</p> <p>Some of the mitigation measures developers are proposing in projects to mitigate for greenhouse gasses don't appear to work. Many developers like those processing the Newland Sierra project in the County are stating in their EIR that they will encourage carpooling and ride sharing to offset greenhouse gas impacts. This sounds good on the surface. Residents of the project would ride share thereby reducing traffic and greenhouse gases. But that is not what is happening now and there is no evidence that it will happen under the CAP.</p> <p>What is happening is now is that most people are mostly commuting alone in their cars and a study I did along the I-15 demonstrates this.</p> <p>I wanted to see how many people were ride sharing. I chose the I-15 because that is the most likely route people in the Newland Sierra project will use, it has a HOV lane that allows people who ride share to save time and avoid the many morning traffic tie ups.</p> <p>For two weeks, from SB7B to I-165 I noted while in the carpool lane how many cars either passed me or I passed that had more than one person in the car. I traveled slightly different times of a weekday morning commute so that I wouldn't be counting the same drivers each day. Only 23% of the people using the HOV lane had someone else in the car with them. These solo drivers had chosen to pay for the privilege of driving in the HOV lane, a lane that should be designated to encourage ride sharing. Therefore a mitigation measure to reduce greenhouse gasses by encouraging people to ride share is not working if only 23% or less are actually commuting with someone else. Please see my comment letter dated August 13, 29007 to Ashley Smith which is below in this email.</p> <p>I am very troubled the County is considering allowing developers to offset their project impacts by using Carbon Offsets. San Diego already has problem with air pollution so why not make development in San Diego greenhouse gas neutral in San Diego so residents can benefit from the CAP?</p> <p>If we genuinely want to have a Climate Action Plan that has merit and actually reduces greenhouse gasses as opposed to increasing them we need to have something that will actually work and results in less greenhouse gasses in San Diego.</p> <p>Thank you very much.</p> <p>Sincerely, Sandra Farrell</p> <p>Sandra Farrell 1900 Escalante Ave Vista, CA 92084</p> <p>Ashley Smith, Planning Manager County of San Diego Planning & Development Services 5510 Overland Avenue, Suite 310 San Diego, California 92123</p> <p>August 13, 2017</p> <p>Comments to the Draft Environmental Impact Report Comment Period for Newland Sierra (Log No. P052015-EIR-15-08-001; SCA No. 2015021036. Project Numbers: PDS2015-GPA-15-001, PDS2015-SP-15-001, PDS2015-REZ-15-001, PDS2015-TMA-5587, PDS000X-HIP-000)</p>	<p style="text-align: center;">Letter 172</p> <p style="text-align: center;">Response to Comment Letter I72</p> <p style="text-align: center;">Sandra Farrell September 23, 2017</p> <p>I72-1 The comment states the comments of the Sierra Club and Endangered Habitats League are valid. Please see the responses to the referenced comments within comment letters O12 (EHL) and O22 (Sierra Club).</p> <p>I72-2 The comment states that the CAP will not achieve project objectives because the County will not direct population growth in a way that will limit GHG emissions. The County disagrees with this assertion for two reasons. First, as described on page 1-6, the County's 2011 General Plan provides an established land use map that guides anticipated growth. The CAP, provides a plan for the reduction of GHG emissions resulting from anticipated growth by implementing the strategies, measures, and supporting efforts that are contained within the plan as described on page 1-8 and 1-9 of the CAP. Therefore, the County anticipates that implementation of the CAP would in fact reduce GHG emissions in accordance with adopted GHG emissions reductions targets.</p> <p>Second, as described on page 2-14, the CAP does not account for GHG emissions that would occur if General Plan Amendments (GPAs) were adopted. The baseline emissions inventory which the CAP is based upon only accounts for emissions-generating activities that existed on the ground in 2014 and projects GHG emissions for all adopted land uses in 2020, 2030, and 2050. Therefore, GPA projects that would require density or intensity beyond that which the General Plan anticipated (as illustrated by the adopted land use map) would be required to offset any GHG emissions resulting from their projects that are above and beyond what the General Plan would have allowed. Refer to Master Response 12 related to mitigation hierarchy and the use of carbon offsets.</p>
