Letter O3

From: Save Fanita
To: CAP
Subject: Climate Action Plan, General Plan Amendment & Draft SEIR Comments Attached
Date: Sunday, September 24, 2017 9:45:46 PM
Attachments: SD County CAP SEIR Comments 09242017.pdf

Climate Action Plan, General Plan Amendment & Draft SEIR Comments attached. O3-1

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Response to Comment Letter O3

Preserve Wild Santee
Van K. Collinsworth, Executive Director/Resource Analyst
September 24, 2017

O3-1 The comment provides introductory remarks and does not require a response.

CALIFORNIA CHAPARRAL INSTITUTE
...the voice of the chaparral

Preserve Wild Santee

September 24, 2017

Maggie Soffel, Land Use/Environmental Planner
County of San Diego
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RE: Climate Action Plan (CAP), General Plan Amendment & Draft SEIR

Dear Ms. Soffel,

The draft Supplemental Environmental Impact Report (SEIR) and CAP do not adequately disclose the context for this project, nor the consequences of half-hearted implementation of it. This lack of disclosure undermines the ability to mobilize the limited resources necessary to implement essential climate action or provide decision makers the information required to choose an alternative with foundational components. O3-2

The term "climate change" does not sufficiently describe the trending instability and breakdown of the earth's climatic life support systems caused primarily by fossil fuel consumption. The climate breakdown is resulting in extreme weather disasters for all species with increasing frequency.

The environmental analysis should have fully disclosed the current status of Greenhouse Gases (GHGs) in the atmosphere (including local, regional and global baseline emissions). The analysis should have explained the significance of GHG growth projections and the ability to control feedback loops that exacerbate the pace of and ability to control climate breakdown that trends toward greater catastrophic weather extremes. O3-3

The relationship of San Diego County's Climate Action Plan (CAP) to the goal of achieving climate stability or deteriorating into a state of permanent climate breakdown (including the ramifications thereof) should be disclosed to set the full context for the plan. The analysis should include a discussion of how in quantifiable terms, California mandated targets, if achieved, relate to the global actions required to reach climate stability. O3-4

O3-2 The comment asserts that the CAP and Draft SEIR do not adequately describe the context of the project or its consequences. It is not clear from the comment as to what specific context the commenter believes is missing and the commenter offers no evidence to support its assertion. The County does not agree with this comment. The environmental setting of the proposed project is detailed within Section 1.5 of the Draft SEIR. The Project Background is detailed in Section 1.2.1 of the Draft EIR. The Draft CAP and Draft SEIR adequately disclose the proposed project and alternatives in compliance with CEQA. The County disagrees that these documents lack disclosure or that they do not provide decision makers the information required to choose an alternative. Again, the comment provides no substantial evidence as to why the commenter believes the draft documents are inadequate.

O3-3 The comment asserts that the environmental analysis should have fully disclosed the local, regional, and global baseline emissions status and explained the status of global climate change in more detail. The County disagrees with this comment. The CAP and Draft SEIR do recognize the global context of climate change as described in Chapter 1 of the CAP and on pages 2.7-2 through 2.7-3 of the Draft SEIR. However, as described at length in both documents, sources of GHG emissions are primarily derived of combustion associated in large part with the transportation, industrial/manufacturing, electricity generation, agricultural, residential, and commercial emissions sectors. As a land use regulatory authority, the County can only regulate activities that occur within its jurisdictional boundary.

Additionally, the CAP is intended to satisfy requirements set forth by the State; hence, it establishes local targets (as opposed to global) that can be achieved within the County's means of control. This approach is in line with direction from CARB and the purpose of the CAP is to show compliance with State regulations, not global; however, CARB develops their targets and regulation with consideration and consistency with the Paris Agreement and other relevant international information.

