



SWIA

700 Seacoast Drive, Suite 108  
Imperial Beach, CA 91932

September 13, 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  
(Comments on the Draft Supplemental Environmental Impact Report)

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 Supplemental Environmental Impact Report (DSEIR) for its Climate Action Plan (CAP). We will separately submit comments on the associated Draft 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  
02

O2-1

**Response to Comment Letter O2**

**Southwest Wetlands Interpretive Association**  
**Michael A. McCoy, President**  
**Bill Tippets, Board Member**  
**September 13, 2017**

**O2-1** The comment provides introductory language about the organization and their interest in the project. The comment also generally expresses support for the establishment of GHG reduction targets for 2020, 2030, and the State's goal for 2050. As this comment does not address the adequacy of the environmental analysis within the Draft SEIR, no further response is warranted. The comment will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the project.

County of San Diego

September 13, 2017

Page 2

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

O2-1  
cont.

Our primary concerns with the DSEIR (and draft CAP) focus on the proposed use of the 2014 GHG emissions as the GHG baseline for all GHG emission reduction targets/goals (vs. the "1990 baseline" to be achieved by 2020); the consequences for calculating the 2030 GHG reduction target and the 2050 GHG reduction goal (which establish threshold of significance for GHG emissions); the need to increase GHG emission reductions from proposed measures if higher GHG reduction targets/goal are justified based on our recommended "baseline"; inadequately low percentage of GHG reductions from the transportation sector measures and 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 CEQA "project streamlining" should be determined – particularly with regard to how well the CAP is functioning. Our specific comments address these and other issues.

O2-2

Chapter 1. Project Description, Location and Environmental Setting. No Comments.

Pages 1-9 and 10. We have commented (email letter dated September 12, 2017) on the County's proposed GHG emission reduction targets (2020 and 2030) and goal (2050), and recommended that the County use the 2020 target (3,147,275 MTCO2e) – not the 2014 emissions (3,211,505 MTCO2e) – as the baseline for 2030 and 2050 reductions. The County's CAP states that the 2020 value is comparable to the "1990 baseline" that the state's GHG emission reduction legislation and executive orders specify should be used for calculating future reductions. Because the proposed 2020 GHG emission reductions are essentially the 1990 baseline, the County's own CAP has provided the evidence supporting using the proposed 2020 target (3,147,275 MTCO2e) as the baseline for 2030 target (40% below the 1990 baseline) and 2050 goal (80% below the 1990 baseline) reductions. This would result in a change of the thresholds of significance for GHG emissions to 1,888,365 MTCO2e (2030) and 629,455 MTCO2e (2050).

O2-3

Page 1-11, Para. 3 and 4. We have commented in our CAP letter that the some of the proposed CAP's GHG emission reduction mitigation measures should/could be modified to increase the

**O2-2** The comment introduces and summarizes the commenter's concerns related to the Draft SEIR including the following: use of 2014 emissions as the baseline and the consequences for the 2030 target and 2050 goal; recommendation of a revised baseline; the percentage of reductions from transportation-related measures and consistency with SB 375 targets; availability of sufficient direct investment opportunities in San Diego County; and CEQA streamlining. This is an introductory paragraph that summarizes the specific comments made in the body of the letter, which are responded to below. Please refer to response to comments O2-3 through O2-22.

**O2-3** The comment summarizes the comments made in a separate letter dated September 12, 2017 which suggest that the CAP use the 2020 target as the baseline for 2030 and 2050 reductions. The comment also refers to comments that suggest some GHG reduction measures should be increased. Please refer to comment letter O1 for a complete response to these comments.

County of San Diego

September 13, 2017

Page 3

reductions by 2030 and 2050. The SEIR should be revised to reflect any changes that are made to the CAP's mitigation measures as a result of our recommendations and public review/input.

O2-3  
cont.

Pages 1-15 through 17. We concur that the proposed changes to GPU Goal COS 20-1, Policy 20-1.1, and GPU PEIR MM CC 1.2, 1.7 and 1.8 are necessary and appropriate to establish compliance with state GHG emission reduction regulations and policies. However, as commented above, we believe the Threshold for Significance should be based on using the proposed 2020 GHG emissions as the ("1990") baseline for 2030 and 2050.

