



SWIA

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September 12, 2017

County of San Diego

5510 Overland Avenue, Suite 310

San Diego, CA 92123

Attn: Ms. Maggie Soffel (CAP@sdcounty.ca.gov)

Subject: PDS2015-POD-15-002, PDS2016-GPA-16-007, LOG NO. PDS2016-ER-16-00-003 (County of San Diego Draft Climate Action Plan)

Dear Ms. Soffel:

The Southwest Wetlands Interpretive Association (SWIA) is an environmental organization established over 40 years ago whose mission is to conserve wetlands and other sensitive natural habitats, primarily in San Diego County and southern California. We are submitting these comments on the County's draft Climate Action Plan (CAP) and will separately submit comments on the associated Draft Supplemental Environmental Impact Report (DSEIR) for the CAP. Our organization is extremely concerned about how jurisdictions are addressing climate change and in particular, how they plan to reduce greenhouse gas (GHG) emissions. Coastal wetlands are particularly vulnerable to sea level rise, which for our coastal region is driven by climate change.

The CAP contains many elements that we support, particularly the commitment to achieve conformance with the state-required GHG reduction target percentages for 2020 and 2030 and the state's goal for 2050. Many of the proposed GHG reduction measures are immediately implementable or have strong justification for future implementation. The monitoring and

Letter
01

Response to Comment Letter O1

Southwest Wetlands Interpretive Association

Michael A. McCoy, President

Bill Tippets, Board Member

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O1-1 The County appreciates the comments on the Climate Action Plan. The comment provides introductory remarks. No further response is required.

O1-1

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reporting, and ability to modify specific measures based on reporting information is an essential part of any effective CAP.

O1-1
cont.

Our primary concerns with the draft CAP focus on the proposed use of the 2014 GHG emissions as the GHG baseline for all GHG emission reduction targets/goals; the consequences for calculating the 2020 and 2030 GHG reduction targets and the 2050 GHG reduction goal (which are supposed to be established on a “1990 baseline” or comparable baseline); the consequent need to increase GHG reductions from proposed measures to meet higher GHG reduction targets/goal based on our recommended “1990 baseline”; low percentage of GHG reductions from the transportation sector and questionable conformance with SB 375 regional targets; the reliance on untested capacity for the County of San Diego to create sufficient “direct investments” measures; and how “project streamlining” should be determined – particularly with regard to how well the CAP is functioning. Our specific comments address these and other issues.

O1-2

Chapter 1 (Introduction). No Comments.

O1-3

Chapter 2 (Greenhouse Gas Emissions, Targets, etc.)

Page 2-1, Para. 2. The County’s decision to use 2014 as the baseline year from which it will establish the CAP targets (i.e., 2020 and 2030) and goal (i.e., 2050) must clearly demonstrate that adopting this baseline will result in reductions that are comparable to – or greater than – reductions that would use a 1990 benchmark as called for by AB 32, SB 32, and EOs B-30-15 and S-3-05. We understand that the County’s 1990 GHG emissions data may not be sufficiently documented to be used as the baseline for future reductions, but the plan must document comparability to or improvement on a “1990 baseline.”

O1-4

For example, a 1990 GHG emissions inventory estimate for San Diego County has been prepared (“An Analysis of Regional Emissions and Strategies to Achieve AB 32 Targets Revised and Updated to 2010” accessed 18 August 2017 at: <http://catcher.sandiego.edu/items/usdlaw/EPIC-GHG-2013.pdf>). That analysis concluded that total San Diego County GHG emissions were approximately 29 MMTCO2e. Presumably the County’s share of the total 1990 San Diego County GHG emissions could be developed from that data. This plan (draft CAP) must provide a clearer discussion and justification of why that

O1-2 The comment summarizes concerns raised in subsequent comments regarding derivation of GHG reduction targets, low percentage of reductions from the transportation sector, conformance with SB 375 targets, feasibility of the direct investments reduction measure, and CEQA streamlining mechanism for projects. A response to each individual comment is provided in subsequent responses.

O1-3 The comment states it has no comments on the Introduction of the Draft CAP. No further response is required.

O1-4 The comment questions the use of the 2014 baseline emissions to set the 2030 GHG reduction target and 2050 goal. Please refer to Master Response 4 on GHG reduction targets.

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and other previous estimates should not be used to establish the 1990 baseline. Pages 2-10 and 2-11 describe how this plan relies on CARB’s recommended per capita reductions where 1990 data are not available, but it would be useful to provide an evaluation comparing the presumed 1990 baseline (see above) and the 2014 baseline to demonstrate the validity of the new inventory procedure (see the comment below for Pages 2-11 and 12).

O1-4
cont.

Page 2-4, Para. 3. Please clarify the Propane usage issue. Shouldn’t the inventory use total annual sales volume within the County’s jurisdiction so that commercial and industrial use (and emissions estimated) to more completely account for propane?

O1-5

Page 2-4, Para. 5. Provide more clarification about how on-road vehicle miles traveled (VMT) is allocated/computed. In particular, it appears (Appendix A – GHG Inventory) that all “external origin-external exit” commute-based VMT are excluded from the County’s inventory. Are those VMT captured in the cities’ inventories?

O1-6

Pages 2-11 and 12. If the County’s GHG emission reductions should be 2% less than its 2014 baseline by 2020 to achieve equivalency with the AB 32 target of lowering GHGs to 1990 levels by 2020, then why shouldn’t this plan establish that 2020 target as the basis for reducing future GHG emissions? That is, according to the draft CAP, it will achieve the “1990 baseline” of 3,147,275 MTCO_{2e} by 2020. Shouldn’t the plan then base its future targets on this “baseline” rather than the 3,211,505 MTCO_{2e} (2014 GHG emissions)? Then, after applying the state’s target for 2030 (40% reduction below “1990 baseline”), the County’s CAP emissions would be at or below 1,888,365 MTCO_{2e} (vs. 1,926,903 using the 2014 inventory “baseline”) and to achieve the state’s goal for 2050 (80% below “1990 baseline”) County GHG emissions would be at or below 629,455 MTCO_{2e}. This difference in the computation is sufficient to have a meaningful effect on the plan’s GHG emission targets that must be addressed before the plan is finalized.

O1-7

Page 2-14. The issue of how currently approved and future General Plan Amendments (GPAs) will be addressed by the CAP is a significant issue. As described in this plan, all current and future GPAs are presumed not to have a significant impact on the CAP because of the implementation of DSEIR mitigation measure GHG-1 (GPAs will achieve net zero or obtain offsetting credits). We do not agree with that conclusory statement as we explain later in this comment letter. This introduction to the GPA impacts and mitigation must be more expansive than the current summary.