	While the County is concerned about the global climate context and recognizes its responsibility to reduce GHG emissions as feasible within its jurisdiction, the global context of climate change is an ancillary issue and occurs outside of the land use authority of the County. Similarly, CEQA is a State law that requires an environmental analysis of the physical environmental impacts that would occur because of implementation of a project, which in this case is the CAP. Therefore, it is the project's contribution to a cumulative issue, such as global climate change, that is required to be analyzed under CEQA. The Draft SEIR adequately analyzes this cumulative issue as required by CEQA and State regulations pertaining to GHG emissions.
	O3-4 The comment reiterates the assertion that the County should relate the CAP to broader global climate stability targets. Please refer to response to comment O3-3 above. This comment does not raise an environmental issue related to the adequacy of the Draft SEIR. This comment is noted, and will be included in the administrative record and made available to decision makers prior to a final decision on the project.

Aggressive emergency actions are required now due to decades of failure to acknowledge and act upon the impacts of fossil fuel reliance and other human caused emissions that are now manifesting into extreme weather events and firestorms. GHG emissions trap greater solar energy that adds significant fuel into the weather systems that distribute the energy worldwide. Destructive events with vast human and economic costs are rapidly increasing in frequency and magnitude.

Current international agreements are insufficient to keep global warming under the 1.5° to 2°C target required to avoid severe impacts that include an unalterable reinforcing breakdown cycle. "2030 emissions will be 12 to 14 gigatonnes above levels needed to limit global warming to 2°C...The world must urgently and dramatically increase its ambition to cut roughly a further quarter off predicted 2030 global greenhouse emissions..."[1] **Current policy results trend toward a catastrophic 3.5°C global temperature increase.**

O3-5

We must take more aggressive action locally and globally to eliminate the emissions reduction gap required to limit global warming to 1.5°C to 2°C.[2]

> "If we don't, we will mourn the loss of biodiversity and natural resources. We will regret the economic fallout. Most of all, we will grieve over the avoidable human tragedy; the growing numbers of climate refugees hit by hunger, poverty, illness and conflict will be a constant reminder of our failure to deliver."[3]

The SEIR is inadequate without a thorough disclosure of this global and statewide context, including potential avoidance measures, which is the motivating factor for requiring effective climate stabilizing actions.

Alternative: Zero Net Emissions - Maximum Carbon Negative Plan

The GHG emission targets set by Executive Orders and Legislation in California (although important leadership measures) are themselves not enough to prevent catastrophic global climate change / climate instability. To generate the opportunity to meet warming targets in the Paris global climate agreement and to avoid even

O3-6

[1] UNEP Release. *World must urgently up action to cut a further 25% from predicted 2030 emissions*, November 3, 2016
[2] Vidal, John. *UN on wrong track with plans to limit global warming to 2°C, says top scientist*...James Hansen says current 'half arsed' plans to reduce emissions will lead to dangerous climate change... December 3, 2015.
[3] UNEP Synthesis Report Forward by Erik Solheim, Head of UN Environment and Jacqueline McGlade, UN Environment Chief Scientist. *The Emissions Gap Report 2016*, November 2016.

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O3-5 The comment provides a description of the global targets that the commenter believes are necessary to keep the worst effects of climate change from occurring. The commenter suggests that Draft SEIR is inadequate without a more robust discussion of the global context of GHG emissions and potential mitigation measures that could reduce impacts. Please refer to response to comment O3-3, O22-18, and O22-24.

O3-6 The comment states that a zero net emissions-maximum carbon negative plan alternative should be prepared. It appears that the comment is suggesting that the County consider a zero net emissions alternative also known as a carbon neutral alternative. Section 4.2.4 of the Draft SEIR evaluates a Carbon Neutral Alternative. This alternative would require additional GHG emissions reductions in all CAP categories to reach a level at which all development would achieve zero emissions by 2050. As described in the Draft SEIR, this alternative was rejected from further consideration because many of the measures required to achieve this level of GHG emissions reductions may be technologically and economically infeasible. Further, many of the actions and strategies that could be required would result in greater physical environmental changes and impacts to implement these measures. Finally, many of the measures required are not subject to the County's control and implementation.

greater catastrophic impacts, a carbon negative plan will need to be implemented globally. Hence, local climate action plans must be aggressive innovative leaders in not only eliminating and avoiding GHG emissions, but in maximizing ways to store carbon. Leading by example is essential.