O2-4

Pages 1-17 and 18. We have commented on the proposed CAP's need to establish that it is "rough step" with its expected GHG reductions; that conformance must be confirmed annually. If the CAP's mitigation measures are not producing the expected GHG reductions (i.e., in rough step – that is within 10% of its commitments for GHG reductions), then we do not agree that all projects, if found by the County to be consistent with the CAP Checklist, would necessarily be considered in compliance with the commitments in the CAP and able to use the SEIR for project "streamlining." If the CAP is not producing the expected GHG reductions, while the County is making findings that individual projects are "complying" with the Checklist, then the CAP is not working – and the projects should not be streamlined by the County.

O2-5

Chapter 2. Significant Environmental Effects of the Project

Page 2.2-1 et seq. We concur with the conclusion that potentially significant impacts to agricultural lands (including Williamson Act lands) and forest lands may occur from large-scale renewable energy facilities' development and could be significant and unavoidable, even after applying Mitigation Measures M-AGR-1 and 2. However, significant impacts could also result from at least some of the possible "direct investment" projects. We recommend that lands under Williamson Act contracts not be developed for large-scale renewable energy facilities and "direct investments" unless and until the contract expires. For forest lands, we recommend that all lands within the Forest Conservation Initiative (FCI) not be developed as large-scale renewable energy facility sites or "direct investments" unless impacts can be avoided and reduced to below a level of significance.

O2-6

Page 2.3-15 et seq. Air Quality. Potentially significant impacts are identified to state and federal Air Quality (AQ) standards, but not to Regional AQ standards; potentially significant

O2-7

**O2-4** The comment expresses support for the proposed updates to GPU Goal COS 20-1, Policy 20-1.1, and GPU PEIR MM CC 1.2, 1.7, and 1.8. The County appreciates the support. The comment also reiterates the recommendation for revising the project's baseline emissions referenced in above comment O2-3 and fully described in letter O1. Please refer to comment letter O1 and the response to comment O2-3.

**O2-5** This comment generally expresses concern regarding the ability of the County to provide streamlining benefits to projects that are consistent with the CAP under CEQA Guidelines Section 15183.5 if the CAP is not producing the desired GHG emission reductions. The comment also suggests that if the CAP is not in "rough step" with its expected GHG reductions, i.e. that the reductions achieved are within 10% of the expected reductions, confirmed annually, then even projects that are consistent with the CAP Checklist should not be guaranteed the streamlining benefit.

The County disagrees with the commenter's assertion for several reasons. Please also refer to response to comment O11-3 and Master Response 10 regarding the use of a Program EIR and streamlining. The CAP is a comprehensive plan to achieve county-wide GHG emissions reductions for the existing land use map that was approved with adoption of the 2011 GPU. The CAP contains 11 strategies, 30 GHG reduction measures, and numerous supporting efforts that are organized under five GHG emissions categories including built environment and transportation, energy, solid waste, water and wastewater, and agriculture and conservation. As described on page 5-2 of the CAP, each of the components of the CAP is intended to functionally decrease GHG emissions; however, not all the components are directly related to development projects and many will be implemented at a much larger scale. The CAP will be implemented through a combination of regulations, programs, incentives, outreach, and educational activities and County efforts complement and build on other federal and State efforts to reduce GHG emissions. In other words, implementation of the CAP and

achievement of the 2030 target and 2050 goal will be a county-wide effort.

In addition, the CAP would be regularly monitored and assessed. The County will conduct annual monitoring beginning in 2019, which is assumed to be one year after adoption. Monitoring reports would include the status of measure implementation and would provide the County with the flexibility to adjust as needed, if measures are underperforming. The County would also prepare a CAP update every 5 years beginning in 2025 which would include updated inventories, adjustments to reduction measures, as necessary, and any changes to land use projections to achieve consistency with zoning and current 2011 GPU land use designations and policies. The regular monitoring and assessment regimen ensures that implementation of the CAP would achieve established GHG emission reductions. Because of the active and adaptive implementation and management of the CAP, the County does not anticipate a situation where the CAP would deviate substantially from the pathway to achieving reduction targets. As such, if monitoring and implementation efforts occur as designed, the CAP would continually serve as a streamlining mechanism for cumulative GHG analyses consistent with CEQA Guidelines 15183.5.

The commenter does not support with any evidence why being within 10% of the commitments and reductions in the CAP is appropriate. As detailed above and throughout this Final EIR, the County does not agree with this approach.