O1-8

O1-5

The comment states that propane usage is unclear in page 2-4 paragraph 3 and asserts that the total annual sales volume within the County’s jurisdiction should be used such that commercial and industrial use are accounted for. Unfortunately, total annual propane sales data are not available (see Section 4.4 of Appendix A to the CAP). According to the Energy Information Administration’s (EIA) *2009 Residential Energy Consumption Survey*, propane usage accounts for approximately three percent of total energy usage in homes in the Pacific region (EIA 2013). Based on this information, the County assumes emissions from propane is low in commercial and industrial uses as compared to the more mainstream fuel of natural gas in residential land uses. Propane is not included as a fuel type in a similar EIA survey for commercial energy usage, so it can be reasonably assumed that non-residential entities in the County use a minimal amount of propane (EIA 2016). No revisions to the Draft CAP or Draft SEIR were made based on this comment.

O1-6

The comment seeks clarification on allocation of vehicle miles traveled (VMT) data. Specifically, the commenter asks if “external origin-external exit” VMT data were excluded from the unincorporated county’s inventory. This refers to vehicle trips that begin and end outside of unincorporated county boundaries, but a portion of the trip passes through the unincorporated areas. As described in Appendix A to the CAP, external-external trips were excluded from the inventory consistent with SANDAG’s origin-destination (O-D) travel demand model (see CAP Appendix A, Section 4.1.1). The O-D VMT method is the preferred method proposed by the ICLEI Community Protocol that estimates miles traveled based on where a trip originates and where it ends to better attribute on-road emissions to cities and regions with policy jurisdiction over miles traveled. This method is also consistent with recommendations of the Regional Targets Advisory Committee pursuant to SB 375. This method is followed for other inventories in the region that also rely on SANDAG VMT data. Trips that are classified as External-External for the unincorporated county may be Internal-External/External-

	<p>Internal for other jurisdictions depending upon origin/destination of the trip. Therefore, such trips would be captured in other jurisdictions' inventories if they rely on SANDAG's VMT data and use the ICLEI Community Protocol. No revisions to the Draft CAP or Draft SEIR were made based on this comment.</p> <p>O1-7 The comment reiterates the earlier comment (O1-4) about how GHG reduction targets were derived. Please refer to Master Response 4 on GHG reduction targets.</p> <p>O1-8 The comment disagrees with the conclusion that GPAs would have a less-than-significant impact related to GHG emissions because of implementation on CAP Mitigation Measure GHG-1 of the Draft SEIR. The commenter does not specify why they disagree or provide evidence that an alternate conclusion should have been drawn. The commenter also does not provide any evidence as to why or how the summary provided in the CAP on page 2-14 must be more expansive. Please also see Draft SEIR Chapter 2.7 and Section 2.7.5. Therefore, no further response is required and no revisions to the Draft CAP or Draft SEIR were made based on this comment.</p>
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Chapter 3 Greenhouse Gas Reduction Strategies and Measures

Page 3-2, Para. 1. As stated in our prior comments, the CAPs 2030 target and 2050 goal appear to be not as low as they should be to comply with the state's 2030 target (40% below 1990 "baseline") and 2050 goal (80% below 1990 "baseline"). We believe that the currently proposed GHG reduction measures can be strengthened to achieve the target and goal numbers that we have identified in our comments.

01-9

Page 3-2, Para. 4. A formal, every-five-years review of mitigation strategies (and efficacy) should not preclude the consideration and implementation of new, more effective GHG reduction strategies and measures that may be ready for implementation during the 5-year interval between the formal review and revision to the strategies.

01-10

Page 3-3, Table 3.1 and Figure 3.1. The table and figure indicate that a disproportionately low percentage/amount of future GHG emission reductions will derive from the "Transportation and Built Environment" category. This raises questions regarding whether the County's CAP is consistent with and supports the goals and expectations of SB 375 (Regional Transportation Plan/Sustainable Communities Strategy) that prioritizes land use changes and transportation efficiencies to reduce per capita vehicle miles traveled (VMT)-based GHG emissions from passenger and light truck vehicles. If the CAP can achieve its 2030 target (and put it on a trajectory to meet the 2050 goal) without contributing its "fair share" to the regional SB 375 reduction targets, that would be a significant impact; it also places a greater burdens on the cities to achieve the regional SB 375 GHG emission reductions.

01-11

Page 3-4, Table 3.2. As noted in our previous comments, we believe that the CAP's targets/goals are not fully aligned with - are not as restrictive on emissions as required by - state regulations and guidance because of the proposed use of the 2014 GHG emissions as being equivalent to the 1990 baseline. That is, because the CAP is committing to reduce 2020 emissions to a level that is equivalent to the "1990 baseline," the 2030 target and 2050 goal should be based on the 2020 GHG emission target level - not the 2014 baseline. The targets/goals should be revised per our comments.

01-12

01-9 The comment contends that the CAP's 2030 reduction target and 2050 goal are not consistent with State targets of 40% below and 80% below 1990 levels by 2030 and 2050, respectively. The commenter asserts that proposed GHG reduction measures can be strengthened to reconcile this perceived discrepancy, but does not offer specific recommendations on measures in this comment. Please refer to the Master Response 4 on GHG reduction targets.

01-10 The comment states that a formal, every-five-year review of mitigation strategies should not preclude the consideration and implementation of new GHG reduction strategies that may be ready for implementation within the five-year period. Chapter 5 of the CAP specifies that the CAP is a dynamic document that would be continuously assessed and monitored. The County would conduct annual monitoring of the CAP to track progress and identify where further efforts and additional resources may be needed. Adjustments would be made to the CAP if measures fall short of the targets or additional measures become available. The County has proposed a comprehensive monitoring process for making performance adjustments to existing measures, replacing ineffective or obsolete actions, and adding new measures as technology, and federal and State programs change. The formal CAP update process would occur every five years as stated; however, the monitoring program would ensure that efficiency improvements of goals within each five-year period is not precluded. No revisions to the Draft CAP or Draft SEIR were made based on this comment.

01-11 The comment states that there is a disproportionately low emissions reduction coming from transportation and are interested to know if the County's CAP is consistent with SB 375. There is no requirement that each emissions sector must be reduced proportionate to its contributions. Please refer to Master Responses 2 and 6 on transportation reductions and relationship between the CAP and SB 375 targets.

01-12 The comment states that the CAP's reduction targets and goal are not aligned with State regulation and guidance. The CAP's GHG reduction targets and goal were derived from the State's

guidance in CARB's *The 2017 Climate Change Scoping Plan Update*. Please refer to Master Response 4 on GHG reduction targets.

