



Balancing the needs of the environment with those of business.

Letter
188

September 25, 2017

Ms. Maggie Soffel
Land Use/Environmental Planner
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Re: County of San Diego Climate Action Plan

Dear Ms. Soffel:

J. Whalen Associates, Inc., has worked closely with County staff, both on behalf of clients and also in an effort to share some of the experience we have had in commercial energy production and in implementing the City of San Diego's approved Climate Action Plan. We are grateful for the opportunity to provide input.

188-1

We have reviewed the proposed CAP, the EIR and Appendices A-F, the Summary of the CAP and Mitigation Measures, the CEQA Thresholds of Significance, the CAP Check List, and the CAP's General Plan Amendment and offer general, specific, and CAP page-number specific comments:

General Comments

As the County's CAP indicates, reaching the County's GHG's goals will require a robust menu of efforts. It is plain that the two biggest sources of Greenhouse Gases (GHG) are from automobiles and electricity generation, nearly 70%. While there are other sources of GHG that are significant, none are anywhere nearly as important as mobility and energy. We believe that GHG reductions due to changing energy production to renewables and promoting electric vehicles should be the central focus for the County.

188-2

It is unrealistic to think significant transit will ever come to the unincorporated areas, especially with the likely approval of AB 805 and associated shift of transportation funding it heralds. Development patterns are going to remain rural

Response to Comment Letter I88

James E. Whalen
September 25, 2017

188-1 This comment provides introductory remarks. No further response is required.

188-2 This comment states that the County should focus on changing energy production to renewables and promoting electric vehicles. The County appreciates this input and will consider the suggestions. This comment is acknowledged. This comment does not raise an environmental issue related to the adequacy of the Draft SEIR and no further response is required. However, the comment will be included as part of the Final SEIR and made available to the decision makers prior to a final decision on the proposed project.

and sparsely populated. Therefore, the County should plan for what's doable and leverage its opportunities.

The County might also do well to plan for possible General Plan amendments (GPA); instead of simply requiring net zero energy use for each GPA, provide another option, which is paying into an excess unit "bank" established by the County, where funding is collected and used for targeted direct investments that can sharply reduce GHG, similar to other in lieu fee programs. The applicability of the excess unit bank could be limited to smaller projects, but it could also work for larger ones.

As SDG&E wisely also recommended in their comment letter, JWA believes that the best thing that can happen is for the County to combine aspects of the Enhanced Direct Investment Alternative (S.5.2) and the 100% Renewable Energy Alternative ((S.5.3). Neither alternative alone will deliver on its full promise immediately, but Alternative S.5.2's clearly stated reduction in emphasis on large-scale renewable energy facilities would at the very least slow down the incremental reduction in GHG reduction from electricity production while also running counter to a key component of the County's Comprehensive Renewable Energy Plan (CREP). Slowing down deploying renewable energy would not be a good idea. Indeed, the Board of Supervisors voted to support CREP Component 5, *Increase the County's Renewable Energy Generation, Transmission, Use and Storage*, which only works promptly with larger-scale renewables in the mix of power sources. Although roof top solar is an increasingly large share of renewable energy production, it is only a part, and growing slowly at that, and doesn't count towards the State Renewable Energy Portfolio goal.

Combining Alternatives S.5.2 and S.5.3 provides the County with a way to fine tune the best parts of both while increasing the ability of the County to derive the most credit for reducing greenhouse gases *using its land use authority and buying power*.

As noted above, the County could organize an excess units in lieu funding program which could be used for GPA's of whatever size it chose for applicability as a way to better aggregate and target investments that reduce GHG in a major way. If large enough, this fund could be used to finance even more robust capital improvements with GHG-reducing qualities.

It is the intent of these comments to provide direct, measurable benefits for GHG reduction actions that the County can take credit for doing, either in concert with the obvious partners, SDG&E and the building industry, or acting alone.

Specific Comments

1. *Install Level 2 EV charging stations in the unincorporated County through a partnership with SDG&E.*

Comment: As a part of their SB 350 filing in January 2017, SDG&E is seeking to establish a program to install 90,000 residential charging stations throughout San Diego and Orange Counties. A decision on the residential charging program is expected in 2018. If approved as expected, the County could derive significant GHG reduction credit by participating in the implementation of the program. We support this effort.