**O2-6**

The comment concurs that potentially significant impacts to agricultural lands, including Williamson Act lands, and forest lands could occur from implementation of large-scale renewable energy facilities. The comment states that significant impacts could also occur from direct investments and recommends that Williamson Act contract lands not be developed for large-scale renewable energy facilities and direct investments until the contract expires. The comment is not specific on how significant impacts to agricultural lands from direct investments could occur; therefore, further response to this issue cannot be provided. As the commenter

notes, the Draft SEIR concludes that impacts related to the potential conversion of agricultural lands would be significant and unavoidable after mitigation, as described on pages 2.2-9 through 2.2-13. As the direct investments are a component of the proposed CAP, the impacts to agriculture and forestry resources were appropriately analyzed within the Draft SEIR (see Draft SEIR Section 2.24.2, specifically pages 2.2-1 to 2.2-17).

It should also be noted that the County does not advocate for the conversion of agricultural lands. The 2011 GPU contains multiple policies that seek to preserve agricultural land uses in the unincorporated area. In addition, GHG Reduction Measure T-1.2 within the CAP would expand the County's existing PACE program, which incentivizes the acquisition of permanent agricultural easements. It is acknowledged that this is an incentive-based program and the County cannot control how individual property owners respond to market demands, and/or utilize their agricultural property because this is beyond the land use authority of the County. Property owners who receive tax benefits under Williamson Act contracts must petition to cancel that agreement, a process which would take 9 years and justification to do so, prior to the development of their property with a non-agricultural use.

The comment also suggests that large-scale renewable energy projects and direct investment projects should not be developed on former Forest Conservation Initiative (FCI) lands unless impacts to forest resources can be reduced to less than significant. This comment does not relate to adequacy of the Draft SEIR prepared for the CAP. The FCI project was included within the cumulative projects list (see Table 1-3) of the Draft SEIR. It was approved by the Board of Supervisors on December 14, 2016. The FCI lands were recently redesignated as part of a Board of Supervisor's directed initiative to bring those lands into consistency with the 2011 GPU. If a direct investment project or large-scale renewable energy project were to occur on former FCI lands, they would be required to obtain a Major Use Permit, demonstrate compliance with the 2011 GPU and current zoning, and would be required to

undergo a project-level CEQA analysis to determine the environmental impacts related to the project (if necessary). Significant impacts to forest lands would be required to be mitigated to the extent feasible. Direct investment projects would be developed as a separate County-administered program which, for some types of projects, would require the County to pre-determine lands where projects could be considered. The program would be analyzed in a program-level discretionary review which would allow for a comprehensive discussion regarding the possible tradeoffs between the benefits of certain types of direct investment projects and the likely environmental impacts. Ultimately, projects would be decided upon by the Board of Supervisors with opportunities for public input.

**O2-7** The comment expresses agreement with the air quality impact conclusions provided in the Draft SEIR. As this comment does not address the adequacy of the environmental analysis within the Draft SEIR, no further response is warranted; however, it will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the project.

County of San Diego

September 13, 2017

Page 4

impacts to Non-attainment areas; to Sensitive Receptors; and to Odors. We concur with the findings that most of the impacts could remain potentially Significant and Unavoidable (and cumulatively substantial), even after mitigation measures are added.

O2-7  
cont.

The DSEIR analysis indicates that some GHG emission reduction measures are anticipated to have greater impacts than others. Large-scale, renewable energy facilities, “direct investments,” and additional solid waste disposal sites are presumed to have larger potential impacts when compared to long-term potential impacts from active transportation, transit and rooftop/small-scale renewable energy projects. For that reason, we recommend that the CAP place greater emphasis (i.e., GHG emission reduction efforts) into the latter categories of potential measures.

O2-8

Page 2.4-1 et seq. We generally concur with the conclusions of the DSEIR regarding potential significant impacts to special status species, riparian/wetland habitats, movement corridors/nursery. Those Significant and Unavoidable (and cumulatively substantial) impacts could remain, even after applying mitigation measures. However, one of the central tenets of NCCP/HCPs is that the conserved lands are connected with viable corridors. The approved MSCP-South has identified corridors that the CAP must not/cannot significantly impact, if the County expects to remain in compliance with its state and federal permits. However, because the MSCP-North plan area, and to a lesser extent the MSCP-East plan area, do not have approved plans (and permits), the possibility remains that wildlife corridors within those plan areas could be significantly impacted. We recommend that the CAP DSEIR include an additional mitigation measure to require that any GHG reduction measure that could significantly impact (i.e., restrict or eliminate) a functional movement corridor must retain sufficient width and natural habitat so as not to eliminate it as a viable corridor for the identified animal and plant species that it would be intended to support.

O2-9

Page 2.4-38 Habitat Conservation Plans and NCCPs. See previous comment.