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Page 3-8. Following-up on the comments for Page 3-3, the CAP acknowledges that transportation is by far the largest contributor (45%) to its GHG emissions, yet the CAP only proposes to implement measures that would produce a 13% GHG reduction from this sector by 2030, which is not in line with the regional SB 375 target (a minimum of 21%). While there is no requirement that each emission sector must be reduced proportionate to its contributions, the CAP appears to under-utilize “transportation” sector reduction opportunities, which then places much greater burden to reduce emissions from other sectors.

O1-13

Page 3-10. GHG reduction measure T-1.1, which proposes to reduce VMT by Acquiring Open Space Conservation Lands, raises a number of questions. For the approved MSCP South, the County has already committed to the open space acreages: shouldn't those acres (regardless that some have not yet been secured) then be part of the existing conditions and not credited as a new source of VMT-based GHG reductions (and if the County were to subsequently permit some of those areas to be developed, that add to its future emissions)? While there is no current commitment to conserve open space (and eliminate development from) habitat lands within the MSCP North plan area, it is not certain whether that plan - and the MSCP East - will be approved and how much actual development will be “removed” from the existing conditions. Yes, the County has a rough outline of likely conserved lands in the MSCP North plan area, but it has no legal commitment to do so at present. This approach needs more clarification.

O1-14

Page 3-12. Acquiring Conservation Easements (Measure T-1.2) from existing agricultural lands to remove future development (dwellings) is a GHG reduction measure that is within the County's ability to effect. However, this is a voluntary measure and subject to the County finding funds to acquire the easements. What commitment can the County provide to ensure its implementation? This issue applies to all voluntary measures and measure that have no existing funding or commitment to develop new funding sources.

O1-15

Page 3-14. Updating Community Plans (Measure T-1.3) to improve housing efficiency (density...and affordability) and associated transportation is a strategy that needs more description. This approach is the central tenet of SB 375 (regional transportation plan/sustainable community strategy), and the CAP must explain how this approach fits within the larger RTP/SCS for San Diego County (including other CAP measures such as T-2.2). The

O1-16

O1-13 The comment states that the 13% reduction in the transportation sector is not in line with the regional SB 375 target and that the targets and goals within the CAP should be revised based on the comments. Please refer to Master Responses 2 and 6 on transportation reductions and relationship between the CAP and SB 375 targets. No revisions to the Draft CAP or Draft SEIR were made based on this comment.

O1-14 The comment asserts that the additional acreage acquired under GHG Reduction Measure T-1.1 (Acquire Open Space Conservation Land) should be considered part of existing conditions as the County has already committed to the open space acreages for the approved MSCP South. Under this measure, the County would purchase land from willing sellers that meets certain criteria that includes completing the planned preserve system for the region, providing critical wildlife corridor linkages, and preserving habitat functions. Lands already acquired by the County are considered within the CAP projections. The acreage and associated offset dwelling units under this measure would be in addition to acreage already acquired by the County under the MSCP South.

The areas identified for potential acquisition in the South County Subarea Plan includes more acreage than is required to meet the Preserve goal. This approach allows for flexibility in acquisitions and recognizes the necessity for a willing seller; not all of the private land identified for acquisition will be made available by a willing seller.

The comment suggests taking emission reduction credit for anticipated land acquisitions associated with the South County Subarea Plan of the MSCP, but goes on to state that land anticipated to be acquired in support of the North County Plan should not be credited due to the lack of a legally binding agreement to ensure acquisitions in the North County Planning Areas. Regardless of the MSCP Planning Area, emission reduction credit is only being accounted for when property is acquired or an easement is recorded, which precludes development and thus unrealized emissions.

The commenter is correct that the County does not have a legal mandate to acquire lands within the North County MSCP Planning Area; however, the County has entered into a Planning Agreement with the California Department of Fish and Wildlife and the Fish and Wildlife Service (federal). The Planning Agreement addresses both the North and East County MSCP Planning Areas and can be reviewed here: (Planning Agreement). Section 6.7 of the Agreement reads:

6. 7.1 Conservation Lands Acquired/Protected

The Parties may elect to preserve, enhance, or restore, either by acquisition or other means (e.g., conservation easements, designated setbacks), lands in the Planning Areas that contain native species of wildlife or natural communities prior to approval of the Plans.

As of 2016, 29,586 acres have been acquired and conserved in association with future conservation efforts. The CAP accounts for this land as it has been acquired and conserved, and anticipates GHG reductions for 2030 based upon future acquisitions. GHG reductions would be realized when property is acquired or an easement is recorded on real property that results in the reduction of development potential. Furthermore, the CAP is designed to be flexible so that as progress is monitored, regulations change, and technology advances, adjustments can be made to measures to achieve the 2020 and 2030 targets. The County will prepare an annual monitoring report to assess the CAP measures' annual performance in achieving the stated targets, in addition to two-year updates of the GHG emissions baseline inventory. Based on findings from the annual monitoring reports and inventory updates, the County will prepare a CAP update every five years to adjust measures as-needed to achieve the targets.

O1-15 The comment states that GHG Reduction Measure T-1.2 (Acquire Agricultural Easements) is subject to the County finding funds to acquire the easements and seeks clarification

on the County's commitment to implementation of this measure. The reduction calculation for GHG Reduction Measure T-1.2 is based on a total of 198 dwelling units offset between 2014 and 2030 (see Page 3-13 of the CAP). The measure would require acquisition of 443 acres of agricultural easements by 2020 to offset 18 dwelling units and an additional 4,430 acres to offset 180 units by 2030. This equates to a total of 198 dwelling units offset. The number of dwelling units is based on the amount of annual funding currently appropriated by the County Board of Supervisors for the existing Purchase of Agricultural Easements (PACE) program (up to \$1.5 million per year between 2020 and 2030), and the estimated cost per acre and acres per dwelling unit based on the current program. Funding to expand the PACE program under GHG Reduction Measure T-1.2 has been identified in the County's five-year budget forecast and will be reflected in the County's FY18/19 – 19/20 Operational Plan for Board consideration.

O1-16 The comment questions the relationship between GHG Reduction Measure T-1.3 and SB 375 targets. The comment also specifies that the CAP should include criteria that the County would apply to community plan updates. Please refer to Master Response 5 related to community plan updates and Master Response 2 related to relationship between the CAP and consistency with SB 375 targets.

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proposed performance metric (update of 19 community plans) is not sufficient; a brief summary must be included to identify what criteria the County will apply to the community plan updates, as well as a reference the documents where the full analyses are presented.