Therefore, a "**Zero Net Emissions - Maximum Carbon Negative Plan Alternative**" should be prepared and adopted.[4]

On-site measures that avoid and reduce a project's GHG emissions to the extent feasible must be the priority prior to shifting to off-site mitigation measures. Closest proximity to the project site should the priority for any off-site measures adopted.

Methods for carbon capture and long-term storage should be analyzed.
Potential measures include:

1. Restoration of native plant communities in city parks, preserves and private open spaces.
2. Urban tree programs that select species for longevity, drought resistance, mass and ability to diffuse heat islands (i.e., Quercus agrifolia).
3. Soil amendment and conservation for carbon storage.
4. Conversion of Sycamore Landfill waste capacity into permanent carbon storage as zero waste goals are achieved.
5. Conversion of undeveloped area parcel zoning into "Carbon Sequestration Open Space Zones", thereby avoiding GHG emissions while simultaneously providing potential carbon storage.
6. Providing civic space and support for local farmers markets within walking distance of most city neighborhoods, including access to reclaimed water and development of greywater systems to support yard scale agriculture and urban forests that store carbon.
7. Carbon storage of vegetation on undeveloped parcels should be calculated, including carbon stored below ground in root systems. Removal of the carbon stored and the long-term storage capacity should be considered in any new development project as a significant impact.
8. Completion of Multiple Species Conservation Program Subarea Plans throughout the county with enhanced carbon storage components, such as broader natural lands conservation.
9. Favorable processing of redevelopment that replaces portions of parking lots with parking structures and reclaims the remaining paved area for civic functions on park like carbon storage landscapes.

O3-6 cont.

O3-7

O3-8

[4] Roberts, David, *It's time to start talking about 'negative' carbon dioxide emissions*, Vox, August 18, 2017.

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O3-7 The comment states that the correct order of mitigation should be first to exhaust all on-site opportunities prior to moving to off-site possibilities. It appears the comment is referring to the hierarchy of mitigation that would be implemented for discretionary projects to reduce their GHG emissions. As detailed in Section 1.2.4 of the Draft SEIR, all discretionary projects that are subject to CEQA, no matter the size of the project, would be evaluated for consistency with the CAP. The CAP Checklist has been incorporated as an appendix to the Guidelines, and would be the mechanism that is utilized to demonstrate compliance with the CAP. The determination of consistency with the CAP would be evaluated utilizing the following two approaches:

- First Approach: If the project is consistent with the County's General Plan, then the project could use the CEQA streamlining provision, CEQA Guidelines Section 15183.5, which would allow the project to tier from and incorporate by reference the GHG emissions analysis presented in the Draft SEIR, upon certification. To show consistency with the CAP, the project would be required to implement applicable GHG reduction measures as adopted in the CAP and outlined in the Checklist.
- Second Approach: If the 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. If the project is requesting a GPA but not requesting an increase in density or intensity beyond that assigned by the 2011 GPU, then the project could achieve consistency with the CAP by implementing applicable GHG reduction measures as adopted in the CAP and outlined in the Checklist. The analysis conducted in the Checklist should demonstrate how the project would achieve consistency with the CAP through implementation of the measures outlined in the Checklist.

This CAP checklist process is not to be confused with the separate mitigation identified on pages 2.7-26 and 2.7-37 of the Draft SEIR to address significant GHG impacts from future GPA projects. As

	described therein, all feasible on-site measures must be incorporated into the project and an analysis must be provided as to why and how all feasible on-site measures have been incorporated. Only after these measures have been incorporated and analyzed can off-site measures, such as the purchase of carbon offset purchases, be considered. See Master Response 12 related to mitigation hierarchy and use of carbon offsets. **O3-8** The comment states that methods for carbon capture and long-term storage should be analyzed. Please refer to Master Response 11 related to carbon sequestration.