Page 2.7-4. We have commented on the CAP that, based on recent global GHG emissions monitoring reports, it appears that global GHG emissions are on a trajectory that reflects mid-to- high emissions, not the low-emission scenario. The County’s CAP (and GHG reduction measures) should be planning for and addressing the anticipated climate effects from those higher scenarios.

O2-10

**O2-8**

The comment restates a conclusion of the Draft SEIR which acknowledges that some GHG reduction measures would result in greater physical environmental impacts than others. The comment suggests that the CAP should place greater emphasis on the least impactful measures. All of the measures set forth in the CAP are necessary to achieve the County’s portion of the State reduction targets for 2020 and 2030, as well as the goal for 2050. The Draft SEIR evaluated the potential impacts of all of these measures. With regard to the selection of measures, the County engaged in a process whereby it consulted with various departments to understand the feasibility, timeliness, and likelihood of implementation of a broad range of measures that in combination could meet targets while considering the range of environmental impacts that would be expected as well as other discretionary factors including costs, control, and community support. Ultimately, the measures brought forward were determined to provide a feasible mix of implementation strategies that would meet the targets. This comment is noted and will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the project. However, the comment does not address the adequacy of the Draft SEIR and no further response is required.

**O2-9**

This comment expresses agreement with the conclusions stated within the Draft SEIR regarding the potential for impacts to biological resources as a result of implementation of the CAP. The comment suggests that the Draft SEIR include an additional mitigation measure which would require that any project resulting from the CAP that would restrict or eliminate a functional wildlife movement corridor must provide sufficient width and natural habitat to remain a viable corridor. As the commenter notes, the County has an approved South County MSCP in place, but does not have an approved North County or East County MSCP. As part of the South County MSCP permit conditions, viable wildlife connectivity must be retained as lands are developed within the boundaries of the MSCP. In the cases of projects resulting from the CAP but located outside of the approved South County MSCP boundaries,

there is not an MSCP-related permit that would require the maintenance of wildlife corridor connectivity; however, each project would be required to individually evaluate the potential for significant environmental impacts to wildlife corridors under CEQA as part of the County's discretionary review process. As described on pages 2.4-31 through 2.4-37 of the Draft SEIR, evaluation of wildlife corridors would be required as part of the subsequent project-specific CEQA evaluation and impacts related to wildlife corridors would be required to be mitigated to the fullest extent possible and as feasible per the requirements of CEQA and consistent with CAP Mitigation Measures M-BIO-1 and M-BIO-2. Nonetheless, because of the uncertainty of the types, locations, and scale of projects that could be implemented under the CAP, it is not possible to guarantee that all impacts to wildlife corridors would be reduced to less than significant. Therefore, as described on page 2.4-43 of the Draft SEIR, no other feasible project-related mitigation would be available.

**O2-10** The comment expresses the opinion that the CAP should be utilizing a mid-to-high emission scenario that reflects the global GHG emissions trajectory. The comment also reiterates previous comments regarding the establishment of CAP reduction targets and baseline as stated in comment letter O1 and above in O2-4, as well as prior comments regarding streamlining. See Master Response 4 related to GHG emissions reduction targets and response to comment letter O1-39 for a comprehensive response to this comment. See also response O2-05.



County of San Diego

September 13, 2017

Page 5

2.7-15. We have commented on the CAP – and above in our comments for DSEIR Pages 1-9 and 10 - that the GHG Threshold for Significance should use the proposed 2020 GHG emissions target (i.e., 1990 emissions baseline) as the baseline for establishing the 2030 target and 2050 goal. Also, as noted in our comments on Pages 1-17 and 18, we recommend that project streamlining only be allowed as long as the CAP is in “rough step” with its expected annual GHG emission reductions.

O2-10  
cont.

Page 2.7-21. The last paragraph must include SB 375 as one of the “target setting” regulations against which the CAP’s impacts are evaluated. Information provided in the CAP appears to document that the CAP’s GHG reductions from vehicle miles traveled (VMT) are low and not consistent with the regional SB 375 target (at least for 2030) [see comment for pages 2.7-31 to 36]. That is a significant impact that must be reduced through increased, efficient land use and transportation mitigation measures.

O2-11

Page 2.7-22. We concur with the conclusion that the CAP impacts are potentially Significant and Unavoidable regarding it meeting the 2050 goal because of the uncertainties in the plan’s effects post-2030. This conclusion strongly supports an approach that maximizes implementation of each of the identified CAP GHG reduction measures, particularly those with the least short-term and cumulative impacts. Also, this supports the need for the CAP to accurately monitor its efficacy/conformance with its 2020 and 2030 targets and to adjust the CAP GHG reduction measures as needed to remain on a trajectory that supports meeting the 2050 goal.