O1-16
cont.

Page 3-18. Improve Roadway Segments as Multi-modal (Measure T-2.1) should describe how the County will integrate this with other CAP measures (e.g., Update Community Plans) and the regional RTP/SCS, and how the prioritization for improvements best implements that integration.

O1-17

Page 3-20. Reducing New Non-residential Development VMT by 15% by 2030 (Measure T-2.2) is an existing commitment (requirement) of the current RTP/SCS. This appears to be a lower reduction percentage than would be needed to conform to the regional RTP/SCS – which calls for a 21% reduction regionally by 2035. Does (successful) implementation of this measure require the County to obtain committed funds from SANDAG? As the public has learned from reporting by the Voice of San Diego, SANDAG’s transportation revenues have consistently lagged behind forecasted levels, forcing projects to be delayed or possibly dropped from funding consideration. If the County is relying on SANDAG appropriations to implement this measure, how can it ensure successful implementation?

O1/18

Page 3-22. Reduce County Employee VMT by 20% by 2030 (Measure T-2.3) The County, which has a limited number of employment centers (compared to the general commercial/industrial centers), should lead in employee VMT reduction.

O1-19

Page 3-24. Shared and Reduced Parking in New Developments to reduce VMT by 10% by 2030 (Measure T-2.4) is a commitment the County would enact through its permitting process. This measure should be applied to all new and redevelopment projects within the County. Reducing the availability of free (e.g., subsidized) parking must be accompanied by reliable/effective alternative (in terms of costs and utility) transportation options.

O1-20

Page 3-28. Use Alternative Fuels in 10% of New Residential and Non-residential Construction Projects by 2030 (Measure T-3.1). The CAP should provide a brief description of why the County chose 10% as the appropriate level of alternative fuel use by 2030. The currently projected GHG reductions are relatively small and because the County controls this measure, how did it determine what level of use is realistic given the rapid advances in vehicle technologies?

O1-21

O1-17 The comment states that GHG Reduction Measure T-2.1 (Improve Roadway Segments as Multi-modal) should describe how the County would integrate this with other CAP measures (e.g., Update Community Plans) and the regional RTP/SCS, and how the prioritization for improvements best implements that integration. GHG Reduction Measure T-2.1 will utilize enterprise efficiency and make improvements as part of regularly scheduled maintenance. Prioritization is determined through the Board of Supervisors. Improvement integration with GHG Reduction Measure T-1.3 (Update Community Plans) can be evaluated when those community plans are under development. Please also see Master Response 5 related to community plan updates.

O1-18 The comment questions if the VMT reduction required under GHG Reduction Measure T-2.2 is consistent with SANDAG’s RTP/SCS. Please refer to Master Response 2 related to relationship between the CAP and SB 375 targets. The commenter questions the successful implementation of this measure should it be dependent on obtaining SANDAG funding. However, this measure will be fully enforceable and successful because this measure will be made a condition of future project approval by inclusion in the CAP Consistency Review Checklist item 2a. The 15% reduction will be required of all future discretionary non-residential projects that meet the applicability requirements as stated in the CAP Checklist for New Development.

O1-19 The comment recommends that the County should lead in employee VMT reduction because it has a limited number of employment centers within its jurisdiction. This comment does not address the adequacy of the CAP or the Draft SEIR; therefore, no further response is required or necessary. Please refer to Master Response 9.

O1-20 The comment states that GHG Reduction Measure T-2.4 (Shared and Reduced Parking in New Developments), which would be enacted by the County through the permitting process, should be applied to all new and redevelopment projects within the County. The comment also states that reducing the availability of free (e.g., subsidized) parking must

be accompanied by reliable/effective alternative transportation options. The County acknowledges this comment. Appropriately priced parking is a documented approach to reduce VMT (e.g., in CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* guide [August 2010]). Further, this measure will be made a condition of future project approval by inclusion in the CAP Consistency Review Checklist item 3a.

O1-21 The comment asks for the rationale for choosing 10% as the appropriate level of alternative fuel use by 2030 under GHG Reduction Measure T-3.1. Please refer to Master Response 9 on the selection of measures in the CAP. In response to this comment and to demonstrate leadership to reduce GHG emissions in the county, the measure has been updated to require 25% alternative fuel use. The Final CAP has been revised to reflect this change.

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Page 3-37. Establish a Direct Investment Program (Measure T-4.1). We concur that the County should allow for some flexibility to use established carbon credit programs. However, most of the programs and options in Technical Appendix B to the DSEIR are not operating within San Diego County, and the CAP does not provide any assessment of whether suitable conditions exist within the County to establish sufficient carbon credits. Furthermore, it appears from the description in DSEIR Section 2.7.5.1 that the County would allow "offsite" mitigation not only through "direct investment" credits from within San Diego County but also from any approved carbon credit providers outside of San Diego County. While the CAP suggests that all onsite mitigation measures would be applied before direct investment credits are used, the CAP provides no limits to how much offsite mitigation could be used. That is not acceptable.

O1-22

We support the County's proposal to include a mitigation measure that provides incentives/rewards for creating local "offsite" (San Diego County) carbon credit investments that would provide alternatives to the non-San Diego County "offsite" providers. However, the CAP does not provide sufficient information to support the assertion that it could/would create sufficient credit to offset 190,262 TCO_{2e}/year.

O1-23

The local direct investment program – augmented by out-of-County carbon credit providers - cannot be allowed to serve as an unrestricted source for offsetting insufficient GHG emission reductions from other measures that fail to meet their expected performance. The CAP must include a "rough-step" tracking system to monitor and report how closely each of its reduction measures is functioning. If the cumulative, County-based GHG emission reduction is not roughly "in step" with its commitments (e.g., within 10% of the projected overall annual GHG emission reduction – before out-of-County credits are applied), then the use of "offsite" direct investment options must be limited.

O1-24

Page 3-40. The "Energy" portion of the CAP presents a comprehensive approach and set of measures that could substantially reduce this sector's GHG emissions. While we agree that the proposed achievement of 90% renewable energy by 2030 is a strong commitment, many of the cities have committed to the goal of 100% renewables by 2030, and we recommend the County do the same.