188-2
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188-3

188-4

188-5

188-3 This comment suggests the County consider having GPAs pay into a bank where the funding collected is used for targeted direct investments. The County acknowledges this comment. Please see Master Response 3 regarding direct investments and Master Response 12 related to mitigation hierarchy and carbon offsets. The Draft SEIR establishes a path for GPAs to offset carbon emissions as described on pages 2.7-36 through 2.7-40. 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 proposed project.

188-4 The comment supports implementation of a combination of the Enhanced Direct Investment Alternative and 100% Renewable Energy Alternative. The County acknowledges this comment. The 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 proposed project.

188-5 The comment indicated SDG&E is seeking a program to establish the installation of 90,000 residential charging stations throughout San Diego and Orange counties and the County should participate in this program. In response to comments, the County has added a new measure, GHG Reduction Measure T-3.5 Install Electric Vehicle Charging Stations, which will result in the installation of 2,040 Level 2 charging stations in priority public locations by 2030. Additionally, the CAP includes a supporting effort to "Install Level 2 EV charging stations in the unincorporated County through a partnership with San Diego Gas & Electric (SDG&E)" under Measure T-3.3. This supporting effort is intended to leverage the SDG&E program to install residential charging stations under the SB 350 filing. This comment does not address the adequacy of the Draft SEIR. 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>2. <i>Support SDG&E's effort to Electrify Local Highways program</i></p> <p>Comment: What better way to address the long vehicle trips inherent to using County roads than making charging possible in more places? Installing fast chargers in well-located public places makes good sense if we want more electric car usage in unincorporated areas. With an offer of funding for pilot efforts, the County should initiate discussions with the tribal casinos, who represent a tremendous opportunity for focused efforts in what are relatively high traffic areas of the County. If the County is successful, it should take credit for the innovation.</p> <p>3. <i>Collaborate with regional partners to provide no- or low-cost energy efficiency audits</i></p> <p>Comment: Work with SDG&E to obtain no-cost energy audits for both business and residential energy users to identify and install no-cost energy efficiency measures. Residents within the unincorporated County can also utilize the Home Energy Survey through "My Account" on their bills to receive personalized suggestions on ways to reduce their energy use. In addition to these programs, customers may also be eligible for rebates that will reduce the costs of making their homes and businesses more energy efficient.</p> <p>4. <i>Reduce Energy Use at County Facilities</i></p> <p>Comment: Increase the percentage of renewable energy used in County buildings and operations by either building its own energy source from renewables; and/or if an immediate solution is desired, the County can purchase of 100% renewable energy for its facilities directly from SDG&E in their EcoChoice plan, which entails no construction or upfront costs.</p> <p>5. <i>CAP Amendment</i></p> <p>Comment: Given possible controversy, the best way to "update" the CAP Guidelines may not be to allow staff to do so solely administratively. There should be a mechanism to allow changes to be made over time without undue Board of Supervisors oversight, but still provide for an "appeal" or similar elevation to the Board in case of conflict serious enough to warrant Board review.</p> <p>6. <i>The MSCP Counts</i></p> <p>Comment: The Multiple Species Conservation Program (MSCP) has been a success at conserving important wildlife habitat for twenty years, and its benefits continue to accrue in the County, and not just for the conservation San Diego's virtually unique diversity of habitats and species. The County does not take credit for the MSCP's achievement in the reduction of GHG, and should. The largest wildlife preserve in the U.S. located in an urban-suburban setting provides the benefit of sequestering enormous and measurable amounts of carbon dioxide in the roots of such deep-rooted vegetation as chaparral and trees. Chaparral is by far the largest percentage of native vegetation in the unincorporated area. Work by Michael F. Allen, Ph.D., at the U.C. Riverside Center for Conservation Biology has proven and allows quantification of this benefit, which is considerable even taking into account development. The County was <u>not</u> obligated to create the MSCP, and as such should derive GHG credit for so doing. This</p> <p style="text-align: center;">3</p>	<p>188-6 The comment states the County should initiate discussions with tribal casinos, and other partners to install fast chargers in public places to increase the region's fleet electrification. The County acknowledges this comment. In response to comments, the County has added a new measure, GHG Reduction Measure T-3.5 Install Electric Vehicle Charging Stations, which will result in the installation of 2,040 Level 2 charging stations in priority public locations by 2030. 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>188-7 The comment states the County should facilitate no-cost energy audits for business and residential energy users to identify energy saving measures. As stated within GHG Reduction Measure E-1.3, Improve Building Energy Efficiency in Existing Development, this has been included as a supporting effort. The County will collaborate with regional partners to provide no- or low-cost energy efficiency audits.</p> <p>188-8 The comment states the County should either retrofit County buildings and operations with renewable energy systems or purchase 100% renewable energy from SDG&E. In response to comments, the County has increased the energy amount of energy reductions in its facilities to 20% below 2014 levels by 2030 (GHG Reduction Measure E-1.4). The County acknowledges this comment. The 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>188-9 The comment states that updates of the CAP shouldn't be a solely administrative action and that there should be a mechanism to allow appeal or elevation to the Board. As described on page 5-6 of the CAP, the County will prepare a CAP update every five years beginning in 2025. The CAP update will be presented to the County Board of Supervisors for review, amendment, and/or adoption. Coupled with update of the CAP, the County will determine whether additional</p>
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environmental review would be required consistent with the requirements of CEQA Guidelines Sections 15162 through 15164 based on the changes proposed. As such, an opportunity to appeal to the County Board of Supervisors would be provided.