O2-12

Pages 2.7-23 to 27. The DSEIR concludes that Direct Investment projects (MM T-4.1) would have less than significant impacts, presumably because their implementation is expected to produce carbon offset credits – not add to the county’s GHG emissions. However, there is no information or evidence provided in the DSEIR regarding the scope and extent of possible “direct investment” projects other than to identify how many MTCO2e “credits” the measure is proposed to create. The County of San Diego has little to no experience with the types of projects that may be implemented, and there is no track record within San Diego County regarding how efficient those projects would be in our region. Also, some of those projects may not ultimately end-up creating carbon offset credits; so, the presumption that requiring the credits to be “retired” before they can be used does not preclude projects being developed that ultimately emit more GHGs than they offset. For these reasons, we believe that the

O2-13

**O2-11** The comment expresses concern regarding the CAP’s consistency with regional targets established by SB 375 and suggests that additional mitigation is required. The County disagrees that the CAP GHG reductions from VMT are not consistent with the regional SB 375 target. Please refer to Master Response 2 related to the CAP and SB 375 consistency.

**O2-12** The comment expresses agreement with the conclusion of the Draft SEIR that states that GHG-related impacts would be significant and unavoidable related to uncertainty of the plan’s post-2030 reductions. This comment argues that this uncertainty provides further evidence in support of emphasizing measures that would result in the fewest environmental impacts. Please see Response to Comment O2-8. The comment does not address the adequacy of the Draft SEIR. The comment will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the project. No further response is required.

**O2-13** This comment expresses the opinion that the Draft SEIR does not provide adequate evidence to support a less-than-significant conclusion for GHG emissions for GHG Reduction Measure T-4.1, Establish a Local Direct Investment Program. Please refer to Master Response 3 regarding direct investments. The comment offers no evidence to support its assertion. While the specific direct investments that would ultimately be implemented is not known, the Draft SEIR did include a range of established protocols that may be considered as part of the program development and evaluated those potential impacts throughout the Draft SEIR. Some of the sample protocols that were described included biomass conversion, boiler efficiency retrofits, wetland creation, forest restoration, and compost additions to rangeland. The measure is described on CAP pages 3-38 and 3-39 set forth the requirement to establish a local direct investment program by 2020. This program would identify the direct investments most suited to the unincorporated County. Please refer to Response to Comment O14-13 regarding how CARB-approved carbon offset registries used for tracking of County local direct

investment projects ensure the environmental integrity of the emissions reductions. The County has already started the local direct investment program analysis to assess the possible costs and opportunities for reductions associated with the program and has attached the corresponding report as an attachment to the Planning Commission Hearing Report titled the Preliminary Assessment of the County of San Diego Local Direct Investment Program. Finally, the County appropriately disclosed the general nature of the program, the mechanics of the administrative process, and the intent of the program such that the public would be informed about the process that would be undertaken (see Draft SEIR pages 2.7-23 through 2.7-27 and SEIR Appendix B). By 2020, the County is required to design a program that would be tailored to the unincorporated County and administered by County staff to achieve the desired GHG reductions. Overall, the purpose of local direct investment projects would be to result in a net reduction of GHG emissions considering the construction and operational emissions of each protocol evaluated for the associated direct investment.

County of San Diego

September 13, 2017

Page 6

appropriate conclusion is that “direct investment” projects may have Potentially Significant impacts. And, because the CAP does not propose a process to screen for/prioritize direct investment projects that are most appropriate to implementing within the county, nor are the scope/extent/locations of such projects known, these direct investments may have Significant and Unavoidable (and even cumulatively substantial) impacts.

O2-13  
cont.

Page 2.7-31. We concur with the DSEIR conclusion that the GHG measures, combined with reasonably foreseeable GPA projects, are potentially cumulatively considerable.

O2-14

Pages 2.7-31 to 36. This section does not address how the CAP’s transportation sector measures (and associated sustainable community strategies...i.e., SB 375-based actions) conflict with or impact the regional SB 375 target and implementation – of which the County is a participant through its membership in SANDAG. Neither the CAP nor the DSEIR provide sufficient evidence that conformance with SB 375 is part of the CAP. If the transportation sector VMT-based GHG emission reduction measures are not conforming to the region’s adopted SB 375 (2015) RTP/SCS, that would constitute a significant impact.