O1-25

The large proposed contribution to GHG reductions (65%) from the Energy sector by 2050 suggests that the County is overly-dependent on GHG reductions from this sector, which may

O1-26

O1-22 The comment states that the CAP does not provide any assessment of whether suitable conditions exist within the County for the reductions needed in GHG Reduction Measure T-4.1. The County has prepared the CAP and CAP SEIR as program documents pursuant to CEQA Guidelines Section 15168 and 15183.5. Future actions implemented by the CAP must be examined in light of the CAP SEIR (CEQA Guidelines Section 15168(b)(1) and (c)). Therefore, the County performed the correct analysis at the program level for the CAP through the SEIR. GHG Reduction Measure T-4.1 requires the County to directly invest in a local carbon reduction program by 2020. The performance-based protocols listed in CAP SEIR Appendix B will be used to develop project-level detail for implementing GHG Reduction Measure T-4.1 as required by 2020. However, the County PDS performed a preliminary assessment of the local direct investment program in advance of approval of the CAP by the Board of Supervisors, the results of which are provided as an attachment to the Planning Commission Hearing Report. The attachment is called the Preliminary Assessment of the County of San Diego Local Direct Investment Program. Though this report is not needed and the Draft CAP and Draft SEIR provided the required detail pursuant to CEQA Guidelines Section 15168 and 15183.5, the County decided to conduct this preliminary assessment in advance of 2020 when the local direct investment program is due to detail for the decision makers the estimated costs of implementing GHG Reduction Measure T-4.1. Please also see Master Response 3 on direct investments.

The commenter confuses GHG Reduction Measure T-4.1 with CAP Mitigation Measure M-GHG-1 claiming that the County would allow "offsite" mitigation through the local direct investment program outside of San Diego County. This is not correct. GHG Reduction Measure T-4.1 would require local direct investments for use by the County to meet the 2030 GHG emission reduction target. Carbon offset credits for use as project mitigation pursuant to CAP Mitigation Measure M-GHG-1 would only be permissible after all other feasible on-site mitigation was applied. For additional information related

	<p>to both issues, please see Master Response 3 on direct investments and Master Response 12 regarding mitigation hierarchy and the use of local carbon offset credits as project mitigation to reduce cumulative impacts in the Draft SEIR.</p> <p>O1-23 The comment states that the CAP does not provide sufficient information to support the assertion it could create sufficient credit to offset 190,262 MTCO₂e/year. The commenter is confusing GHG Reduction Measure T-4.1 with CAP Mitigation Measure M-GHG-1. Please see Response to Comment O1-22.</p> <p>O1-24 The comment states that the local direct investment program cannot be allowed to serve as an unrestricted source for offsetting insufficient GHG emission reduction from other measures, and that a tracking system is needed to monitor measure performance. Please see Response to Comment O1-22. The County does include monitoring of measure performance as detailed in Chapter 5 of the CAP. The comment also states that “offsite” direct investments must be limited if the CAP measures are in “rough step” with achieving anticipated emission reductions. The County will not purchase carbon offset credits to satisfy GHG Reduction Measure T-4.1 as the commenter claims.</p> <p>O1-25 The comment states that achievement of 90% renewable electricity by 2030 is a strong commitment, but recommends that the County adopt a 100% renewable electricity goal. Thank you for the comment and recommendation to adopt 100% renewable energy by 2030. The Draft SEIR included the 100 Percent Renewable Energy Alternative as an alternative to the CAP based on CEQA Guidelines 15126.6 and to provide the decision makers an alternative for selection.</p> <p>O1-26 The comment states that the County is overly dependent on GHG reductions from the energy sector and should reevaluate its ability to reduce emissions from transportation. Please refer to Master Response 6 related to transportation GHG reductions and Master Response 9 related to the selection of measures in the CAP.</p>
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be due to the relatively low targets/goals for the transportation sector – as we have noted in previous comments. We recommend that the County re-evaluate its ability to find legitimate ways to reduce the transportation sector GHG emissions and not to over-rely on the energy sector.

O1-26
cont.

Page 3-42. Improve Building Energy Efficiency in New Construction (Measure E-1.1). We support the County’s proposal to phase-in ZNE with a 10% additional efficiency standard.

O1-27

Page 3-46. Improve Building Energy Efficiency in Existing Developments (Measure E-1.3). We agree that any remodel/renovation must complete an energy audit. The audit should also include specific recommendations (including prioritizing by cost-effectiveness) for reducing energy use. However, as with the requirements for new construction (Measure E-1.1), we recommend that, based on the audit, the remodel/renovation be required to include a minimum 10% reduction in energy use unless the current use is within 20% of net zero energy (and the remodel will keep it within 20%).

O1-28

Page 3-48. Reduce Energy Use Intensity at County Facilities (Measure E-1.4). We recommend the CAP require the County to change the reduction percentage from 15% to 20% by 2050.

O1-29

Page 3-51. As we stated in our comment for Page 3-40, we recommend the County adopt a goal to achieve 100% renewable energy by 2030.

O1-30

Page 3-52. Increase Renewable Electricity (Measure E-2.1). As stated in the previous comment, we recommend the County adopt a 100% renewable energy goal by 2030. It is not clear why the CAP identifies this as a high cost measure. We note that the DSEIR includes increasing renewable electricity as a reasonable and feasible alternative – albeit with potentially additional environmental impacts. Options like Community Choice Energy (CCE) could provide opportunities for reducing or at least moderating energy costs compared to existing costs.

O1-31

Page 3-56. Install Solar Photovoltaics in Residences (Measure E-2.3). We support the CAPs emphasis on increasing solar photovoltaics (PV); however, past rates of PV installation are no assurance that future installation will continue at that rate. Currently, federal tax credits provide a significant incentive for private residence PV installations – and the County has no control over the continuance of those credits. This presents a potentially serious flaw in the measure, and the County must address how any substantial deviation from the anticipated rate

O1-32

O1-27 The comment supports GHG Reduction Measure E-1.1 to phase-in ZNE with an additional 10% efficiency standard. The County acknowledges this comment. No further response is required.

O1-28 The commenter agrees that any remodel/renovation must complete an energy audit as proposed in GHG Reduction Measure E-1.3 (Improve Building Energy Efficiency in Existing Developments). The comment states that the audit should also include specific recommendations for reducing energy use and, based on the audit, the remodel/renovation should be required to include a minimum 10% reduction in energy use unless the current use is within 20% of net zero energy (and the remodel would keep it within 20%). The County acknowledges this comment. The general goal of energy audits is to identify the strengths and weaknesses related to energy efficiency standards in existing buildings. As stated on page 3-46 of the CAP, implementation of the recommended improvements identified by the audit will not be required as a condition of building permit issuance; however, the audits can encourage property owners to make the energy efficiency upgrades stated in the audits. These audits will provide an energy efficacy roadmap based on specific energy upgrade recommendations. Most audits evaluate energy efficiency, along with associated costs, to prioritize tailored recommendations for a building. During the code amendment process, the threshold for size of remodels/renovations subject to the audit requirement will be identified, and potential audit options will be reviewed, such as the Whole House Energy Ratings (HERS) audit developed through the State of California, and other local utility energy audit programs. The County will consider the commenter’s recommendations, including prioritizing by cost-effectiveness, when PDS amends Title 9 of the San Diego County Code of Regulatory Ordinances (County Construction Codes). Please refer to Master Response 9 related to the selection of measures in the CAP.