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	<p>I72-3 The County acknowledges concern that future annexations and property specific requests to increase density above the general plan would affect the ability of the County to reach established GHG emissions targets.</p> <p>Specifically, the commenter expresses concern that upon annexation, lands that were formerly within the jurisdiction of the County will no longer be managed by the County, and therefore will not be subject to the GHG emissions regulations that will be adopted through the CAP. The County acknowledges that annexation proposals that remove land from the County's jurisdiction would remove the County's land use authority to regulate GHG emissions associated with development within that land area. However, there are several ways in which the County can coordinate with other local agencies on efforts to implement the state's plan for GHG emissions reductions. The County is a steering member of the San Diego Regional Climate Collaborative and regularly participates in efforts to plan for regional GHG emissions reductions. Additionally, the County can collaborate with the San Diego County Local Agency Formation Commission (LAFCO) to provide the GHG reduction assumptions associated with the land uses proposed for annexation so that LAFCO, as the lead agency responsible for consideration of annexation proposals can adequately evaluate the GHG impacts of the proposed annexation. With regard to the Property Specific Requests (PSRs) General Plan Amendment County-initiated project, the land use designation changes are not reflected in the CAP's baseline inventory and instead were considered in the cumulative projects list within the Project Description. Therefore, upon development of PSR property, applicants would be required to demonstrate consistency with the CAP in the same way that is outlined for General Plan Amendments. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.</p> <p>I72-4 The County acknowledges concern that GHG mitigation measures proposed by developers on other projects are not being implemented and that this will happen under the CAP.</p>
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	<p>The commenter offers no evidence to support this statement. As described in Chapter 5 of the CAP, the County will monitor the effectiveness of CAP reduction measures and strategies. Further, as described in the Draft CAP Consistency Checklist, which is an appendix to the Guidelines for Determining Significance, developers seeking coverage under the CAP would be required to demonstrate their consistency with the CAP through implementation of reduction measures and strategies identified in the CAP. Further, developers would be required to submit verification to the County at appropriate stages that measures have been implemented and have been effective at reducing GHG emissions. The comment offers no evidence that reduction measures or strategies identified in the CAP or the County's permitting or mitigation monitoring process is not effective; therefore, no further response can be provided.</p> <p>I72-5 The County acknowledges concern with allowing offsets and suggests making development GHG neutral. This comment does not address the adequacy of the Draft SEIR and no further response is required. However, the comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>I72-6 The comment provides a concluding statement to the comments provided above and does not require a further response.</p>
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Sent via email to Smith, Ashley <Ashley.Smith12@sdcounty.ca.gov>