O2-15

Pages 2.7-36 to 39. The proposed approach to mitigate CAP project impacts, in particular GPAs that exceed the 2011 GPA emissions, would allow possibly significant “offsite mitigation” in the form of obtaining carbon credits from any legally/governmentally-approved sources. Two options (no net increase and zero energy) are proposed: the first option seeks to ensure consistency with the CAP via Checklist compliance for reducing all “allowed” emissions (per the existing General Plan), but this would allow use of offsite carbon credits; the second option seeks to reduce additional (GPA) emissions through prioritizing onsite measures and obtaining offsite (including purchasing carbon credits/offsets) that cannot be achieved onsite.

O2-16

We encourage innovative and effective new approaches to reduce GHG emissions and concur that some level of carbon offsets (i.e., carbon credits) could be part of the CAP mitigation strategy. However, we have previously commented on the CAP that before a project can use direct investments - or carbon offsets - to reduce its GHG impacts, the County must confirm that, overall, the CAP is in “rough step” with meeting its expected GHG reductions. We have proposed that “rough step” mean that the CAP must be within 10% of its annual GHG reductions (before out-of-County credits are used) before a project can use Checklist compliance streamlining and/or use direct investment mitigation or carbon offsets. If the

**O2-14** This comment expresses agreement with the cumulatively considerable GHG conclusion as stated in the Draft SEIR. The comment does not address the adequacy of the Draft SEIR. The comment will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the project. No further response is required.

**O2-15** This comment expresses concern that the Draft SEIR does not adequately substantiate consistency with the SB 375 targets. This comment asserts that if there were an inconsistency between SB 375 targets and VMT-based GHG emission reduction measures, there would be a significant impact. Please refer to Master Response 2 related to the CAP and SB 375 consistency and Response to Comment O2-11.

**O2-16** This comment asserts that the CAP and the CAP Checklist provide for the use of off-site carbon credits to mitigate General Plan Amendment (GPA) project impacts. The commenter states that before a project can use direct investments – or carbon offsets – to reduce impacts, the County must confirm it is in “rough step” with meeting its reduction targets. Here, the commenter assumes the direct investments under GHG Reduction Measure T-4.1 would be used to reduce cumulative impacts of GPAs, as though they were the same as purchasing carbon offsets from a CARB-approved registry. This is not correct. Please see Master Response 3 on direct investments. The County is proposing direct investments as a County-led initiative to invest in local projects to reduce GHG emissions. Development projects (such as GPAs) have no involvement in direct investments; however, these projects may be able to provide off-site mitigation (e.g., EV charging stations near the project) or purchase carbon offset credits as off-site mitigation only after all feasible on-site mitigation measures have been implemented or determined to be infeasible.

The purpose of the County’s CAP is to provide a plan for the reduction of GHG emissions in the unincorporated areas and from County operations consistent with state targets. Upon adoption, the County’s CAP would provide CEQA streamlining benefits to projects that were considered in the 2014 baseline emissions inventory (used to establish CAP targets) and are

consistent with the 2011 General Plan land use (also used to establish CAP targets). As detailed in Section 1.2.4 of the Draft SEIR, if a project is not consistent with the 2011 GPU and would require a GPA, then the project would not qualify for the CEQA streamlining provision and would be required to prepare a project-specific GHG emissions analysis. Because the 2014 baseline emissions inventory does not and could not include a complete inventory of GHG emissions that may be created because of unknown projects that do not comply with the existing 2011 GPU land use, these projects would be required to provide additional GHG emissions analysis at the time of discretionary review as described in the CAP Checklist.

Additionally, projects that do not comply with the underlying assumptions of the CAP would be required to mitigate any additional GHG emissions that would result above and beyond what was considered within the CAP for that specific land use and property as designated by the 2011 GPU. The County recognizes that projects that do not comply with the 2011 GPU land use designation should include as much on-site mitigation as is feasible, per CEQA and relevant guidance (See Response to Comment O14-12 and O14-13 and SEIR Section 2.7.5). Only upon exhaustion of on-site feasible mitigation can an applicant consider off-site mitigation options. Please refer to Master Response 12 related to mitigation hierarchy and the use of carbon offsets for further detail. It should be noted that the CAP is not intended to provide streamlining benefits for projects that do not comply with the 2011 GPU land use designation and thus the assumptions used within the CAP.