O1-29 The comment recommends that the County update GHG Reduction Measure E-1.4 to reduce energy use intensity at

	<p>County facilities by 20% instead of 15% by 2030. The comment specifies the goal for 2050 but it is assumed that it meant to refer to 2030 based on how the measure is defined. In response to this comment and to demonstrate leadership to reduce GHG emissions in the county, GHG Reduction Measure E-1.4 has been updated to require a 20% reduction. The Final CAP has been revised to reflect this change.</p> <p>O1-30 The County acknowledges this comment. Please refer to response O1-25.</p> <p>O1-31 The comment states that the County should adopt a 100% renewable energy goal by 2030 and that it's not clear why the CAP identifies this as a high cost measure. The County acknowledges this comment. The County evaluated the 100% Renewable Energy Alternative as part of its alternatives analysis on pages 4-19 through 4-23 of the Draft SEIR. Ultimately, adoption of a 100% renewable energy target and a Community Choice Energy program is a decision for the Board of Supervisors. This comment does not raise an issue related to the adequacy of the Draft SEIR. Therefore, this comment is noted and will be included as part of the Final EIR and made available to decision makers prior to a final decision on the project. Please refer to response O10-12 and O10-14.</p> <p>O1-32 The comment supports the CAP's emphasis on increasing solar photovoltaics; however, the commenter questions whether solar installations would continue at historic rates if federal tax credits were not available. The comment expresses concern regarding the use of historical rates of PV installation to predict future rates of PV installation. The comment does not raise an environmental issue related to the adequacy of the Draft SEIR. The historical PV installation rate in the unincorporated area was driven not only by incentives, but by the County's effort to streamline the process through the Renewable Energy Ordinance which allows homeowners to install up to 500 square feet of PV without a building permit. In addition, awareness about the cost effectiveness of solar systems has risen, along with incentive programs offered by the State. The County agrees that it cannot control the availability of incentives and tax credits; however, based upon</p>
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recent adoption of SB 350 which further illustrates the State's commitment to increasing energy efficiency, incentive programs may continue. Additionally, CARB's The 2030 Scoping Plan Update indicates that to achieve the State's 2030 GHG emissions reduction targets, continued investment in renewables, including solar roofs, wind, and other distributed generation will be required. Therefore, it is reasonable to assume that installation of PV systems will continue given that it is a key component of the State's strategy to meet GHG reduction goals.

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of PV installations would be remedied: such as, developing a County-controlled reserve fund to compensate for at least a portion of reduced federal tax credits.

O1-32
cont.

Page 3-58. Increase the Use of Renewable Energy in County Operations (Measure E-2.4). It isn't clear why the County is requiring only 10% renewable electricity by 2020 and 20% renewable electricity by 2030 for County operations – when the overall County target for renewable electricity (Measure E-2.1) specifies 90% by 2030. The County must require higher use of renewable energy for its operations that is in-line with the overall County target (90% by 2030).

O1-33

Page 3-62. Increase Solid Waste Diversion in the Unincorporated County by 75% by 2025 or 2030 (Measure SW-1.1). This measure identifies two dates (2025 and 2030) by which the County expects to reducing waste diversion by 75% - please clarify which is correct. As the CAP notes, emissions from solid waste and existing landfills are a significant component (11%) of the total GHG emissions. It isn't clear why the CAP proposes no additional emission reductions by 2020 and why the County cannot begin to increase its waste diversion activities before 2020. We recommend that the CAP adopt a more aggressive but feasible target of 90% diversion by 2030, which is similar to the City of San Diego CAP target of 90% by 2035.

O1-34

Pages 3-64 and 65. Water is and will continue to be a limited resource in San Diego and throughout California. We concur that reducing water consumption has multiple benefits beyond GHG emission reductions, and the co-benefits from reducing consumption may be as valuable as the emission reductions from a general quality of life perspective.

O1-35

Page 3-66. Increase Water Efficiency in New Residential Development (Measure W-1.1). We support the CAP approach to accelerate the implementation of CalGreen Tier 1 requirements.

O1-36

Page 3-68. Reduce Outdoor Water Use (Measure W-1.2). Support the CAP approach, which would require conformance with the state target of 40% reduction, regardless whether the state makes that a requirement or not.

O1-37

Pages 3-82 to 90. Increase Carbon Sequestration (Measures A-2.1 tree planting requirement for new residences and A-2.2 for community tree planting). We support the CAP's approach that includes carbon sequestration. The County should work with nurseries, native plant societies and forest advisory boards/groups to identify species that are effective and appropriate for carbon sequestration and for the unincorporated lands. In particular, tree

O1-38

O1-33 The comment questions why the County is requiring only 10% renewable electricity by 2020 and 20% renewable electricity by 2030 for County operations under GHG Reduction Measure E-2.4, when the overall target for renewable electricity for the community is 90% (GHG Reduction Measure E-2.1). GHG Reduction Measures E-2.1 and E-2.4 are addressing two different aspects of renewable energy. GHG Reduction Measure E-2.1 refers to the mix of fuels used to generate electricity on the grid side of the electricity supply. Providing 90% renewable energy to electricity customers means that the electrons that flow across customer meters are from 90% renewable sources. GHG Reduction Measure E-2.4 refers to increasing the County's generation of renewable electricity on County sites from 2.8% in 2017 to 20% by 2030. This measure is addressed by installing renewable energy systems such as PVs on existing County properties. Onsite generation of renewable electricity is only one facet of the County's energy portfolio; the balance of the County's energy will continue to be supplied through the grid. GHG Reduction Measure E-2.4 will not impact the balance of renewable energy on the grid. The measure summary for GHG Reduction Measure E-2.4 on page 3-58 of the CAP has been revised to clarify that the measure relates to onsite generation, rather than total renewable portfolio.