I88-10 The comment states the County does not take enough credit for GHG reductions from the County's Multiple Species Conservation Program. Specifically, the comment recommends that carbon sequestration benefits of conserved lands should be credited in the CAP. Please see the response to comment O1-14 and Master Response 11 related to this topic.

<p>approach would also allow for a calculation of vegetation loss from development being offset by preserved habitat, and also allow an additional GHG mitigation measure that the County can take credit for doing.</p> <p><i>7. Future CAP Changes Over Time</i></p> <p>The County correctly notes that it is impossible to predict the kinds of changes in the future which can reduce GHG. There should be a strong consensus that is the reality, and responding prudently and flexibly to these unknowns offers the best chance of meeting the CAP's reduction targets.</p> <p>CAP-Specific Comments by Page Number</p> <p><i>Page 2-2</i></p> <p>The emissions inventory is limited to GHGs that are generated by activities in the county from a defined set of sources (e.g., on-road transportation, electricity use, and waste) that can readily monitored and reduced through County actions. What is left out?</p> <p><i>Page 3-5</i></p> <p>Reduction in outdoor water use is vague – 40% reduction of what?</p> <p><i>Page 3-11</i></p> <p>The County's calculation of the benefits of acquiring open space only equates it to offsetting GHG from 307 dwelling units, when much more is really being done. See previous comment on MSCP. It is possible to better quantify balancing development losses against sequestration benefits, and should be done. Updating ten community plans and studying the feasibility of developing an incentive-based transfer of development rights program is a good idea, but the time frame 2030 is too long to do much good in the near term.</p> <p><i>Page 3-17</i></p> <p>What about electric vehicles? The Plan is silent and should explore ways to bring EV into the mix. When over half of GHG come from internal combustion engines, more needs to be done. There must be opportunities to partner with energy companies to bring more electric cars into service. Other older commenters may remember the days when electric utilities sold appliances. While perhaps not allowed today, finding a way for the County to facilitate greater use (through leasing or other mechanisms to increase numbers of electric cars) would be dramatic in effect over time.</p> <p>Trip reduction measures may include telecommuting, car sharing, vanpools, carpools, shuttle service, bicycle parking facilities, and transit subsidies. TDM only works when you charge for parking.</p> <p><i>Page 3-32</i></p>	<p>I88-11 This comment expresses opinions regarding the future of climate change and the CAP. 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>I88-12 The comment asks what emissions are left out of the GHG inventory. The inventory excludes emissions that are not under the County's jurisdiction, e.g., aircrafts and stationary sources. Please see the Section 2.4.2 of Appendix A – 2014 Greenhouse Gas Emissions Inventory and Projections for details on excluded emissions.</p> <p>I88-13 The comment refers to page 3-5 of the CAP and states that the reduction is water usage is vague. It is unknown what the comment is referring to. There is no reference to reduction in outdoor water usage on page 3-5 of the CAP. Please also refer to Master Response 7 related to outdoor water use.</p> <p>I88-14 The comment states that the benefits of acquiring open space only equates it to offsetting GHG from 307 dwelling units and to refer to their previous comment on MSCP. Please see the response to comment I88-10. It also states that the County should quantify balancing development losses against sequestration benefits and that studying the feasibility of an incentive-based transfer of development rights program is a good idea but the timeframe of 2030 is too long. The County acknowledges this comment. 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>I88-15 This comment suggests that the CAP should engage in additional ways to incentivize electric vehicles. In response to comments, the County has added a new measure, GHG Reduction Measure T-3.5 Install Electric Vehicle Charging Stations, which will result in the installation of 2,040 Level 2 charging stations in priority public locations by 2030.</p>
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Additionally, the CAP includes multiple GHG Reduction Measures that would facilitate the electrification of County and private vehicles and facilities. With regard to electric vehicles, GHG Reduction Measure T-3-2 (see page 3-30 of the CAP) would require County-initiated project to use alternative fuels in 100% of construction equipment by 2030 through implementation of the 2016 Green Fleet Action Plan. GHG Reduction Measure T-3.3 includes supporting efforts that would result in the development and implementation of a local Electric Vehicle (EV) Incentive Program, would install Level 2 EV charging stations in the unincorporated County, and would collaborate with SANDAG to encourage installation of EV charging stations in new residential and non-residential developments. Finally, GHG Reduction Measure T-3.4 would require the County to transition two to five percent of the County's light-duty fleet to electric vehicles.