I appreciate this opportunity to comment on the DEIR for the Newland Sierra project. I have many concerns about the project and especially the DEIR. I believe mitigation is important to lessen the impacts of a project. Sadly however, mitigation without positive results does not mitigate impacts. The California Environmental Quality Act (CEQA) has been in place for 47 years. Over that time, numerous projects have been built and San Diego County allowing it to grow from 1.365 million people to over 3.5 million. Considering all the impacts from numerous projects and all the mitigations to lessen those impacts, the public need to know why the roads are still so congested, the schools filled beyond capacity, and there will continue to be more traffic and more shortages. Yet, during the no-holds-barred public hearing, the Project Director of who was in charge of Planning and Zoning did not take about the planning case in the first and last hour. General Plan need to respect that. It is said it won't expense to maintain development on highly constrained land and noted how the County was struggling to maintain the existing road network and provide services for current residents.

I believe CDDA is a good tool, but it only works if everyone, including the consultants, governmental staff and the decision makers are all honest with themselves and with the public. They also must follow through to make sure the mitigation measures have the desired result.

My comments in this letter will focus on mitigation measures specified in the **Section 7, List of Mitigation Measures and Environmental Design Consideration**. This same comment applies to all mitigation measures in the DEIR that use the terms "Promote" or "Coordinate" because there are actions with data supplied that demonstrate they can be executed and have the intended results.

I believe mitigation is important to lessen the impacts of a project. Sadly however, mitigation without positive results does not mitigate impacts. The California Environmental Quality Act (CEQA) has been in place for 47 years. Over that time, numerous projects have been built and San Diego County allowing it to grow from 1.365 million people to over 3.5 million. Considering all the impacts from numerous projects and all the mitigations to lessen those impacts, the public need to know why the roads are still so congested, the schools filled beyond capacity, and forced water conservation's needed to prevent shortages.

Clearly something is going terribly wrong. After 45 years we are in the same situation we are today. The Newland Sierra project gives us what is wrong. In PDF-7 for instance, the mitigation measure has no measure of being measurable or achievable. It merely provides a park-and-ride and encourages carpooling with no detail or method measure its success. There is no evidence presented in the DEIR showing it will work. In addition to this is the real problem, many of the mitigation measures presented in this DEIR is well meaning fuzzy fluff of good intentions but without substance.

Looking at T-8 PDF-7, although promoting the park-and-ride is a good idea, as someone who occasionally has used the park-and-ride, it will take some work. I can speak from personal experience about the problems of the park-and-ride and why I likely most of the Newland Sierra residents won't use it.

1. The park-and-ride lots are often full and cars parked some distance from their garage bays by rental lot. The company work lot is located at University Station and when we are in the project area, we see in La Jolla and Orange Counties I drive in park-and-ride lots off of I-15 or I-805 where I meet my coworkers en route north. The I-15 park-and-ride lots are usually full and on occasion I have seen a lot of broken or warped glass in the lots indicating there is been vandalism of the cars left there. Mine wasn't vandalized but after seeing the I-15 North parkway park-and-ride shinned glass a couple of years ago, I opted to drive to a shopping center and leave my car there. The Newland Sierra project will be comprised of mostly upper income buyers with cars in the \$40,000+ price range. I can't say someone with that kind of investment leaving it in the baking sun unattended, in park-and-ride lot.
2. In PDF-7, it is stated a ride-share shuttle service will be provided. This is a good idea but there are no data is presented in the DEIR that tells you historically how many people use CDDA. CDDA should let a similar project and see how many people within the project used Commute with public and decision makers should have a good idea what percentage of the Newland Sierra project will use carpool, vanpool or shuttle. Last this because when my company's office moved to University Station I thought I could easily join a vanpool, shuttle or carpool with someone. I tried for over 3 years and again recently without success.

Sally one has only to use the HOV lane during peak morning and evening commute times on the T-15, between to see what is being proposed in PDF-7 likely won't work. The Newland Sierra residents will do what most people do now- purchase a FastTrak transponder and pay to use the carpool lane.

The I-15 for those like myself who commute from North County south to one of the many job centers near Miramar or downtown, is extremely congested. Single car drivers are either the regular driver or they careen to purchase a HOV pass with cost about \$800 extra a year during those times. Vehicles with more than two passengers in them are not allowed in the HOV lane. In fact, there are no HOV lanes other than the few provided in the HOV lane more than 10 miles from the end of the HOV lane. Over the last couple of weeks I started counting the total number of vehicles that either I passed or passed by me en route to and from work, noting how many had more than one person in the car. I traveled west from where I entered the HOV lane at SR80 and I-15 and where it ends at the T-15. I counted both private and commercial vehicles. The only vehicles I did not count were the Rapid Express bus or motorcycles. I visually looked into vehicles as I either passed them or they passed me and noted if there was someone in the car besides the driver. If there was a car seat, even if I couldn't confirm it was occupied, I counted that vehicle as having more than one person. Oddly, I saw few vanshuttle or shuttles and about half of them I did see had no passengers. The data below is my observation.