O1-34 The comment states that the County has two different dates by which the 75% waste diversion goal (2025 and 2030) would be reached. The comment also queries why the County does not expect to see emissions reductions from this effort before 2020. As described on Page 3-61 of the CAP, the Board approved "Option 3" of the Strategic Plan to Reduce Waste which establishes a 75% diversion target to be achieved by 2025 for the unincorporated area. To maintain consistency with the CAP reduction measurement calculations, these reductions from waste diversion are expected to be maintained from 2025 to 2030. As this initiative was approved by the Board in April 2017, emissions reductions are not assigned for 2020 to allow time for program establishment and startup. The

	<p>County meets its 2020 reduction target through GHG reduction measures as currently proposed in the CAP.</p> <p>The comment also recommends that the CAP adopt a 90% diversion target for 2030. The Draft SEIR analyzes 80% solid waste diversion as a feasible alternative to reduce GHG impacts from the CAP. This diversion rate was selected based on input from Department of Public Works on what could feasibly be attained within the framework and timeline of the CAP. While additional reductions may be achieved, the county has provided a good-faith and reasonable effort at identifying feasible measures. The County is not required to evaluate every iteration of a potential measure or alternative. The County has put forth a reasonable selection of measures and a reasonable range of alternatives for evaluation. The comment offers no evidence to dispute this. Please refer to Master Response 9 on selection of measures in the CAP.</p> <p>O1-35 The comment concurs that reducing water consumption has multiple benefits beyond GHG emissions reductions. The County acknowledges this comment. No further response is required.</p> <p>O1-36 The comment supports GHG Reduction Measure W-1.1 to accelerate implementation of CALGreen Tier 1 requirements. The County acknowledges this comment. No further response is required.</p> <p>O1-37 The commenter supports GHG Reduction Measure W-1.2 to require 40% reduction in water use and the requirement to include this measure regardless of whether the state makes that a requirement or not. The County acknowledges this comment. No further response is required.</p> <p>O1-38 The comment supports the CAP's approach to increase carbon sequestration through tree plantings. The comment suggests that the County work with nurseries, native plant societies, and forest advisory boards/groups to identify appropriate species for carbon sequestration. The comment also suggests that invasive species or species that require substantial water should not be allowed. The County acknowledges this comment. The County's <i>Water Efficient Landscape Design</i></p>
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Manual includes a list of undesirable plants and invasive species that would not be allowed under GHG Reduction Measures A-2.1 and A-2.2. The manual also provides a list of low water use plants that can be used to guide tree plantings in the county.

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species that are potentially invasive into surrounding natural areas or require substantial water should not be approved.

O1-38
cont.

Chapter 4 Climate Change Vulnerability, Resiliency and Adaptation

Pages 4-1 to 4-7. The CAP uses generally accepted/state of CA developed approaches and methods to assess the County’s vulnerabilities to climate changes that are anticipated to result from GHG emissions. Given the range of potential climate change effects on temperatures, precipitation, flooding, wildfires, sea level rise, diseases, etc. the vulnerability assessments –and threats – are presented in fairly general terms. We agree that it is neither necessary nor reasonable to provide specific predictions of future conditions, and conditions may fluctuate or alter their expected trajectory despite what the projections may indicate. However, the preponderance of evidence from recent/current global emissions monitoring suggests that the “low emission” scenario and its projected climate change effects are less likely to occur; and mid-range or high-range scenarios may be more likely the future condition. So, we recommend that the CAP focus its responses to potential vulnerabilities and threats posed by mid and high-emission scenarios.

O1-39

Page 4-9. Prepare for Increases in Temperatures and Extreme Heat. In addition to the list of potential actions, the CAP should include requiring its emergency management services to coordinate with other local governments to alert residents when extreme heat days are expected; identify buildings/facilities in the County where people can go if their living conditions do not provide effective relief from extreme heat.

O1-40

Pages 4-9 and 10. Prepare for Changes in Precipitation Patterns and Water Availability. The proposed adaptation strategies should be aligned with (tiered according to) water supply levels/projections. The SDCWA and local governments (and, presumably the County) have water supply management and drought response plans – how are the proposed adaptation strategies related to/embedded in those documents? The CAP should incorporate drought response strategies and actions similar to what Australia did during its Millennium Drought: <http://theconversation.com/what-california-can-learn-from-australias-15-year-millennium-drought-55300>

O1-41

O1-39 The comment acknowledges that the County uses generally accepted, State-developed approaches and methods to assess vulnerabilities to climate change. The comment suggests that a “preponderance of evidence from recent/current global emissions monitoring” suggests that the Low-Emissions Scenario and its projected climate change effects are less likely to occur. However, the comment does not offer this suggested evidence or cite data/studies to support this assertion. Chapter 4 of the CAP provides an analysis of various climate change effects (e.g., increased temperatures, increase frequency of heat waves, changes to precipitation, increased wildfire risk, increased likelihood of flooding, and sea-level rise) under a range of forecast scenarios, from the low- to high-emissions scenarios. Although a mid-emissions scenario is not explicitly discussed, the effects associated with that scenario would be assumed to occur between the low- and high-emissions scenarios discussed in Chapter 4. The inclusion of climate change effects in Chapter 4 associated with a high-emissions scenario is more conservative than the requested mid-emissions scenario.

O1-40 The commenter suggests that the CAP include a requirement for emergency management services to coordinate with local governments to alert residents when extreme heat days are expected. As stated on Page 4-6 of the CAP, the County currently has a Comprehensive Excessive Heat Response Plan for emergent heat waves. The Multi-Jurisdictional Hazard Mitigation Plan, which includes participation from incorporated cities and the County along with certain special districts and stakeholders, recognizes extreme heat as a hazard for the county and includes establishment of Cool Zones for use during periods of extreme heat and integration of public awareness about extreme heat into outreach campaigns.

O1-41 The comment suggests that the adaptation strategies for changes in precipitation patterns and water availability should be aligned with water supply projections. The San Diego County Water Authority (SDCWA) has created the Water Shortage and Drought Response Plan that outlines actions necessary to respond to drought conditions. Please refer to the

section on “Efforts Related to Changes in Precipitation Patterns and Water Supply” on Page 4-6 for details on current actions to address water supply. The commenter suggests incorporating drought response strategies from Australia into the CAP. Chapter 4 of the CAP was developed using guidance from the State of California that is relevant to local conditions. The County analyzed strategies to prepare for changes in precipitation patterns and water supply and identified the most feasible and effective potential actions to address local water supply issues.

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Pages 4-10 and 11. Prepare for Increased Wildfire Risk. Wildfires present a more predictable risk than temperature/extreme heat and drought. The list of adaptation measures is useful, but “adaptation” should be more closely allied with reducing the exposure of residences to wildfire. Reducing the number and widespread distribution of homes in the unincorporated area should be a primary “adaptation” measure, as that also corresponds to development that is more energy efficient/serviceable by alternative transportation options.

O1-42

Pages 4-11 and 12. Prepare for Increased Flooding. The adaptation strategies should include completing and implementing its watershed management plans and coordinating with regional partners.