This comment also reiterates a previously addressed comment (refer to response to comment O2-5 for response) that suggests that the CEQA streamlining provision under 15183.5 can only be utilized if the CAP is performing as expected (or in the opinion of the commenter “in rough step; not more than 10% less than targets”). The County does not agree that this approach is appropriate. See also response to comment O11-3 and Master Response 10.

County of San Diego

September 13, 2017

Page 7

CAP's identified mitigation measures (again, before out-of-County credits are used) are not achieving the expected GHG reductions (i.e., not attaining 90% of the reductions), then the CAP is not working as approved and certified by the County. That should trigger the modification of the measures, addition of new measures, and other actions to bring the CAP into conformance with its commitments (excluding unproven "direct investment" and offsite carbon credits).

O2-16  
cont.

Land Use and Planning. We do not agree that Land Use and Planning, which includes GPAs, has no significant impacts. As commented above regarding transportation sector measures, the CAP does not appear to conform to the adopted regional RTP/SCS VMT-based (SB 375) GHG emission reductions target (i.e., 21% by 2035). The CAP only indicates an overall transportation sector GHG reduction of 13% by 2030. The CAP's measures may be able to require buildings within the GPAs to reduce their building energy emissions to "net zero," but the CAP provides no substantial evidence that it can/would reduce their VMT-based emissions to align with the regional target. This is a significant impact.

O2-17

Chapter 4. Project Alternatives

The alternatives evaluated in this chapter include the following:

- No Project Alternative: The No Project Alternative assumes the CAP, GPA, GHG Thresholds, and Guidelines would not be adopted and implemented. As a result, the County would not adopt strategies, measures, and supporting efforts to reduce GHG emissions in accordance with state-mandated reduction targets.

O2-18

We concur with the DSEIR's conclusion that this alternative would not achieve the objectives of the CAP; it is not a reasonable and feasible alternative.

- Enhanced Direct Investment Program Alternative: This alternative would implement the CAP without the renewable energy program (GHG Reduction Measure E-2.1). In lieu of the renewable energy program, the County would pursue the Direct Investment Program (GHG Reduction Measure T-4.1) to a greater degree than currently proposed in the CAP.

O2-19

The DSEIR does not provide sufficient evidence to conclude that this is a reasonable and feasible alternative. Previously we have commented on the CAP's description of the direct investment program and the possible range of carbon offset options, as described in Technical

**O2-17** This comment asserts that the Draft SEIR should conclude that there are significant and unavoidable impacts for the topic of Land Use and Planning based upon the commenter's assertion that the CAP is inconsistent with the VMT-based GHG emissions reduction target established by SB 375. Please refer to Master Response 2 related to the CAP and consistency with SB 375. The County disagrees with the commenter's conclusion for several reasons. First, the principal reason to reduce VMT is to reduce GHG emissions in the region. VMT projections provided by SANDAG for use in developing the CAP incorporate the County's land use forecasts and account for achievement of regional SB 375 targets as accepted by CARB. Thus, the CAP's forecasted VMT, which was provided by SANDAG after the adoption of San Diego Forward: The Regional Plan, and related emissions forecasts through 2050 in the CAP, are consistent with SB 375. The region as a whole seeks to maximize transportation investments in transit, bike, and pedestrian improvements and to focus growth to use these facilities. Potential future GPA's will be evaluated against this standard to support SB 375 progress. However, in the case that they cannot accomplish this with location efficiency or transportation choice, GPA's may contribute no net increase to regional GHG emissions by implementing GHG reduction measures as required in CAP SEIR Mitigation Measure M-GHG-1. Secondly, the commenter incorrectly concludes that because the CAP projects achieving a 13% GHG emissions reduction within the transportation sector that it would be inconsistent with the 21% GHG emissions reduction target established by SB 375.

**O2-18** The comment generally states that the No Project Alternative would not meet the objectives of the CAP. As detailed in Section 4.3.5 of the Draft SEIR, the No Project Alternative would not be environmentally superior to the project because it would not meet SB 32 reduction targets and would not reduce any of the projects significant environmental impacts. Therefore, this alternative would result in a new significant GHG impact that was not previously identified for the project.

This comment does not address the adequacy of the Draft SEIR. The comment will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the proposed project. No further response is required.

**O2-19** The comment asserts that the Draft SEIR and Appendix B does not provide substantial evidence to support that GHG Reduction Measure T-4.1 could generate 190,262 MTCO<sub>2</sub>e carbon offsets by 2030 as described in the CAP or 227,423 MTCO<sub>2</sub>e carbon offsets by 2030 as described in the Enhanced Direct Investment Alternative. Please see Response to Comment O2-13 and Master Response 3 regarding direct investments.