10. Resurfacing of public transportation surfaces with solar energy generation mediums and earmarking the value of the energy produced to support carbon storage projects.
11. Replacement of artificial turf fields with well-maintained natural grass irrigated with reclaimed water.
12. Incentives to convert plastic grass into drought-tolerant or native species and limiting new artificial turf surfaces to 100 square feet per parcel.

O3-8 cont.

As a result of fossil fuel emissions, we are on the cusp of perpetual catastrophic climatic breakdown regionally and worldwide. Recognizing this inescapable reality, Governor Brown's Executive Order B-30-15 requires greenhouse gas emissions to be 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050. Governor Brown also signed into law SB 350 that requires by 2030, widespread electrification of the transportation sector, half of all power generated to be from renewable sources, and a doubling of energy efficiency in buildings.

To reach these targets, local jurisdictions must act aggressively with their land use decisions. Within this context, we request that San Diego County adopt a Climate Action Plan (CAP) with aggressive quantifiable and enforceable measures to exceed state mandated emission targets.

O3-9

Suggested Climate Goals for San Diego County:
- 100% Clean Renewable Power Consumption by 2030
- 75% Electrification of the entire local Transportation sector by 2030
- 50% Less Power Consumed in Public and Government Structures by 2030
- 35% Urban Forest Canopy by 2030 to reduce heat islands and store carbon
- Zero Waste by 2030 and increased Water Conservation Targets.
- Reduced Vehicle Miles Traveled (increased use of alternatives by adopting policy that favors transit, walking and biking with specified share targets)
- No discretionary approvals of residential developments that are more than ½ mile from an existing mode of public transit.
- Zero Net Emissions / Carbon Negative by 2050
- Social justice implemented as a component of climate investments
- Update of the General Plan with supporting ordinances to incorporate these adopted climate goals

O3-10

Implementation

San Diego County must develop an efficient means to implement, monitor (with specific timelines and requirements to remedy insufficient progress) and enforce actions intended to meet the GHG reduction levels established by climate goals.

O3-11

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O3-9 The comment requests that the County prepare and adopt a CAP that exceeds the State mandated emission targets. This comment is acknowledged. However, the CAP targets are established based on and consistent with State targets as directed by CARB (refer to Master Response 4 related to GHG reduction targets). There is no requirement for the County to go beyond these targets. The comment does not address adequacy of the Draft SEIR, and no further response is required.

O3-10 This comment provides a list of suggested climate goals for the County and includes the following: 100% Renewable Energy by 2030; 75% electrification of the transportation sector by 2030; 50% more efficiency in public and governmental facilities by 2030; 35% urban forest canopy by 2030; zero waste by 2030 and increased water conservation; reduced VMT and policies that favor alternative forms of transportation; prohibition on residential projects that are more than ½ mile from public transit; carbon negative by 2050; social justice considered in climate investments; and General Plan Update with supporting ordinances to incorporate these goals. 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 to achieve the targets and goal as detailed within the CAP. Please see Master Response 9 related to CAP measures selection. The comment is acknowledged. This comment does not address the adequacy of the Draft SEIR, and no further response is required.

O3-11 This comment states the County must implement, monitor, and enforce actions intended to meet GHG reduction levels. The measures in the CAP were developed to be enforceable, achievable, and measurable. As described in Chapter 5 of the CAP, progress toward achieving GHG reductions will be monitored through an annual CAP monitoring report, GHG emissions inventory updates every two years, and CAP updates every 5 years. The regular monitoring and assessment regimen ensures that implementation of the CAP will achieve established GHG emission reductions. Additional information about the

	relative cost of implementation for each measure is located in Chapter 3, GHG Reduction Strategies and Measures and as an attachment to the Planning Commission Hearing Report. Please see the Climate Action Plan Implementation Cost Report: A Preliminary Estimate of County of San Diego Costs for the Five-Year Forecast and the Climate Action Plan Cost-Effectiveness Analysis.

