

Response to Comment Letter I9

**John Suhr
August 25, 2017**

Letter
I9

From: John Suhr
To: CAP
Cc: [Gov. Greg Horn, Bill; Jacob, Dianne; Roberts, Son; Gasparr, Kristin; EGG, CAO Mail; Montgomery, Thomas E; kckcassa@cox.net; jbbabe@ci.la-mesa.ca.us; joshua.smith@sduniontribune.com; blanca.gonzalez@usandiego.com](mailto:Gov_Greg_Horn_Bill; Jacob_Dianne_Roberts_Son; Gasparr_Kristin; EGG_CAO_Mail; Montgomery_Thomas_E; kckcassa@cox.net; jbbabe@ci.la-mesa.ca.us; joshua.smith@sduniontribune.com; blanca.gonzalez@usandiego.com)
Subject: More: rehear or appeal the Sierra Club CAP court case
Date: Friday, August 25, 2017 5:13:09 PM

On review the updated draft CAP notes County GHG emissions at 3.2 MMTCO_{2e} annually for a population of 460,000 or 3,200,000/460,000 = 6.96 MMTCO_{2e}/capita. Note that the CARB 2030 Scoping Plan recommends 6 MMTCO_{2e}/capita based on the 40% SB 32 GHG reduction requirement so the County need only reduce emissions 0.96 MMTCO_{2e} /capita or 0.96 X 460,000 = 0.44 MMTCO_{2e} to meet that recommendation.

Also I had previously used 4.5 MMTCO_{2e} for County emissions instead of 3.2 MMTCO_{2e} so the revised reduction of global temperatures if the County ended emissions *entirely* would be 3.2/7800 = 0.00041 X 0.007 = 0.0000028 degrees C.

Surely that impact cannot be *scientifically or factually significant* as required by CEQA Guidelines 15064 (b) *so no action is necessary.* This should also affect the revised SEIR.

The updated draft CAP includes the Schwarzenegger 80% GHG reduction Executive Order which the State Supreme Court has just rejected so it should be revised to remove the 80% reduction in addition to finding County emissions insignificant. And again, the Sierra Club vs. the County Appeals Court decision should be reheard or appealed based on the updated information. No action should be taken on the CAP until this is done.

John Suhr
La Mesa
619-461-1246

I9-1

-----Original Message-----

From: John Suhr <johnsuhr@aol.com>
 To: CAP <CAP@sdcounty.ca.gov>
 Sent: Wed, Aug 23, 2017 5:16 pm
 Subject: Rehear or appeal the court case

Thank you,

I believe all my comments are pertinent and should be included. Note that La Mesa has encountered serious problems with its updated draft CAP probably due to the overturn of the Schwarzenegger Executive Order and has had to extend its schedule. Hopefully the same will be true with the County's CAP.

John Suhr

-----Original Message-----

From: CAP <CAP@sdcounty.ca.gov>
 To: John Suhr <johnsuhr@aol.com>
 Sent: Wed, Aug 16, 2017 4:45 pm
 Subject: RE: Rehear or appeal the court case

Mr. Suhr,

I9-1

The comment provides an estimate of required reductions based on the per capita reduction target for 2030 recommended by the CAP. The County has chosen not to apply per capita targets as is because the statewide inventory includes sectors that are not applicable to the County's emissions inventory. The per capita targets were used to estimate reductions required from baseline emissions, taking into account emissions sectors that are relevant to community sources and County operations. Please see Master Response 4 related to GHG reduction targets for further information. The comment also erroneously expresses the per capita targets in terms of million metric tons of emissions; they are based on metric tons. The comment also appears to correlate the county's emissions to global temperature changes but does not provide any sources to substantiate these calculations. The comment uses this information to conclude that the impact is less than significant under CEQA. As stated in Chapter 2.7 of the Draft SEIR, GHG emissions are evaluated as a cumulative impact under CEQA, therefore, the analysis focuses on whether the incremental contribution towards this impact is significant. Finally, the comment states that the County should not rely on Executive Order S-3-05 to set a reduction goal. The CAP analyzes GHG emissions from buildout of the County's General Plan which is anticipated to occur by 2050. Therefore, 2050 is used as the horizon year for analysis.

Thank you for your email. The County's Draft Climate Action Plan, Draft Supplemental Environmental Impact Report, and related project documents have been released for a 45-day public comment period from August 10, 2017 to September 25, 2017. Please let us know which, if any, of your comments below you would like to be included in the final Supplemental Environmental Impact Report and Response to Comments.

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I9-1
cont.

Sincerely,

The County's Climate Action Plan Team

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