County of San Diego

September 13, 2017

Page 8

Appendix B in the DSEIR. Our concerns regarding the proposed direct investment program are that the CAP provided no evaluation regarding whether the conditions in San Diego County can realistically produce the presumed amount of carbon offsets (190,262 MTCO<sub>2</sub>e by 2030); an alternative that proposes to produce additional local carbon offsets of 227,423 MTCO<sub>2</sub>e raises the question of how feasible this alternative is. It is reasonable to assume that some level of direct investment carbon credits could be developed within San Diego County. However, there is no evidence in the CAP or DSEIR to presume that substantially increasing the direct investment credits beyond what is already proposed in the Proposed Project is reasonable or would not cause additional, significant and unavoidable impacts.

O2-19  
cont.

- 100% Renewable Energy Alternative: This alternative would evaluate the increase in renewable energy production from 90% proposed in the CAP to 100%.

We concur with the DSEIR's conclusion that this alternative could further reduce the Proposed Project's GHG reductions. This alternative relies only on expanding large-scale renewable energy supply facilities that are similar to sources that already exist within the County. In light of previous discussion in the DSEIR regarding the infeasibility of greatly expanding the distributed energy supply, this alternative should provide information regarding how additional GHG reductions could be split among the various potential local renewable energy sources (i.e., large-scale facilities and distributed energy).

O2-20

- Increased Solid Waste Diversion Alternative: This alternative would increase the solid waste diversion rate from 75% to 80% by 2030.

Our comments on the CAP recommended that the County increase its waste diversion rate mitigation measure as part of the Proposed Project. Given the relatively low additional GHG reductions (compared to other alternatives), it isn't clear why this is considered a significantly different alternative from the Proposed Project.

O2-21

In summary, SWIA believes that the Proposed Project's DSEIR has appropriately identified many of the potentially significant impacts and those that would remain Significant and Unavoidable even after mitigation. However, we disagree with some of the DSEIR findings: (1) using the 2014 GHG inventory – not the 2020 target - as the "baseline" for computing the 2030 GHG target and 2050 goal (and establishing those new GHG emissions targets as the thresholds of

O2-22

**O2-20** This comment expresses agreement with the Draft SEIR conclusion that the 100% Renewable Energy Alternative would further reduce the amount of GHG emissions that could be achieved by the CAP. The comment also states that the alternative should provide information regarding how additional GHG reductions would be split among renewable energy sources. It appears the comment is suggesting that because the Distributed Generation Alternative was rejected from further consideration, that distributed generation sites would not be available under the 100% Renewable Energy Alternative. This is not correct. Under the 100% Renewable Energy Alternative, the County could still rely upon maximum available distributed generation site opportunities, while expanding large-scale renewable energy facilities to a greater degree to meet the increased renewable energy targets. The exact split between distributed sites versus large-scale facilities is unknown and cannot be known at this point in the development of a programmatic plan. See Master Response 10 regarding use of a program EIR.

**O2-21** The comment expresses agreement that the County should increase its solid waste diversion target but is unclear on why this is an alternative different from the project. The County selected a solid waste diversion rate for the CAP based on the information gathered from various County operations and the feasibility of expanding those operations within the timeline of the CAP. While the Increased Solid Waste Diversion Alternative provides a relatively modest increase in diversion rates from that of the CAP, efforts to further expand would require substantial investment but remain feasible. Therefore, the County evaluated an alternative to differentiate whether increasing the solid waste diversion target would result in substantial additional GHG reductions and environmental benefits in balance with investment requirements. This alternative was selected for evaluation because it further reduces GHG emissions from the project.

**O2-22** The comment is a conclusion to the preceding comments. No further response is required.

County of San Diego

September 13, 2017

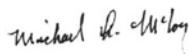
Page 9

significance); (2) the CAP poses a potentially significant conflict with meeting SB 375 VMT-based GHG reductions; (3) the apparently unrestricted ability for projects to use out-of-county carbon credits (a strict limit on those credits should be established for all projects); and (4) the use of the Checklist to streamline future projects (we believe that any proposed streamlined project must first demonstrate that the CAP is achieving its committed GHG reduction trajectory before streamlining using the Checklist can be allowed).

C2-22  
cont.

Bill Tippets ([billtippets@gmail.com](mailto:billtippets@gmail.com)) is our contact if you wish to discuss our comments and recommendations.

Sincerely,



Michael A. McCoy, President SWIA



Bill Tippets, Board Member