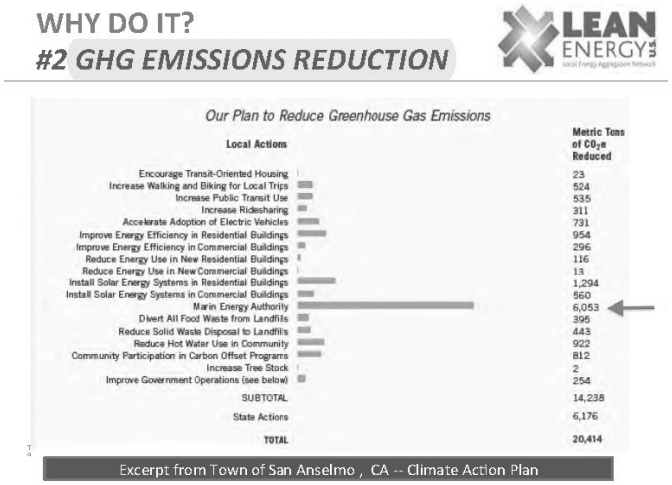
Therefore, GHG reduction measures considered for inclusion should be quantified with specific expected reduction levels and estimated cost ranges. These estimates should be verified following implementation through monitoring and reporting made available to the public. Only then can informed comparisons and decisions be made about adoption of specific actions.

O3-11

Driving Innovation and Efficiency with Community Choice Energy

An essential element of San Diego County's CAP should be formation of it's own Community Choice Aggregation (CCA) as an effective means to reach the 100% clean power target.

CCA's are proven to provide cleaner power at lower rates than Investor Owned Utilities (IOUs). CCA is the single most effective tool available to reduce GHG emissions due to the ability to utilize competitive market forces. **CCA can be a revenue source to seed CAP measures.**



Excerpt from Town of San Anselmo , CA -- Climate Action Plan

O3-12

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O3-12 The comment expresses support for the establishment of a Community Choice Aggregation (CCA) program within the County. This comment is acknowledged. This comment does not raise environmental issues related to the adequacy of the Draft SEIR, and no further response is required. This comment is noted, and will be included in the administrative record and made available to decision makers prior to a final decision on the project.

The Lean Energy GHG Reduction chart demonstrates how the GHG reductions from Marin Energy Authority CCA dwarf any other single reduction measure. CCA provides 30% of San Anselmo CAP's total GHG reductions (6,053 of 30,414 Metric Tons CO2e reduced).

The current failure of San Diego County to move forward on CCA indicates a lack of recognition of the severity of the climate crisis and an intention to do the minimum required for meeting state requirements.

How does the County plan to identify the resources required to finance "direct investments" without harnessing the power of CCA as a revenue source?

O3-12 cont.

Failure to Confront Sprawl as a major component of GHG Emissions

San Diego County has vested land use authority, yet the draft CAP/ SEIR fails to include urban growth boundaries or other measures that would curtail new sprawl developments. The County's propensity to award developers with General Plan Amendments for sprawl subdivisions further undermines the ability to implement an effective CAP. Unless corrected in a way that insures significant reductions in overall vehicle miles traveled, the CAP /SEIR will be fatally flawed.

O3-13

Conclusion

Effective measures that will transition us away from fossil fuel emissions and remove carbon from the atmosphere are critical steps toward achieving climate stability and are long overdue. Adoption of an effective CAP is essential, therefore, the measures requested above are crucial.

O3-14

Thank you for considering these comments.
/s/

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O3-13 This comment expresses concern that the CAP should curtail new sprawl development by including urban growth boundaries or other similar policies. The CAP is not a land use plan. Land use is regulated through the 2011 GPU. The 2011 GPU, which contains the approved land use map for which the CAP is a mitigation measure, is the approved document which establishes the patterns of development in the County. The County's 2011 GPU focused growth in existing communities by establishing higher densities in villages and planning for diverse uses to create comprehensive live, work, and play communities and a sustainable pattern of development. Therefore, the County has established the regulatory framework to create sustainable patterns of development. Finally, the CAP is not a mechanism which governs land use development. The CAP is a plan to reduce GHG emissions resulting from the build-out of the 2011 GPU land use map.

O3-14 This comment summarizes previous comments that have been addressed in the body of the letter. No further response is required.