Date	Aprox. Time entry to HOV at I-15/SR80 or at I-15/SR8	Total vehicles observed	Those vehicles with 2 or more riders	% of people carpooling
8-3	6:00am	46	12	26
8-3	5:45pm	53	15	24.5
8-4	6:00am	57	9	16
8-7	6:05am	46	9	19.5
8-7	6:00pm	44	14	31.8
8-8	6:05am	71	15	21
8-8	6:05pm	47	11	23.4
8-9	6:05am	46	9	19.6
8-9	6:00pm	48	11	23
8-10	6:05am	49	12	24.5
8-10	6:05pm	57	19	33.3
8-11	6:05am	67	15	22
8-11	6:05pm	68	12	17.6

My small sampling shows that approximately 23% of the people in the HOV lane were commuting with someone else in the car. Therefore I think we can expect only 23% of the people in the Newland Sierra project would be using forms of carpooling, vanpooling or shuttle. Since most of the other freeways near the project do not have HOV lanes there is little incentive to carpool, especially if the residents of the Newland Sierra Project work in San Marcos or in one of the Coastal Cities. Therefore the number of people likely using the park-and-ride or carpooling will be low 2%. Since the FastTrak system tags each car and notes even those cars without transponders there should be data available that is far more accurate than my small sampling.

The DEIR needs to demonstrate the mitigation measures proposed actually work. It should provide a level of detail beyond simple "promoting", "coordinating" or "encouraging". It should provide data to illustrate how other projects similar to the Newland Sierra project successfully mitigate impacts. The bottom line is carpooling and leaving your car at a park-and-ride is not an attractive idea to most people and I recommend the below mitigation measures be added to the Newland Sierra project.

I72-7

The comment provides comments on the Newland Sierra Project. Because the comment does not address the CAP or the analysis provided in the Draft SEIR, no further response can be provided.

I72-7

1. **Make it Safe:** Integrate a park-in-ride into the retail or commercial area where there is good eyes-on or provide police presence/station so residents are more likely to feel their cars will not be vandalized when they are left unattended over an eight to ten hour period.
2. **Provide Amenities:** Offer covered parking with a solar roof would provide shade, independent dealer or some other attractor so the park-in-ride has something that would actually attract a resident who values their vehicular investment. By having the park-in-ride combined or next to a retail center the project could specify that there is off-street shopping and dining areas where residents can wait for their ride or passenger.
3. **Provide Monitoring Devices:** The DEIR needs to work with the developer who would be provided to encourage people to use the park-in-ride or carpool during peak traffic commutes and monitor the use so that there is proof there is real mitigation happening.
 - a. Create a cell phone application using GPS tracking to log in the cars from the project each time they use the park-in-ride so that data can be collected to verify use.
 - b. Provide a point system managed by the HOA to be used towards a free smoothie or sandwich at a nearby walkable store located in the shopping area.
4. **Provide a False Alternative:** If after 25% of the construction is completed and residents aren't decreasing the traffic from the project by a specified percent per the mitigation measures, the project will stop construction until there is a solution that will work to mitigate the impacts.

Summation:

The DEIR fails to show the mitigation measures listed in **Section 7, Use of Mitigation Measures and Environmental Design Consideration** will work and it is imperative that they do. The DEIR needs to look at mitigation measures talk about how they will be done and demonstrate they will be effective. Thus should be data supplied to show that each measure will likely work to lessen impacts. Without this level of detail the mitigation measures of mere boilerplate fluff.

This same comment applies to all mitigation measures in the DEIR that use the terms "Promote" or "Coordinate". The DEIR needs to resolve this problem and recirculate the EIR so the public can review the mitigation measures and have some confidence that the EIR has done its job.

Thank you very much for your consideration.

Sincerely,

Sandra Farrell

172-7
cont