I88-16 The comment lists trip reduction measures and provides an opinion that TDM only works when you charge for parking. The County acknowledges this comment. 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.

Page 3-32

This measure may not be worth the effort, particularly given the social justice implications of removing old cars from the road. Some people can't afford new cars, and there are very few old cars on the road anyway. Natural attrition will likely eliminate all but collector cars.

188-17

Page 3-37

Protocols to consider include Boiler Efficiency, Coastal Wetland Creations, Reforestation, Forest Preservation, Compost Additions to Rangeland, and Winterization (energy efficiency upgrades). This should be expanded due to the opportunities for multiple possible use of wetland restoration for habitat, stormwater compliance and now GHG sequestration.

188-18

Page 3-38

The verifying entity will ensure that the County's direct investment projects have retired the specified amount of GHG emissions rather than selling the GHG credits on the registry market. How will this be tracked?

188-19

As noted above, property owners with General Plan Amendment projects that are unable or unwilling to fully mitigate or offset their GHG impacts onsite would be able to purchase GHG credits from the registry to fulfill applicable regulatory requirements to mitigate any potential impacts to the County's CAP. This tool should be expanded to a County-operated in lieu fee program. This would be a good way to combine funding from disparate or smaller sources to achieve larger goals by aggregating the funds, an idea with wide regulatory agency support which was first explored in stormwater alternative compliance measures.

Page 3-52

There is a 40% reduction in outdoor water use for landscaping in new and existing residential and non-residential development. From what baseline?

188-20

Page 3-85

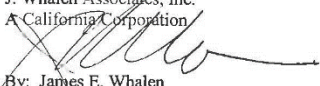
Increasing residential tree planting seems like a good idea, but is this anything meaningful? People already plant more than 2 trees per acre.

188-21

We appreciate the opportunity to comment on the County's draft Climate Action Plan and Environmental Impact Report. SDG&E is committed to continuing our partnership with the County and pleased to lead several customer initiatives that directly support the County's CAP objectives.

188-22

Sincerely,
J. Whalen Associates, Inc.
A California Corporation



By: James E. Whalen
President

cc: Board of Supervisors

188-17 This comment provides an opinion that Measure T-3.3 (referenced on page 3-32 of the CAP), Develop a Local Vehicle Retirement Program, may not be worth the effort because most of the region's fleet is new and natural attrition will ultimately eliminate all older cars except collectibles. The County acknowledges this comment. The 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.

188-18 The comment lists protocols to consider that offset carbon emissions and states this should be expanded. Refer to Master Response 3 regarding local direct investment projects.

188-19 The comment questions how the retirement of GHG emissions from the County's direct investment projects will be tracked. The comments also states the direct investments should be expanded to include a County-operated in lieu fee program. Regarding the in-lieu program, please see Master Response 3 regarding direct investments.

188-20 The comment asks from what baseline would there be a 40% reduction in outdoor water use for landscaping in new and existing residential and non-residential development. Please see Master Response 7 related to outdoor water use and Measure W-1.2.

188-21 The comment provides an opinion that residential tree planting is not a meaningful GHG reduction measure because most homeowners already plant more than 2 trees per acre. It should be noted that this measure would require new residential projects to plant 2 trees per dwelling unit. The 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.

188-22 The comment provides closing statements and expresses interest in continuing to work with the County on future implementation efforts. No further response is required.