O1-43

Page 4-12. Prepare for Sea Level Rise. The County has only a few acres of jurisdictional lands subject to sea level rise, so No comments????

O1-44

Chapter 5 Implementation and Monitoring

Page 5-3, Para. 2. We agree with assigning the responsibility for overseeing the CAP implementation and its updates among its various identified departments/entities, with a central entity responsible for overall coordination.

O1-45

Page 5-5, Para. 2. We agree the statement/commitment that the “CAP is a dynamic document that will be continuously assessed and monitored...and to make timely adjustments to existing measures; replace ineffective or obsolete actions; or add new measures as technology, federal and State programs, and circumstances change.”

O1-46

Page 5-6. The County is committing to annual reporting, biannual GHG emission updates, and CAP updates every 5 years. However, the CAP also proposes: “If a particular measure is not adopted by the Board, the County will adjust the amount of reductions needed from Measure T-4.1 related to direct investments in local carbon offset projects or consider additional reduction measures to achieve an equivalent amount of reductions specified for the proposed Code or Ordinances update.” This statement appears to commit the County to amend its CAP prior to the 5-year update if it is to keep to the GHG emission reduction trajectory/commitments. However, there is no assurance that the County can rely on “direct investments in local carbon offset projects or additional reduction measures” to achieve the comparable reductions.

O1-47

O1-42 The comment states that as wildfires are more predictable than other vulnerabilities, the adaptation measures should be more closely aligned with reducing the exposure of residences to wildfires. The comment suggests that reducing the number and distribution of homes in the unincorporated area should be an adaptation measure. The CAP is based on projected growth in the County under the 2011 GPU and includes GHG reduction measures to reduce development potential in the more remote areas of the County (see GHG Reduction Measures T-1.1 and T-1.2). Response to wildfire risks, and consideration of suggestions provided, would be managed in a comprehensive manner through the County’s portion of the MHMP and preparation of the Safety Element of the General Plan as required by SB 379.

O1-43 The comment suggests the adaptation strategies for increased flooding should include completing and implementing watershed management plans and coordinating with regional partners. The County has a Watershed Protection Ordinance that serves to protect water resources and to improve water quality by controlling the stormwater conveyance system and receiving waters, to implement and incentivize the use of best management practices to reduce adverse effects of pollutant stormwater discharge, and to comply with applicable State and federal laws (San Diego County Code Title 6, Division 7, Chapter 8, Section 67.801 et seq.). Adaptation strategies for increasing flooding would be managed in a comprehensive manner through the County’s portion of the MHMP and preparation of the Safety Element of the General Plan as required by SB 379.

O1-44 The comment acknowledges that the County has limited jurisdictional lands subject to sea-level rise. No specific comments are provided and, therefore, no response is required or necessary. However please refer to pages 4-7 and 4-12 of the CAP for additional information detailing the County’s efforts related to sea-level rise.

O1-45 The comment agrees with assigning responsibility for overseeing CAP implementation and updates to various departments with a central entity responsible for overall

	<p>coordination. The County acknowledges this comment. No further response is required.</p> <p>O1-46 The comment agrees that the CAP is a dynamic document that would be continuously assessed and monitored. The County appreciates this comment. No further response is required. Also, please refer to response O1-10 above.</p> <p>O1-47 The comment acknowledges that the County is committing to annual reporting, biannual GHG inventory updates, and five-year CAP updates. The comment questions whether the CAP may need to be updated prior to the five-year timeline if a measure is not adopted by the Board. The County would update the CAP ahead of the five-year cycle in that scenario by adjusting the local direct investments in GHG Reduction Measure T-4.1 or considering additional measures to achieve an equivalent amount of reductions.</p> <p>The comment also questions if there is an assurance that the CAP can rely on the level of direct investments identified in the CAP. Please refer to Master Response 3 related to direct investments. The comment also suggests that the County augment the direct investment program to achieve additional local reductions. The County has made updates to certain GHG reduction measures that may lead to lower reliance on the direct investments program. However, as stated in GHG Reduction Measure T-4.1 and in the SEIR the County can achieve the full 190,262 MTCO₂e as required by 2030. GHG Reduction Measure T-4.1 requires the County to establish a local direct investment program by 2020.</p>
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The CAP already is proposing to rely on a substantial contribution to its GHG emission reductions from “direct investments (Measure T-4.1),” which is a novel approach - without a track record – in San Diego County, as we have noted in a previous comment (Page 3-37). We recommend that the County CAP identify other mechanisms to augment/complement “direct investments in local carbon offset projects or additional reduction measures” to achieve the comparable reductions. For example, it should identify which of the other currently identified GHG emission reduction measures may have flexibility to be implemented sooner and/or with more intensity such that their contributions to reducing GHGs are enhanced.

O1-47
cont.

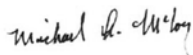
Pages 5-7 and 8. We agree that the CAP could be used for the purpose of streamlining future individual projects if their GHG emissions are consistent with/ lower than what was identified/expected in the CAP. Consistency with the CAP will be determined through the CAP Consistency Review Checklist (Checklist). However, this raises a serious question: if the CAP is not meeting its overall commitments, can the CAP serve as a means to streamline future project approvals, even if those projects align with the anticipated level of GHG emissions from its emission sector? It appears that the projects’ emissions would then have to be determined to be “significant” as they would contribute to a plan that has been found to already cause a cumulatively considerable impact on GHG emissions. This issue must be more fully explained and resolved before it can be used as described in the DSEIR.

O1-48

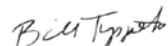
In summary, SWIA agrees with many aspects of the draft CAP, but there are a number of significant issues that we believe must be clarified and revised, consistent with our recommendations. Bill Tippetts (billtippetts@gmail.com) is our contact for the CAP and DSEIR if you wish to discuss our letter.

O1-49

Sincerely,



Michael A. McCoy, President SWIA



Bill Tippetts, Board Member

O1-48 The comment agrees with the CEQA streamlining provisions of the CAP and the use of the CAP Consistency Review Checklist. The comment questions the validity of the CAP to serve as a plan for CEQA streamlining if it does not meet its overall reduction commitments. The comment contends that the individual project’s GHG emissions would need to be determined as having a significant impact because the CAP has a cumulatively considerable impact on GHG emissions. The County does not agree with these contentions. The CAP qualifies as qualified GHG reduction program pursuant to Section 15183.5 of the CEQA Guidelines. Please see Master Response 10 related to the use of a Program EIR, streamlining under CEQA, and CAP.

O1-49 The comment contains concluding remarks. Therefore, no further response is required or necessary.